

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

PT. HARI SAWIT JAYA - Negri Lama 2 Mill and Its Supply Bases

FMS40024

RSPO Membership number: 1-0022-06-000-00

RSPO Member name: PT. INTI INDOSAWIT SUBUR

Audited Address:

Negri Lama 2 Mill:

Negeri Lama Seberang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatera IDN

Its supply bases:

Negri Lama Utara Estate, Negeri Lama Selatan Estate and Negeri Lama Central Estate : Negeri Lama Seberang Village, Bilah Hilir District, Labuhan Batu Regency, North

Sumatera IDN

Aek Kuo Estate:

Aek Korsik Village, Aek Natas District, Labuhan Batu Regency, North Sumatera IDN

Date of audit: 19 - 22 December 2017 Follow Up Audit: 14 - 15 February 2018

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<b>Table of conte</b> Executive Ove Abbreviations U	rview	Page 4 6
1.0	SCOPE OF THE ASSESSMENT	8
1.1	Introduction	8
1.2	Audit Objective	8
1.3	Scope of Certification	8 8
1.4	Location of Mill and Estates	10
1.5	Description of Supply Base	10
1.6	Date of Plantings	15
1.7	Area of plantation	15
1.8	Approximate tonnages offered for certification (CPO and PK)	16
1.9	Other certificates held	20
1.10	Organizational information/contact person	20
1.11	Time bound plan for other management units	20
1.12 1.13	Partial Certification Requirements  Date of Issue of Certificate dan Date of Previous Assessment	23 29
1.13	Date of Issue of Certificate dan Date of Previous Assessment	29
2.0	AUDIT PROCESS	29
2.1	Certification Body	29
2.2	Audit Methodology	30
2.3	Qualification of the Lead Auditor and Audit Team Members	30
2.4	Stakeholder Consultation	31
2.5	Date of Next Surveillance Visit	32
3.0	AUDIT FINDINGS	32
3.1	Action taken on previous audit issues	32
3.2	Claim and use of certification mark and or logo	32
3.3	Description of audit findings	33
3.4	Recommendation	195
3.5	Environmental and social risk for this scope of certification for planning of the surveillance audit	195
3.6	Acknowledgement of Internal Responsibility and Formal Sign-off of Assessment Findings	195
	of Assessment Findings	
List of Tables	Mill and Estates CDC Leasting	40
1	Mill and Estates GPS Locations	10
2	Estimated FFB Production of the supply base 2017  Age Profiles of Planted Palms	10 15
4	Land use description of Estate	15
5	Estate and Area Planted	16
6	Estate FFB Production Trend	16
7	Mill Total CPO and PK Production of 2017 and Estimate	17
	Production of 2018	
8	Mill Production of CPO and PK derived from Estates FFB in 2017	19
9	Estimated Mill Production of CPO and PK from Estate FFB in	19
10	2018	00
10	Certificates Held by Mill and Estates	20
11	RSPO Certification Time Bound Plan	21
List of Figures		Page
1	Map of Mill and Estates Location	11

# **Audit Report**

List of Appen	dices	Page
Α	Audit Record	196
В	Previous nonconformities, corrective actions and status	200
С	Nonconformities, Corrective Actions and Observations Summary	204
D	Stakeholder's issues and comment	224
E	Definition of, and action required with respect to audit findings RSPO PC	227

#### **Executive Overview**

SAI Global has conducted the 2<sup>nd</sup> Annual Surveillance Audit on 19 – 21 December 2017 for Certified Units

a. Mill : Negeri Lama II Mill

b. Supply bases : Negeri Lama Utara, Negeri Lama Selatan,

Negeri Lama Central and Aek Kuo Estate

c. Model of Supply Chain Certification : MB

The audit concluded with issuance of 14 Major and 7 minor NCRs. There were recurrence of Major NCRs (indicator 2.1.1; 4.6.5; 4.6.6; and 6.5.2) from previous audit. Also, there were 4 minor NCR recurrence from previous audit (indicator 4.2.2; 4.4.1; 4.7.5 and 5.3.3) so in this audit upgraded into Major NCR. Follow up audit for verification of major NCRs root cause analysis, correction and corrective actions were done onsite 14-15 February 2018 and concluded that major NCRs were closed and minor NCRs responses were accepted.

At the conclusion of this audit, Negeri Lama II Mill and its supply bases operation has not been complied overall with the requirements of the Indonesian National Interpretation of the RSPO Principles and Criteria 2013 (Endorsed by the RSPO Board of Governors on September 30<sup>th</sup>, 2016) and the RSPO Supply Chain Certification Standard, Module E – CPO Mill: Mass Balance, version November 2014. The recommendation from this audit is can continue as a producer of RSPO Principles and Criteria for Sustainable Palm Oil Production, May 2013 (Endorsed by the RSPO Board of Governors on September 30<sup>th</sup>, 2016) and the RSPO Supply Chain Certification Standard, Module E – CPO Mill: Module E Mass Balance, November 2014.

The estimate figures of production offered based on this audit are:

Estimated tonnage of certified CPO produced	71.986,14 MT
Estimated tonnage of certified PK produced	14.441,10 MT

The Mill has calculated the net GHG emissions using The RSPO Palm GHG Calculator Version 3.0.1. Capturing the information about summary of net GHG emissions, summary of field emissions and sinks, and summary of mill emissions and credits.

# Summary of net GHG emissions

<b>Emissions per Product</b>	tCO2e/tProduct	
CPO	15.48	
PK	15.48	

Land use	ha
OP planted area	14,351
OP planted on peat	14,351
Conservation (forested)	0
Conservation (non-forested)	108
Other	56
Total	14,515

Production	t/yr
FFB processed	202,803
CPO Produced	44,025

Extraction	%
OER	21.71
KER	4.52

# Summary of field emissions and sinks

	Own Crop		Group		3rd Party		Total	
	tCO2e	tCO2e/tF FB	tCO2e	tCO2e/t FFB	tCO2e	tCO2e/t FFB	tCO2e	tCO2e/t FFB
Emissions		10		110		110		1110
Land Conversion	104574.39	0.68	0	0	0	0	104574.39	0.68
*CO2 Emissions from	4935.4	0.03	0	0	0	0	4935.4	0.03
Fertilizer								
**N2O Emissions	83611.76	0.54	0	0	0	0	83611.76	0.54
Fuel Consumption	3593.49	0.02	0	0	0	0	3593.49	0.02
Peat Oxidation	578108.34	3.74	0	0	0	0	578108.34	3.74
Sinks								
Crop Sequestration	-99122.64	064	0	0	0	0	0	0
Conservation	0	0	0	0	0	0	0	0
Sequestration								
Total	675700.74	4.37	0	0	149640.21	0	0	0

# Summary of mill emissions and credits

	tCO2e	tCo2e/tFFB
Emissions	3856.64	0.02
POME	105.57	0
Fuel Consumption	8.87	0
Grid Electricity Utilization		
Credits		
Export of Grid Electricity	-161.6	0
Sales of PKS	-5621	-0.03
Sales of EFB	0	0
Total	-1811.72	-0.01

Palm Oil Mill Effluent (POME) Treatment:

Divert to compost	0%
Divert to anaerobic dig	gestion 100%

**POME Diverted to Anaerobic Digestion:** 

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

# **Abbreviations Used**

AK3U Occupational Health and Safety Expert (*Ahli K3 Umum*)

AMDAL Environmental Impact Analysis (*Analisis Dampak Lingkungan*)

BKM Log book of group leader activity (*Buku Kegiatan Mandor*)

BLH Environmental Agency (Badan Lingkungan Hidup)

BOD Biological Oxygen Demand

BPN National Land Agency (Badan Pertanahan Nasional)

COD Chemical Oxygen Demand

CPO Crude Palm Oil

CSR Corporate Social Responsibility

EFB Empty fruit bunch

ERT Emergency Response Team

FFB Fresh Fruit Bunch

FRF Fractionation and Refinery Factory

GAPKI Gabungan Pengusaha Kelapa Sawit Indonesia

GPS Global Positioning System

Ha Hectare

HACCP Hazard Analysis Critical Control Point

HCV High Conservation Value

HGU Land Use Title (Hak Guna Usaha)

HIPERKES Industrial Hygienist

IDN Indonesia

IPM Integrated Pest Management

ISCC International Sustainability Carbon Certification

ISO International Standards Organisation ISPO Indonesia on Sustainable Palm Oil

Jamsostek Man Power Social Assurance (*Jaminan Sosial Tenaga Kerja*)
Kepmen Degree of Man Power Ministry (*Keputusan Menteri Tenaga Kerja*)

KAK Aek Kuo Estate (Kebun Aek Kuo)

KNC Negri Lama Central Estate (*Kebun Negri Lama Central*)
KNS Negri Lama Selatan Estate (*Kebun Negri Lama Selatan*)
KNU Negri Lama Utara Estate (*Kebun Negri Lama Utara*)

KTU Head of Administration (*Kepala Tata Usaha*)
KUD Cooperation of Village Unit (Koperasi Unit Desa)

LA Land Appliacation

LHP Daily Mill Report (Laporan Harian Pabrik)

LTI Loss Time Incident

LUK Estate Unit Report (*Laporan Unit Kebun*)
LUP Mill Unit Report (*Laporan Unit Pabrik*)

MCU Medical Check-Up
MOS Mill Operation Summary
MSDS Material Safety Data Sheet
NCR Non Conformance Report
NGO Non-Government Organisation

OER Oil Extraction Rate

OHS Occupational Health and Safety

P2K3 Safety Committee
P&C Principle and Criteria

Permen/Permenaker Regulation of Man Power Ministry (*Peraturan Menteri Tenaga Kerja*)
Permentan Regulation of Agricultural Ministry (*Peraturan Menteri Pertanian*)

PHL Daily worker (*Pekerja Harian Lepas*)

PK Palm Kernel

PKWT Contracted worker (*Pekerja Waktu Tertentu*)
PND Negri Lama II Mill (*Pabrik Negri Lama Dua*)
PNS Negri Lama I Mill (*Pabrik Negri Lama Satu*)

POME Palm Oil Mill Effluent

PP Government Regulation (Peraturan Pemerintah)

PPE Personal Protective Equipment

PK Palm Kernel

PKB Joint Working Agreement (*Perjanjian Kerja Bersama*)

QC Quality Control

R&D Research and Development RABQSA Quality Society of Australia

RKH Daily Work Plan (Rencana Kerja Harian)

RKL Environmental Management Plan (*Rencana Pengelolaan Lingkungan*)
RPL Environmental Monitoring Plan (*Rencana Pemantauan Lingkungan*)

RSPO Roundtable on Sustainable Palm Oil

SA Social Accountability

SCCS Supply Chain Certification System

SEL Environmental Evaluation Study (Studi Evaluasi Lingkungan)

SIA Social Impact Assessment

SKU Permanent worker (Syarat Kerja Utama)

SPSI Indonesian Worker Union (Serikat Pekerja Seluruh Indonesia)

SOP Standard Operational Procedure

UKL Environmental Management Effort (*Upaya Pengelolaan Lingkungan*)
UPL Environmental Monitoring Effort (*Upaya Pemantauan Lingkungan*)

Walhi (Wahana Lingkungan Hidup Indonesia)

WWF World Wild Fund

WWTP Waste Water Treatment Plant

YOP Year of Planting

# 1.0 SCOPE OF THE ASSESSMENT

# 1.1 Introduction

SAI Global conducted an audit of PT. Hari Sawit Jaya, Negri Lama II Mill and Its Supply Base on 19 – 21 December 2017. Supply bases of Negeri Lama II Mill are Negeri Lama Selatan Estate (KNS), Negeri Lama Utara Estate (KNU), Negeri Lama Central Estate (KNC) and Aek Kuo Estate (KAK).

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

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

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

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

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

# 1.2 Audit Objective

The purpose of this audit was to determine continuing compliance of your organization's management system with the audit criteria; and it's effectiveness in achieving continual improvement and system objectives. Also to verify the volume of certified and uncertified FFB entering the mill and volume sales of RSPO certified producers

# 1.3 Scope of certification

Doc ID: 7913 / Issue Date: Aug, 2017

The scope of certification is the CPO production from one (1) Palm Oil Mill and three (3) FFB supply bases owned by PT. Hari Sawit Jaya (KNS, KNU and KNC) and one (1) Oil Palm Estate owned by subsidiary (KAK).

#### 1.4 Location of mill and estates

# 1.4.1 Palm Oil Mill

# Negri Lama II Mill, PT. Hari Sawit Jaya

Location: Negeri Lama Seberang Village, Bilah Hilir District, Labuhan Batu Regency,

North Sumatera Indonesia

GPS Location: East 100<sup>0</sup> 02' 08" North 2<sup>0</sup> 21' 35"

Mill capacity: 45 MT FFB/hour (permit: 60 MT FFB/hour)

#### 1.4.2 Oil Palm Estate

# Negri Lama Selatan Estate, PT. Hari Sawit Jaya

Location: Negeri Lama Seberang Village, Bilah Hilir District, Labuhan

Batu, Regency, North Sumatera Indonesia

GPS Location: East 99° 59' 08" – 100° 02' 36"

North 2° 16' 29" - 2° 23' 28"

Total Certified Area 4.790 Ha Planted Area 4,718 Ha

# Negri Lama Central Estate, PT. Hari Sawit Jaya

Location: Negeri Lama Seberang Village, Bilah Hilir District, Labuhan

Batu, Regency, North Sumatera Indonesia

GPS Location: East 99° 58' 45" – 100° 02' 37"

North 2° 21' 15" – 2° 25' 40"

Total Certified Area 3.146 Ha Planted Area 3,139 Ha

# Negri Lama Utara Estate, PT. Hari Sawit Jaya

Location: Negeri Lama Seberang Village, Bilah Hilir District, Labuhan

Batu, Regency, North Sumatera Indonesia

GPS Location: East 99° 58' 56" – 100° 02' 35"

North 2° 23' 54" – 2° 28' 30"

Total Certified Area 4.030 Ha Planted Area 3,896 Ha

# Aek Kuo Estate, PT. Andalas Intiagro Lestari

Location: Aek Korsik Village, Aek Natas District, Labuhan Batu Regency, North

Sumatera Indonesia

GPS Location: East 99° 54′ 18″ – 99° 59′ 00″

North 2° 22' 58" – 2° 26' 00"

Total Certified Area 2.088 Ha Planted Area 2,033 Ha

#### 1.4 Location of mill and estates

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

MILL AND ESTATE	EASTING	NORTHING
Negri Lama II Mill (PND),	100° 02' 29" E	2º21'35" N
PT. Hari Sawit Jaya Negri Lama Selatan Estate (KNS),		
PT. Hari Sawit Jaya	99° 59' 08" – 100° 02' 36" E	2º 16' 29" – 2º 23' 28" N
Negri Lama Central Estate (KNC), PT. Hari Sawit Jaya	99° 58' 45" – 100° 02' 37" E	2° 21′ 15" – 2° 25′ 40" N
Negri Lama Utara Estate (KNU), PT. Hari Sawit Jaya	99° 58' 56" – 100° 02' 35" E	2° 23' 54" – 2° 28' 30" N
Aek Kuo Estate (KAK), PT. Andalas Intiagro Lestari	99° 54' 18" – 99° 59' 00" E	2° 22' 58" – 2° 26' 00" N

#### **Description of supply base** 1.5

Table 2: Estimated FFB Production of the supply base 20188

ESTATE	PRODUCTION AREA (HA)	TBM AREA /REPLANTING (HA)	ESTIMATED FFB PRODUCTION 2018 (TON/YEAR)
Negri Lama Selatan Estate	4,570	148	138,479
Negri Lama Central Estate	3,139	-	93,298
Negri Lama Utara Estate	2,056	1,840	60,460
Aek Kuo Estate PT. Andalas Intiagro Lestari	1,160	873	30,609
Total	10,925	2,861	322,846

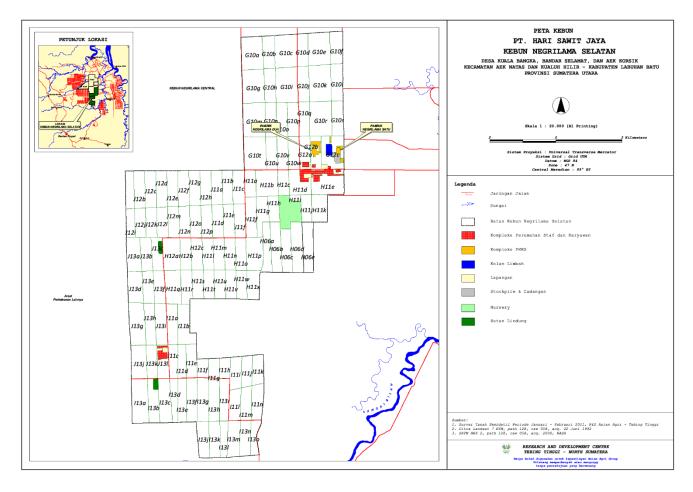


Figure 1 Map of Negri Lama Selatan Estate and Negri Lama I and II Mill

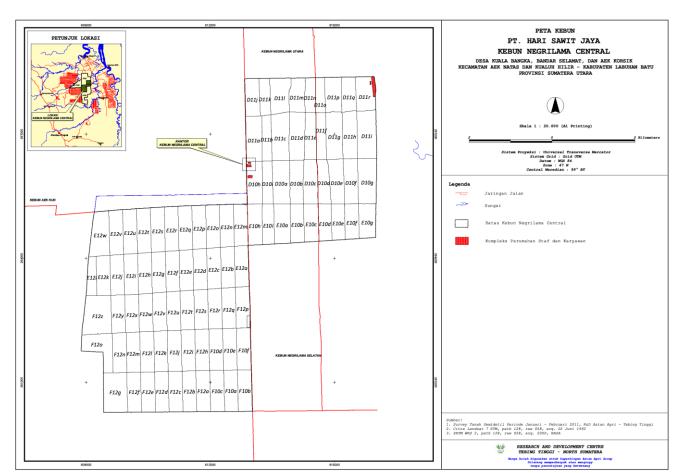
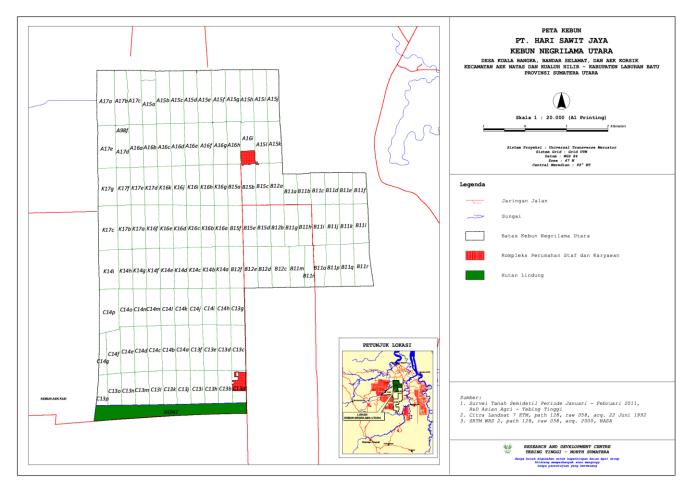
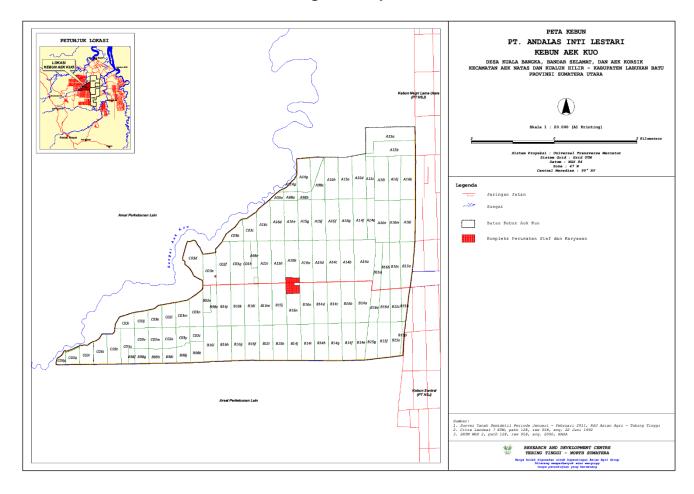


Figure 2 Map of Negri Lama Central Estate

# Figure 3 Map of Negri Lama Utara Estate



# Figure 4 Map of Aek Kuo Estate



Source: PT. Andalas Inti Lestari, December 2017

# 1.6 Date of plantings

Table 3: Age Profiles of Planted Palms in 2017

Year of Planting	Negri Lama Selatan Estate (KNS)	Negri Lama Central Estate (KNC)	Negri Lama Utara Estate (KNU)	Aek Kuo Estate, PT. Andalas Intiagro Lestatri (KAK)	Total	% of Planted Area
1998				132	132	0.96
1999						
2000						
2003				481	481	3.49
2006*	189				189	1.37
2010*	1,116	822			1,938	14.06
2011*	1,465	625	552		2,642	19.16
2012*	743	1,692	214		2,649	19.22
2013*	1,057		452		1,509	10.94
2014*			838	547	1,385	10.05
Mature	4,570	3,139	2,056	1,160	10,925	79.25
2015*	116		691	345	1,152	8.36
2016*			669	528	1,197	8.68
2017*	32		480		512	3.71
Immature	148	0	1,840	873	2,861	20.75
Total	4,718	3,139	3,896	2,033	13,786	100.00

Note:\*) replanting Source: PT. Hari Sawit Jaya, December 2017

#### 1.7 Area of plantation

Table 4: Land use description of Estate in 2017

AREA	Negri Lama Selatan Estate (KNS)	Negri Lama Central Estate (KNC)	Negri Lama Utara Estate (KNU)  Aek Kud Estate, P Andalas Intiagro Lestatri (KAK)		Total (Ha)
Mature area	4,570	3,139	2,056	1,160	10,925
Immature area	148	0	1,840	873	2,861
Total planted area	4,718	3,139	3,896	2,033	13,786
Emplacement	41	7	25	55	128
HCV	0	0	109	0	109
Nursery	0	0	0	0	0
Mill	16	0	0	0	16
POME	15	0	0	0	15

AREA	Negri Lama Selatan Estate (KNS)	Negri Lama Central Estate (KNC)	Negri Lama Utara Estate (KNU)	Aek Kuo Estate, PT. Andalas Intiagro Lestatri (KAK)	Total (Ha)
Total unplanted area	72	7	134	55	268
Total certified area	4,790	3,146	4,030	2,088	14,054

Table 5: Estates and Area Planted in 2017

ESTATE	MATURE (HA)	IMMATURE (HA)
Negri Lama Selatan Estate	4,570	148
Negri Lama Central Estate	3,139	0
Negri Lama Utara Estate	2,056	1,840
Aek Kuo Estate PT. Andalas Intiagro Lestari	1,160	873
Total	10,925	2,861

Source: PT. Hari Sawit Jaya, December 2017

#### Approximate tonnages offered for certification (CPO and PK) 1.8

Table 6: Estate FFB Production Trend 2012 - 2016

YEAR	Actual Production (MT)
2011	187,252
2012	130,139
2013	116,200
2014	124,310
2015	186,414
2016	211,155

Table 7: Mill Total CPO and PK Production of 2017 and Estimate Production of 2018

Ourselle Dane	FFB Processed	СРО	OED (0/)	PK Production	KER				
Supply Base	(MT)	Production (MT)	OER (%)	(MT)	(%)				
	Actual production Dec 2016 - Nov 2017								
Negri Lama Selatan	98,520.21	26,842.12	27.25	4,784.97	4.86				
Negri Lama Central	55,031.15	15,240.04	27.69	2,801.75	5.09				
Negri Lama Utara	29,273.20	6,402.87	21.87	1,257.39	4.30				
Aek Kuo Estate	10,084.36	2,119.16	21.01	442.73	4.39				
Sub Total Own Estate*	192,908.92	50,604.19	26.23	9,286.84	4.81				
Other Supply Base									
☐ The 3 <sup>rd</sup> Party	35,083.79	5,974.25	17.03	1,763.51	5.03				
Total actual production	227,992.71	56,578.43 24.82		11,050.35	4.85				
	Estimation prod	uction Dec 2017 -	- November 201	8					
Negri Lama Selatan	137,652.65	32,828.80	23.85	6,194.37	4.5				
Negri Lama Central	92,618.39	21,624.74	23.35	4,167.83	4.5				
Negri Lama Utara	60,727.17	12,341.17	20.32	2,732.72	4.5				
Aek Kuo Estate	29,915.10	5,191.43	17.35	1,346.18	4.5				
Sub Total Own Estate* 320,913.31		71,986.14	22.43	14,441.10	4.5				
Other Supply Base	22.046.22	F 000 07	47.00	4 500 05	4.5				
□ The 3 <sup>rd</sup> Party	33,916.66	5,833.67	17.20	1,526.25					

Comply Dags	FFB Processed	CPO Draduction	OED (%)	PK Production	KER
Supply Base	(MT)	Production (MT)	OER (%)	(MT)	(%)
Total actual production	354,829.98	77,819.80	21.93	15,967.35	4.5

Table 8: Actual Negri Lama II Mill Production of CPO and PK derived period December 2016 - November 2017

			Total I	FFB (Ton)			CPO Produced (Ton)						Palm Kernel Produced (Ton)					
Month			Own Estate			2nd nantu			Own Estate			2rd norty	Own Estate					3rd party
	KNS	KNC	KNU	KAK	Sub Total	3rd party	KNS	KNC	KNU	KAK	Sub Total	3rd party	KNS	KNC	KNU	KAK	Sub Total	ord party
Dec-16	8,204.99	5,965.26	2,468.96	699.76	17,338.97		1,932.74	1,381.85	556.58	154.88	4,026.05		330.75	240.83	99.65	27.99	699.22	-
Jan-17	8,534.15	6,208.52	2,719.56	742.61	18,204.84	-	2,012.16	1,432.85	579.70	151.39	4,176.10		347.72	253.05	110.69	30.19	741.65	-
Feb-17	7,849.38	5,164.88	2,359.34	1,188.34	16,561.94	-	1,892.77	1,222.12	515.76	244.55	3,875.19		365.81	241.18	110.46	54.89	772.33	
Mar-17	9,512.29	6,610.86	3,421.19	1,431.68	20,976.02	504.65	2,243.92	1,526.59	727.59	294.73	4,792.82	81.52	422.53	295.15	152.08	64.16	933.93	25.68
Apr-17	9,735.56	6,720.80	3,516.41	1,803.04	21,775.81	844.50	2,324.25	1,588.30	770.29	359.57	5,042.41	157.96	438.85	306.77	160.89	78.43	984.94	47.67
May-17	10,563.59	6,718.88	3,633.20	1,775.16	22,690.83	-	2,647.55	1,634.77	811.87	395.69	5,489.88		471.76	296.35	160.08	81.29	1,009.48	-
Jun-17	9,175.48	5,392.50	3,266.40	1,678.58	19,512.96	1,888.95	2,240.72	1,288.09	717.74	353.31	4,599.85	336.24	403.70	237.03	143.76	73.97	858.45	94.44
Jul-17	9,783.08	261.85	3,607.56	95.98	13,748.47	7,448.74	2,316.35	45.67	775.02	13.79	3,150.83	1,194.55	405.38	7.78	148.63	2.63	564.42	355.70
Aug-17	11,153.87	2,320.39	4,280.59	669.21	18,424.06	8,086.70	2,719.47	583.09	941.84	151.25	4,395.65	1,430.98	444.03	99.18	169.97	29.18	742.36	402.36
Sep-17	9,812.85	6,654.98			16,467.83	6,531.41	2,317.23	1,524.49			3,848.19	1,089.69	389.14	261.61			651.94	313.29
Oct-17	2,207.47	1,514.22			3,721.69	5,667.52	2,207.47	1,514.22			3,721.69	975.41	388.74	272.51			661.25	294.93
Nov-17	1,987.50	1,498.01			3,485.51	4,111.32	1,987.50	1,498.01			3,485.51	707.91	376.57	290.31			666.88	229.43
Total	98,520.21	55,031.15	29,273.20	10,084.36	192,908.92	35,083.79	26,842.12	15,240.04	6,402.87	2,119.16	50,604.19	5,974.25	4,784.97	2,801.75	1,257.39	442.73	9,286.84	1,763.51

Table 9. Estimated Negri Lama II Mill Production of CPO and PK for December 2017 - November 2018

			Total FFE	(Ton)					CPO Produc	ced (Ton)		
Month			Own Estate			2rd norty	Own Estate					
	KNS	KNC	KNU	KAK	Sub Total	3rd party	KNS	KNC	KNU	KAK	Sub Total	3rd party
Dec-17	10,797.65	7,378.85	5,855.30	1,587.32	25,619.12	-	2,510.45	1,678.69	1,229.61	319.05	5,737.81	-
Jan-18	8,554.00	7,451.77	3,256.38	2,028.06	21,290.21	3,083.33	2,044.41	1,743.72	659.42	348.83	4,796.36	530.33
Feb-18	8,691.00	6,598.66	3,466.55	1,898.38	20,654.59	3,083.33	2,077.15	1,544.09	701.98	326.52	4,649.73	530.33
Mar-18	9,928.00	7,305.36	3,988.72	2,150.15	23,372.23	3,083.33	2,372.79	1,709.45	807.72	369.83	5,259.79	530.33
Apr-18	10,497.00	7,511.47	4,700.88	2,099.55	24,808.89	3,083.33	2,508.78	1,757.68	951.93	361.12	5,579.52	530.33
May-18	12,148.00	8,322.88	5,309.39	2,301.85	28,082.11	3,083.33	2,903.37	1,947.55	1,075.15	395.92	6,321.99	530.33
Jun-18	11,155.00	7,480.33	5,337.41	2,535.18	26,507.93	3,083.33	2,666.05	1,750.40	1,080.83	436.05	5,933.32	530.33
Jul-18	13,339.00	7,320.87	5,486.77	3,316.85	29,463.49	3,083.33	3,188.02	1,713.08	1,111.07	570.50	6,582.67	530.33
Aug-18	14,159.00	8,218.33	5,702.77	3,153.92	31,234.01	3,083.33	3,384.00	1,923.09	1,154.81	542.47	7,004.37	530.33
Sep-18	13,264.00	8,752.23	6,019.03	3,186.25	31,221.50	3,083.33	3,170.10	2,048.02	1,218.85	548.03	6,985.01	530.33
Oct-18	12,845.00	8,297.14	5,836.77	2,839.60	29,818.50	3,083.33	3,069.96	1,941.53	1,181.95	488.41	6,681.84	530.33
Nov-18	12,275.00	7,980.50	5,767.21	2,818.02	28,840.72	3,083.33	2,933.73	1,867.44	1,167.86	484.70	6,453.72	530.33
Total	137,652.65	92,618.39	60,727.17	29,915.10	320,913.31	33,916.66	32,828.80	21,624.74	12,341.17	5,191.43	71,986.14	5,833.67

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

Estimated tonnage of certified CPO produced	71.986,14 MT
Estimated tonnage of certified PK produced	14.441,10 MT

# 1.9 Other certificates held

Table 10: Certificates Held by Mill and Estates

MILL/ESTATE	OTHER CERTIFICATION HELD
Negri Lama II Mill	ISCC by SGS Germany GmbH, certificate number: EU-ISCC-Cert-DE100-53032017, Expired 20 September 2018.
Negri Lama Selatan Estate, Negri Lama Central Estate, Negri Lama Utara Estate, Aek Kuo Estate	ISPO Certified by SAI Global Indonesia, FMS 40011 Expired 10 December 2020

# 1.10 Organizational information/contact person

# PT. Hari Sawit Jaya

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# 1.11 Time bound plan for other management units

PT. Hari Sawit Jaya and PT. Andalas Intiagro Lestari as a subsidiary of PT. Inti Indosawit Subur is committed to RSPO certification of all its Management Units located in North Sumatera, Riau and Jambi Province. Time bound plan has been developed to achieve the RSPO certification for all its Management Units and Plasma. The time bound plan is realistic and challenging. The plan was detailed on Table 11. The time bound plan was revised in February 2016 and updated in November 2017.

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

Name of Mill	Mill Address	Name of Supply Base Plantation	Estate Address	Time bound for certification	Progress
Buatan I Mill	Delik & Pangkalan Kerinci Village, Bunut Langgam District, Pelalawan Regency, Riau	Buatan Estate	Delik & Pangkalan Kerinci Village, Bunut Langgam District, Pelalawan Regency, Riau	2010	Re-certified on 16 September 2015
		Buatan (Plasma)	Delik & Pangkalan Kerinci Village, Bunut Langgam District, Pelalawan Regency, Riau		
Buatan II Mill	Delik & Pangkalan Kerinci Village, Bunut Langgam District, Pelalawan Regency, Riau	Buatan Estate  Buatan (Plasma)	Delik & Pangkalan Kerinci Village, Bunut Langgam District, Pelalawan Regency, Riau Delik & Pangkalan Kerinci Village, Bunut	2010	Re-certified on 16 September 2015
	Felalawan Regency, Riau	Buatan (Flasina)	Langgam District, Pelalawan Regency, Riau		
Ukui I Mill	Ukui Village, Ukui District, Pelalawan Regency, Riau	Ukui Estate	Ukui Village, Ukui District, Pelalawan Regency, Riau	2010	Re-certified on 1 March 2016
		Ukui (Plasma)	Ukui & Lubuk Batu Jaya District, Pelalawan & Inhu Regency, Riau	Brought forward from 2012 to 2011	Re-certified on 1 March 2016
Ukui II Mill	Ukui Village, Ukui District, Pelalawan Regency, Riau	Soga Estate	Ukui Village, Ukui District, Pelalawan Regency, Riau	2010	Re-certified on 1 March 2016
		Ukui (Plasma)	Ukui & Lubuk Batu Jaya District, Pelalawan & Inhu Regency, Riau	Brought forward from 2012 to 2011	Re-certified on 1 March 2016
Tungkal Ulu Mill	Pulau Pauh / Penyabungan / Merlung Village, Tungkal Ulu District, Tanjung Jabung Regency,	Tungkal Ulu Estate	Pulau Pauh / Penyabungan / Merlung Village, Tungkal Ulu District, Tanjung Jabung Regency, Jambi	2011	Re-certified on 15 August 2017
	Jambi	Tungkal Ulu (Plasma)	Renah Mendalo, Merlung, Muara Papalik District, Tanjung Jabung Barat Regency, Jambi	2012	Re-certified on 15 August 2017
Muara Bulian Mill	Singoan / Bukit Sari / Bulian Jaya Village, Muara Bulian / Pemayung District, Batang Hari Regency,	Muara Bulian Estate	Singoan / Bukit Sari / Bulian Jaya Village, Muara Bulian / Pemayung District, Batang Hari Regency, Jambi	2011	Re-certified on 28 August 2017
	Jambi	Muara Bulian (Plasma)	Maro Sebo Ilir District, Batanghari Regency, Jambi	2012	Re-certified on 28 August 2017

Name of Mill	Mill Address	Name of Supply Base Plantation	Estate Address	Time bound for certification	Progress
Topaz Mill	Petapahan Village, Tapung District, Kampar Regency, Riau	Topaz Estate	Petapahan Village, Tapung District, Kampar Regency, Riau	2013	Certified on 30 March 2015
Taman Raja Mill	Lubuk Bernai / Kampung Baru / Pelabuhan Dagang / Pematang Pauh Vilage, Tungkal Ulu District, Tanjung Jabung Regency, Jambi	Taman Raja & Badang Estate	Lubuk Bernai / Kampung Baru / Pelabuhan Dagang / Pematang Pauh Vilage, Tungkal Ulu District, Tanjung Jabung Regency, Jambi	2013	Certified on 20 February 2015
Segati Mill	Langkan / Penarikan / Tambak / Sotol Village, Langgam District, Pelalawan Regency, Riau	Segati Estate	Langkan / Penarikan / Tambak / Sotol Village, Langgam District, Pelalawan Regency, Riau	2018	NPP in progress, this unit will be re- audited in 2018 by
		Penarikan & Gondai Estate	Pangkalan Sarik / Baru Village, Langgam / Siak Hulu District, Pelalawan / Kampar Regency, Riau	2018	the same of CB
		Penarikan (KKPA)	Pangkalan Sarik / Baru Village, Langgam / Siak Hulu District, Pelalawan / Kampar Regency, Riau	2018	-
		Gunung Sahilan (KKPA)	Gunung Sahilan Village, Lipat Kain District, Pelalawan Regency, Riau	2018	-
Tanah Datar Mill	Tanah Datar Petatal Village, Talawi District, Asahan Regency,	Tanah Datar Estate	Tanah Datar Petatal Village, Talawi District, Asahan Regency, North Sumatera	Brought Forward from 2015 to	Certified on 18 May 2015
	North Sumatera	Bahilang Estate	Bahilang Village, Tebing Tinggi District, Serdang Bedagai Regency, North Sumatra	2013	
Aek Nabara Mill	S1-S3 / Sukadame Village, Bilah Hulu / Kota Pinang District, Labuhan Batu Regency, North Sumatra	Aek Nabara Estate	S1-S3 / Sukadame Village, Bilah Hulu / Kota Pinang District, Labuhan Batu Regency, North Sumatra	Brought Forward from 2015 to 2013	Certified on 6 March 2015
Teluk Panjie Mill	Teluk Panjie Village, Kampung Rakyat District, Labuhan Batu Regency, North Sumatra	Teluk Panjie Estate	Teluk Panjie Village, Kampung Rakyat District, Labuhan Batu Regency, North Sumatra	Brought Forward from 2015 to 2013	Certified on 21 April 2015
	3 37	Teluk Panjie Estate of 801 ha.		2020	HGU is still in process.
Peranap Mill	Simelinyang / Pauh Ranap / Sengkilo Village, Peranap District, Indragiri Hulu Regency, Riau	Peranap Estate	Simelinyang / Pauh Ranap / Sengkilo Village, Peranap District, Indragiri Hulu Regency, Riau	Brought Forward from 2016 to 2013	Certified on 7 January 2015
		Peranap (Plasma)	Simelinyang / Pauh Ranap / Sengkilo Village, Peranap District, Indragiri Hulu Regency, Riau	2016	Certified on 4 May 2016

# **Audit Report**

Name of Mill	Mill Address	Name of Supply Base Plantation	Estate Address	Time bound for certification	Progress
Bungo Tebo Mill	ill Village, PWK Sumai / Tebo Ulu Sumai /		Tuo Sumai / Sungai Rambai Village, PWK Sumai / Tebo Ulu District, Bungo Tebo Regency, Jambi	2016	Certified on 3 December 2015
	Jambi	Bungo Tebo (Plasma)	Tuo Sumai / Sungai Rambai Village, PWK Sumai / Tebo Ulu District, Bungo Tebo Regency, Jambi	2016	Certified in January 2017
Tanjung Selamat Mill	Kampung Padang Village, Bilah Hilir District, Labuhan Batu	Tanjung Selamat	Kampung Padang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra	2017	Certified on 26 May 2015
	Regency, North Sumatra	Pangkatan	Sennah Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra	2017	Certified on 26 May 2015
Gunung Melayu I	Rahuning Village, Bandar Pulau District, Asahan Regency, North Sumatra	Pulau Maria Estate	Rahuning Village, Bandar Pulau District, Asahan Regency, North Sumatra	2017	Certified on 7 September 2015
Gunung Melayu II	Gonting Mahala Village, Bandar Pulau District, Asahan Regency, North Sumatra	Sentral & Batu Anam Estate	Gonting Mahala Village, Bandar Pulau District, Asahan Regency, North Sumatra	2017	Certified on 8 July 2015
Negri Lama II	Negri Lama Seberang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra	Negri Lama Utara, Negri Lama Central, Negri Lama Selatan	Negri Lama Seberang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra	2018	Certified on 6 April 2015
		Aek Kuo	Aek Korsik Village, Aek Natas District, Labuhan Batu Regency, North Sumatra		
		Aek Kuo of 501 ha	Negri Lama Seberang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra	2018	2018 Next ASA
Negri Lama I	Negri Lama Seberang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra	*3rd party which is excluded from scope of certification	Negri Lama Seberang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra	Brought Forward from 2018 to 2013	Certified on 23 December 2015

# 1.12 Partial Certification Requirements

NO	CERTIFICATION SYSTEM/ CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS	COMPLIANCE (YES/NO)				
4.2.4	management units and/or subsidiary comp	anies only if all the following are complied with:	one autonomous company growing oil palm will be permitted to certify i	ndividual				
1	<ul> <li>1 For groups with complex management structures the following are required:</li> <li>(a) A statement of the ultimate controlling shareholders and directors in the managing agency company/companies.</li> <li>(b) Ditto in respect of each of the operating groups.</li> <li>(c) Application for membership by the top asset owning company/companies.</li> <li>(d) Application for membership by the managing agency company/companies.</li> </ul>							
	a. Is the management structure of the group complex?	List of Operating Company in 2017.	The management structure of the group is not complex. The following is structure sequence:	YES				
	If the answer to question a above is yes, check the following b-e check items		Asian Agri Group → PT. Hari Sawit Jaya					
	b. Is there a statement of the ultimate controlling shareholders and directors in the managing agency company/companies							
	c. Is there a statement of the ultimate controlling shareholders and directors in each operating group							
	d. Is there application for membership by the top asset owning company/companies							
	e. is there application for membership by the managing agency company/companies							
2	RSPO membership  a. The parent organization or one or	f its majority¹ owned and / or managed subsidia	ries are member of RSPO. The requirements (b) to (j) will be applicable	e, whether the				

NO	CERTIFICATION SYSTEM/ CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS	COMPLIANCE (YES/NO)
	registered RSPO member is the h  1. Does the parent organisation or one of its majority¹ owned and / or managed subsidiaries is member or RSPO?  2. State organisation who is member of RSPO  3. State RSPO membership number of the above organisation(s)	olding company or one of its subsidiaries;  - List of Operating Company in 2017.  - www.rspo.org	The company is one of managed subsidiaries by PT. Inti Indosawit Subur as RSPO membership. It was also stated in RSPO website ( <a href="https://www.rspo.org">www.rspo.org</a> ) that the Inti Indosawit Subur as RSPO membership and have the number of 1-0022-06-000-00.	YES
3	should contain a list of subsidiaries comments received from stakehold surveillance assessments (see An	s, estates and mills. The Certification Body will ders following the public consultation process. nex 4). Where the Certification Body conducting	to the Certification Body (CB) during the first certification audit. The time be responsible for reviewing the appropriateness of this plan³, taking in Progress towards this plan will be verified and reported on in subsequence the surveillance audit is different from that which first accepted the time the moment of first acceptance and shall only check continued approach There was a challenging TBP for all its relevant entities of the PT. Inti Indosawit Subur. TBP was containing list of subsidiaries (estates and mills). There was no complaint during public consultation. During public consultation, there no comment and issue from stakeholders regarding time-bound plan.	nto account ent annual me-bound plan, the

NO	CERTIFICATION SYSTEM/ CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS	COMPLIANCE (YES/NO)
	assessments, Annex 4) for wheth	er it is still appropriate, such that changes to the	I cause the plan to be reviewed (as provided for in the guidance on sure time-bound plan are permitted only where the organisation can demonstrate that the company is legally registered with the local not be moment that the company is legally registered with the local not be supported by the provided for in the provided for in the guidance on sure time.	nstrate that they
	<ol> <li>Is the any revision to the time-bound plan or to the circumstances of the company?</li> <li>When there is revision as indicated in the point 1 above, has the plan reviewed whether it is still appropriate?</li> <li>Can the organisation demonstrate that the revisions to the time-bound are justified?</li> <li>Is there any newly acquired subsidiary that already legally registered with the local notary of chamber of commerce (or equivalent)?</li> <li>Are the time-bound plans including</li> </ol>	The updated time-bound plan in February 2016 and revision in November 2017	There was revision of the time-bound plan for the some subsidiaries (estates and mills), date in November 2017. The company has conducted review of time-bound plan. The revision are due to:  - Several unresolved licenses (HGU and permit location).  - For Segati Mill, there is a conservion from rubber plant to palm oil, it was coordinated with RSPO by email related NPP. Until this audit, the company was still conducting internal study related NPP and will be re-audited in 2018 by the same of CB (BSI)	YES (Minor NCR 2017 – 01) OPEN
	the above newly acquired subsidiary?  d. Where there are isolated lapses in implementation of the plan, a major.		non-compliance is raised. Where there is evidence of systematic failur	e to proceed with
	Are there isolated lapses in implementation of a time-bound plan? Raise minor non-compliance if found     Is there systematic failure to precede implementation of the plan? Raise major non-compliance if found	The updated time-bound plan in February 2016 and revision in November 2017	There was no the isolated lapses in implementation of a time-bound plan. It was evidenced by TBP progress includes HGU progress and NPP progress. There was HGU and permit location progress in Negri Lama, Teluk Panjie and Topaz Estate, until this audit was processing with government institution. For more detail, please refer to Table 11.	YES
4	Requirements for uncertified management u	•		
			ervation Values (HCVs) or required to maintain or enhance HCVs in actithe RSPO New Plantings Procedure (Annex 5).	cordance with

Doc ID: 7913 / Issue Date: Aug, 2017

NO	CERTIFICATION SYSTEM/ CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS	COMPLIANCE (YES/NO)
	f. Land conflicts, if any, are being rescriteria 6.4, 7.5 and 7.6.  g. Labour disputes, if any, are being in the compliance, if any, are being rescribed.	resolved through a mutually agreed process, e.g. resolved through a mutually agreed process, in being resolved in accordance with the legal rec mpliance with these rules for partial certification quirements (e) – (h) by the certification body ba  The updated time-bound plan in February 2016 and revision in November 2017  RSPO Internal Audit at Segati Mill and	puirements, with reference to RSPO criteria 2.1 and 2.2. In at each and every assessment of any of the management units (see Assed on self-declarations only by the Company, with no other supporting assed on compliance for uncertified management units were conducted by Certification Division through RSPO Internal Audit that covered all RSPO Principle and Criteria. Based on internal audit found that the companies:	nce with RSPO Annex 4).
	b. Has the verification covered all requirements of e-f above?  c. Based on the result of verification in point 1 and 2 above, please indicate is there any:  i. Replacement of primary forest or any area containing HCV or required to maintain or enhance HCV in line with RSPO criterion 7.3?  ii. Are there new planting since January 1st 2010 which was not comply with RSPO NPP?  iii. Land conflict, which was not being resolved through a mutually agreed process in accordance with RSPO criteria 6.4, 7.5 and 7.6?	its supply bases, date on 23 –31 October 2017  - RSPO Internal Audit at Negri Lama II Mill and its supply bases, date on 31 May – 3 June 2017  - RSPO Internal Audit at Teluk Panji Mill and its supply bases, date on 3 – 4 February 2017	<ul> <li>No land conflicts</li> <li>No labour disputes</li> </ul> Several non-conformances of the RSPO internal audit were regulation compliance still in progress with other parties and NPP is also still in progress correction by the company after being revised by RSPO. For more detail, please refer to Table 11. Targeted stakeholder consultation is part of certification audit that carried out by other CB and no need further targeted stakeholder consultation.	

NO	CERTIFICATION SYSTEM/ CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS	COMPLIANCE (YES/NO)		
	iv. Labour dispute, which was not being resolved through a mutually agreed process in accordance with RSPO criterion 6.3					
	v. Legal non-compliance, which are not resolved in accordance with the legal requirements, with reference to RSPO critera 2.1 and 2.2					
	d. Are there targeted stakeholder consultation carried out by other CB?					
	e. Considering all the above data is there necessary to conduct further targeted stakeholder consultation or filed inspection?					
	Guidance					
			be applied from the relevant national interpretation. For example, if nor ent certification assessment cannot proceed to a successful conclusion			
	Failure to address any of the requirements (e)-(h) may lead to certification suspension(s) (consistent with the RSPO Certification Systems document rules on non-compliance					
	<sup>1</sup> Majority shareholding: the largest shareho		nt to RSPO, membership status and involvement with palm oil for each all (e.g. 50/50) this applies to the organisation that has management codes around each entity			

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

Date of issue of certificate : Originaly issued by SGS on 23 December 2015

Date of previous audit : 20 – 23 December 2016 (1st ASA) and 03 March 2017 (Special

Audit)

#### 2.0 AUDIT PROCESS

# 2.1 Certification body

# PT. SAI Global Indonesia

Email

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Contact person : Eko Prastio Ramadhan

RSPO P&C Certification Program Manager : Eko.PrastioRamadhan@saiglobal.com

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

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

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

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

# 2.2 Audit methodology

The 2<sup>nd</sup> Annual Surveillance Audit was performed on 19 – 21 December 2017. The audit programme

was included in the body of report. Audit was conducted in the mill and its supply base. The audit methodology for collection of objective evidences is site inspection, documentation and record review and interview with staffs, workers, and other stakeholders. Objective evidences from documentation/record review in one area may also be cross checked with other objective evidences in other areas and with the evidence of implementation on site during the audit. Inputs from stakeholders via letter, email, or other communication media were also considered for this certification audit. Particular attention has been paid to previous non-conformities. Area of potential environmental and social risk was concern. For detail of audit plan, can be seen on the page of 196.

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

# Eko Prastio Ramadhan – Lead Auditor and audited Environment, HCV and Partial Certification System

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

# Nanang Rusmana – Audit team member and audited Health and Safety Aspects

Nanang, Bachelor from Faculty of Forestry, Bogor Agricultural University (IPB) in 2005, Majoring in Forest Resources Conservation. He has a working experience in Environment Consultant as Staff Division Environment and Social at PT. Studiotama Maps Konsultan (2005-2006), in Palm Oil Plantations as SHE Assistant at PT. Astra Agro Lestari Tbk (2006-2012), and as HSE Coordinator at PT. Kapuas Prima Coal Group (2013-2016). He joined the SAI Global since April 2016 as Auditor ISO 9001, ISPO and RSPO. Various training has followed, such as: Lead Auditor ISO 9001:2015 Training (2016), Auditor ISPO Training (2016), Lead Auditor ISO 14001:2015 Training (2016), RSPO Supply Chain Certification Training (2016), Auditor SMK3 Training (2014), HCV Assessor Training (2010), OHS Expert/Ahli K3 Umum Training (2007), etc. Since 2016 he has had experience for audit ISO 9001 in various industries and services, include RSPO and ISPO audit for palm oil plantation companies

# Fahrul Rozi – Audit Team Member and audited BMP (Estate and Mill) and Supply Chain Aspects

**Rozi** graduated with Bachelor of Agricultural Social Economic from University of Padjadjaran in 2008. He has working experience as Assistant of agronomic section at Sinar Mas Group (2008-2011), as staff of Agronomic Vice President at Bima Palma Group (2011-2014), and as sustainability supervisor at Bima Palma Group (2014-2016). Experiencing on the implementation of sustainable palm oil management system (RSPO and ISPO), environmental management, and issue of social impact, and SMK3 in palm oil companies. He is involved on audit quality management system (ISO 9001:2015) for variety of industry sectors include RSPO and ISPO. He has completed *Ahli K3 Umum* (2010), ISO 14001 (2016), ISO 9001 (2016), RSPO P&C (2016) lead auditor training courses, RSPO SCCS (2016), ISPO (2016) lead auditor training courses.

# Jarot Widyatmaka - Audit Team Member and audited Social aspects.

Jarot, graduated with Industrial Engineering, Trisakti University in 1998. He has experience as a consultant and auditor quality management system for several years he had received training Lead

Auditor for ISO 9001 (2000), ISO 14001 (2003), OHSAS 18001 (2010), ISPO (2014) RSPO (2014), while also training for social audits as Lead Auditor SA 8000 (2011) and Lead Auditor SMETA (2010). Over the last 15 years he was involved in the audit of the quality management system (ISO 9001) and social audits for various sectors, among others in his industry, Previous working experience at PT Surveyor Indonesia as a quality management system consultant (1998-2006) and then at PT SGS Indonesia as Lead Auditor for the quality management system (2006-2011) and joined PT SAI Global Indonesia in 2011, in June 2014 he has attended and passed for ISPO auditor training class XII.

#### 2.4 Stakeholder consultation

Stakeholder consultation was performed to internal and external stakeholders. The purpose of this consultation to verify compliance against relevant criteria and indicator related to land status and conflict, environmental, social aspect and HCV.

The performed consulation method through directly interview/discussion. Directly interview include internal (staffs, workers, gender committee, and labour union) and external stakeholders (head of village, public figure, local NGO, government, local NGO, FFB suppliers, etc.). External stakeholders were selected by considering that they have an interest in the organisation activities, directly border with organisation, area which the workers live. This consultation performed in the room through focus group discussion and individual interview. Other than that, discussion with workers also conducted in the field when they were working.

Stakeholder consultation was also performed through sending the letter of response request to external stakeholders, such as Internaltional NGO, Social and Labour Agency, Agriculture and Plantation Agency, National Land Agency, etc. Response can be sent by email or letter to Team Leader or SAI Office. Response can be received during audit process and will be considered as input in this audit. The result of stakeholder consultation used to justify fulfilment of some indicators, e.g. criterion 2.2 indicator major 3, minor 1 and minor 2, criterion 2.3 indicator major 1, criterion 6.5 indicator minor 1, criterion 6.6 indicator minor 1, criterion 6.7 indicator minor 1, criterion 6.8 indicator minor 1, criterion 6.9 indicator minor 1, 2 and 3, criterion 6.10 indicator minor 1 and 2, criterion 6.11 indicator minor 1, etc. List of internal and external stakeholders can be seen on the Tabel 13.

The result of these consultations was provided in Appendix D on page 224.

Table 13: List of internal and external stakeholder

STAKEHOLDERS	METHODS OF CONSULTATION	
Internal stakeholder (mill & estates)		
Deputy Secretary of SPSI	Individual discussion	
Chairman of Gender Committee	Individual discussion	
Workers	Group discussion for workers with similar role, otherwise individually interviewed	
External Stakeholders (mill & estates)		
Head of Villages, respective people and villagers representatives Sidomulyo Village - Sidomulyo 2 Village	Individual discussion	
FFB Supplier	Individual discussion	

STAKEHOLDERS	METHODS OF CONSULTATION
Social and Labour Agency	Individual discussion
Agriculture and Plantation Agency	Individual discussion
Environment Agency	Individual discussion
National land Agency – Badan Pertanahan Nasional (BPN) Labuhan Batu Regency	An invitation letter to comment was sent
District Police (Polsek Bilah Hilir)	Individual discussion
District Head (Camat Bilah Hilir)	An invitation letter to comment was sent
NGOs: AMAN (Aliansi Masyarakat Adat Nasional), GAPKI, Sawit Watch, WWF, Walhi Sumatera Utara, FFI, FP, Greeneconomics, Greenpeace, TNC, Tropenbos, Yayorin	An invitation letter to comment was sent

# 2.5 Date of next surveillance visit

The next surveillance audit is 3<sup>rd</sup> ASA that will be conducted within twelve months of the license expiration dates, but not earlier than eight months after the expiration date.

# 3.0 AUDIT FINDINGS

# 3.1 Action taken on previous audits findings

Several non-conformances (Major and Minor) from the previous audits have been followed up by taking corrective actions. Nevertheless, there were recurrence of Major NCRs (indicator 2.1.1; 4.6.5; 4.6.6; and 6.5.2) from previous audit. Also, there were 4 minor NCR recurrence from previous audit (indicator 4.2.2, 4.4.1, 4.7.5 and 5.3.3) so in this audit upgraded into Major NCR.

# 3.2 Claim and use of certification mark and or logo

There was no use of certification mark and or logo. Claim has been made for the RSPO certified product were PK of 8,891 MT and CPO of 2,603 MT.

Table 13: CSPO delivery and sold Period December 2016 Until November 2017

		CPO Delivered				PK Delivered		
Month	RSPO	ISCC	Non Certified	Total	RSPO	ISCC	Non Certified	Total
Dec-16	-	4,094	-	4,094	711	-	-	725
Jan-17	-	4,002	-	4,145	712	63	-	775
Feb-17	-	3,828	-	3,828	687	-	-	687
Mar-17	-	4,819	-	4,819	962	-	-	962
Apr-17	-	5,147	-	5,147	914	-	-	980
May-17	-	5,494	-	5,494	749	284	-	1,033
Jun-17	-	3,833	-	4,308	982	-	-	982
Jul-17	-	3,825	-	4,986	564	-	-	965
Aug-17	-	4,189	-	5,677	403	-	-	788
Sep-17	2,522	1,249	-	4,956	910	-	-	1,186
Oct-17	81	3,341	-	4,108	561	-	-	805
Nov-17	-	3,865	-	4,824	736	-	-	1,137
Total	2,603	47,686	-	56,386	8,891	347	1	11,025

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

# 3.3.1 RSPO Principle and Criteria

# PRINCIPLES 1: COMMITMENT TO TRANSPARENCY

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)				
1.1		relevant stakeholders on environment	ial, social and legal issues relevant to RSPO Criteria, in appropriate la					
	Guidance:	line Drandure (COD) to recovered count		wa wu a a ta fa w				
	Growers and millers should have a Standard Operating Procedure (SOP) to respond constructively to stakeholders, including a specific timeframe to respond to requests for information. Growers and millers should respond constructively and promptly to requests for information from stakeholders. The SOP should include information on the officer, who may be contacted by the interested external parties.							
	Growers and millers should ensure that sufficient ob	jective evidence exists to demonstrate	that the response is timely and appropriate.					
	See Criterion 1.2 for requirements relating to publicly See Criterion 6.2 on consultation.	y available documentations.						
	See Criterion 4.1 on SOPs.  Definition of relevant stakeholders according to the least stakeholders.	Regulation of the Minister of Environme	ent No. 17 year 2012 regarding Guidance for Involvement of Commun	ities in the Process				
	of Environmental and Social Impact Assessment (Al	MDAL) and Environmental Permit are.						
	<ul> <li>Affected communities are the communities wh and/or plan of activities;</li> </ul>	o live within the AMDAL study bounda	ry (social boundary), which will be beneficially or adversely affected b	y the operations				
			operations and/or business plan, however they shall pay attention to	the environmental				
		MDAL process are communities who a	re located outside and or directly adjacent to the boundary of AMDAL	study areas relevant				
	Relevant stakeholders are also NGOs that have con		issues of the upcoming operations and/or business plan, including th	e potential				
1.1.1	environmental and social impacts;  List of information related to criterion 1.2 that can be	accessed by relevant stakeholders sh	all be available					
	Specific Guidance:							
	For 1.1.1: Evidence should be provided by growers information on the RSPO mechanisms for stakehold		in appropriate form(s) and language(s) by relevant stakeholders. Info	rmation will include				
	a. Does the company maintain a list of	- Stakeholder list of PT Hari	The organization documented and maintained stakeholder list of	n YES				
	stakeholders? (E.g. listed by category and	Sawit Jaya, updated on	document "Daftar Stakeholder PT Hari Sawit Jaya" updated o	n				
	stakeholders listed should be site specific)	October 2017	October 2017. Stakeholder consists of governance agency, village chief, prominent figure, workers organization and third parties. Data					
	b. What is the frequency of updating the stakeholder list?	- SOP AA-GL-5008.1-R1	and information will be update by SSL Officer (Public Relations)	if				
	c. Is there evidence of stakeholder verification?	dated 22 August 2011	there are changes but usually SSL officer review it every year Information provided to public and stakeholder specified in social					

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
d.	Environmental, social and legal)	- List information for stakeholder updated 2 February 2016	communication procedures AA-GL-5008.1-R1 – Communication and consultation procedure  The Organization has determined the type of information that is	
e.	What is the frequency and level of access to this information?	- Interview with stakeholder	available and accessible to all stakeholders. There are 13 types of information that is available to stakeholders :	
f.	How and where is the information disseminated?	and field observation		
g.	. Who is responsible for providing & updating information?			
h.	Is there an SOP available to describe the process (of information sharing/dissemination)?			
i.	Are stakeholders aware of the type of information available and the procedures for accessing the information?			

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
			example in the form of reports and the contents of the report. Delivery of Information is delivered in <i>Bahasa</i> .	
1.1.2	<ul> <li>(M) Records of requests for information and responses <i>Specific Guidance:</i> For 1.1.2: Records of requests for information and responses a.  Does the company have an SOP to ensure constructive response to stakeholders?  b. Who is the personnel in charge (PIC)?  c. Does the SOP cover the elements under 1.1.1?  d. Is there a clear time frame for response to request for information?  e. Are records of requests for information and responses maintained?</li> <li>f. Are responses to requests for information timely and appropriate?</li> </ul>			YES
			All information requests from stakeholder and their respond were listed and recorded by Mill and Estate on logbook "Record of information request and responses". Most of requests were an invitation to follow the event held by the stakeholders, for example: invitation for memorial of religious holidays, invitation for area meeting from Camat (Head of Subdistrict) and proposal for borrowing	

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
			heavy machine like excavator, etc. Based on document review, all of them responded in accordance to procedure which is no later than 14 days.  Organizations are routinely required to submit reports to the regulatory agencies, such as: Monthly Social Security, Report to the CTF return period PPh21, P2K3 Report (Office of Manpower and Transmigration), and Report of the implementation of the RKL / RPL (Environmental Agency of the district, the province and the Ministry	
			of Environment, Land Application Report (LA). Organization (estate and Mill) monitor all of the information that is communicated to stakeholders routinely.	
1.2		pt where this is prevented by commerce	cial confidentiality or where disclosure of information would result in nega-	ative
1.2.1	environmental or social outcomes.			
	privacy should also be confidential. One of legal requ	orts. of the documents listed in the public so clude financial data such as costs and uirements related to personal privacy is		•

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
	parties. However, affected stakeholders and those seeking re However, affected stakeholders and parties who are Examples of information where disclosure could resu- increase the risk of hunting or capture for trade, or sa Growers and millers should ensure that sufficient obj appropriate and made available.  a. How are the management documents listed in (c) below made publicly available?  b. Where are the documents placed?	esolution to conflict should have acces working towards resolutions should ha ult in potential negative environmental of acred sites which a community wishes iective evidence exists to demonstrate  - List information for stakeholder updated on February 2016 - SOP AA-GL-5008.1-R1	ave access to relevant information. or social outcomes include information on sites of rare species where di	sclosure could
	<ul> <li>c. Is the information provided adequate? Note: At minimum, an information summary of the document listed below should be made available.</li> <li>Land titles/user rights (Criterion 2.2) <ul> <li>Legal boundaries, land use, classification, total area, grant title, permit validity, NCR rights,</li> <li>Occupational health and safety plans (Criterion 4.7);</li> <li>risk assessment and mitigation, emergency response plan, training, accident records</li> </ul> </li> <li>Plans and impact assessments relating to environmental and social impacts (Criteria 5.1, 6.1, 7.1 and 7.8); <ul> <li>main social and environmental impacts and mitigation measures,</li> <li>HCV documentation (Criteria 5.2 and 7.3);</li> <li>identification on HCV areas, maps, management and monitoring HCV</li> </ul> </li> </ul>	dated 22 August 2011 - Site Permit (Izin Lokasi), - Land Use Title (HGU), - Plantation Operation Permit (IUP), - Environmental and Environment Impact Analysis document (AMDAL), - Environmental management and monitoring report (RKL and RPL implementation reports), - HCV Assessment report, - Social Impact Assessment (SIA) Report, - Corporate Social Responsibility (CSR) - Continuous Improvement Plan	Analysis document (AMDAL), environmental management and monitoring report (RKL and RPL implementation reports), HCV Assessment report, Social Impact Assessment (SIA) Report, Occupational Health and Safety Management Plan, Corporate Social Responsibility (CSR) and Continuous Improvement Plan Those documents were accessible and shown during this audit.  The documented procedure was established, it's described the process and responsibilities and authorities in regards responding the request on information from the public. The coverage of request on information as stated in the procedure including information on legal documents, environmental documents, social activities documents, occupational health and safety programme documents and continual improvement documents.  All monitoring reports publicly available such as environmental management and monitoring report (RKL and RPL implementation reports), reports of P2K3 and etc.	

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
	Pollution prevention and reduction plans (Criterion 5.6);     identification of pollutants, management and reduction measures			
	Details of complaints and grievances     (Criterion 6.3);     nature of complaints, parties     involved, status of case			
	<ul> <li>Negotiation procedures (Criterion 6.4);</li> <li>SOP, consultative, neutral, inclusiveness, timeframe, responsibility</li> </ul>			
	Continual improvement plans (Criterion 8.1);     for all elements under 8.1,			
	Public summary of certification assessment report;     follow RSPO format			
	<ul> <li>Human Rights Policy (Criterion 6.13).</li> <li>policy statement should comply to the requirements of 6.13</li> </ul>			
	d. Do the management documents contain monitoring plans and reports?			
	e. Are all monitoring reports publicly available?			
1.3 <sup>1</sup>	Growers and millers commit to ethical conduct in all *1 New Criteria - Growers and millers commit to ethic	cal conduct in all business operations a		
1.3.1	There shall be a written policy committing to a code of ethical conduct and integrity in all operations and transactions along with the documentation of socialisation process of the policy to all levels of the workers and operations.			
	Guidance: All levels of the operations will include contracted third parties (e.g those involved in security). The policy of ethical conduct and integrity should include: • A respect for fair conduct of business;			

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
	A prohibition of all forms of corruption, bribery and     A proper disclosure of information in accordance were  The policy should be set within the framework of the  Regulations that are related to eradication of corrupt 1. Act No. 7 year 2006 regarding Ratification of Unite 2. Act No.8 year 2010 regarding Prevention and Erac 3. Act No. 13 year 1999 regarding Eradication of Cor 4. Presidential Instruction No.1 year 2013 regarding  Normal business is the business that complies with a	with applicable regulations and accepted UN Convention Against Corruption, in for are as followings: and Nations Convention Against Corruptication of Money Laundry.  Truption.  Action for Corruption Prevention and E	ed industry practices. particular Article 12. tion	
	<ul> <li>This written policy should be communicated to the affine a. Is there a written policy committing to a code of ethical conduct and integrity in all operations and transactions?</li> <li>b. Does the policy include as a minimum: <ul> <li>A respect for fair conduct of business?</li> <li>A prohibition of all forms of corruption, bribery and fraudulent use of funds and resources?</li> <li>A proper disclosure of information in accordance with applicable regulations and accepted industry practices?</li> </ul> </li> <li>c. Is the policy documented and communicated to all levels of the workforce and operations, including contracted third parties? How is it communicated?</li> <li>d. Are the documentation and communication done in the appropriate languages?</li> </ul> <li>Note to auditor: The workforce should be</li>	Policy Code of Ethic dated 1     December 2014     Minutes and attendance     dissemination of code of     ethics policy in PT Hari Sawit     Jaya	Written policy committing to a code of ethical conduct and integrity in all operations and transactions was available in "Company Policy" dated 1 December 2014 and signed by the Managing Director.  Ethic policy includes several aspects, such as:  - Social Responsibility - Wages - Fair conduct of business - Infrastructure and accommodation - Labour union - Child labour - Indiscriminative treatment - Protection against sexual harassment and violence - Protection of reproductive rights - Receipts and provision of gifts, entertainment or assistance in job, corruption and fraud - Relation with supplier - Occupational health and safety, and environment - Employee cooperatives - Human rights	YES

## **Audit Report**

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
	interviewed to determine level of understanding of policy		The policy was well documented on 01 December 2014 and signed by the Managing Director. The policy has been communicated to all levels of the workforce and operations, including contracted third parties. Dissemination of code of ethics policy has been carried out:  a. KNC on June 2017 to harvester and on November 2017 to all workers  b. KNS on July 2017 to local contractor To all workers on November 017  PND on November 2017 to all workers,	

## PRINCIPLE 2: COMPLIANCE WITH APPLICABLE LAWS AND REGULATIONS

	CRITERION / INDICATOR	OBSERVATIONS & OBJECTIVE		COMPLIANCE
NO	CHECKLIST	EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	(YES/NO)
2.1	a. Land use period and right b. Labour c. Agricultural practices (e.g. chemical use) d. Environment (e.g. wildlife, pollution, environmenta e. Storage f. Transportation and processing practices.  It also includes laws made pursuant to a country's ol Guiding Principles on Business and Human Rights).  Key international laws and conventions are set out in	paseline requirement for all growers and management and forestry)  bligations under international laws or conformation for the formation of th	on millers whatever their location or size. Relevant legislation includes, but the second of the sec	
2.1.1	Legal requirements are existing laws and regulations (M) Evidence of compliance with relevant legal requi			
2.1.1	<ul> <li>a. Is the complete list of legal requirements available? (Refer to relevant NIs or LIs for list of legal requirements)</li> <li>b. Does the company have copies of the legal requirements?</li> <li>Note to auditor: A due diligence on the company/area or management unit on legal compliance should be conducted prior to field audit. Any non-compliance should be verified during the field audit.</li> <li>Relevant legislation includes, but is not limited to: regulations governing land tenure and land-use rights, labour, agricultural practices (e.g. chemical use), environment (e.g. wildlife laws, pollution, environmental management and forestry laws),</li> </ul>	Procedure AA-GL-5001.1-R0 (Compliance to regulations and its change)  Record of regulatory compliance evaluation called "Evaluasi Kepatuhan Hukum PT Hari Sawit Jaya" updated on September 2017	Relevant legal requirement legal were documented in "Regulations compliance evaluation form. Information on applicable legal and other requirements have been reviewed and summarised. Copies of the legal requirements were shown and maintained properly.  Evidence of compliance with applicable local, national and ratified international laws and regulations of Negeri Lama II Mill and Estate have been provided, including:  Land tenure and land use right:  - Location permit,  - Izin Usaha Perkebunan (Plantation Business Permit)  - Concession (HGU), please see criterion 2.2.1 major for details  Labour:  - SMK3 (OHS) implementation records,	YES (Major NCR 2017 - 02) CLOSED

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
	storage, transportation and processing practices. It also includes laws made pursuant to a country's obligations under international laws or conventions (e.g. the Convention on Biological Diversity (CBD), ILO core Conventions and UN Guiding Principles on Business and Human Rights.		<ul> <li>freedom of worker union,</li> <li>labour cooperation,</li> <li>minimum wage (UMSK),</li> <li>labour law,</li> <li>employee social benefit,</li> <li>BPJS Ketenagakerjaan (worker insurance) for employee,</li> <li>medical check-up,</li> <li>clinic operation permit,</li> <li>Hyperkes certified doctor and paramedic, etc</li> </ul>	
			Occupational Health and Safety:	
			<ul> <li>Heavy equipment operator/SIO (10 operators)</li> <li>First aider certified by Dinas NAKERTRANS (3 workers)</li> <li>HIPERKES certified for paramedics and doctors (5 workers)</li> <li>Boilers operator for mill (2 workers)</li> <li>Electrical safety officer (K3 Listrik) officer (2 workers)</li> </ul>	
			The permit of equipment utilization were available at each units (estate and mill):	
			<ul> <li>Electricity installation approval of ministry of manpower at Negri Lama II Mill, inspection date 25 April 2017.</li> <li>Steam boiler units, inspection date 14 May 2016</li> <li>3 units of sterilizer at mill, inspection date 25 April 2017</li> <li>Pressure vessels, such as: 2 units of compressor capacity 120 litres at Negeri Lama Utara Estate and 160 litres at Aek Kuo Estate, 1 back pressure vessel at mill, motor diesel (genset) 3 units at mill capacity 400 Kw and 320 Kw, inspection date: 25 April 2017. While 2 units at Aek Kuo Estate capacity 136 kva and 32.5 Kva and also 3 units at Negeri Lama Utara Estate capacity each 52 Kva, 135 Kva and 32.5 Kva 1 unit steam turbine capacity 1200 kw, inspection date 25 April 2017.</li> <li>Lifting equipment: 16 units Excavators capacity 500 Kg at</li> </ul>	

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
			mill and 1 unit excavator at Aek Kuo Estate, inspection date 7 November 2017.	
			Agricultural practise: - System of plant cultivation of oil palm plantation, - Use of limited pesticides (paraquat),	
			<ul> <li>Environment:         <ul> <li>Government regulation of the Environment No. 5/2014 - water quality standard, environmental impact analysis, etc.</li> <li>Government Regulation 101/2014 hazardous waste management, company has manage the waste properly (liquid, air and solid waste management)</li> <li>Government Regulation No.41/1999 re: Emission Control, Company has conducted air pollution control and emission control periodically in every six month at mill</li> <li>Periodic environmental parameter monitoring (stationary emission, ambient emission and ambient noise, moving source emission, waste water discharge quality, and ground water quality)</li> <li>SK MenLHK No 68/2016 about Domestic Waste Water Standards</li> <li>Permenkes No 32/2017 about standar baku mutu kesehatan lingkungan dan persyaratan kesehatan air untuk keperluan higiene sanitasi, kolam renang, solus per aqua, dan pemandian umum</li> </ul> </li> </ul>	
			Conservation:	
			<ul> <li>President Decree No. 32/1990 regarding Management of protected areas complies by identifying areas comply with HCV in the estate and surrounding area, perform management and monitoring of HCV.</li> <li>Act No. 5/1990 regarding the conservation of natural resources and ecosystems, comply with managing HCV areas, create HCV management and monitoring plan and</li> </ul>	

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
			performed it well, create procedures regarding HCV protection.  - IUNC Red List, CITES, HCV Toolkit, UU No. 32/2009, Act No. 41/1999, No. 5/1990, Act No. 9/1985, Act No. 11/1974, Government Regulation No. 7/1999, Government Regulation No. 35/1991, and President Degree No. 32/1990.  - SK MenLHK No 130/2017 about Penetapan Peta Fungsi Ekosistem Gambut Nasional  - list of protected flora and fauna,  - management of protected area and protected flora and fauna  Status of compliance with laws and regulations were evaluated, and evaluation of compliance result indicated that compliance status was justified with reference to the objective evidence of compliance.	
2.1.2	A documented system, which includes written inform	ation on legal requirements, shall be n	I naintained.	
	a. Is there a document system which includes the following?  - Personnel in charge to manage  - Set of legal documents  - Comprehensive list of international, national, sub-national and provincial laws which details the requirements of specific to the mill and estate operations.  - Relevant sections within the law that is identified and linked to activities	SOP AA-GL-5001.1-R0 –     Compliance Laws Procedure.	A documented system which includes written information on legal requirements was maintained. It was documented in SOP AA-GL-5001.1-R0 - Compliance Laws Procedure. The procedure described that identification and evaluation performed against regulation and requirement regarding environment, OHS, plantation, labour, social, etc. the updating of legal regulation performed once a year in January, while evaluation of compliance with legal regulation performed is once per year; personnel in charge to manage the updating and evaluation which is sustainability division together with estate personnel in each section.	YES
	Are the documents available to all levels of management?		This document was available to all staff and all level management, the document was store at central office.	
2.1.3	A mechanism for ensuring compliance shall be imple	mented.		

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)	
	a. Is an internal audit for legal compliance conducted annually and documented?	List Of Attendances – Corrective Action ISPO RSPO RSPO Internal Audit April 2017 Check list and corrective action audit internal year 2017.	Mechanism for ensuring compliance has been implemented and documented in SOP AA-GL-5001.1-R0 – Compliance Laws Procedure. The audit checklist covered the implementation of the all applied regulations. Status of compliance with the applicable environment, OHS, plantation, labour, social laws and regulations were evaluated, and evaluation of compliance result indicated that compliance status was justified with reference to the objective evidence of compliance.	YES	
			Internal audit related to legal compliance has been performed by Sustainability Department. Last internal audit was conducted on 1 September 2017. Report of audit result was sighted and well documented.		
2.1.4	A system for tracking any changes in the law shall be available and implemented.  Specific Guidance: For 2.1.4: The systems used for tracking any changes in laws and regulations should be appropriate to the scale of the organisation.				
	a. Is there a documented methodology (e.g.: personnel in charge (PIC), source of info, frequency of update) for tracking changes and communication of changes to relevant sections of the legislation?	Procedure.AA-GL-5001.1-R0 (Compliance to regulations and its change)     Procedure (AA-EMS-432-PR) Law regulation and other requirements     Procedure (AA-EMS-452-PR) Compliance evaluation     List of regulations compliance evaluation form (AA-4320002a-LT) Review period 2017	The SPO officer in charge was responsible to identified and updated the regulation applicable to the organisation, also to socialize to related functions. Update and reviewed was conducted periodically once within a year. Updating of law and regulations change activities were well documented and update once a year as defined in Procedure AA-GL-5001.1-R0 (Compliance to regulations and its change). Last update was performed in September 2017	YES	
2.2	The right to use the land is demonstrated, and is not legitimately contested by local people who can demonstrate that they have legal, customary or user rights.				
	Guidance: The company has SOP for Land Acquisition to ensure that there is no removal of legal, customary or user rights (see 6.4.1 & 6.4.2) Descriptions of those rights are as follows:				

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)	
	<ul> <li>a. Legal Right may be in the form of Land Certificates (Ownership Right / Hak Milik, User Right /Hak Guna Usaha), Registration Letter / Surat Keterangan Terdaftar, Letter of Inheritor Right / Surat Keterangan Hak Waris, and or Letter of Girik Right/Surat Keterangan Hak Girik.</li> <li>b. Customary Right in the Local Regulation/Perda (based on Constitution Court Decision No. 35/PUU-X/2012 regarding Customary Forest) determined through participatory mapping of customary land by the legitimate customary law community who are recognized by the surrounding customary law community and refers to Regulation of the Minister of Home Affairs (Permendagri) No. 52 year 2014 regarding Guideline of Recognition and Protection of Customary Law Community and Regulation of the State Minister of Agrarian Affairs/Head of National Land Agency (BPN) No. 5 year 1999 regarding Guidelines for the Settlement of Problems Related to the Communal Reserved Land of the Customary Law Abiding Community.</li> <li>c. User Right may be in the form of evidence of land leasing from the legal right holder, and/or official letter from the Village Head based upon testimony of communities or individual where their areas are adjacent to that land.</li> </ul>				
	Customary area is customary land, including soil, water and or waters and natural resources with certain boundaries, owned, utilized and preserved for generations and on sustainable basis to fulfill the needs of their livelihood that was acquired from their ancestor or claimed ownership of communal land or customary forest.  Where there is a conflict on the condition of land use as per land title, growers should show evidence that necessary actions have been taken to resolve the conflict with relevant parties				
	A mechanism should be in place to resolve any conflict (Criteria 6.3 and 6.4).  Where operations overlap with other rights holders, companies should resolve the issue with the appropriate authorities, consistent with Criteria 6.3 and 6.4.  Historical data of land ownership should be provided by the company for a minimum of one period of ownership/control.				
2.2.1	If there is a claim on customary right, this shall be legally demonstrated.  (M) Documents showing legal ownership or lease, history of land tenure and the actual legal use of the land shall be available.  Specific Guidance: For 2.2.1: The documents required to demonstrate legal ownership, lease or control and use of land shall include those related to getting the land permit or transfer of land right and up to the operational right.				
	<ul> <li>a. Are there documents showing legal ownership or lease of the land available? (e.g. land titles, lease documents)</li> <li>b. Are there documents showing history of land tenure available? (e.g. legal documents showing land status change, SIA and EIA reports, HCV assessment reports)</li> <li>c. Are there documents showing the actual legal use of the land available?</li> </ul>	SK HGU certificate no. 01 and Keputusan Menteri Dalam Negeri no. 02/HGU/1988, dated 9 February 1988, covering: 11,777.08 Ha.     SK HGU certificate no.2, 1997 and Decree of the Minister of Agrarian Affairs / Head of National Land Agency, dated 27 January 1997,	The total area coverage for all land titles (HGU) were resumed 14,053.74 Ha, as details: 11,777.08 Ha For HSJ Negeri Lama (+) 2,087.91 ha for Aek Kuo (+) 188.75 Ha for extension.  The completes legal documents showing history of land tenure includes the actual legal use were available as below:  • Land title HGU; certificate no. 01 and Keputusan Menteri Dalam Negeri no. 02/HGU/1988, dated 9 February 1988, covering: 11,777.08 Ha.	YES	

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
	d. Are the documents complete?	no.12/HGU/BPN/97; covering 2,087.91 ha.  SK HGU certificate no.3, and SK BPN Sumatera Utara No.3/HGU/BPN.12/XI/2015 dated 8 December 2015 regarding extension land titles issues for PT Hari Sawit Jaya for area coverage 188.75 Ha	<ul> <li>Land tittle HGU; certificate no.2 year 1997, letter of measurement no. 2348/1997, and Special Situation Map no. 57/12/IV/1996, covering: 2,087.91 Ha.</li> <li>Land titles HGU Extension No.02-12-00-00-2-00074 issued on 29 February 2016, letter of measurement dated 12 February 2016 No.516/Labuhan-batu/2016, and SK BPN Sumatera Utara No.3/HGU/BPN.12/XI/2015 dated 8 December 2015 regarding extension land titles issues for PT Hari Sawit Jaya for area coverage 188.75 Ha</li> <li>IUP-B (Izin usaha perkebunan Budidaya) No. 180/293/Huk/2014 dated 3rd December 2014 from Labuhan Batu Regent for coverage area extension 190.96 Ha</li> <li>Plantation Operation Permit SPUP (Surat Pendaftaran Usaha Perkebunan) No.HK.350/410/DJ.Bun.5/V/2001 dated 28th May 2001, capacity 45 ton FFB/hr. area wide 11.777, 08 Ha</li> <li>Site Permit/Izin Lokasi from Labuhan Batu Regent No.503.593/259/pthh/2013 dated 03rd September 2013 for area usage ± 190.96 Ha at Desa Sidomulyo village, Bilah Hillir District, Labuhan Batu Regent, North Sumatera Province</li> <li>Site Permit (Izin Lokasi) issued as indicated in Decree of the Governor of North Sumatera #593/9/K/BKPMD/Tahun 1987 dated 4th May 1987, covering an area of 11,000 hectares for village of Selat Besar, Tanjung Halaban, Sei Tampang and Village of Kuala Bangka, Subdistrict Kuala Hilir</li> <li>Approval letter investor (Surat persetujuan tetap penanaman modal Dalam Negri )No.145/I/PMDN/1980</li> <li>Business extension Izin usaha perluasan No.9/1/IU/I/PMDN/Industri/2011 dated 15 Mar 2011. IUT 66040 in toi 79540 ton CPO</li> <li>Registered company / Tanda Daftar perusahaan (TDP) No.020610100219 dated 17th June 2014 valid for 5 years</li> </ul>	
			The organisation has already followed up the previous audit findings regarding plantation area outside the HGU/land title certificates, the	

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)		
			additional land tittle/HGU as listed, covering area 188.75 Ha. Moreover there are also available the "Izin Lokasi" and IUP-B for coverage area 190.96 Ha.			
2.2.2	Legal boundaries are demonstrated clearly and maintained.  Specific Guidance: For 2.2.2: Grower should cease operations on land planted beyond the legally determined area and there should be specific plans in place to address such issues for smallholders.					
	<ul> <li>a. Is there a legal map showing location of boundary markers?</li> <li>b. Is there physical presence of boundary markers?</li> <li>c. Is there an SOP for boundary demarcation and maintenance?</li> <li>Note to auditor: Ground verification of boundary markers using GPS should be conducted. Priority should be on boundaries with other estates, community areas, protected area and rivers</li> <li>In the case of Associated Smallholders:</li> <li>d. Are there documents showing that the boundaries of associated smallholders have been recorded and verified by the mill?</li> <li>e. In case of boundary breach, is there proof of a mitigation plan being implemented?</li> </ul>	Situation Map / HGU map Site visit observation on KNU and KAK Estate Working instruction (NLG-WI-001/Rev.0/01-12-15) Monitoring and Maintenance of boundary markers Laporan Pemeriksaan dan Perawatan Patok Batas (Report of Pegs monitoring and maintenance, dated 10 May 2016.	Area has been measured by government BPN and recorded on Situation Map / HGU map. Documented working instruction (NLG-WI-001/Rev.0/01-12-15) regarding the monitoring and maintenance of boundary markers was established. Within the procedure was defined that maintenance conducted twice within a year.  Legal boundaries marker were sighted during audit visit and maintained along the perimeters of estate lands which were mapped with Global Positioning System (GPS). Field observation was conducted to pegs number as below:  Negri Lama Selatan (KNS) Estate  Peg no. 4 with coordinates N: 02° 20' 25,1", E: 100° 02' 06,5" at Block H11k, bordering with field of Sidomulyo Village community.  Peg no. 8 with coordinates N: 02° 19' 09,8", E: 100° 00' 05,9" 02° 20' 25,1" at Block H11r, bordering with field of Sidomulyo Village community.  Negri Lama Central (KNC) Estate  Peg no. 8 with coordinates N: 02° 22' 04,2", E: 099° 58' 45,4" at Block F12o, bordering with PT Merbau Jaya.  Peg no. 9 with coordinates N: 02° 22' 03,3", E: 099° 59' 02,4" at Block F12o, bordering with PT Merbau Jaya.	YES		

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	EVIDENCE SUMMARY OF FINDINGS FOR EACH INDICATOR		
2.2.3	In the event that there is a dispute or a dispute has or resolution which has been received through Free, Pr		ate acquisition and compensation or compensation settlement process through conflict d parties shall be provided.		
	a. Are there, or have there been any land disputes?  Note to auditor: Due diligence should be conducted on the management to provide evidence that there has been no historical or current land dispute	<ul> <li>Public consultation with stakeholders on 19 December 2017</li> <li>SOP: Social Conflict and Land Dispute Resolution has been described in AA-GL-0052.1-R1.</li> </ul>	No complaints associated with land disputes between the company and the surrounding community. This was also confirmed during the public consultation with stakeholders on 19 December 2017 at KNS.  PT. Hari Sawit Jaya has established a mechanism for resolution of conflicts and disputes through SOP for Social Conflict and Land Dispute Resolution has been described in AA-GL-0052.1-R1.	N/A	
	<ul> <li>b. If there are or have been disputes, are there: <ul> <li>Documents to proof legal acquisition?</li> <li>Records of FPIC process?</li> </ul> </li> <li>c. If there has been acquisition involving compensation, are there: <ul> <li>Records that Fair compensation has been provided and accepted by parties involved?</li> <li>Records that all affected parties are consulted and represented?</li> <li>Documents of negotiations/discussion available?</li> </ul> </li> <li>Note to auditor: There should be direct verification of above with the affected parties.</li> </ul>		This procedure mentioned how the company solves the problem if any conflict occurred, both internal and external conflicts. This procedure also mentioned if the problem cannot be resolved by negotiation, the company will take legal action involving the related institution.		
2.2.4	by the parties involved.	flict, unless requirements for acceptab	ble conflict resolution processes (see Criteria 6.3 and 6.4) are implement	ted and accepted	
	Does the company have cases of significant land conflict? (i.e. preventing the company from operating normally)  If the company has cases of conflict, are	Public consultation with stakeholders on 19 December 2017	No complaints associated with land disputes between the company and the surrounding community. This was also confirmed during the public consultation with stakeholders on 19 December 2017 at KNS.	N/A	
	<ul> <li>b. If the company has cases of conflict, are records of the following available?</li> <li>Status of conflict</li> </ul>	SOP: Social Conflict and Land Dispute Resolution has been	PT. Hari Sawit Jaya has established a mechanism for resolution of conflicts and disputes through SOP for Social Conflict and Land		

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
	<ul> <li>SOP/ mechanism for conflict resolution</li> <li>Implementation of SOP/mechanism</li> <li>Acceptance of the procedures by all parties</li> <li>Records of conflict resolution</li> </ul>	described in AA-GL-0052.1-R1.	Dispute Resolution has been described in AA-GL-0052.1-R1.  This procedure mentioned how the company solves the problem if any conflict occurred, both internal and external conflicts. This procedure also mentioned if the problem cannot be resolved by negotiation, the company will take legal action involving the related institution.	
2.2.5	For any conflict or dispute over the land, the evidenc communities and local government where applicable		ped out in a participatory way with involvement of affected parties (inclu	iding neighboring
	<ul><li>a. Is there an SOP for participatory mapping of disputed area?</li><li>b. Is a dispute map available?</li></ul>	Public consultation with stakeholders on 19 December 2017	No complaints associated with land disputes between the company and the surrounding community. This was also confirmed during the public consultation with stakeholders on 19 December 2017 at KNS.	N/A
	c. Is there documented evidence of involvement and acceptance by the affected parties?	SOP: Social Conflict and Land Dispute Resolution has been described in AA-GL-0052.1-R1.	PT. Hari Sawit Jaya has established a mechanism for resolution of conflicts and disputes through SOP for Social Conflict and Land Dispute Resolution has been described in AA-GL-0052.1-R1.	
	Note to auditor: Actual ground verification showing the accuracy of the dispute map should be conducted		This procedure mentioned how the company solves the problem if any conflict occurred, both internal and external conflicts. This procedure also mentioned if the problem cannot be resolved by negotiation, the company will take legal action involving the related institution.	
2.2.6	(M) To avoid escalation of conflict, there shall be no	evidence that palm oil operations have	 instigated violence in maintaining peace and order in their current and pl	anned operations.
	by the security personnel as mentioned above (see		curity personnel in their operations and prohibit extra-judicial interference	
	<ul> <li>a. Does the company have a policy to circumvent instigated violence to maintain peace and order in current and planned operations?</li> <li>b. Is there any evidence of:</li> </ul>	<ul> <li>Company policy.</li> <li>Public consultation with stakeholders on 19 December 2017</li> </ul>	Company have a policy to circumvent instigated violence to maintain peace and order in current and planned operations. It documented in the Company Policy dated 1 December 2014 and mentioned in the item no 8 and stated circumvent instigated violence to maintain peace	YES

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
	- The use of confrontation and intimidation		and order in current and planned.	
	by the company to maintain peace and order?		From the results of the public consultation with stakeholder on 19 December 2017 also confirmed that no act of violence and militaristic	
	<ul> <li>Use of para-militaries and mercenaries in the plantation?</li> </ul>		ways adopted by the company in solving problems with public / stakeholders.	
2.3	Use of the land for oil palm does not diminish the leg	al, customary or user rights of other us	sers without their free, prior and informed consent.	
	Guidance: All indicators are applied to all oil palm plantations de dating back to the time of decision making, in particular		xception to plantations developed prior to November 2005 that may not a 1 and 2.3.2.	have records
		nd 7.6. Where customary rights areas a	nese rights are understood and are not being threatened or reduced. This are unclear these should be established through participatory mapping e	
	and entered into voluntarily, carried out prior to new be transparent and in open communication with othe	investments or operations, and based or community members. Adequate time	est benefits and/or relinquished rights. Negotiated agreements should be on an open sharing of all relevant information. The representation of con- should be given for customary decision making and iterative negotiation in the courts. Establishing certainty in land negotiations is of long-term in	mmunities should ns allowed for,
	Growers and millers should refer to the RSPO appro	ved FPIC guidance (RSPO endorsed I	Free, Prior and Informed Consent Guide for RSPO Members, Novembe	r 2015).
	Companies should be especially careful where they	are offered lands acquired from the Sta	ate by its invoking the national interest (also known as 'eminent domain'	).
2.3.1	involving affected parties (including neighbouring co		or rights (Criteria 2.2, 7.5 and 7.6) shall be developed through participate ant authorities).	, ,,
	a. Does the company have an SOP on FPIC?	SOP Penanganan Konflik	Company has established SOP Penanganan Konflik Lahan (Conflict	YES
	b. Is there evidence that the identification of legal, customary or user rights has been done through FPIC process?	Lahan (Conflict Management and Handling) AA-GL-5003.1- R2 dated 5 May 2015.	Management and Handling) AA-GL-5003.1-R2 dated 5 May 2015 which stated the mechanism of FPIC.	
	c. Is there evidence that the FPIC process has been implemented in accordance to the	Areal Statement of PT Hari     Sawit Jaya	However FPIC process was not applicable due to all land in inside the concession area has been developed in period 1993 - 2003 (based on areal statement). Based on Social Impact Assessment,	
	company SOP? Where is this evidence	Public consultation with stakeholders on 19 December	HCV Assessment and public consultation there were no customary rights in the land.	

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)		
	recorded? (E.g.: Documents, Minutes of meeting, Records, Agreements, Maps, etc.)	2017				
	d. Is there a map of the extent of legal, customary or user rights? Is this map of appropriate scale (1: 10,000)?					
	e. Was the map produced through participatory mapping with reference to SIA and HCV assessment?					
	f. Does the map have a title, legend, source, scale and projections/georeference?					
	g. Are the maps accepted by the relevant communities?					
2.3.2	2.3.2 Copies of negotiated agreements including the process of free, prior and informed consent (FPIC) (Criteria 2.2, 7.5 and 7.6) shall be available and these include:  a. Evidence of consultation b. Statement of transfer of rights c. Evidence of compensation See specific guidance 2.3.2  Specific Guidance: For 2.3.2:  Copies of negotiated agreements shall include at minimum: a. A plan that should be developed through consultation and discussion with all affected groups in the communities, and that information has been provided to all affect 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 taken; c. Evidence that the company has ensured that affected communities have understood and accepted the legal, economic, environmental and social implications for permitting operations on their land, including the implications for the legal status of their land at the expiry of the company's title or concession. The company shall in the legal implication based upon, but not limited to, Act No. 50 year 1960 and Government Regulation No. 40 year 1996 regarding Land-Use Right (HGU), Building-Right (HGB), and User Right, where the land will be owned by the state if HGU right is expired, not be extended and or updated.  d. Evidence that the company has informed the plan for partnership program.					
	Are copies of negotiated agreements with affected parties available?	SOP Penanganan Konflik     Lahan (Conflict Management     and Handling) AA-GL-5003.1-	Organizations have established procedures SOP <i>Penanganan Konflik Lahan</i> (Conflict Management and Handling) AA-GL-5003.1-R2 dated 5 May 2015. Describes the mechanism of land conflict resolution mechanisms between companies and land owners. The	N/A		

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
	<ul> <li>b. Is there evidence that the agreement is prepared through proper FPIC process?</li> <li>c. Does the agreement contain the following: <ul> <li>An action plan developed through consultation with affected parties, is inclusive and evidence that members of affected parties are well informed and involved in the decision making process</li> <li>Evidence of options to give or withhold consent for development</li> <li>Evidence that members of the affected communities understand and accept the implication involved in permitting/rejecting oil palm development on their land (E.g.: legal status, social, environmental, economic)</li> <li>Evidence that the negotiated agreement was entered voluntarily without coercion by all parties</li> <li>Evidence that adequate time was given for customary decision making and iterative negotiations</li> <li>Clause which states that the negotiated agreement is legally binding</li> </ul> </li> </ul>	R2 dated 5 May 2015.  • Areal Statement of PT Hari Sawit Jaya  • Public consultation with stakeholders on 19 December 2017	land cleared for oil palm plantations should ensure not be a problem and there is no dispute over land ownership. Procedure was presented to the head of the village around the plantation.  Procedure for FPIC process was available, and during public consultation with Villages Heads, it was confirmed that the procedure was made in consultation and discussion with them. The procedure was consulted with surrounding communities around the area of company.  There are no customary or user right in the plantation. It has been verified during group discussion with villages head, community leader and young leader around estate.  The results of the consultation can be seen that the legal implications, economic, and social environment so that the use of land for plantation development has been understood and accepted by the affected communities, including the implications for the legal status of their land, concessions or compensation for their land.	
2.3.3	Relevant information shall be available in appropriate		rsis of impacts, proposed benefit sharing, and legal arrangements.	
	a. Is there evidence that all the information (maps, agreement, records, impact assessment, benefit sharing and legal arrangements) is available in appropriate forms and languages, understood and accessible to affected parties?  Note to auditor: this should be cross checked to a sample of the affected parties	- Interview with local governance and stakeholder on 19 December 2017	Before performing land clearing, the company ensures that all of lands that will be cultivated have a clear status. The company has a land map according to the location permit given by the government. If there was land that become around community ownership within the area of location permit, companies will freeze the land with compensation as agreed both parties.  There is no element of coercion and violence that performed by companies. This was also confirmed when the public consultation on 19 December 2017 with community leaders, prominent figure and local governance.	N/A

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
			Planted areas of the Estate are wholly on Government land, leased under HGU. Maps have been developed for each estate indicating Legal demarcation and planted areas.  Currently organizations have established procedures SOP SOP Penanganan Konflik Lahan (Conflict Management and Handling) AA-GL-5003.1-R2 dated 5 May 2015. Describes the mechanism of land conflict resolution mechanisms between companies and land owners. The land cleared for oil palm plantations should ensure not be a problem and there is no dispute over land ownership. Procedure was presented to the head of the village around the plantation	
2.3.4	Specific Guidance:	, , , , , , , , , , , , , , , , , , ,	ons or representatives of their own choosing, including legal counsel.  The institution which represents community at the negotiation process,	shall be
	<ul><li>a. Who is the representative of the community in the negotiation process?</li><li>b. Is the representative accepted by the community?</li></ul>	Interview with local governance and stakeholder on 19 December 2017     HCV and SIA Assessmet	Communities are represented through institutions or representatives of their own choosing. It was confirmed that Village communities have delegated their representatives to the Village Head. Village Head are selected through local election and accepted by the community.	N/A
	c. Is the record of appointment to represent the community available and shared with other parties?		FPIC process was not applicable due to all land in inside the concession area has been developed in period 1993 - 2003. Based on Social Impact Assessment, HCV Assessment and public consultation there were no customary rights in the land.	

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

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR (YES						
3.1	There is an implemented management plan that aims to achieve long-term economic and financial viability. <b>Guidance:</b> Whilst it is recognised that long-term profitability is also affected by factors outside their direct control, top management should be able to demonstrate attention to economic and financial viability through long-term management planning. There should be longer term planning for plantations on peat, particularly in regards to subsidence and flooding issues (see Indicator 4.3.5).								
	to RSPO Guidance On Scheme Smallholders,	July 2009 or endorsed final revisctices in line with new information	where applicable (see also Criteria 6.10 and 6.11). For scheme smallholders, the comp ion. In and techniques. For smallholder schemes, the scheme management should be expe						
			dance for Independent Smallholders under Group Certification, June 2010)						
3.1.1	(M) A documented management plan, a minimum of three years shall be available, including, where appropriate, plan for scheme smallholders.  Specific Guidance: For 3.1.1: The business or management plan should contain: Attention to quality of planting materials; Crop projection = Fresh Fruit Bunches (FFB) yield trends; Mill extraction rates = Oil Extraction Rate (OER) trends; Cost of Production = cost per tonne of Crude Palm Oil (CPO) trends; Forecast prices; Financial indicators.								
	a. Does the company have a documented business or management plan with a minimum planning period of 3 years?  b. Does it include the following:  - Land area statement (planting years, non-planted areas, i.e. HCV, conservation areas, fragile soils, enclaves) with updated location maps. Maps should have	PT. Hari Sawit Jaya – Negri Lama II Projection year 2017 – 2021 PT. Hari Sawit Jaya – Negri Lama Selatan, Negri Lama Central, Negri Lama Utara and Aek Kuo Estate	Management plan established for period 2017 - 2021 has been used to achieve economic viability and long-term financial. The plan was approved by the top management. The Management Plan has include:  - Land area statement (planting years, non-planted areas, i.e. HCV, conservation areas, fragile soils, enclaves) with updated location maps. Maps does have title, legend, source, scale and projections/georeferenced  - Plan for management of scheme smallholders (where appropriate)  - Quality of planting materials  - Crop projection = Fresh Fruit Bunches (FFB) yield trends	YES					

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
	title, legend, source, scale and projections/georeferenced  - Plan for management of scheme smallholders (where appropriate) - Quality of planting materials - Crop projection = Fresh Fruit Bunches (FFB) yield trends - Mill extraction rates = Oil Extraction Rate (OER) trends - Cost of Production = cost per tonne of Crude Palm Oil (CPO) trends - Forecast prices - Financial indicators – profitability forecast (income vs cost) - Projected expansion (area, mill capacity, infrastructure, social amenities) - General strategy and allocation for environmental and social management (refer to P5, P6 and P8)  c. Is this management document subjected to an annual review?  d. For plantations on peat, is there a long term viability plan – e.g. flooding, drainability assessments and subsidence issues? (see 4.3.5)  e. Does the grower have a system to improve practices in line with new	Operation Projection year 2017 – 2021	<ul> <li>Mill extraction rates = Oil Extraction Rate (OER) trends</li> <li>Cost of Production = cost per tonne of Crude Palm Oil (CPO) trends</li> <li>Forecast prices</li> <li>Financial indicators – profitability forecast (income vs cost)</li> <li>Projected expansion (area, mill capacity, infrastructure, social amenities)</li> <li>General strategy and allocation for environmental and social management (refer to P5, P6 and P8)</li> <li>The parameters listed in the management plan that includes revenue and earnings, projected crop production (FFB yield trend), the extraction rate of CPO and PK (Production forecast up to 2021), harvesting, processing FFB and CPO. The achievement of the management plan is reviewed every month in the Estate Unit Report (LUK) and Mill Unit Report (LUP) according to the current month. Reviewing of LUK and LUP was conducted monthly. Planting material are 70% Topaz, 10% Socfin, 10% Dami Mas and 10% Lonsum.</li> <li>For plantations on peat, there is a long term viability plan – e.g. flooding and subsidence issues. Water canal and water gate has been established, subsidence monitoring and drainability assessment has been performed February 2017.</li> <li>The organisation has a system to improve practices in line with new information and techniques through continual improvement. PIC for estate is each Estate Manger, and PIC for Mill is Mill Manager. New information and new techniques are update through regular management review meeting. All staffs can propose continual improvement. Continual improvement was communicated to all unit managements.</li> </ul>	
	improve practices in line with new information and techniques?  - Has the personnel in charge (PIC) been identified?  - How is the information updated?			

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE			SUMM	ARY O	F FINI	INGS I	FOR EA	CH INE	OICATO	R		COMPLIANCE (YES/NO)
3.1.2	Is there a documented SOP which requires monitoring and updating information to improve practices?     Is new information communicated to workers and scheme smallholders (where appropriate)?     How is it communicated?  An annual replanting programme projected for	a minimum of five years (but long	ger where	e neces	sary to ı	reflect	the ma	nagem	ent of fr	aqile so	ils, see	Criterior	1 4.3), with	n yearly review.
	shall be available.  a. Is there an annual replanting programme projected for a minimum of five years?  b. Has it been documented?	Replanting program of PT. Hari Sawit Jaya     LUK (Estate Unit Report)	Project of PT. I been	ojected annual replanting programme was described in the "Replanting Program PT. Hari Sawit Jaya". Detail Annual Replanting Programme for 2015 – 2023 has en documented. The progress of implementation (realisation) has been cumented in monthly LUK (Estate Unit Report).						YES				
	c. Is the progress of implementation documented?		Year	Prograr	n (Ha)				Realisa	tion (Ha)				
	<ul> <li>d. How does the programme take into consideration fragile soils such as peat? Is there a longer projection period (see C4.3)?</li> <li>e. Is there evidence of a yearly review of the replanting programme?</li> </ul>		2010 2011 2012 2013 2014 2015 2016 2017 Fragile prograr	mme of	PT. H	ari Sa	wit Ja	ya. Lor	nger pro	ojection	period	64 KAK  0 0 0 0 50 547 431 565 0  1 the reis applieview me	Total  1938 2642 2646 1559 1385 1221 1234 0 eplanting ied. The eeting.	

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

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
4.1.1	Operating procedures are appropriately documented  Specific Guidance: For 4.1.1 and 4.1.4: SOPs and documentations for a  Mechanisms to check implementations could include These procedures refer to the Best Management Pra  Ministry of Agriculture, 2006.  (M) Standard Operating Procedures (SOPs) for estata  a. Have the SOPs for mills and plantation been	mills should include relevant supply characters for Oil Palm in Indonesia, such the (land clearing to harvesting) and Sources (land clearing to harvesting) and Sources (Apriculture Policy Manual (APM)	ain requirements (see RSPO Supply Chain Certification Standard, Nov 2) and internal control procedures.  as Technical Guideline for Oil Palm Development, Directorate General of the CPO and PKO) shall be available to the documented Standard Operating Procedures (SOP) for Estate	2011). of Estate Crops,
	<ul> <li>documented?</li> <li>b. Does the SOP cover key processes, harvesting, transportation, manuring, IPM, GAP, Supply Chain requirements for the mill, etc.?</li> <li>c. Is a copy of the SOP available on site and is it documented in an appropriate language?</li> <li>d. Is there evidence that SOPs are implemented and understood by workers?</li> </ul>	<ul> <li>Mill Policy Manual (MPM)</li> <li>Records of APM and MPM dissemination dated 02-September-2015</li> <li>Laporan Unit Kebun (Estate Operation Report) November 2017</li> <li>Mill operation summary (MOS) period November 2017</li> </ul>	<ul> <li>was evident:</li> <li>AA-APM-OP-1100.01-R1 Nursery</li> <li>AA-APM-OP-1100.02-R1 Land Preparation</li> <li>AA-APM-OP-1100.03-R1 Creation and Maintenance of Road</li> <li>AA-APM-OP-1100.04-R1 Creation and Maintenance Trenches</li> <li>AA-APM-OP-1100.05-R1 Soil and Water Conservation</li> <li>AA-APM-OP-1100.06-R1 Planting Leguminous Cover Crop</li> <li>AA-APM-OP-1100.07-R1 Oil Palm Planting</li> <li>AA-APM-OP-1100.09-R1 Manuring</li> <li>SOPs for IPM:</li> </ul>	
	e. Are the SOPs appropriate and adequately cover all estate and mill processes and activities?  f. How are the SOPs made available at the point of use?		<ul> <li>AA-APM-OP-1100.10-R1 Pest &amp; Diseases Control</li> <li>AA-APM-OP-1100.08-R1 Weeding Control</li> <li>AA-APM-OP-1100.14-R1 Census and Identification Plant</li> <li>AA-APM-OP-1100.11-R1 Management Pesticides</li> <li>AA-APM-OP-1100.12-R1 Castration</li> <li>AA-APM-OP-1100.13-R1 Pruning</li> <li>AA-APM-OP-1100.15-R1 Census of Production</li> <li>AA-APM-OP-1100.16-R1 Consolidation</li> <li>AA-APM-OP-1100.17-R0 Water Management</li> <li>AA-APM-OP-1100.18-R1 FFB Harvesting</li> <li>AA-APM-OP-1100.19-R1 Transportation Management</li> </ul>	

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			AA-APM-OP-1100.20-R1 Replanting  The documented procedures regarding processing activities of palm oil have already described within the "Mill Policy Manual" (MPM) document which approved by Operations Director. The manual are consist of each processing station start from FFB (Fresh Fruit Bunch) receiver until the CPO delivery and also include the procedures of machineries preventive maintenance, utilities and quality control. Herewith the procedures consists within the MPM such as:      AA-MPM-OP-1400.02-R2 FFB Receiver Procedure      AA-MPM-OP-1400.03-R1 Sterilizer station Procedure      AA-MPM-OP-1400.04-R1 Threshing station Procedure      AA-MPM-OP-1400.05-R1 Digesting and Screw Press station Procedure      AA-MPM-OP-1400.07-R1 Nut Polishing Procedure      AA-MPM-OP-1400.08-R1 Kernel station Procedure      AA-MPM-OP-1400.11-R1 Water Treatment Procedure      AA-MPM-OP-1400.12-R1 Laboratory Procedure      AA-MPM-OP-1400.15-R1 Preventive machineries maintenance Procedure      AA-MPM-OP-1400.15-R1 Preventive machineries maintenance Procedure      AA-MPM-OP-1400.13-R1 – WWTP Process      AA-MPM-OP-1400.17-R3 Traceability      AA-MPM-OP-1400.18-R3 Mass Balance  Copy of the procedures was available on site and is it documented in Indonesian language. Procedures were distributed to Estate and Mill. Procedure has been disseminated periodically to all Estate and Mill employees through regular training and morning briefing. Interviews with the employees indicated satisfactory level of understanding and implementation in relation to their respective job function. The SOPs were appropriate and adequately cover all estate processes and activities and were available at the point of use.	
			Based on field observation at estate and mill it was demonstrated that	

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			SOPs are implemented and understood by workers.	,
4.1.2	Checking or monitoring of operations procedures is	conducted at least once a year.		
7.1.2	<ul> <li>a. Is there a master list of all SOPs?</li> <li>b. How does the company keep track of revisions?</li> <li>c. Is there mechanism for: <ul> <li>Translation of SOP into work instructions in appropriate languages?</li> <li>Records of training for all levels?</li> <li>Internal control (e.g. audit and review, field inspection) procedure in place to monitor consistent implementation of SOPs?</li> <li>Trained and competent personnel assigned to carry out internal control activities?</li> <li>Implementation audits to be carried out regularly covering implementation of all the SOPs?</li> <li>Procedure to address non-compliance and corrective action for continuous improvement?</li> </ul> </li> </ul>	<ul> <li>Agriculture Policy Manual (APM)</li> <li>Mill Policy Manual (MPM)</li> <li>VA (Visit Agronomy) Report KNC for visit date 30 January to 3 February 2017.</li> <li>VA (Visit Agronomy) Report KNS for visit date 21 to 25 May 2017.</li> <li>VE (Visit Engineering) Report dated 14 – 15 December 2017</li> </ul>	The master list of mill documents (include procedures and work instruction) were compiled within 1 bundled documents named "APM" (Agriculture Policy Manual) for Estate and "MPM" (Mill Policy Manual) for Mill. The updated procedures were received from head office sustainable department sent to all mill related functions.  The APM and MPM Documents were available on Bahasa Indonesia language and disseminated by head office sustainable department, records of dissemination was evident dated 02-September-2015.  The internal control for plantation (Visit Agronomy) was conducted by experienced Agronomy Consultant, regarding all operation process in agronomy, last visit conducted on 30 January to 3 February 2017 in KNC and 21 to 25 May 2017 in KNS. Internal control for Mill resulted in Visit Engineering Report regarding CPO inter-laboratory crosscheck using statistical method to compare the quality of CPO for each mill, records was sighted that the result shown there is no big issues in PND (Negri Lama 2 Mill) and its supply bases. The company has keep track of revisions.  The documented mechanism has include:  - Translation of SOP into work instructions in appropriate languages.  - Records of training for all levels.  - Internal control (e.g. audit and review, field inspection) procedure in place to monitor consistent implementation of SOPs.  - Trained and competent personnel assigned to carry out internal control activities.  - Implementation audits to be carried out regularly covering implementation of all the SOPs.  - Procedure to address non-compliance and corrective action for continuous improvement.	YES

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4.1.3	CHECKLIST  Records of monitoring and any follow-up actions sha	EVIDENCE		(YES/NO)
	a. Have the records been maintained on the following?  - Measurements or results of internal control and monitoring activities (refer 4.1.2)  - Records of corrective actions and improvement undertaken	<ul> <li>VE (Visit Engineering) Report. 14 – 15 December 2017</li> <li>R&amp;D Pest and Disease Visit Report, 20 – 22 July 2017</li> <li>VA (Visit Agronomy) Report KNC for visit date 30 January to 3 February 2017.</li> <li>VA (Visit Agronomy) Report KNS for visit date 21 to 25 May 2017</li> <li>FFB Quality Monitoring Form</li> </ul>	In Estates, Head of Assistant and Afdeling Staf inspected and monitored the activities at the site on a regular basis. The result of internal control to monitoring activities was available and reviewed, such as monitoring of FFB Quality and Harvest Area.  R&D Pest and Disease Visit was conducted by R&D officer, dated on 20 – 22 July 2017. Monitoring for action plan progress form Visit Agronomy Report, dated on 30 January to 3 February 2017 for KNC and 21 to 25 May 2017 for KNS, its Action status of 100% closed for under prunning, midrib on circle, and attacking of Tirathaba low. Records of corrective action and improvement from internal audit were available in the report of Visit Agronomy Report (Appendix 2 Action Plan includes issues and action).  For Mill, the organisation conducted monitoring and checking for all applicable procedures, mill operation performance activities through periodic visit of corporate engineering called VE (Visit Engineering), The Report sighted; dated 14 – 15 December 2017 was sighted includes Mill key performance, assessment overall mill operations, process efficiency, plant maintenance, management supervision, manpower statement, production cost, EHS management system and sustainability. The corrective action plans was established and followed up by mill, the records was also evident.  Non-conformance:  There are inappropriate operational activities  Objective evidence:  KNC  a. Calibration of fertilizer dosage in 2017 for each division has not been demonstrated yet.  b. Spray tools calibration in 2017 can't be shown during audit  Mill  a. The temperature gauge for the press machine and digester	YES (Minor NCR 2017 – 03) OPEN

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			number 3 is damaged	
4.1.4	<ul> <li>(M) Records of the origins of all third-party FFB sou</li> <li>a. Is there an SOP for third-party FFB sourcing?</li> <li>b. Is there a list of approved third-party FFB suppliers?</li> <li>c. Is there proof of observed implementation of SOP?</li> <li>d. Is there daily and summary records of volume</li> </ul>	<ul> <li>AA-MPM-OP-1400-02.R1 (Procedure of Receiving Station)</li> <li>AA-MPM-OP-1400.17-R3 (Procedure of Traceability)</li> <li>AA-MPM-OP-1400.18-R3 (Procedure of Mass Balance)</li> </ul>	armers Association and out-grower) shall be available.  Standard Operating Procedures for third party FFB sourcing were available. The receiving station split FFB from internal and external sources (third party). Mechanism of third party FFB receiving described the process from proposal from supplier, approval as FFB supplier, FFB pricing, FFB receiving in Mill and payment of FFB.  Record of TBS received from external sources was stated on	YES
	and origins of third-party FFB received?  e. Have these records been verified against the available document?	Mechanism of third party FFB receiving.     Mechanism of FFB pricing	Record of TBS received from external sources was stated on Recapitulation of FFB Received Report. There were a list of approved third-party FFB suppliers, such as:  - ESTERIA M QQ - SUMIYATIK-AB - Mukhtar Pinem, - KPKS Wahyu Agung - Edy Ahmad - Sitolong Nadangol There were evidence of SOP implementation such as: FFB grading process 100% in accordance with grading criteria which has been agreed in DO, price of FFB was agree in DO based Memorandum from Regional Office Medan, payment carry out after FFB received and invoice receive by finance. Payment was performed daily. Third party FFB price affected by CPO and PK price, transport, OER, KER, processing cost and others.	
			For example payment recapitulation dated 2 December 2017 IDR 383,525,011 for FFB nett 260.305 MT. Payment has been transfer to an account number in BRI. It was observed that the payment and price was met with DO and procedure. Organization only received legal FFB; There was statement letter from each FFB supplier that:  - FFB supplied to PT. HSJ, Negri Lama 2 Mill was not came from forest area or prohibited area by law and regulation.  - FFB supplied to PT. HSJ, Negri Lama 2 Mill was not came from peat area.	

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		<ul> <li>Not performed burning for land clearing in new planting or replanting</li> <li>Not employed children under 18 years old.</li> <li>Negri Lama 2 Mill records the origins of all third-party sourced Fresh Fruit Bunches. FFB tonnage delivery from the third party was well documented daily (Laporan Harian Pabrik) and monthly (Mill Operation Summary).</li> <li>All records have been verified and it was compliance with available</li> </ul>				
			procedure.			
4.2	Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.  Guidance:  Long-term fertility depends on maintaining the structure, organic matter content, nutrient status and microbiological health of the soil. Growers should ensure that they follow the best practices. Nutrient efficiency should take account of the age of plantations and soil conditions.  The nutrient recycling strategy should include any use of biomass for by-products or energy production.  One of the guidance may be used as a reference to the Technical Guideline for Oil Palm Development, Directorate General of Estate Crops, Ministry of Agriculture (2006)					
4.2.1	(M) A record of SOP implementation to maintain soil	fertility that ensures optimal and susta	ined yield, shall be available			
	<ul> <li>a. Are there SOPs for Good Agricultural Practices in managing soil fertility?</li> <li>b. Is there evidence that the SOPs have been implemented and monitored?</li> </ul>	<ul> <li>Agriculture Policy Manual No. AA-APM-OP-1100.09-R3</li> <li>Work Instruction of Leaf Sampling in Field</li> <li>Field observation on KNS Afdeling II and KNC Afdeling III</li> </ul>	Procedure for Good Agricultural Practices in managing soil fertility was documented in Manuring Procedure No. AA-APM-OP-1100.09-R3 that the first principle of fertilizer application was each the palm oil stand shall receive a type of fertilizer in accordance with recommendation dosage form R&D. Fertilizer programme and realisation are recorded as mentioned in indicator 4.2.2.  The company has also Work Instruction for Leaf Sampling in Field, Rev 00, January 2016. It has been implemented and monitored in the fertilizer recommendation based on annual leaf sampling unit (LSU). LSU was analysed by Nusa Pusaka Kencana Laboratorium for Fertilizer Recommendation 2017, PT. Hari Sawit Jaya.	YES		
			Based on field observation shows that plants are in good condition.			

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			fertiliser dosage wa based on Manuring	s according to documented s in accordance with manung grecommendation and applique was in line with the principle.	uring recommendation polication report 2017,	
4.2.2	Records of fertilizer inputs shall be available.					YES
	<ul><li>a. Is records of fertiliser inputs maintained?</li><li>b. Is there records to proof that the fertiliser program is linked to the agronomic report?</li></ul>	Manuring recommendation and application report 2017	be shows. This was	Record of manuring recommendation and realisation in 2017 can't be shows. This was a recurrence from previous audit so it will upgraded into Major NCR.		
	c. Is there records of fertilizer usage per tonne		Negeri Lama	Selatan Estate		CLOSED
	of FFB production (>in Summary Table, specific types of fertilizers)?		Type of	Fertilizer u	sage	
			Fertilizer	Total usage (kg)	Budget (kg)	
			ZA	1,967,990	1,991,532	
			RP	799,903	804,590	
			MOP	2,616,621	2,565,876	
			DOLOMITE	727,254	751,456	
			HGFB	137,690	140,640	
			Cu-EDTA	1,527	28,128	
			Zn-EDTA	-	26,643	
			TOTAL	6,250,985	6,308,865	

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			Negeri Lama  Type of	Central Estate Fertilizer	usage		
			Fertilizer	Total usage (kg)	Budget (kg)		
			ZA	1,529,788	1,531,511		
			MOP	1,851,389	1,851,911		
			RP	411,148	411,464		
			HGFB	94,142	94,175		
			DOLOMITE	-	-		
			Cu-EDTA	19,007	19,025		
			Zn-EDTA	19,407	19,426		
			TOTAL	3,924,881	3,927,512		
4.2.3	Records of periodical leaf, soil and visual analysis sh		The second by	- \\/- d. ltt' f	Last Canadian in	Ciald Davi	VEO
	<ul> <li>a. Is there SOPs for tissue and soil sampling?</li> <li>b. Is there evidence of implementation of the SOPs, including availability of records?</li> <li>c. Is there records of tissue and soil analysis?</li> <li>d. Is the results of the study incorporated into the fertilizer program?</li> </ul>	<ul> <li>Work Instruction of Leaf Sample Taking, January 2016.</li> <li>Work Instruction of Soil Sample Taking, dated 14 January 2016</li> <li>Leaf Analysis Report, issued 06 June 2016</li> </ul>	00, January 201 fertilizer recomme The SOP for soil of Soil Profile Sa 00, 14 January 20	s Work Instruction for 6. It has been implen endation based on and sampling unit was ava mpling Taking, R&D A 116. Leaf and Soil sam Laboratorium for Fert	nented and monito nual leaf sampling unilable in the Work AA IK about Soil Pr ple are analysed by	red in the unit (LSU). Instruction ofile, Rev:	YES (Minor NCR 2017 – 05) OPEN
			Analysis Report 88/INT/R&D/JUL/	f leaf sampling analys t, e.g dated 06 L/16 with number of s f soil sampling analys issued by R&D A	June 2016, ample 272 samples is result was record	Ref no. s for KNS.	

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			demonstrated of reporting by R&D dated on 3 February 2011 at Block B94f/1994, B94j/1994, B97c/1997 Afdeling 2, C03l/2003 Afdeling 3, KAK explained of profile soil analysis data such as physiography, topography, humidity, temperature, drainage, etc. Whilst for KNU was conducted on 16 December 2010, Div of 3, at block of I-97-f/1997, J-39-q/1993, H-91-k/1991, G-91-r/1991, G-91-w/1991, G-91-z.	
			Records of soil analysis was available and the result of study incorporated into the fertilizer program each 6 (six) years. Soil analysis was used within agronomy and R&D program (fertilizer program).	
			LSU 2017 is conducted in accordance with the memorandum number 15/RD/KNC/DES/2017 dated December 4, 2017 that the soil profile update at KNC and KNS is scheduled on 12 - 15 December 2017	
4.2.4	A nutrient recycling strategy is recorded, including us			\
	<ul> <li>a. Is there a nutrient recycling strategy in place?</li> <li>b. Does the strategy include the following?</li> <li>Clear objectives and time-bound targets</li> <li>Inventory of</li> <li>EFB</li> <li>POME</li> <li>Fibre</li> <li>Boiler ash</li> <li>Kernel shell</li> <li>Palm residues from replanting</li> <li>Biomass recycling program</li> <li>Implementation and monitoring records</li> </ul>	<ul> <li>Agriculture Policy Manual No. AA-APM-OP-1100.09-R3</li> <li>Recapitulation of fertilizer for mature</li> <li>Record of Inventory from palm oil process in 2017</li> </ul>	There was a nutrient recycling strategy at KNS and KNC include bunch / boiler ash from burning EFB in Boiler and SOP was available in the Agriculture Policy Manual – Manuring, No. AA-APM-OP-1100.09-R3 that bunch ash was only recommended of dosage to mature palm oil by R&D. The target time-bound was explained in the Recapitulation of fertilizer for mature. Boiler ash management was carried out the application for ground at estate area as organic fertilizer. Record of monitoring was available in recapitulation evaluation of fertilizer. It was observed that Boiler Ash application is comply with best agriculture practices. Based on field observation at KNS and KNC, there is no application of EFB or POME in the plantation because most of the area is peat.	YES
	Note to auditor: Ground verification required		Inventory from palm oil process in 2017, as follows:  - Boiler ash 18,698 kg (as organic fertilizer)  - Shell 4,687 kg, meanwhile for kernel sold as RSPO PK Certified and in ISCC scheme	

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	Practices minimise and control erosion and degrada	tion of soils.			
4.3	Guidance: Techniques that minimize soil erosion are well known recycling, terracing, and natural regeneration or rest		priate. These should include practices suc	ch as ground cover manageme	ent, biomass
4.3.1	(M) Maps of any fragile soils shall be available.	Man of Coll and Land	Cail man and land suitability was as	cilable in early 4, 20,000	VEC
	<ul> <li>a. Is there soil maps showing presence of fragile soils and problem soils (refer to 4.3.6)?</li> <li>b. Are maps georeferenced and of appropriate scale (1:50,000)?</li> </ul>	Map of Soil and Land Suitability	Soil map and land suitability was averaged projection system: Universal Transverse Zone: 47 M, Central Meredien: E 99° follows:  KNU  Soil Classification  Typic Endoaquepts Histic Humaquepts Typic Haplosaprists (peat < 3 m) Typic Haplosaprists (peat 1 - 3 m)	Mercator, Datum: WGS 84,	YES
			Typic Haplosaprists (peat > 3 m)  KAK  Soil Classification	0 - 3 1,280  Topography (%) Ha 0 - 3 842	
			Typic Endoaquepts Histic Humaquepts Typic Haplosaprists (peat < 3 m) Typic Haplosaprists (peat 1 - 3 m) Typic Haplosaprists (peat > 3 m)	0 - 3	
			KNS Soil Classification Typic Endoaquepts	Topogra	

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			Histic Humaquepts	0 - 3	99	,
			Typic Haplosaprists (peat < 3 m)	0 - 3	171	
			Typic Haplosaprists (peat 1-3 m)	0 - 3	814	
			Typic Haplosaprists (peat > 3 m)	0 - 3	3307	
			KNC	_		
			Soil Classification	Topography (%)	На	
			Typic Endoaquepts	0 - 3	5	
			Histic Humaquepts	0 - 3	3	
			Typic Haplosaprists (peat < 3 m)	0 - 3	12	
			Typic Haplosaprists (peat 1-3 m)	0 - 3	276	
			Typic Haplosaprists (peat > 3 m)	0 - 3	2834	
			Planting on peat (including thicknes 2010, and 2011, at that time; there peat yet. Moratorium on planting of 10/2011) newly published on May 20	was no prohibitio n peat (Presiden	n of planting on	
4.3.2	A management strategy shall be in place for planting  Specific Guidance: For 4.3.2: Management strategy on areas planted with Ministry (2006). Area with slope of >40% shall be averaged.	ith steep slope may refer to the Technic	cal Guidance for Oil Palm Developme	nt, Directorate Ge		
	a. Is there a management strategy in place for plantings on slopes?	Agriculture Policy Manual No. AA-APM-OP-1100.05-R2	SOP of planting on slopes was avail and SOP to minimise soil erosion conditions was available in AA-APN	based on local s	soil and climate	YES
	b. Does the management strategy include the following?		The organisation has management above certain limit such as terracing and work instructions. The Work insplanting including planting on slope organisation:  - Flat undulating 0° – 5°	strategy for plang, as referred to outroction described	nting on slopes company's SOP d preparation for	

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	recycling, terracing, and natural regeneration or restoration instead of replanting		- Rolling 6° - 12° - Hilly 13° - 20° - Steep >20°		
	c. Is there proof of records of field inspection on SOP implementation?		Practices to control and minimize erosion have been applied by :  - Terracing - Making the catchment where runoff water, called: "Tapak Kuda" Making the catchment where runoff water, called "Rorak" Planting legume cover crop.  There was proof records of field inspection on SOP. For planting on slope performed with 0° – 5° or flat undulating and its compatible with SOP		
4.3.3	A road maintenance programme shall be in place.				
	a. Is there a road maintenance programme in place with supporting budget and resources?     b. Is there road maintenance records?	Road maintenance program in 2017	PT. HSJ has a road maintenance program in place with supporting budget and resources in Planning and Realization for Manual and Mechanical Maintenance, as follows:  Road Hardening - 2017	YES	
			Estate Plan (m) Realisation (m)		
			KNS 1.118.892 1.065.310		
			KNC 780.720 797.306		
4.3.4	(M) Subsidence of peat soils shall be minimised and monitored. A documented water and ground cover management programme shall be in place.  Specific Guidance: For 4.3.4: For existing plantings on peat, the water table should be maintained at an average of 50cm (between 40 - 60cm) below ground surface measured with groundwater piezometer readings, or an average of 60cm (between 50 - 70cm) below ground surface as measured in water collection drains as per the Manual Best Management Practice existing oil palm cultivation on peat, June 2012 or as per existing regulation if equal or shallower measured through a network of appropriate water control structures e.g. weirs sandbags, etc. in fields, and watergates at the discharge points of main drains (Criteria 4.4 and 7.4). Regulations regarding water table on peat may refer, but not limited, to:  1. Government Regulation No. 71 year 2014 regarding Protection and Management of Peat Ecosystem  2. Regulation of Minister of Agriculture No. 14 year 2009 regarding Guideline of Oil Palm Cultivation on Peat  3. Regulation of Minister of Agriculture No. 11 year 2015 regarding Guideline of Indonesia Sustainable Palm Oil Plantation (ISPO)				

			COMPLIANCE (YES/NO)
<ul> <li>a. Is there an SOP to provide guidance on subsidence management?</li> <li>b. Does the SOP make reference to the RSPO BMPs on peat?</li> <li>c. How is subsidence being monitored?</li> <li>d. Are there records of subsidence monitoring?</li> <li>e. How is subsidence being minimised?</li> <li>f. Is there a water management programme and evidence of implementation?  For existing plantings on peat, the water table should be maintained at an average of 50cm (between 40 - 60cm) below ground surface measured with groundwater piezometer readings, or an average of 60cm (between 50 - 70cm) below ground surface as measured in water collection drains, through a network of appropriate water control structures e.g. weirs, sandbags, etc. in fields, and watergates at the discharge points of main drains (Criteria 4.4 and 7.4).</li> <li>g. Is there a ground cover management programme and is there evidence of implementation?</li> </ul>	<ul> <li>Agriculture Policy Manual No. AA-SOP-OP-1100.17-R1</li> <li>Peat Subsidence Monitoring, period January and July 2017</li> <li>Water Level Monitoring Data</li> </ul>	PT. HSJ has procedure to provide guidance on subsidence management in Water Management No. AA-SOP-OP-1100.17-R1 about Water Management. Subsidence pipe position based on peat depth and topography have been determined by R&D Department was between of stand in row free from weed and midrib pile to reach the substratum (mineral soil). Measuring was half-yearly conducted and Water height monitoring was weekly with optimum size of 50-70 cm. Control of drainage or water management, especially in the area of peat, used tools such as Stick-scale monitoring, and sluices (water gate) or drain block so as to maintain the ground water level. Its SOP reference to the RSPO PC, HCV, ISPO, and HCS.  The subsidence was half-yearly monitored in Recapitulation of Peat Subsidence Monitoring. The last monitoring record on 2017. Result demonstrated that there was some subsidence in several Block, for example, monitoring of peat soil for page no 4 Block D11r during 2017 decreased 1.8 cm peat subsidency, and page no 1 Block E10g during 2017 decreased 2,4 cm peat subsidency.  Water management programme has been implemented by PT. HSJ, among others by constructing water gate that equipped with water pump, water table monitoring, and piezometer. Base on field observation on Afdeling 2 KNS.  PT. HSJ has ground cover management programme, such as planting legume cover crop. Field observation has been conducted at Block H06e KNS Estate. it was evident that ground cover management programme has been implemented.	YES (Major NCR 2017 – 06) CLOSED

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)			
	2012 (especially water management, fire avoidance,	Plantations on peat should be managed at least to the standard set out in the 'RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat', June 2012 (especially water management, fire avoidance, fertilizer use, subsidence and ground surface management).					
	<ul><li>a. Was a drainability assessment conducted before replanting on peat?</li><li>b. Was a flood risk map provided as a result of the drainability assessment?</li></ul>	AA-APM-OP-1100.20-R4     Agriculture Policy Manual     Replanting					
	c. If the drainability assessment shows that an area is unsuitable for replanting, are there alternative plans in place for rehabilitation and alternative use in accordance to the RSPO BMPs?		keep off the planting in non-productive area and has a high potential for flooding. Other than that, this assessment was used to measure that peat area can be distributed using gravity.				
4.3.6	A management strategy shall be in place for other fra						
	a. Is there a management strategy in place for other fragile and problem soils?	Agriculture Policy Manual No.     AA-APM-OP-1100.05-R1	Management strategy for soil problem was available in Environment Impact Assessment (EIA), Study of palm oil plantation and process	Yes			
	b. Does the management strategy include SOPs for the management of other fragile and problem soils?	Subsidence and Water     Management monitoring     Soil map and land suitability,	at PT. Hari Sawit Jaya, Labuan Batu Regency, North Sumatera Province. There is no other type of fragile and problem soil in PT. Hari Sawit Jaya.				
	c. Is inspection and implementation records available?	2011					
4.4							
4.4.1	Practices maintain the quality and availability of surface and ground water.  An implemented water management plan shall be in place.  Specific Guidance:  For 4.4.1: The water management plan will:  a. Take account of the efficiency of use and renewability of sources;  b. Ensure that the use and management of water by the operation does not result in adverse impacts on other users within the catchment area, including local communities and customary water users;  c. Aim to ensure local communities, workers and their families have access to adequate, clean water for drinking, bathing, cleaning and latrine purposes;  d. Avoid contamination of surface and ground water through run-off of soil, nutrients or chemicals, or as a result of inadequate disposal of waste including Palm Oil Mill Effluent (POME).						

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
	<ul> <li>a. Is there a water management plan in place for mill and plantation with identified actions?</li> <li>b. Does the plan include the following? <ul> <li>Identification of water sources</li> <li>Efficient use of water</li> <li>Renewability of water source</li> <li>Impacts on catchment area and local stakeholders</li> <li>Access of clean drinking water all year round for stakeholders</li> <li>Avoidance of surface and ground water contamination</li> </ul> </li> <li>c. Have the identified actions in the plan been implemented?</li> </ul>	<ul> <li>Permit of Surface Water Usage from Keputusan Kepala Badan Pelayanan Perizinan Terpadu Propinsi Sumatera Utara Nomor: No. 610/479/BPPTSU/2/XII.I/X/20 16 dated 19 Oktober 2016, debit maximum allowed is 6 L/second</li> <li>Permit of Ground Water Usage from Grovernor of North Sumatra No: 546.2/533/DPMPPTSP/6/XI.3 b/VII/2017 dated 21 July 2017 for MCK purposes valid for 3 years</li> <li>Permit of Ground Water Usage from Grovernor of North Sumatra No: 546.2/532/DPMPPTSP/6/XI.3 b/VII/2017 dated 21 July 2017 for workers and office purposes valid for 3 years</li> <li>LUP (Laporan Unit Pabrik)</li> <li>Water analysis measurement for period 2017 by Balai Teknik Kesehatan Lingkungan dan Pengendalian Penyakit (BTKLPP) Kelas I Medan</li> <li>Records of water consumption period December 2016 – November 2017</li> <li>Water management</li> </ul>	The main source of water for Mill activity is surface water — Bilah River. Permit of water abstraction from surface water has been obtained on 19 Oktober 2016 and valid through 3 years. Flow meters were installed to monitor water usage. The volume of water usage is monitored monthly both for process and domestic usage. Water consumption data December 2016 — November 2017 was sighted.  Surface water quality is monitored every six months. Surface water quality was analysed both for upstream and downstream. Monitoring result of surface water quality was reviewed for 2nd semester 2016 and 1st semester 2017 against PP #82/2001 class II.  Kebun Negeri Lama Central have a permit for ground waters usage such as:  Permit of Ground Water Usage from Grovernor of North Sumatra No: 546.2/533/DPMPPTSP/6/XI.3b/VII/2017 dated 21 July 2017 for MCK purposes valid for 3 years. Maximal debit allowed is 6.6 liter/second.  Permit of Ground Water Usage from Grovernor of North Sumatra No: 546.2/532/DPMPPTSP/6/XI.3b/VII/2017 dated 21 July 2017 for workers and office purposes valid for 3 years. Maximal debit allowed is 6.6 liter/second  Analysis for ground water results not yet received by the company. On November 2017, the company have send ground water samples to be analysed by Balai Teknik Kesehatan Lingkungan dan Pengendalian Penyakit (BTKLPP) Kelas I Medan.  Water management plan include water source and distribution identification, volume of water utilization, parameter/standards of water utilization, identify the impacts include water effluents/wastes and also the method to reduce and control.  The monitoring of water volume utilization for process was conducted, records was also sighted that YTD November 2017 achieved 319,859 m³ in volume that above the year period 2016 are 254,624 m³ due to exceed in FFB been processed. But if calculate	YES (Major NCR 2017 – 07) CLOSED

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FI	SUMMARY OF FINDINGS FOR EACH INDICATOR			
		programme 2017	period December 2016 to	per M3/ton FFB, it was noted that mill water use per tonne of FFB period December 2016 to November 2017 was below compared to 2016 (December 2015 – November 2016).			
			Year	FFB Process (MT)	Water Consumption (m³)		
			2015	162,044	214,942		
			2016 (November)	196,175	254,624		
			2017 (November)	248,232	319,859		
			The organisation has e consumption, such as: rep turbines by installed joint reduce losses; to recycle kernel processes operatio main valve; recycle the st decanter and water dilutio This NCR was recurrence Major NCR.	pair the boiler steam expansion to replace the vacuum drie on; steam optimizati terilizer condensate on press in order to i	outlet pipelines toward be the elbow in order to r water discharge into on by setting the boiler s for solution oil phase minimize water usage.		
4.4.2	(M) Protection of water courses and wetlands, including securing and maintaining appropriate riparian and other buffer zones, at the time of or prior to replanting shall be demonstrated.  Specific Guidance: For 4.4.2: Refer to the 'RSPO Manual On Best Management Practices (BMP) for management and rehabilitation of natural vegetation associated with oil palm cultivation on peat', July 2012.  Growers and millers should address the effects of their use of water and the effects of their activities on local water resources.						
	<ul><li>a. Is there a map identifying water courses and wetlands?</li><li>b. Are the water courses and wetlands protected?</li></ul>	<ul> <li>HCV assessment report</li> <li>AA-APM-OP-1100.05-R1-Soil and Water Conservation</li> <li>Field observation</li> </ul>	Based on HCV assessme estate, it was observed the and reservoir) as water protection area, but PT. I	ent and field observ nat there was no wa provider and mana	ater area (river, swamp, age the hydrology and	YES	

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)						
	c. Are the riparian and buffer zones maintained and restored in existing plantation and replanting areas?		that conducted the water management to protect of area from fire and flood.							
	d. Is there SOP for riparian and buffer zone protection?		Nevertheless, organization has been establish the procedure for riparian and buffer zone protection which documented in AA-APM-OP-1100.05-R1-Soil and Water Conservation. The organisation has							
	e. Has the SOP been implemented?		a procedure that prohibits the application of agrochemicals on the riparian area: Environmental Field Procedure on the Restoration of Riparian and Areas surrounding Lakes/Reservoirs and Springs (AA-KL-12-EFP), issued on August 1st 2010.							
4.4.3	a. Decree of the Minister of Environment No. 51 year b. Decree of the Minister of Environment No. 28 year c. Regulation of the Minister of Environment No. 12 year National regulations relate to riparian strip are, such 1. Government Regulation No. 38 year 2011 2. Government Regulation No. 37 year 2012 3. Government Regulation No. 26 year 2008 - Riparian strip of at least 5 meter width - Riparian strip of at least 100 meter from	r 1995 regarding Industrial Effluent Qu r 2003 regarding Technical Guidance A year 2006 regarding Requirements and as: regarding River. regarding Management of Riparian Sta regarding National Landscape, clause in from the outer dike along the river ba form river side along main river bank with m river side along sub-main river bank use 16, regarding Criteria of Riparian S	Records for monitoring of effluent especially BOD (Biochemical Oxygen Demand) and efforts to comply with legal requirements, shall be available (see criteria 2.1 and 5.6)  Specific Guidances: For 4.4.3: The references and standard may refer, but not limited to: a. Decree of the Minister of Environment No. 51 year 1995 regarding Industrial Effluent Quality b. Decree of the Minister of Environment No. 28 year 2003 regarding Technical Guidance Assessment Effluent Usage from Industry to Soil in Palm Oil Plantation. c. Regulation of the Minister of Environment No. 12 year 2006 regarding Requirements and Mechanism of Legal Permit to Discharge Effluent to the Sea.  4.4.3  National regulations relate to riparian strip are, such as: 1. Government Regulation No. 38 year 2011 regarding River. 2. Government Regulation No. 37 year 2012 regarding Management of Riparian Strip.							

NO			CRITERION / INDICATOR CHECKLIST			NS & OBJECTIVE DENCE	\$	SUMMARY OF FINDI	NGS FOR EACH INC	DICATOR	COMPLIANCE (YES/NO)
	Γ.		Divon Tono	Cro	ss-Section	Outs	ide Settle	ement	Inside S	ettlement	
	1 '	Vo	River Type	ı	rojection	Criteria		Minimum Riparian	Criteria	Minimum Riparian	Article
		1	River with dike (measured from outer dike side)	٠	•	-		5 m	-	3 m	Article 6
				_		Main River (river cross-sectional km²)		100 m	Depth: > 20 m	30 m	Article 7 & 8
		2	River without dike (measured from river edge)	_					Depth: 3 m to 20 m	15 m	Article 7 & 8
			(measured nonliniver edge)			Sub-main Riv (river cross-sectional km²)		50 m	Depth: 0 m to 3 m	10 m	Article 7 & 8
	Lake/dam 3 (measured from highest water tide to land)			-		50 m	-	50 m	Article 10		
		4	Spring (around Spring)			_		200 m	-	200 m	Article 10
			River that influenced by tidal (from river edge)			-		100 m	-	100 m	Article 10
	5. Regulation of the Minister of Public Work No. 63 year 1993 regarding Riparian Strip, River Usage Area, River Authorization Area, Criteria of Riparian Strip										
	<ul> <li>a. Is the mill effluent treatment process in place?</li> <li>b. Is there a process in place for checking and monitoring water discharge quality, particularly BOD?</li> <li>c. Is the water discharge quality in compliance with national regulations?</li> <li>d. Does the mill have a license for treatment, discharge or land application of mill offluent.</li> </ul>			f flowrate and pH	water tre permit of The perri treatmen The resu of BOD Environn discharg	te water (POME) was eatment ponds. POME f waste water discharg nit was valid through 5 at.  If of POME monitoring for period January nent Decree Permen ed is less than 100 his period was under 1	is monitored month ge (IPLC) on 19th of syears. POME discha was reviewed includ – November 2017. 05/2014 required that mg/litre. The result	ly as required by September 2013. rge into river after ing measurement The Ministry of at BOD of POME	YES		
4.4.4	Мо	nitor	ing of mill water use per ton of FFB	shall be r	ecorded						

NO		CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMN	MARY OF FINDIN	GS FOR EACH I	NDICATOR	COMPLIANCE (YES/NO)
	a.	Are there procedures to measure mill water usage, and are the procedures implemented?	Mill operation summary 2016 and 2017	monitoring of		r tonne of FFB w	monthly. Result of as sighted for 2016	YES
	b.	Are there records of mill water use per tonne of Fresh Fruit Bunches (FFB)?		Item	2015 (m³/ton FFB)	2016 (m³/ton FFB)	2017 (m³/ton FFB)	
				mill water use per tonne of FFB	1.19	1.29	1.28	
					mber 2017 was b		B period December to 2016 (December	
				The organisat as:	ion has a progran	n to reduce water	consumption, such	
				installed losses;	joint expansion to	replace the elbov	oward turbines by win order to reduce	
				processe - steam op - Recycle	es operation; otimization by setti the sterilizer co	ng the boiler main	charge into kernel n valve; solution oil phase to minimize water	
				usage.				
4.5	Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management techniques. <b>Guidance:</b> Growers should apply recognised IPM techniques, incorporating cultural, biological, mechanical and physical methods to minimise the use of chemicals.  Native species should be used in biological control where possible.							
	a. 6 b. 7	gulations to be referred are such as: Guidance for Advancement of Pesticides usage, L Fechnical Guidance for the Development of Oil Pa	Ilm Plantation, Directorate General of E	Estate Crops, M				
4.5.1		Monitoring of Integrated Pest Management (IPM			IDM Dian	ilable of DT UO	Charge of IDM	VEO
	a.	Is there a documented IPM plan?	<ul><li>IPM Plan</li><li>Tyto alba monitoring</li></ul>	program wer	IPM Plan was ava e :	liable at PT. HSJ.	Stages of IPM	YES

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
	b. Does the IPM plan include the following?  Identification of potential pests and thresholds  What are the techniques used (cultural, biological, mechanical and physical methods)?  What are the native species used as part of the biological control method?  Does it help in reducing the use of chemicals over a period of time?  Prophylactic use of pesticides  Minimization of pesticide use  Review on the plans to suit the present condition such as replanting?  c. Is there an SOP to implement the plan and monitor its effectiveness?  d. Is there records of pest occurrence and control?	Planning and realization for Beneficial plant Record of rate census Record of caterpillars census	- Visual observation (visual plant e.g. leaves or broken stems and fruit rot) - Conducting a census (to determine the distribution and level of attack) - Control (manual, biological or chemical) Census of evaluation (to see the effect of control).  IPM program covered census of caterpillars, termites and rodents and upkeep of beneficial plant.  Biological control used <i>Tyto alba</i> and Beneficial plant ( <i>Cassia tora</i> ). Other than that, protect the predator species, such as Kobra hitam ( <i>Naja sumatrana</i> ), Elang tikus ( <i>Elanus caeruleus</i> ), ect, so that can reduce the use of chemical. The last monitoring (census) of Tyto alba:  Tyto Alba Cencus KNS  Afdeling Cages Total of Tyto Alba Grown Puppies Egg  I 39 24 10 4 II 37 35 1 4 III 37 29 2 9 9 IV 40 19 10 14 V 40 19 10 14 V 40 39 5 1  Tyto Alba Cencus KNC  Afdeling Cages Total of Tyto Alba Grown Puppies Egg I 33 8 4 II 39 12 4 III 39 12 4 III 39 12 4 III 39 12 4 III 39 5 3 3 3	(YES/NO)
			palm leaf-eating caterpillars. The last rat census in KNS and KNC in November 2017 resulted that attacking level was < 5%, which is under the threshold.	

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
4.5.2	Training records of Integrated Pest Management (IP	M) shall be available.		
	a. Is there records of training provided to those involved in the implementation of IPM?	Training record	Records of training provided to those involved in the implementation of IPM were available at PT. HSJ. Training was held annually to untrained personnel. The last training was conducted on 25 June 2016 by R&D for Agronomy Staff and Foreman in Clinic IPM and Pest and Disease Training. List of participant attendance was sighted. Training material covered IPM technique and implementation.	YES
	Pesticides are used in ways that do not endanger he	ealth or the environment.		
4.6	Palm; CABI, April 2011'.	use IPM methods, such as in the RSP0	se listed in the 'Research project on Integrated Weed Management Stra D Manual on Management Practices (BMPs) for Management and Reha	
4.6.1	have minimal impact on non-target species.  Specific Guidance:		ons and the use of pesticide is specific to target species with appropriate on the use of pesticide is specific to target species with appropriate on the use of pesticide is specific to target species with appropriate on the use of pesticide is specific to target species with appropriate on the use of pesticide is specific to target species with appropriate on the use of pesticide is specific to target species with appropriate on the use of pesticide is specific to target species with appropriate on the use of pesticide is specific to target species with appropriate on the use of pesticide is specific to target species with appropriate on the use of pesticide is specific to target species with appropriate on the use of the use	nd IPM.
	a. Does the organization have a policy on safe	Company Policy	PT. HSJ has a policy on safe use of chemicals in Company Policy.	YES
	use of chemicals?	Agriculture Policy Manual No.     AA-APM-OP-1100.11-R1	The company implement and maintain integrated health and safety in accordance with national and international management standard	
	b. Does the organization have SOPs for use of		applicable.	
	selective products that are specific to target pests, weeds, or diseases and which have minimal effect on non-target species?  i. Measures to avoid the development of resistance (such as pesticide rotation) should be applied.  ii. Is there a list of all pesticide with target species and justification of use?  iii. The justification should consider less harmful alternatives and IPM.	Field observation on afdeling III KNC	PT. HSJ have SOPs for using of selective products that are specific to target pests, weeds, or diseases and which have minimal effect on non-target species available in Agriculture Policy Manual No. AA-APM-OP-1100.11-R1 about Management Pesticide. This procedure was explained that using pesticide based on target, such as Fungicide to control fungus of pathogen (example: Benomil, Heksakonazol, Mankozeb, and Triadimefon), Herbicide to control weed (example: Fluroksipir, Glifosat, Paraquat, Sulfosat), and Insectiside to control insect pest (example: deltametrin, sipemetrin, sihalotrin).	

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
NO			It was available a list of all pesticide with target species and justification in Using of Pesticide and Its Target in 2017. For example the uses of Metsulindo 205 litre to keep the resistance of weeds. Daily monitoring of pesticide uses was available in foreman book.  Less harmful alternatives and IPM was applied by planting of beneficial plants, building house of owl, detection and census of caterpillar, development of fruit trap and pheromone trap.  Pesticides used by the supply bases of Negri Lama II Mill has license and registered in the Agriculture Department as mentioned in Pesticide Commission Book "Buku Komisi Pestisida":  1. Gramoxone (paraquat 200 g/l), License RI.010301197436, valid through 10 December 2020.  2. Elang (Isopropilamina glyphosate 480 g/L), license RI.01030119941170, valid through 21 December 2021.  3. Kenrane (Trifloroksipir - 1 - methyl heptyl ester 288 g / I), License RI.01030120031806, valid through 28 April 2018.  5. Metsulindo 20 WP(metil metsulfuron: 20%), License RI.01030119991484, valid through 11 May 2021  6. Regent 50 SC, license RI.01010119951192, valid through 31 December 2020  7. Polydor 25EC (lamda sihalotrin: 25 g/l), License RI.01010120041994, valid through 9 December 2020	
			During audit it was evidence that procedure was implemented.	
4.6.2	(M) Records of pesticides use (including active ingreavailable.	dients used and their LD50, area treate	ed, amount of active ingredients applied per ha and number of application	ons) shall be

a. Does the company have a pesticide  • Document of Pesticide  PT. HSJ has a pesticide application program in Document of	
application program? b. Is record of pesticides use available? c. Do the records detail the active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications?  Pesticide Monitoring  Pesticide Monitoring  Records of Pesticide Monitoring detail the active ingredients use and their LD50. Records of pesticide using in Pesticide Monitoring 2017 (to date November), as follows:    Records of Pesticide Monitoring detail the active ingredients use and their LD50. Records of pesticide using in Pesticide Monitoring 2017 (to date November), as follows:    Records of Pesticide Monitoring detail the active ingredients use and their LD50. Records of pesticide using in Pesticide Monitoring 2017 (to date November), as follows:    Records of Pesticide Monitoring detail the active ingredients use and their LD50. Records of pesticide using in Pesticide Monitoring 2017 (to date November), as follows:    Records of Pesticide Monitoring detail the active ingredients use and their LD50. Records of Pesticide Monitoring 2017 (to date November), as follows:    Records of Pesticide Monitoring detail the active ingredients use and their LD50. Records of Pesticide Monitoring 2017 (to date November), as follows:    Records of Pesticide Monitoring 2017 (to date November), as follows:   Records of Pesticide Monitoring 2017 (to date November), as follows:   Records of Pesticide Monitoring 2017 (to date November), as follows:   Records of Pesticide Monitoring 2017 (to date November), as follows:   Records of Pesticide Monitoring 2017 (to date November), as follows:   Records of Pesticide Monitoring 2017 (to date November), as follows:   Records of Pesticide Monitoring 2017 (to date November), as follows:   Records of Pesticide Monitoring 2017 (to date November), as follows:   Records of Pesticide Monitoring 2017 (to date November), as follows:   Records of Pesticide Monitoring 2017 (to date November), as follows:   Records of Pesticide Monitoring 2017 (to date November), as follows:   Re	D-9 D-9 D-9 D-9 D-0 8 8 -10 -10 0-6

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
4.6.3	except in specific situations identified in Indonesia E  Specific Guidance: For 4.6.3: Justification of the use of such pesticides	Best Practice guidelines.  will be included in the public summary	grated Pest Management (IPM) plans. There shall be no prophylactic us  report.  Integrated Pest Management (IPM) program included:	se of pesticides,
	<ul><li>a. Does the company have an IPM plan?</li><li>b. Has that plan been implemented?</li><li>c. Is the effectiveness of the IPM plan monitored?</li></ul>	<ul> <li>IPM Program – Budget 2016</li> <li>SOP AA-APM-OP-1100.10-R1         Pest and Diseases Control     </li> <li>Report of pest and diseases,         July and November 2017     </li> </ul>	<ul> <li>Visual observation (e.g. broken leafs or stems and fruit rotten)</li> <li>Conducting census to determine the distribution and level of attack.</li> <li>Control (manual, biological or chemical), e.g hand picking, light</li> </ul>	TES
	d. Are there records showing that the use of pesticides have been minimised in accordance with Integrated Pest Management (IPM) plan?	<ul><li>Recapitulation of pest census</li><li>LUK (Estate Report)</li><li>Field observation</li></ul>	trap, planting of beneficial plant (nest of natural predator for caterpillars)  Pesticide usage as a last alternative in the control of pests and diseases	
	e. Has there been prophylactic use of pesticides? If so, justification must be provided in accordance to National Best Practices.		<ul> <li>Census of evaluation (to see the effect of control)</li> <li>IPM plan was well implemented and documented, e.g.:</li> <li>Census of caterpillar is conducted monthly. Based on result of caterpillar census in 2017, there was no caterpillar attack in 2017, the plantation has performed several action to control the attack by chemical, manual and biological control.</li> <li>To control rat, the organisation applied <i>Tyto alba</i> (owls) as predator of rat. House of owl was built one in 25 Ha. Condition of <i>Tyto alba</i> is monitored three times a year.</li> <li>Census of <i>Oryctes rhinoceros</i> performed monthly. Oryctes attack were controlled by development of fruit trap.</li> <li>Planted the beneficial plant as the host/nest for natural predator for caterpillars (<i>Eucanticona purcelata, cycanus sp</i>). The beneficial plant such as: <i>Turnera subulata, Antigonon leptopus</i> and <i>Casia cobanensis</i> planted in the collection and the main road. Planting and upkeep of beneficial plants in KNC and KNS Estates were sighted and during field observations, it was observed that beneficial plants were well maintained.</li> <li>All pests are controlled with biological method, there is no uses of insecticides, the use of herbicides has been minimised as part of a</li> </ul>	

	CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
			plan, and in accordance with Integrated Pest Management (IPM) plans. Use of pesticides in the field was always lower than the planned budget. It also shows the company's commitment to always reduce pesticide usage and give priority to the prevention of mechanical, biological and integrated pest management.  It was evidence that there was no prophylactic use of pesticides in KNS, KNC, KNU and KAK. Pesticide only used and apply for weeds	
			and pest.  1A or 1B by World Health Organization, or those are listed in the Stock n national Best Practice guidelines. The use of such pesticides shall be	
4.6.4	eliminated as part of a plan, and shall only be used in Specific Guidances:	n exceptional circumstances.  se pesticides, shall refer to the Regula	tion of the Minister of Agriculture No. 24 year 2011. Operators involve in	
	Does the company have a complete listing of WHO class 1A, class 1B, and Stockholm or Rotterdam Conventions pesticide?	Memorandum No.     001/HP/INT/IX/2009     List of Agriculture Minister	PT. HSJ can't be shown a list of pesticides that are included in WHO Class 1A (extremely hazardous), class 1B (highly hazardous) and Stockholm Rotterdam convention pesticide.	YES (Minor NCR 2017 – 09)
	b. Is there a policy, procedure or management plan committing to minimise and eliminate use of these pesticides and paraquat?	Regulation No. 1/2007  • Memorandum form Estate Manager No. 059/MR/KNC/MAR/16	PT. HSJ has also established procedure on safe use of pesticides. Procedure described on safe use of pesticides and selection including minimise and eliminate use of these pesticides and	OPEN
	c. Are there records of minimisation of pesticides and paraquat use?		paraquat.	
	d. Where there is the use of the above pesticides or paraquat, has justification in line with national best practice guidelines been documented?		PT. HSJ was still using type of pesticide that listed by WHO class 1B (highly hazardous) which is <i>Paraquat diclorida</i> . Implementing of Paraquat diclorida was managed in Memorandum No. 001/HP/INT/IX/2009, dated no 1 September 2009 regarding reduction the use of herbicide containing <i>Paraquat diclorida</i> .	
4.6.5	Does physical verification of inventory in the chemical store agree back to the inventory records?		The following are monitoring for <i>Paraquat diclorida</i> at PT. HSJ in KNC and KNS can be shown, use for KNC 3.167 and KNS 11.112,79 in 2017.  guidelines in product label and storage guidelines shall be available. Ap	

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
	Specific Guidance : For 4.6.5: Requirement pertaining to Personal Protect	cted Equipment (PPE) shall refer to the	properly observed, applied, and understood by workers (see Criterion 4.  Regulation of the Minister of Manpower No.8 year 2010 regarding PPE there are gaps between the use of pesticides and the guidance, docume	and Material
	a. Is there SOP for chemicals/pesticides handling?	Agriculture Policy Manual AA- APM-OP-1100.11-R1	There was SOP for chemical / pesticide handling and training workers list at PT. HSJ. It was described chemicals identification, some of	YES (Major NCR
	b. Is there a training plan and training records for workers who apply or handle pesticides?	<ul><li>Training Certificate</li><li>Risk assessment analysis</li></ul>	MSDS availability, chemical handling (label and hazard symbol, storage based on hazard nature, use of PPE), and expire chemical handling. It was available in Procedure No. AA-APM-OP-1100.11-R1	2017 – 10) CLOSED
	c. Is there evidence that training has been conducted in an appropriate language understood by the workers?		The workers from KNS have get the limited pesticide using training from Committee of Fertilizer and Pesticide Supervision, Province of	
	d. Are pesticides handled, used or applied only by persons who have completed the necessary training?		North Sumatera, on 14 October 2014 and valid 5 years. And for KAC the workers have got the training on 03 September 2015. Training certificates were available. Training was conducted in Bahasa	
	e. Are the workers involved in chemical handling or application able to demonstrate understanding of the hazards and risks related to chemicals used when interviewed?		Indonesia and covered handling of agrochemical concentrate and spraying method including pesticide hazard. But for new foreman, has not been given that training.  Based on interview with foreman, sprayer workers, workers knew	
	f. Are pesticides always applied in accordance with the product label?		handling of the hazards and risks related to chemical used. During interview they used the appropriate safety and application	
	g. Are MSDS for pesticides used readily available for easy reference?		equipment. Dilution and mixing of pesticides process was conducted by pesticides foreman in mixing area besides pesticides warehouse. PPE for dilution and mixing process was available in mixing area.	
	h. Is appropriate safety and application equipment provided and used?		Pesticide used was accordance with the product label and MSDS that available in chemical store, however some MSDS do not understand	
	Is PPE used appropriate according to recommendations in any risk assessments done?		by warehouse clerk. Pesticides warehouse was equipped with enough ventilation. Besides pesticides warehouse was provided eye wash and shower for emergency situation.	
	j. Is appropriate PPE provided and used, and can it be easily replaced if damaged?		Based on risk assessment analysis for sprayer activity at Document of KNS-HSJ 2016/2017, PPE for sprayer includes glasses, mask,	

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
	k. Does the management checked the workers usage of appropriate PPEs?		apron, boot shoes, and long-sleeved shirt and can be easily replaced if damaged with report to foreman or Afdeling staff. The PPEs monitoring was daily conducted by foreman in the each morning.	
4.6.6	instructions enclosed on the containers (see criterion  Specific guidance: For 4.6.6: Some regulations regarding pesticides are a. Government Regulation No. 18 year 1999 rega b. List of Toxic & Hazardous Materials from specification of Government Regulation and Poisoned Waste. c. FAO International Code of Conduct on the district. d. Regulation of the Minister of Agriculture No. 01.	n 5.3).  Trick the contract of	hemical, leaked chemical, residue, container, or product disposal which of Government Regulation No. 18 year 1999 regarding the Management dance and supported by relevant industrial guidance (see Annex 1).  List of Banned and Restricted Pesticide (based on active ingredients).  Requirement and Mechanism to Register Pesticide.  I with Act No. 19 year 2009	does not comply
	documented and implemented?  b. Are all pesticides stored according to recognised best practices?  c. Is there evidence that empty pesticide containers are properly stored and disposed off and not used for other purposes?	<ul> <li>KL-06-EFP) Handling         <ul> <li>Hazardous Wastes.</li> </ul> </li> <li>Documented procedure (AA-APM-OP-1100.11-R1)         <ul> <li>regarding pesticide application</li> </ul> </li> <li>Field observation at central warehouse and division</li> </ul>	fertiliser and other chemicals. Pesticides storage was provided in each Division. Pesticides storage was locked areas with limited access. The storage was ventilated through cross flow ventilation. MSDS and hazard symbol label were provided nearby of pesticides. Emergency shower and eyewash were also provided to anticipate in case of an emergency of chemical handling. PPE for handling of chemicals were provided including boots, apron,	(Major NCR 2017 - 11) CLOSED
	d. Is there evidence observed in the field that pesticide containers are indiscriminately disposed (in dump site) or used for other purposes, .e.g. as waste containers, flower pots?	warehouse include spraying activities at estate operation	safety glass, respiratory mask and hand gloves. The possible spill was managed. Secondary containment was provided around the pesticides storage area. Spill kit was also provided in the area. EHS patrol was regularly performed monitor possible spill. All empty pesticides containers were triple rinsed and collected in the temporary storage of hazardous waste.  Empty pesticides container was stored in Hazardous Waste Storage, however there are still some used for anything else. Pesticides containers were transported by authorised transporter, PT Indostar	

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
			Cargo. Records of pesticides containers quantity were evident. Liquid	
407	Anniliantian of markinida aballiba burnaran markinida	the standard control of the st	waste from pesticides was reused for the next spraying applications.	
4.6.7	<ul> <li>Application of pesticides shall be by proven methods</li> <li>a. Is there work instruction for pesticide application?</li> <li>b. Is there training provided on work instruction including risk and impacts of pesticide applications?</li> </ul>	AA-APM-OP-1100.08-R1     Weeding Control     AA-APM-OP-1100.10-R1 Pest     & Diseases Control     AA-APM-OP-1100.11-R1     Management Pesticides     Training and dissemination record     Field observation to spraying activity on Afdeling III KNC and Afdeling II KNS	Pesticide application was described in AA-APM-OP-1100.08-R1 Weeding Control, AA-APM-OP-1100.10-R1 Pest & Diseases Control and AA-APM-OP-1100.11-R1 Management Pesticides. Training and dissemination on work instruction including risk and impacts of pesticide applications has been performed by the organization regularly. Training and dissemination records were sighted.  Site visit in KNS and KNC has been done to observe the spraying and pesticide application in field. Interview with spraying workers were evident that all of them has a good knowledge regarding the pesticide usage and its material usage and toxicity. All the workers have used the personal protective equipment meet with the safety rules and work instruction such as: Apron, safety goggles, mask, hand gloves and safety shoes. All precautions attached to the products properly observed, applied, and understood by workers. Mandor (Supervisor) as person in charge to check the workers usage of appropriate PPEs.	YES
4.6.8	(M) Pesticides may only be applied aerially where th relevant information within reasonable time prior to a		bunding communities shall be informed of impending aerial pesticide app	plications with all
	<ul><li>a. Has aerial spray been applied? If yes, is there documented justification?</li><li>b. Is the impact and risk associated with aerial</li></ul>	Not Applicable	There was no the pesticides aerially applied.	N/A
	application documented and made available?			
	c. Are the identified affected communities informed of impending aerial pesticide applications with all relevant information within reasonable time prior to application?			
4.6.9	Evidence of training on handling pesticide for worker			
	A. Has the company provided information materials on pesticide handling to all	Training program and realization	There was no smallholder associated with Negri Lama II Mill, PT. HSJ.	YES

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
	employees and associated smallholders (if any) (see Criterion 4.8)?  b. Is there evidence of periodic training (in appropriate language) of employees and associated smallholders on pesticide handling?  Note: Interview with workers and smallholders on their knowledge and skills in pesticides handling.	Training certificateForeman book	PT. HSJ has provided information materials on pesticide handling to all employees. Training and dissemination on work instruction including risk and impacts of pesticide applications has been performed by regularly organization. Training and dissemination records were sighted. However there is non-conformity related to training as mentioned in indicator 4.6.5.  Site visit at KNS and KNC has been done to observe the spraying and pesticide application in field. Interview with spraying workers were evident that all of them has a good knowledge regarding the pesticide usage and its material usage and toxicity. All the workers have used the personal protective equipment (PPE) meet with the safety rules and work instruction such as: apron, safety goggles, mask, hand gloves and safety boot. All precautions attached to the products properly observed, applied, and understood by workers. Checking the workers usage of appropriate PPEs is daily conducted through Foreman Book.	
4.6.10	Proof that pesticide waste has been handled as per	legal regulations and understood by wo	orker and manager, shall be demonstrated	
	<ul> <li>a. Is there an SOP for proper disposal of waste material?</li> <li>b. Is there training provided to workers and managers on proper waste disposal?</li> <li>c. Is there evidence of implementation of proper ways for waste disposal by the company?</li> </ul>	<ul> <li>Documented procedure (AA-KL-06-EFP) Handling Hazardous Wastes.</li> <li>Documented procedure (AA-APM-OP-1100.11-R1) regarding pesticide application</li> <li>Field observation at central warehouse and division warehouse include spraying activities at estate operation</li> <li>The training list of attendance and training material</li> </ul>	Based on interview with foreman, sprayer workers, workers knew handling of the hazards and risks related to chemical used. During interview they used the appropriate safety and application equipment. Dilution and mixing of pesticides process was conducted by pesticides foreman in mixing area besides pesticides warehouse. PPE for dilution and mixing process was available in mixing area.  All empty pesticides containers were triple rinsed and collected in the temporary storage of hazardous waste. Pesticides containers were transported by authorised transporter, PT Indostar Cargo. Records of pesticides containers quantity were evident. Liquid waste from pesticides was reused for the next spraying applications.  Training/briefing regarding disposal of waste material has been conducted to all workers and staffs. Based on interview with workers,	YES

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
			they understood the disposal of waste material.	
4.6.11	(M) Annual medical records of pesticide operators, a	nd follow-up treatment of medical resu	lts, shall be available	
	<ul><li>a. Is there an updated list of pesticide operators?</li><li>b. Is there record of annual medical surveillance of pesticide operators?</li></ul>	<ul> <li>Presence (attendance) of pesticides operators</li> <li>Last medical check-up conducted on period June and August 2017 by third party</li> </ul>	The periodical medical check-up was conducted for all spraying operators by third party laboratory (Gatot Subroto Laboratory Medan) include the package of cholinesterase, spirometry, urine and bloods examination.  List of pesticides operator was shown and updated periodically for all	YES
	Is there medical and treatment record of all pesticide operators?	laboratory (Gatot Subroto Medan)	estates. Specific health surveillance has been performed on for pesticide operators. The surveillance was planned to be conducted once in a year. Reports of the health surveillance for all workers were available. The recommended actions were recorded and reported to estate manager.	
			The records were sighted; last medical check-up conducted on period August 2017 for KNS (Kebun Negerilama Selatan) and KNC (Kebun Negerilama Central) and PND (Pabrik Negeri Lama Dua).	
			The surveillance was planned to be conducted twice in a year. Reports of the health surveillance for all workers were available. The recommended actions were recorded and reported to estate manager. All results raised from actions taken were maintained properly. Result of MCU was available. Several records were sighted and reviewed such as for: Ngateni, Siti Fatimah, Latimani, Sutini, Rusti and Listina as pesticides operator at block I13c Division IV. Result of MCU resume all operators were in normal condition.	

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)	
4.6.12	(M) Records shall be available to show that spraying	is not conducted by pregnant or breas	t-feeding women.		
	<ul> <li>Is there a policy statement preventing pregnant and breast-feeding women from handling pesticides?</li> </ul>	Company Policy dated 1     December 2014	Policy related to prevent pregnancy and breastfeeding women from handling pesticides has been described in the Company Policy.	YES	
	b. Is there a lists of female workers handling pesticides available?	Field observation and interview with sprayer workers	List of female workers are available and include female workers related to pesticide as well as worker's age can be identified.		
	c. Does the company have a system to identify pregnant and breast-feeding women?	<ul> <li>Interview with workers union and committee gender on 19 December 2017</li> </ul>	Identification of pregnancy and lactating mothers performed by a clinical nurse. And result was recorded. And based on the medical		
	d. Is there evidence showing that pregnant and breast-feeding women are not allowed to	December 2017	records of nursing there is no evidence that pregnant and lactating women work in handling pesticides. When are pregnant and lactating women, the women workers will be transferred to other jobs.		
	handle pesticides?		Based on interview with sprayers, gender committee and worker union said that it's prohibited for pregnant and breast-feeding women working as fertilizer and sprayer or other work that related to chemical compounds.		
	An occupational health and safety plan is documented	ed, effectively communicated and imple	emented.		
4.7	Guidance: Growers and millers should ensure that the workplace, machinery, equipment, transport and processes under their control are safe and without undue risk to health. Growers and millers should ensure that the chemical, physical and biological substances and agents under their control are without undue risk to health, and appropriate measures are taken if needed. All indicators apply to all workers regardless of status.				
	The health and safety plan should also refer to the Government Regulation No. 50 year 2012 regarding Application of Occupational Health and Safety Management System.				
4.7.1		•	ed and implemented, and its effectiveness monitored.		
	<ul> <li>a. Is there a health and safety policy in place?</li> <li>Is it written in an appropriate language?</li> <li>Has the policy been approved by an authorized personnel and dated?</li> </ul>	<ul> <li>OHS Policy (dated 24         November 2015, approved by Managing director)     </li> <li>MPM (Mill Policy Manual)</li> <li>APM (Agricultural Policy</li> </ul>	Documented policy in Bahasa Indonesia related to occupational health & safety (OHS) was established and integrated to company policy also approved by Managing Director dated 24 November 2015 that consists of: compliance to regulations, implement and monitoring OHS management system, setting objective and target, etc. The	YES	

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
	<ul> <li>Does the policy cover mitigation of risks to workers health and safety at all workplace activities?</li> <li>Are the workers aware of and understand the policy?</li> <li>Is there a health and safety plan in place?</li> <li>Does the plan include targets for improving occupational health and safety?</li> <li>Does the plan reflect guidance provided in the ILO Convention 184 (see Annex 1)?</li> <li>Is there evidence of implementation of the plan?</li> <li>Is the effectiveness of the health and safety plan monitored?</li> <li>Is the health and safety plan made publicly available?</li> <li>Is there an action plan if targets are not achieved?</li> </ul>	<ul> <li>Manual)</li> <li>OHS Objectives and programme period 2016 and 2017</li> <li>Site visit observation to estate and mill: KNS:  <ul> <li>Manuring: Block J13L</li> <li>Division IV</li> <li>Spraying: Block I13C</li> <li>Division IV</li> <li>Harvesting: Block H11V</li> <li>Division III</li> <li>Loading FFB: Division IV</li> </ul> </li> <li>KNC:  <ul> <li>Manuring: Block E12J</li> <li>Division III</li> </ul> </li> <li>Spraying: no spraying activity, because the unit transport KNC/ Tanki TUS was breakdown.</li> <li>Harvesting: Block F12C</li> <li>Division IV</li> </ul>	socialization of its policy by provide banner, displayed at several area within office and buildings also by conduct induction to employees. Several documented procedures related to OHS aspects were integrated within the MPM (Mill Policy Manual) and APM (Agricultural Policy Manual). There were also separated OHS Management systems Procedures and records established for operational activities that integrated with Environmental management system since the company certified with ISO 14001.  The objectives and programmes related to health and safety were established for each estate; includes: to reduce the number of accidents and 5S programme; safety meetings and briefings for all employees and contractors; safety inspections. The objective and programmes for mill, includes: reduce the number accidents; preventive maintenance programme; PPE provisions and implementation of health surveillance. Within the OHS objective and programmes was included the time frame; person in charge and cost estimation. The monitoring of each objectives and programmes were conducted periodically by the person in charge.  Evidences were sighted for several OHS programmes / OHS Management system manual, such as:  Medical check-up for mill operators was conducted for period 2 August 2017 by third party laboratory (Gatot Subroto Medan); the packages include spirometry, audiometry and urine/bloods laboratory.  The OHS monitoring and measurement was conducted periodically twice within a year, records were sighted for period Semester II 2016 and Semester I 2017 include the measurement of noise, vibration and temperature, so far the results were within the threshold limit values. Several mandatory PPE are available by the organization to the employees and visitors such as: helmet, safety shoes, ear plugs, ear muffs and respirators. Also there were deployed several PPE symbols at the at risk areas. It was also several working tools and machineries that utilized at mills and estate are equipped with safety devices, such as knives cover that using	

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
			and equipment that regulates within the law are already certified and inspected by local government ministry of manpower ( <i>Dinas Tenaga Kerja Labuhan Batu Regency</i> ), such as: pressure vessels, lifting equipment, electricity installation, etc.	
4.7.2	(M) A documented risk assessment shall be available <b>Specific Guidance</b> : For 4.7.2: All precautions attached to products shall	·		
	<ul> <li>a. Have risk assessments been conducted for all operations where health and safety is an issue?</li> <li>b. Does the risk assessment cover all the organization's processes and activities?</li> <li>c. If any accidents had occurred, were these included in the risk assessments with action plans to prevent further recurrence?</li> <li>d. Have the procedures and action plans been documented and implemented to address the identified issues?</li> <li>e. Have all precautions attached to products been properly observed and applied to the workers?</li> </ul>	Risk analysis (updated 1 September 2017)	The quantitative method of risk analysis was conducted for all activities at Mill and Estate.  The mills risk analysis was covered activities such as: transportation, weighbridge receiver, FFB sorter, loading ramp, transfer carriage, sterilizer, tippler, thresher, press, clarifier, engine room, water treatment, effluent plant, workshop, warehouse, diesel tank, laboratory, offices and traffic activities.  While the estates risk analysis were covered activities such as: Replanting, Loading FFB, estate maintenance, fertilizer, pesticides & herbicides, harvesting, workshop activities at workshop and also warehousing. Risk analysis covers emergency drill activities and contractor's processes and activities such as replanting, estate maintenance, mill maintenance, FFB transportation, and upkeep activities.  According to the procedure, at least OHS risk assessment document must be reviewed once a year and/or when incident happened will consider as review agenda. OHS risk assessment records 2016-2017 were sighted for all Mill and Estates.  The analysis method were described within the documented instruction that analysis was considered frequency of hazard and consequences of risks that summarized the risk level from low risk to extreme risks. Within the risk analysis was also considered the hierarchy of control to take action of risk control such as elimination, substitution, engineering, administrative and PPE. Action plan was developed as followed up the existing high risk in order to reduce to	YES (Major NCR 2017 - 12) CLOSED

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
			lowest residual risk analysis. However, there is still uncontrollable risk for unsafe conditions in the workplace area.	
4.7.3	and risk analysis shall be available to all workers.  Specific Guidance:		tective Equipment (PPE) training in accordance with the result of hazar	
			be sticides, operating machinery, land preparation, harvesting and if it is  OHS training has been programmed and provided appear balanced with OHS hazard and risk at Mill and Estates. Basic OHS training performed internally by safety officer in charge at mill and estate, the	
	Are OSH training programs and training records available and conducted by qualified persons?	Licenses/certificates of trainings (licenses for boiler operator, licence for operator of generator set, licence of heavy	training record and programme related to OHS were sighted and verified during this audit, e.g. licenses for boiler operator, licence for operator of generator set, licence of heavy equipment operator, pesticide training for sprayers, etc.	CLOSED
	c. Is adequate and appropriate protective equipment available to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, and land preparation, harvesting and, if it is used, burning?	equipment operator, pesticide training for sprayers, etc.)  Site visit observation to estate and mill: KNS:  Manuring: Block J13L Division IV	The PPE for each activity has been established, e.g. working at mill, working at generator set, welder, working at laboratory, harvester, sprayer, fertilizer storage, chemical storage, etc. The distribution list of PPE was kept by supervisors ("mandor") It was observed in spraying, manuring and harvesting activity the workers in Estate (KNC and KNS) were interviewed during this audit and generally they understood the risk of their work and the purpose	
	<ul> <li>d. Is PPE provided to workers and replaced when damaged?</li> <li>Does the organization maintain a list of PPE distribution?</li> <li>Are workers observed wearing appropriate PPE?</li> </ul>	- Spraying: Block I13C Division IV - Harvesting: Block H11V Division III - Loading FFB: Division IV KNC: - Manuring: Block E12J Division III - Spraying: no spraying activity in KNC, because the unit transport KNC/ Tanki TUS is under repair.	of using PPE. However, the PPE has not been well provided and implemented. Several mandatory PPE are not available by the organization to the employees and visitors such as: helmet, safety shoes, and respirators.	

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
		- Harvesting: Block F12C Division IV		
4.7.4	Specific Guidance: For 4.7.4: Workers shall be represented in the Advi. 1987.	sory Committee for Occupational Safet	re shall be records of periodical meetings on health and safety issues by and Health (P2K3) based on the Regulation of the Minister of Manpo	·
	<ul> <li>a. Has the company identified the responsible person/persons to implement OSH?</li> <li>b. Are meetings between the responsible persons and workers conducted on a regular basis, or as required by law, if any?</li> <li>c. Are minutes of meeting recording attendees and issues discussed available?</li> <li>d. Are concerns of all parties about health, safety and welfare discussed at these meetings?</li> <li>Note to Auditor: Interviews with workers reflect compliance to a-d above.</li> </ul>	<ul> <li>Approval letter from local authority regarding EHS committee (P2K3) for KNS and KNC.</li> <li>Records of OHS Committee periodical meeting in KNS and KNC.</li> </ul>	KNS (Kebun Negeri Lama Selatan)  The structure of OHS Committee (P2K3) was established and approved by local authority (Labuhan Batu Regency) as approval letter No.Kep.24-7/P2K3/WIL-IV/DTK/SU/2017 dated 23 October 2017, that the safety expert/AK3U (Jhony Yusuf Manurung) acts as the secretary.  Meetings of OHS committee (P2K3) were conducted monthly and attended by all member and chairman, last minutes of meeting dated 9th December 2016 was sighted, with agenda to reduce the number of incidents.  Several concerns were discussed such as: PPE, accident and incidents, and socialization of risk assessment. The actions were monitored for realisation and reported to management and local authority as quarterly report as required by regulation.	YES
			KNC (Kebun Negerilama Central)  The structure of OHS Committee (P2K3) was established and approved by local authority (Labuhan Batu Regency) as approval letter KEP.381/P2K3/DSTKT-4/2016 dated 7 March 2016, that the safety expert/AK3U (Arif RH Harahap) acts as the secretary. Meetings of OHS committee (P2K3) were conducted monthly and attended by all member and chairman, last minutes of meeting dated 9th December 2016 was sighted, with agenda to reduce the number of incidents.  Several concerns were discussed such as: PPE, accident and	

NO	CRITERION / INDICATOR	OBSERVATIONS & OBJECTIVE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE
	CHECKLIST	EVIDENCE	incidents, and socialization of risk assessment. The actions were monitored for realisation and reported to management and local authority as quarterly report as required by regulation.  PND (Pabrik Negeri Lama Dua) The structure of OHS Committee (P2K3) was established and	(YES/NO)
			approved by local authority (Labuhan Batu Regency) as approval letter No.Kep.307/P2K3/DSTKT-4/2016 dated 9th November 2016, that the safety expert/AK3U (Ismail) acts as the secretary. Meetings of OHS committee (P2K3) were conducted monthly and attended by all member and chairman, last minutes of meeting dated 09th November 2016 was sighted, with agenda regarding the safety inspection and housekeeping at mill. Several concerns were discussed such as: PPE, reduce the number of accident and in accidents, and socialization of risk assessment. The actions were monitored for realisation and reported to management and local authority as quarterly report as required by regulation.	
			Based on interview with workers it was conform that workers understand regarding safety committee and there was monthly meeting that they attended.	
	A procedure for emergency and work accident shall areas.	be available in Indonesian Language; a	and the workers, who have attended First Aids training, are available in	the working
4.7.5	Specific Guidance: For 4.7.5: Assigned operatives trained in First Aid staccidents shall be kept and periodically reviewed.	nould be present in both field and other	operations, and first aid equipment shall be available at worksites. Rec	
	a. Are there SOPs for accidents and emergencies?  • Do these cover all major potential emergencies, such as, but not limited to fire, chemical spillage, and potential natural disasters specific for the region, e.g. earthquakes, volcanoes, etc.?	Documented procedures related to emergency response (AA-EMS-447-PR)     Emergency response team form (AA-447-01-LT)     Accident reporting and investigation form of RKK (AA-SOP-OP-1400.02)	There were several documented procedures related to emergency response in local language Bahasa Indonesia. The emergency conditions have been identified including general fire, land fire, chemical spillage and earth quake. The procedure described the roles and responsibilities of each emergency response team include the mechanism how to conduct medical evacuation to near hospital/local health centre, the emergency contact number of each internal emergency team and external related parties such as public	YES (Major NCR 2017 - 14) CLOSED

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
	<ul> <li>Are accidents investigated and action taken to prevent recurrence?</li> <li>Are accident records provided to the local authority in accordance with local legal requirements, if any?</li> </ul>	Incident statistics quarter report to local authority (Labuhan Batu Regent)	fire station at local area <i>Kabupaten Labuhan Batu</i> and Public health centre " <i>Puskesmas Labuhan Batu</i> " were also available. The composition of emergency response team was established at forms (AA-447-01-LT) consist of ERT commander, head of transport and logistics and also several fire fighters and first aider.	
	<ul> <li>Available in the appropriate language of the workforce?</li> <li>b. Are the instructions on emergency</li> </ul>		Regarding accident reporting and investigation, it was available the form of RKK (AA-SOP-OP-1400.02) to conduct the reporting and investigation of accidents, which within the forms are described the	
	procedures clearly understood by all workers?		accident chronology, cause and impact of the accident also to find the root causes of the accident happened and formulized the corrective and preventive action. The incident statistics were reported	
	c. Are assigned operators trained in First Aid present in both field and other operations?		quarterly within a year to local authority ( <i>Labuhan Batu Regent</i> ) by safety officer obtained from supervisors ( <i>mandor</i> ) and clinics.	
	<ul><li>d. Is there records of training of the first aiders?</li><li>e. Is first aid equipment available at worksites?</li><li>Is the equipment available during conduct of field manual work?</li></ul>		The emergency kits such as first aid box and emergency shower were available at mill and several locations at estate. First aid kits were not regularly checked. Some of the group leader ( <i>mandor</i> ) was not provided with first aid kits.	
	Are first aid kits adequately stocked and regularly checked in accordance with local legal requirements?		Certified first aiders were also available as part of emergency team structure. Mill and Estate was supported with one clinic centre and first aid room at each division office.	
	f. Are records of all accidents kept and periodically reviewed for continuous improvement?		This was a recurrence from last audit, so the NCR upgraded into Major NCR.	
4.7.6	All workers shall be provided with medical care, and	covered by accident insurance (see cri		
	<ul> <li>a. Is there evidence that all workers are provided with medical care (refer to Criterion 6.5.3), and covered by accident insurance by the company? For contract workers, the contract between the company and the contractor shall be in compliance.</li> <li>b. For accidents that have occurred, is there</li> </ul>	<ul> <li>Site visit observation/interview to estate clinic</li> <li>The BPJS Ketenagakerjaan monthly payment for period August - November 2017.</li> </ul>	The insurance were provided for all employees (SKU, PHL and outsources/contractors) that mandatory from government ( <i>BPJS Ketenagakerjaan</i> ); the packages for accident insurance (JKK) were 0.54 in percentages. The monthly payments were evident for period August – November 2017.  The insurances were still valid as seen by the recent slip payment in January – November 2017 for estates and mill.	YES
	evidence that the affected workers received appropriate medical treatment, and was			

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
	able to claim and receive compensation under the insurance policy (if relevant)?			
	c. Is there evidence that the insurance policies are valid?			
	Occupational injuries shall be recorded using Lost Ti	ime Accident (LTA) metrics.		
4.7.7	Accident Case and work-related Illness.	·	ower and Transmigration No. 609 year 2012 regarding Guidance to Sol	-
	a. Are occupational injuries recorded using Lost Time Accident (LTA) metrics?	Incident statistics quarter report to local authority (Labuhan Batu Regent)	KNS (Kebun Negeri Lama Selatan)  The incident statistics were reported quarterly within a year to local authority (Labuhan Batu Regent) by safety officer (Jhony Yusuf Manurung) obtained from supervisors (mandor) and clinic. Records sighted for period year 2017, include the investigation report. The data of Lost Time Accident for estates have been shown and the records were properly maintained. Sample of accident report and investigation were taken in 12 November 2017, for harvester worker (Andi) which his hands pierced by the thorns while doing harvesting activities. The result of accident investigation can be shown. The number of lost times and accident statistics Y2017 as presented below:  Fatality = 0; Permanent disabled = 0; Lost time = 9; Property damage = 0; Medical aid = 20; First aid case = 0.  KNC (Kebun Negeri Lama Central)  The incident statistics were reported quarterly within a year to local authority (Labuhan Batu Regent) by safety officer (Ari RH Harahap) obtained from supervisors (mandor) and clinics. Records sighted for period year 2017, include the investigation report. The data of Lost time accident for estates have been shown and the records were properly maintained. The number of lost times and accident statistics as presented below:  Fatality = 0; Permanent disabled = 0; Lost time (days) = 0; Property damage = 0; Medical aid = 0; First aid case = 26.	YES

NO	CRITERION / INDICATOR CHECKLIST OBSERVATIONS & OBJECTIVE SUMMARY OF FINDINGS FOR EACH INDICATOR		SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)			
	CHECKEIOT	LVISLIVOL	PND (Negeri Lama Dua Mill)  The incident statistics were reported quarterly within a year to local authority (Labuhan Batu Regent) by safety officer (Mr. Ismail). Records sighted for period year 2017, include the investigation report. The number of lost times and accident statistics as presented below:  Fatality = 0; Permanen disabled = 0; Lost time (days) = 0; Property damage = 0; Medical aid = 0; First aid case = 0.	(125/NO)			
	Guidance: Workers should be adequately trained on: the health vulnerable groups (e.g. young workers, pregnant won protect workers' health.	Workers should be adequately trained on: the health and environmental risks of pesticide exposure; recognition of acute and long-term exposure symptoms including the most vulnerable groups (e.g. young workers, pregnant women); ways to minimise exposure to workers and their families; and international and national instruments or regulations that					
4.8	The training programme should include productivity and best management practice, and be appropriate to the scale of the organisation.  Training should be given to all staff and workers by growers and millers to enable them to fulfil their jobs and responsibilities in accordance with documented procedures, and in compliance with the requirements of these Principles, Criteria, Indicators and Guidance.						
	Contract workers should be selected for their ability to fulfil their jobs and responsibilities in accordance with documented procedures, and in compliance with the requirements of the RSPO Principles, Criteria, Indicators and Guidance.						
	Growers and millers should demonstrate training activities for schemes smallholders who provide Fresh Fruit Bunches (FFB) on a contracted basis.						
	Workers on smallholder plots also need adequate training and skills, and this can be achieved through extension activities of growers or millers that purchase fruit from them, This training may be conducted through smallholders' organizations, or through collaboration with other institutions and organizations (See Guidance on Scheme Smallholders', July 2009)						
	The contract workers in Indonesia refer to the Fixed Term Contract (PKWT) and Non-fixed Term Contract (PKWTT) based on the Decree of the Minister of Manpower No. 100 year 2004; and the Regulation of the Minister of Manpower & Transmigration No. 19 year 2012 regarding Requirements for Transfer of Parts of Work to Other Company(ies).						
4.8.1	(M) Records of training program related to the aspec	ts of RSPO Principles and Criteria sha	ll be available.				

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
	<ul> <li>a. Does the company maintain a list of staff, workers, smallholders and contract workers whom training must be provided to?</li> <li>b. Is there a formal training programme in place that covers all aspects of the RSPO Principles and Criteria? Does the formal training program include: <ul> <li>Regular assessment of training needs of all staff, workers, smallholders and contract workers;</li> <li>Training for workers on smallholder plots;</li> <li>Documentation of all the training assessment needs, formal training conducted and the list of participants attending these formal training;</li> <li>Does the training for workers cover, a minimum, to the following: <ul> <li>The health and environmen risks of pesticide exposure;</li> <li>recognition of acute and lor term exposure symptoms including the most vulnerab groups (e.g. young workers pregnant women);</li> <li>ways to minimise exposure workers and their families;</li> <li>International and national instruments or regulations that protect workers' health and</li> <li>Productivity and best management practice.</li> </ul> </li> <li>Note to auditor: To interview staff, workers,</li> </ul></li></ul>	Training programme 2016 – 2017 Training records (attendance list and certificates) Site visit observation to estate and mill and interviews with all employees and contract workers  Training records (attendance list and certificates) Site visit observation to estate and mill and interviews with all employees and contract	There was established training programme that feedbacks from regulations and basic competence as training needs identification.  All functions and levels included contract employees within the organisation were covered by the training programme. The training needs identified appear sufficient and complete, this including training related to OHS, environmental, social, training required by regulations, training related to operation of Mill and Estates. Training programme 2016 and 2017 were sighted, the training programme was established based on the training needs identification. Realization of training programme 2017 were sighed for all staff, workers and contract workers, includes:  AK3U/OHS Training (11-23 December 2017); HCV awareness (18 November 2016); Heavy Equipment Training (22 September 2017); Safety awareness (11 August 2017, 15 September 2017 and 9 October 2017); Fire safety training (11 November 2017 and 6 December 2017); First Aider (15 September 2017). Hazardous waste handling (16 April 2017).  Based on interview to workers (spraying workers at block I13C Division IV and harvesting workers at block H11V Division III) during audit they were aware the need of the training and they were assisted by information provided during training.	YES

## **Audit Report**

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)		
	smallholders and contract workers to verify that the training has been conducted effectively.					
4.8.2	.2 Records of training for each employee shall be maintained.					
	Are training records maintained for each employee?	Training attendance Individual training history	The system to record personal training was established-in the attendance record; the training which has been completed by each person was recorded and updated.	YES		

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

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
5.1	Aspects of plantation and mill management, including positive ones are made, implemented and monitored Guidance:  Report on environmental management and monitoring the Environmental Management System (ISO 14000) with government regulation), such as Greenhouse Geminiciples and Criteria.  If there are impacts identified, that may change the confidence of environment impact assessment is the a. Environmental Impact Assessment (Analisis Most.). Environmental Management Effort (Upaya Perplantation with areas of < 3000 Ha.  c. Environmental Management Document (Dokume e. Environmental Evaluation Document (Dokume e. Environmental Evaluation Performance (Penyagent). Environmental Evaluation Study (Studi Evalual h. Environment Management and Monitoring Docinical Evaluation Letter for Managing and Monitoring Doci	g replanting, that have environmental is a to demonstrate continual improvement. It is demonstrate continual improvement. It is a replanting, that have environmental aspects which haves, High Conservation Value, a study is a study in the company shous environment document based on the elengenai Dampak Lingkungan Hidup/Angelolaan Lingkungan Hidup/Del.) and men Pengelolaan Lingkungan Hidup/Del.) a Evaluasi Lingkungan Hidup/Del.) a Evaluasi Lingkungan Hidup/Pel.) a Lingkungan Hidup/Pel.) a Euronment (Dokumen Pengelolaan dan Pengelolaan terment (Dokumen Pengelolaan dan Pengelolaan terment (Surat Pernyataan Kesament activities to the environment, it is will be sustainably preserved and protesticosphere reserve;	ports in accordance with the provisions of AMDAL and/or other docume of the provisions of the provisions of AMDAL and/or other document of the provisions of the provision of the provision of the provision of the conducted separately and in accordance with the requirements of the provision of the operational practices within this existing regulations, such as:  MDAL) for plantation with areas of > 3000 Ha  Environmental Monitoring Effort (Upaya Pemantauan Lingkungan Hid  PLH)  Amaggupan Pengelolaan Hidup/DPPL)  Anggupan Pengelolaan dan Pemantauan Lingkungan Hidup/SPPL)  Amaggupan Pengelolaan dan Pemantauan Lingkungan Hidup/SPPL)	nents as required in ent (in accordance s of the RSPO s specified period.  The property of the results of the responsibility of the responsibility of the results of the responsibility of the responsibility of the results of the res

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
	Job and business opportunities;	EVIDENCE		(TE3/NO)
	<ul> <li>Community's standard of living;</li> </ul>			
	Public health			
		vironmental management implementat	ion and monitoring report to the relevant authorities.The company is re	esponsible for
			e Environmental Impact Assessment (AMDAL) requirement covering a	
	plantation and mills operations, as well as incorporate			
	The environmental impact assessment should cover			
	a. Building new roads, processing mills or other in			
	b. Putting in drainage or irrigation systems;			
	c. Replanting and/or expansion of planting areas;			
	d. Management of mill effluents (Criterion 4.4);			
	e. Clearing of remaining natural vegetation;			
			vernment Regulation No. 4 year 2001 (Criteria 5.5 and 7.7).	
		e.g. ISO 14001 EMS and/or EIA report	ncorporating elements spelt out in this Criterion and raised through sta	akeholder
	consultation.			
			air quality (criterion 5.6), greenhouse gases calculation analysis, biodi	versity and
	ecosystems, and people's amenity (Criterion 6.1), bo		of consultation about a result in improved are consult in improve	a and to dayalan
	,	g environmental impacts. The inclusion	of consultation should result in improved processes to identify impacts	s and to develop
	any required mitigation measures.	has the responsibility to undertake imp	act assessment and to plan and operate in accordance with the result	to (rofor to
	'Guidance on Scheme Smallholders', July 2009 or its		act assessment and to plan and operate in accordance with the result	S (TETEL TO
	The Strategic Environment Study Result (KLHS) by a		in consideration while conducting replanting	
	Regulations related to the environment documents, a		Treorisacration willo conducting replanting	
	1. Government Regulation (PP) No. 27 of 2012 re			
			nagement and Monitoring Effort (UKL-UPL) and Environment Manage	ement and
	Monitoring Effort (UKL-UPL) and Declaration Le			
	3. Regulation of the Minister of Environment No. 5			
	4. Regulation of the Minister of Environment No. 1	4 year 2010 regarding Environment Ma	anagement and Monitoring Document (DPPL)	
			anagement and Monitoring Document for Business and or Activities, w	ith Absence of
	Environment Management Document.			
	6. Regulation of the Minister of Environment No. 5			
			Community and Information Transparency in the AMDAL Process	
	8. Regulation of the Minister of Environment No. 8			
	9. Decree of the Head of Bapedal No. No. 299 of	1996 regarding Technical Guidance of	Social Aspects Study in Establishing AMDAL	

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)	
5.1.1	a. Has an EIA been conducted according to the Document of ANDAL, RKL Impact assessment was documented in document of ANDAL, RK				
	<ul> <li>scope of operation covering at minimum the following:</li> <li>Building new roads, processing mills or other infrastructure;</li> <li>Putting in drainage or irrigation systems;</li> <li>Replanting and/or expansion of planting areas;</li> <li>Management of mill effluents (Criterion 4.4);</li> <li>Clearing of remaining natural vegetation;</li> <li>Management of pests and diseased palms by controlled burning (Criteria 5.5 and 7.7).</li> </ul>	<ul> <li>RPL #PC.220/383/B/II/1994</li> <li>AA-EMS-431-PR –         <ul> <li>Environmental aspect</li> <li>identification and evaluation</li> </ul> </li> <li>Result of evaluation of environmental aspect and impact</li> <li>Report of RKL RPL Semester II 2016 and Semester 1 2017</li> <li>Receipt note of RKL RPL submission</li> </ul>	RPL approved by Department of Agriculture of Republic of Indonesia on 26th of February 1994.  Negri Lama II Mill, Negri Lama Utara Estate and Aek Kuo Estate have implemented procedure for identifying environmental aspect and evaluating its impact based on Environmental Management System ISO 14001:2004.  The result of environmental aspect and impact identification and evaluation was documented. As required by the procedure, the information of environmental is reviewed and updated annually.  Last review and update of environmental aspect and impact register for Negri Lama II Mill, Negri Lama Utara Estate and Aek Kuo Estate		
	<ul> <li>b. Has the EIA been conducted and documented according to local requirements?</li> <li>c. Does the assessment include consultation with relevant stakeholders to identify impacts and to develop any mitigation measures?</li> </ul>		was performed on January 2017.  Document of environmental impact assessment included:  - Building new roads, processing mills or other infrastructure;  - Putting in drainage or irrigation systems;  - Replanting and/or expansion of planting areas;  - Management of mill effluents;  - Clearing of remaining natural vegetation;  - Management of pests and diseases palms by controlled burning;  - Result of stakeholder consultation.		

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
	identify impacts and to develop any mitigation measures. The		The EIA has been included consultation with relevant stakeholders to identify impacts and to develop any mitigation measures. The consultation result and the mitigation has been state at ANDAL, RKL, RPL documents.	
5.1.2	Environment management plan document to prevent practices) shall be available. The company's manage		report and revision (if the identification of impact requires changes in curson(s) for the implementation of the document.	
	<ul> <li>a. Is there an environmental management plan in place?</li> <li>b. Is the environmental management plan documented to include the following: <ul> <li>Identification of responsible person(s);</li> <li>Potential impacts from current practices;</li> <li>Measures to mitigate negative impacts;</li> <li>Timetable for change (where changes in current practices are required).</li> </ul> </li> <li>c. Has the environmental management plan been implemented?</li> </ul>	Report of RKL RPL Semester II 2016 and Semester I 2017 Receipt note of RKL RPL submission	Implementation of RKL RPL is reported every six months. The report of Semester II 2016 and Semester II 2017 of RKL-RPL was submitted to North Sumatera Province and Labuhan Batu District Environmental Agency, Central of Environmental Management Regional Sumatera and Ministerial Office of Environment. RKL-RPL was included the identification of responsible person, potential impact from current parties, Measures to mitigate negative impacts and Timetable for change (where changes in current practices are required  Negeri Lama Dua Mill and estates have ensured that all plan mentioned in RKL RPL or Environmental Management Plan were implemented. Control measure were defined and implemented for ensuring that negative environmental impact were prevented or mitigated. There were several types of control measures defined: engineering control, administrative control and PPE. The implementation of those control measures are monitored during monthly environmental patrol and also round of internal audits.	YES
5.1.3	Environment monitoring plan document, its implement reviewed on two-yearly basis.	ntation report, and the corrective plan (	if non-conformance arised from the monitoring result) shall be available	. This plan is
	<ul><li>a. Does the plan incorporate a monitoring protocol?</li><li>b. Is the monitoring protocol adaptive to operational changes?</li></ul>	<ul> <li>Report of RKL RPL Semester II 2016 and Semester I 2017</li> <li>Evaluation of Environmental Aspect and Impact PT. Hari</li> </ul>	Management Plan and monitoring of environmental impacts documented in RKL ( <i>Rencana Pengelolaan Lingkungan</i> ) and RPL ( <i>Rencana Pemantauan Lingkungan</i> ) as monitoring protocol.  Environmental management plans adapted to estate and mill	YES

NO	)	CRITERION / INDICAT CHECKLIST	FOR	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
		c. Is the monitoring protocol imp monitor the effectiveness of t measures?		Sawit Jaya 2017	operations change and regulations, if there are changes in the regulations related to operational and environmental, management plan will be reviewed and re-conducted the update to be relevant.	
		d. Is the plan reviewed at a mini years to reflect the results of where there are operational of may have positive and negation environmental impacts?	monitoring and changes that		The reporting of RKL/RPL was conducted 6 monthly issued by Head of administration/KTU that consist of the implementation of environment management and monitoring plan include analysis of waste water quality and flow rate also the air emissions measured by third party (Environmental Laboratory). The effectiveness of the outcome from the implementation of environmental management and monitoring was reviewed on the report through the evaluation of compliance, evaluation of trends and evaluation of the effectiveness of management and environmental monitoring.  Whenever there is a material change, changes in operations and regulatory changes the company will revise their environment aspect	
					and impact assessment. Later on, it will updated annually.	

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

## Guidance:

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

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

5.2

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

- 1. Act No. 5 year 1990 regarding Conservation on Biodiversity and its Ecosystems
- 2. Act No. 16 year 1992 regarding Quarantine for Animals, Fish and Plants
- 3. Act No. 5 year 1994 regarding Ratification of the United Nations on Convention to Biodiversity
- 4. Government Regulation No. 13 year 1994 regarding Wildlife Hunting
- Government Regulation No. 68 year 1998 regarding Areas of Natural Sanctuary and Natural Conservation
- Government Regulation No. 7 year 1999 regarding Preservation of Flora and Fauna (List of Protected Flora and Fauna is on the annex).

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)		
	7. Regulation of the Minister of Forestry No.: P.48/Menhut-II/2008 regarding Guideline of Conflict Resolution between Human and Wildlife 8. Presidential Decree No. 43 year 1978 regarding Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) ratification.  Growers need to consider a variety of land management and tenure options to secure HCV management areas in ways that also secure local people's rights and livelihoods. Some areas are best allocated to community management and secured through customary or legal tenures in certain period. In other cases, co-management options can be considered. Where communities are asked to relinquish rights so that HCVs can be maintained or enhanced by the companies or State agencies, then great care needs to be taken to ensure that communities retain access to adequate land and resources to secure their basic needs; all such relinquishment of rights must be subjected to their free, prior, and informed consent (see Criteria 2.2 and 2.3).					
5.2.1	(M) Record(s) on the results of High Conservation Value (HCV assessment) that includes both the planted area and the relevant wider landscape-level considerations (such as wildlife corridors) shall be available  Specific Guidance: This information will cover:  Presence of protected areas that could be significantly affected by the grower or miller;  Conservation status (e.g. IUCN status), legal protection, population status and habitat requirements of rare, threatened, or endangered (RTE) species that could be significantly affected by the grower or miller;  Identification of HCV habitats, such as rare and threatened ecosystems, that could be significantly affected by the grower or miller;  HCV Identification may be conducted internally (by the company, where the team leader shall be registered in the HCVRN-Assessors Licensed Scheme (ALS), through peer-review by the competent experts, prepared in accordance to the common Guidance for the identification of HCV 2013. If the company has no expert for assessing certain HCV type(s), then it may use the external assessor(s). The HCV assessment. If possible, each external assessor who comes from outside the assessed areas should cooperate with the local or regional expert(s). The HCV report shall describe the composition					
<ul> <li>and qualification of the assessor team in biological and social aspects.</li> <li>a. Has a High Conservation Value (HCV)         assessment been conducted and cover the following:         <ul> <li>Presence of protected areas that could be significantly affected by the grower or miller;</li> <li>Conservation status (e.g. IUCN status), legal protection, population status and habitat requirements of rare, threatened, or endangered (RTE) species that could</li> </ul> </li> <li>And qualification of the assessor team in biological and social aspects.         <ul> <li>HCV assessment has been conducted and documented in "Report of Identification and Analysis of the existence of High Conservation Value (HCV) area at Negri Lama Selatan, Central and Utara Estate and Aek Kuo Estate in September 2012 by Faculty of Forestry, Bogor Agricultural University (IPB). All assessors are RSPO approved HCV assessor, such as:</li></ul></li></ul>						

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)		
	be significantly affected by the grower or miller.  Identification of HCV habitats, such as rare and threatened ecosystems, that could be significantly affected by the grower or miller;  Was the HCV assessment performed by a qualified HCV assessor?  Was the HCV assessment performed in consultation with relevant stakeholders?  Does the HCV assessment include checking of available biological records?  Does the HCV assessment include both the planted area itself and relevant wider landscape-level considerations (such as wildlife corridors)?  Was the HCV assessment performed in accordance to the latest methodology available at global and national level?  Are identified HCVs mapped?		f. Gilang Pambudi  Stakeholder consultation was carried out on 12 June 2012, attended by community around from Aek Korsik, Sei Sentang, Kuala Bangka, Sidomulyo, Tanjung Haloban, Selat Besar, Negeri Lama Seberang, Sei Tarolat, and Tanjung Haloban Village.  Peer review was conducted by Dr. Kun Kun Jaka Gurmaya (Qualified HCV Assessor and Peer Reviewer) in January 2013. Record of HCV Assessment, in the form of a report, including a map of HCV area was available.  Besides presenting data and map of HCV area, the report also includes a list of rare and threatened wildlife species from 4 (four) main wildlife groups, such as mammals, birds, herpetic-faunas and fishes.  The HCV assessment includes Negri Lama Utara protected area, palm plantation area of Negri Lama Utara, palm plantation area of Negri Lama Selatan, and palm plantation area of Negri Lama Selatan in accordance with Guidelines of Indonesia HCVs Identification, version on June 2008. Maps of HCV Area in Palm Oil Plantation, PT. Hari Sawit Jaya, Labuan Batu and North Labuan Batu Regency, North Sumatera Province.	(123/110)		
5.2.2	(M) Where rare, threatened or endangered (RTE) species or other HCVs are present or affected by the plantation and mill operations, an appropriate measures that are expected maintain or enhance them shall be implemented through a management plan.  Specific Guidance: These measures will include: a. Ensuring that any legal requirements relating to the protection of the species or habitat are met; b. Avoiding damage to and deterioration of HCV habitats such as by ensuring that HCV areas are connected, corridors are conserved, and buffer zones around HCV areas are created:					

NO		CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR		COMPLIANCE (YES/NO)	
	c. d. a. b.	Controlling any illegal or inappropriate hunting, elephants) Improving HCV, if possible, through management Are HCVs and/or RTEs present?  If HCVs and/or RTEs are present, has a management plan containing appropriate measures that are expected to maintain	fishing or collecting activities, and deve	HCV assessment results in the identified of 109 Ha HCV areas	ne area of PT h , as follows :	Hari Sawit Jaya was	
		<ul> <li>and/or enhance them been prepared? The measures should include the following:</li> <li>Ensuring that any legal requirements relating to the protection of the species or habitat are met;</li> <li>Avoiding damage to and deterioration of HCV habitats such as by ensuring that HCV areas are connected, corridors are conserved, and buffer zones around HCV areas are created;</li> <li>Controlling any illegal or inappropriate hunting, fishing or collecting activities, and developing responsible measures to</li> </ul>	Report of HCV Management	HCV 1.2. Critically endangered species  HCV 1.3. Areas that contain habitat for viable population of endangered, restricted range or protected species  HCV 1.4. Areas that contain habitat of temporary use of species or congregation of species  HCV 2.3. Areas that contain representatives population of most naturally occurring	Negeri Lama Utara protection area Refer to HCV 1.2  Refer to HCV 1.2	Refer to HCV 1.2  Refer to HCV 1.2  Refer to HCV 1.2	
	C.	resolve human-wildlife conflicts (e.g. incursions by elephants).  Are the measures contained in the management plan actively implemented to		species.  HCV 3. Rare or endangered ecosystem  HCV 4.1. Areas of ecosystem important for the provision of	Refer to HCV 1.2 Refer to HCV 1.2	Refer to HCV 1.2 Refer to HCV 1.2	
	d.	maintain and/or enhance HCV values?  Are the HCV values and the presence of RTEs periodically monitored?		water and prevention of floods for downstream communities.  HCV 6. Areas critical for maintaining the cultural identity	Cemetery	2	
	e.	Are the field inspections conducted regularly to ensure implementation of mitigation plan (especially along areas bordering natural area)?		of local communities Total  Based on report of HCV identific and Endangered IUCN, App II C Regulation of No. 7 / 1999, as f	CITES, and Prote	109 e status of vulnerable ecting of Government	

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
			<ul> <li>a. IUCN</li> <li>Endangered-Flora; Meranti gembung (Shorea bracteolate Dyer)</li> <li>Vulnerable-Flora; Siangus (Diospyros oblongifolia), Ramin (Gonystilus bancanus), and</li> <li>Vulnerable-Fauna; Lutung simpai (Presbytis thomasi), Beruk (Macaca nemestrina), Bangau tongong (Leptoptilos javanicus), and Bangau bluwok (Mycteria cinerea)</li> <li>b. CITES (App II)</li> <li>Flora; Ramin (Gonystilus bancanus)</li> <li>Fauna; Kucing kuwuk (Felis bengalensis), Lutung simpai (Presbytis thomasi), Beruk (Macaca nemestrina), Rangkong badak (Buceros rhinoceros), Kangkareng perut putih (Anthracoceros albirostris), Ular python (Python reticulatus), Biawak (Varanus salvator), and Kobra hitam (Naja sumatrana)</li> <li>c. PP No. 7 / 1990</li> <li>Flora; Pinang Merah (Cystostachys lakka)</li> <li>Fauna; Kucing kuwuk (Felis bengalensis), Burung madu kelapa (Anthreptes malacensis), Kipasang belang (Rhipidura javanica), Cekakak belukar (Halcyon smyrnensis), Elang-ular bido (Spilornis cheela), Alap-alap capung (Microhierax fringillarius), Burung madu belukar (Anthreptes singalensis), Elang hitam (Ictinaetus malayensis), Elang tikus (Elanus caeruleus), Elang brontok (Nisaetus cirrhatus), Kuntul kecil (Egretta garzeta), Elang kelelawar (Macheiramphus alcinus), Rangkong badak (Buceros rhinoceros), Undan putih (Pelecanus onocrotalus), Bangau tongong (Leptoptilos javanicus), Bangau bluwok (Mycteria cinerea), Elang-laut perut putih (Haliaeetus leucogaster), Burung madu sepah raja (Aethophyga siparaja), Caladi tilik (Dendrocopsos moluccensis), and Kangkareng perut putih (Anthracoceros albirostris)</li> </ul>	
			There was no water area (river, swamp, and reservoir) as water provider and manage the hydrology and protection area, but PT. HSJ have the land cover was peat land, so that conducted the water management to protect of area from fire and flood. Area that important for identification of local communities was cemetery at	

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
			Implementing for HCV management and monitoring PT. HSJ 2017 in accordance with the Conservation Management Plan 2017. Some activities that has been conducted, other between: damage monitoring of protect area, installation of boundary area, installation of area HCV information board include penalties of the UU No. 5/1990, installation of board the ban on hunting, and making of boundary ditch. Other than that, also conducted half-yearly fauna and flora monitoring by Sustainability Officer and Foreman.	
5.2.3			workers shall be available, including records of appropriate sanction dis	sciplinary
	<ul> <li>measures to any individual working for the company</li> <li>a. Does the company have policies or rules to protect RTE species?</li> <li>b. Is there a programme to regularly educate the workforce about the status of the RTE species?</li> <li>c. Is there evidence or action taken to implement the rules and programs? E.g. Inspections conducted to check no traps/snares put up within or nearby areas.</li> <li>d. Have appropriate disciplinary measures been imposed in accordance with company rules and national law, should any individual working for the company is found to have captured, harmed, collected or killed any RTE species?</li> </ul>	Company Policy     Conservation Management Plan 2017     HCV Management and Monitoring Report	PT HSJ has policy to protect RTE species from Managing Director, that PT. HSJ was not conducted of new planting in high carbon stock, high conservation value area (includes was fauna and flora protected), and peat area.  Program to disseminate HCV area for workers was periodically conducted. The last refresh HCV Awareness dated on 26 August 2017 by Environment and Sustainability Officer. It was attended by assistant and workers reprensentative.  Inspection of HCV area was periodically conducted by HCV Foreman, the last inspection was conducted on May 2017. List of inspection, such as potential for fire and hunting disturbance. Information for Penalties of the UU No. 5/1990 have been communicated directly to all employees and the local community during HCV socialization and through the HCV sign boards and warnings board.  Based on document review and interview with worker, there was no cases that the workers was captured, harmed, collected or killed any RTE species.	YES (Minor NCR 2017 – 15) OPEN

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
5.2.4	Once the management plan is prepared, continuous and palm oil mill shall be available, and the results o  Specific Guidance: For 5.2.4: The result of HCV monitoring may become	f monitoring are to be used to follow-up		s of the plantation
	<ul> <li>a. Does the management plan contain ongoing monitoring of status of HCV and RTE species that are affected by plantation or mill operations?</li> <li>b. Is the status documented and reported?</li> <li>c. Are the outcomes of monitoring fed back into the management plan?</li> </ul>	<ul> <li>Conservation Management Plan 2017</li> <li>HCV Management and Monitoring Report 2017</li> </ul>	HCV management and monitoring at PT. HSJ was available in the Conservation Management Plan, one of its activity was half-yearly flora and fauna monitoring and reported in HCV Management and Monitoring Report, PT. HSJ. The last report was for Semester I 2017. Management was monitored the protected species accordance Government Regulation/PP. No.7/1999.  Follow up from the recommendation of HCV Monitoring Report 2016 has been documented and available during audit.	YES
5.2.5	community's rights  Specific Guidance:	·	ence of a negotiated agreement that optimally safeguard their HCVs and include third pa	
	<ul> <li>a. Is there HCV set-asides with existing rights of local communities?</li> <li>b. Who are the affected communities?</li> <li>c. Is the identified HCV areas mapped?</li> <li>d. Is there evidence of stakeholder consultation and negotiated agreement, in accordance to FPIC principles, with local community to optimally safeguard both the HCVs and rights of local communities?</li> <li>e. If a negotiated agreement cannot be reached, is there evidence of sustained efforts to achieve an agreement? Refer to specific guidance for 5.2.5.</li> </ul>	Memorandum of Understanding No. 01/SPKT/NLG/III/2016     HCV assessment and analysis of the existence	HCV set-asides present with existing rights of around communities at PT. HSJ. The community Sidomulyo Village were affected. It has been conducted agreement between PT. HSJ with Sidomulyo Village available in Memorandum of Understanding No. 01/SPKT/NLG/III/2016 about Joint Management for Cemetery and Protect Area at Block of C13, dated on March 14, 2016 and valid for 5 years.  HCV areas were mapped in Map of HCV Area in Palm Oil Plantation PT. Hari Sawit Jaya, Labuan Batu and North Labuan Batu Regency, North Sumatera Province.	YES

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)	
5.3	Waste is reduced, recycled, re-used and disposed of in an environmentally and socially responsible manner.  Guidance:  The waste management and disposal plan should include measures for:  a. Identifying and monitoring sources of waste and pollution.  b. Improving the efficiency of resource utilisation and recycling potential wastes as nutrients or converting them into value-added products (e.g. through animal feeding programmes).  c. Appropriate management and disposal of hazardous chemicals and their containers. Surplus chemical containers should be reused, recycled or disposed of in an environmentally and socially responsible way based on best available practices (e.g. returned to the vendor or cleaned using a triple rinse method) and existing regulations. This is to prevent pollutions to the water sources and risk to human health. The disposal instructions on the manufacturer's labels should be adhered to.  Use of open fire for waste disposal should be avoided.  Regulations relate to waste management, such as:  1. Government Regulation No. 18 year 1999 regarding Management of Toxic and Hazardous Waste (B3)  2. Government Regulation No. 8 year 1999 regarding Amendment of Government Regulation No. 18 year 1999 regarding Management of B3 (the annex shows a list of B3 from specific and non-specific sources, expired chemicals, leakage, remaining containers and waste of unspecified products).  3. Government Regulation No. 82 year 2001 regarding Management of Water Quality and Control of Water Pollution. This includes criteria for water quality, and requirements for utilising and disposing waste water)  4. Government Regulation No. 81 year 2012 regarding Management of Domestic Waste  5. Decree of the Minister of Environment No. 51 year 1995 regarding Technical Guidance for Study for Utilising Palm Oil Mill Effluent (POME) on Oil Palm Plantation.  7. Decree of the Minister of Environment No. 29 year 2003 regarding Guidance for Permit Requirements and Administration for Utilising POME on Oil Palm Plantation.  8. Decr				
5.3.1	(M) A documented identified source of all waste and				
	<ul><li>a. Is there a registry/list of waste products produced?</li><li>b. Is there a registry/list of pollution sources?</li></ul>	<ul> <li>Procedure AA-KL-06-EFP – Handling of Hazardous Waste</li> <li>Procedure AA-KL-07-EFP – Handling of Medical Waste.</li> <li>Procedure AA-KL-11-EFP – Handling of Laboratory Waste.</li> <li>Form AA-KL-601-FM – Record of Hazardous waste</li> </ul>	Identification of waste and pollution sources from Negri Lama II Mill, Negri Lama Selatan, Negri Lama Central Estate, Negri Lama Utara Estate and Aek Kuo Estate activities was evident. The sources of pollution, type and control method of waste were documented. Wastes identified were among others: POME, used oil, used oil filter, agrochemical and chemical containers, contaminated rags and domestic wastes.  The source of pollution, type and control method of waste was recorded. The waste products from estate generally were domestics waste and also several hazardous waste from estate operations	YES	

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
		Form AA-KL-602-FM – record of hazardous waste circulation  EMS-431-003-LT Rev.10 form updated on January 2017 Identification of Environmental Aspect	activities as detailed below (but not limited):  ✓ Ex-pesticides containers (bottles and jerry cans)  ✓ Used battery from the heavy vehicles  ✓ Plastics  ✓ Medical waste (first aid usage)  ✓ Polybag  ✓ rags  ✓ and fertilizer containers  ✓ Emissions from vehicles  While at the Mill it was several hazardous waste generated from the mill operations, in detailed below (but not limited):  ✓ POME  ✓ Palm shell  ✓ Fibre  ✓ Depricaper waste  ✓ Empty bunch  ✓ Boiler ash  ✓ Chemicals jerry can and bottles  ✓ Gunny sacks from chemicals materials  ✓ Sacks resulted from fertiliser materials  ✓ Welding materials from workshop activities  ✓ Lubricants from workshop materials  ✓ Contaminated rags from workshop activities  ✓ Usage lamps  ✓ Tires  ✓ Usage batteries  ✓ Usage oil filters  Emissions from vehicles and other engines (genset, boilers)	
5.3.2	(M) There shall be evidence that all chemicals and the	neir empty containers are disposed of r		
	a. Is there an inventory of chemicals and their containers that are used and kept on site?     b. How are chemicals and their containers stored and disposed off? Is it in accordance	Procedure AA-APM-OP- 1100.11-R1 and AA-KL-04- EFP – Agrochemical Waste Handling	All agrochemical containers were rinsed and then disposed to licensed vendor: PT. PT Indostar Cargo for transporter. Liquid waste from agrochemical was reused for the next spraying application. The disposal methods of were described on documented Procedure AA-	YES (Major NCR 2017 – 16) CLOSED

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
	to best practices? (as prescribed by	Balance sheet of	APM-OP-1100.11-R1. Records of chemical containers quantity	
	manufacturers' labels, local requirement,	agrochemical containers	disposed were evident. Liquid waste from agrochemical was reused	
	national or international best practice)			
		<ul> <li>agrochemical containers</li> <li>Permit of temporary storage of hazardous waste for Negeri Lama Selatan Estate #503.660/322/BLH-LB/WAS/2014</li> <li>Permit of temporary storage of hazardous waste for Negeri Lama Dua Mill No. 503.660/200/BLH-LB/WAS/2015 dated 29 June 2015 and valid for 5 years</li> <li>Contractual agreement of PT Inti Indosawit Subur (parent company of PT Hari Sawit Jaya) and Consorsium of PT Sumatera Deli Lestari Indah -PT Indostar Cargo and PT PT Prasadha Pamunah Limbah Industry with contract number 003/AA-SDLI-ISC-PPLI/III-</li> </ul>	disposed were evident. Liquid waste from agrochemical was reused for the next spraying application. While the ex-fertilizer sacks was also rinsed and reuse for fertiliser distribute "untilan" at estate operations.  License of hazardous wastes temporary storage (TPS B3) for Negeri Lama Dua Mill as issued from Labuhan Batu Utara Regent No. 503.660/BLH-LB/WAS/2015 dated 29 June 2015 and was valid for 5 years defined that the time limit was 90 days but if produce (less than) < 50 kg per days may store maximal 180 days.  License for Negeri Lama Selatan (KNS) as issued from Labuhan Batu Regent No. 503.660/322/BLH-LB/WAS/2014 dated 30 December 2014, and were valid for 5 years defined that the time limit was 90 days but if produce (less than) < 50 kg per days may store maximal 180 days. In permit, estate and mill, stated that "tidak diperkenankan penyimpanan (sementara) limbah B3 di tempat lain selain tempat penyimpanan sebagaimana huruf a di atas yang berlokasi sebagaimana dimaksud pada Diktum Kedua".  The license include: lubrication oil, battery, oil filter, contaminated rugs, medical wastes; include pesticides/chemical containers and etc Manifest of disposal were sighted for 26 May 2017, 31 May 2017	
		2017 dated 3 March 2017, valid for 1 year • Permit of PT Indostar Cargo	and 12 December 2017 (KNS), 31 May 2017 and 16 November 2017 (PND).	
		as hazardous waste transporter No : B.4674/Dep.IV/LH/PDAL/05/2 015 dated 27 May 2015 valid		
		for 5 years  Permit of vehicles No SK.971/AJ.309/DJPD/2017/12 0710258BB-0057 for vehicles BK 8891 DD valid until 26 January 2018  Hazardous waste manifest		

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)	
		Receipt note of report of hazardous waste management submission			
5.3.3	<ul> <li>A documented waste management plan to avoid or real and disposal plan to avoid or reduce pollution?</li> <li>b. Does the waste management and disposal plan, at minimum, include measures for: <ul> <li>Identifying and monitoring sources of waste and pollution?</li> <li>Improving the efficiency of resource utilisation and recycling potential of wastes as nutrients or converting them into value-added products (e.g. through animal feeding programmes)?</li> <li>Appropriate management and disposal of hazardous chemicals and their containers?</li> <li>Reduction, re-use and recycle of waste?</li> </ul> </li> <li>c. Is there evidence that the plan has been implemented?</li> <li>d. Is there evidence that waste has not been disposed off using open fire?</li> </ul>	Procedure AA-KL-05-EFP – Industrial Waste Handling Procedure AA-AMP-OP- 1100.11-R1 and AA-KL-04- EFP – Agrochemical Waste Handling Procedure AA-AMP-OP- 1100.11-R1 and AA-KL-06- EFP – Hazardous Waste Handling Handling	Identification of waste and pollution sources from Negri Lama II Mill, Negri Lama Utara Estate and Aek Kuo Estate activities was evident. The sources of pollution, type and control method of waste were documented. Wastes identified were among others: POME, used oil, used oil filter, agrochemical and chemical containers, contaminated rags and domestic wastes. Procedure waste handling including hazardous waste handling has been established and implemented. The procedure required waste to be segregated from point of sources. In addition Mill and Estate also established waste register, which described wastes sources from each activity/location, its classification (organic, inorganic or hazardous), and its disposal, reusing or recycling. Mill and Estate including housing has provided different colour of waste bin for each type of waste. Organic and inorganic wastes from Mill and Estate including housing were disposed to landfill in the Estate area. Areas of organic and inorganic wastes disposal was far from housing, in the flood-free area and not in swamp area and completed with warning sign not burning wastes. There are evident the measurement periodical report include air ambience quality; emissions of vehicles and other engines (boilers, generators, etc.) also the programme on how to reduce the fuel usage and environmentally friendly.  Hazardous waste was reported to North Sumatera Province and Labuhan Batu District Environmental Agency, Central of Environmental Management Regional Sumatera and Ministerial Office of Environment. Receipt note was also sighted.	YES (Major NCR 2017 - 17) CLOSED	
5.4	Guidance: Renewable energy use per tonne of Crude Palm Oil (CPO) or palm product in the mill should be monitored. Direct fossil fuel use per tonne of CPO or Fresh Fruit Bunches (FFB) should be monitored. Energy efficiency should be taken into account in the construction or upgrading of all operations.  Growers and millers should assess the direct energy use of their operations, including fuel and electricity, and energy efficiency of their operations. This should include estimation of				

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY C	F FINDINGS	FOR EACH IND	ICATOR	COMPLIANCE (YES/NO)
			Fossil fuels	2015	2016 (YTD December)	2017 (YTD December)	
			Vehicles (litre)	239,629	236,274	279,525	
			Genset (litre)	300,414	298,228	187,535	
	Use of fire for preparing land or replanting is avoided		Per tonnage CPO	2.32	2.40	1.89	
5.5.1	Guidance: Clause 11 of the Government Regulation No. 4 year activities causing forest and or land fire are including Therefore, the use of fire is prohibited in those activity management of flora and fauna. Implementation of management of land clearing with zero burning shall regulations.	l land clearing in forestry, plantation, ag ties, unless for unavoidable circumstan estricted burning shall be authorised by	griculture, transmigration ces or specific purpose y the relevant agency.	n, mining, tour s, such as fore	ism which are ca est fire control, p	arried out through est and disease c	burning. ontrol, and habitat
	<ul> <li>a. Does the company have a zero burning policy or any statement on zero burning?</li> <li>b. Does the company have SOPs for land preparation which mentions zero burning?</li> <li>c. Was land prepared using the burn method? If yes, was it based on the specific situations identified in the 'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003, or comparable guidelines in other regions?</li> <li>d. Has the policy been implemented throughout the operations?</li> <li>e. Is there training programmes for associated smallholders on zero burning where appropriate?</li> </ul>	<ul> <li>Company policy dated 1         December 2014</li> <li>Replanting procedure (AA-APM-OP-1100.20-R1)</li> <li>Field observation</li> </ul>	Company have a zero dated 1st December 2 Land preparation whi replanting procedure committed to zero be ganoderma risks plan chopping and stacking.  Procedure replanting and Estate Manage contractor does not replanting.  All the replanting active such as: Schedule of progress planting LC replanting (Progress in the procedure of retails).	ch mentions z (AA-APM-OF urning by using excava mentioned that must perfor perform but ities requires t f replanting ( C (Legume C n the Works C	ero burning deser- 2-1100.20-R1), the first chipping tended to be designed to be designed to be decumented to be documented t	cribed within the the organisation chnique" at the the palm trees, odification.  Assistant Chief ensure that the preparation for d and monitored, g and planting), Minutes Works ethods used are:	YES

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)	
			<ul> <li>Chipping: cutting palm trunk, so as not infected with ganoderma</li> <li>Planting LCC / legumes (Mucuna and Puereria javanica etc. So that the decay of the old oil palm trunks can be faster</li> <li>Planting of oil palm.</li> <li>This method has been used in replanting the whole plantation belonging to Asian Agri group including PT. Hari Sawit Jaya – Negri</li> </ul>		
5.5.2	Specific Guidance: Fire should be used only where an assessment has	demonstrated that it is the most effecti	Lama II Mill and its supply bases.  sis of the use of fire and permit from the authorised agency shall be avaive and least environmentally damaging option for minimizing the risk of eat. This should be subject to regulatory provisions under respective na	severe pest and	
	The company shall have procedure and records of e	emergency response to ground fire, inc	luding the means and facilities.		
	a. Where fire has been used for preparing land for replanting, is there evidence of prior approval of the controlled burning as specified in 'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003, or comparable guidelines in other regions?	<ul><li>Zero burning policy</li><li>Field observation</li></ul>	Organisation has policy "zero burning" in each operational activity, including land preparation and replanting. No fire has been used for land preparation.	NA	
	b. What was the justification for using fire?				
5.6	Growers and millers commit to report greenhouse gas emissions from their operations. However, it is recognised that these significant emissions cannot be monitored completely or measured accurately with current knowledge and methodology. It is also recognized that to reduce or minimise these emissions is not always practical or feasible.  Growers and millers commit to an implementation period until the end of December 2016 for promoting best practices in reporting to the RSPO, and thereafter to public reporting. Growers and millers make this commitment with the support of all other stakeholder groups of the RSPO.				
5.6	Plans to reduce pollution and emissions, including g  Guidance:  Where practically feasible, operations should follow.		emented and monitored. e and reduce emissions. Advice on this is available from the RSPO.		

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
<b>NO</b> 5.6.1	CHECKLIST	EVIDENCE ources, including gaseous, particles, s	nd evaluation of potential pollution level.  Identification of pollution and emission sources was evident. The source of pollution, type of pollution and its control were documented, e.g. stack of boiler, electricity generator and heavy equipment, methane from WWTP and fertiliser. Monitoring of pollution and emission quality of sources identified has been programmed.  Monitoring and measurement results for 1st semester 2017 were sighted for:  - boiler emission against Environment Ministry Decree #07/2007, - diesel electricity generator emission against Environment Ministry Decree #Per13/Menlh/2009, - vehicle and heavy equipment emission against Environment	
			Ministry Decree #05/2006,  - odour emission against Environment Ministry Decree #50/Menlh/11/96,  - noise against Environment Ministry Decree #48/Menlh/11/96,  - also ambient air quality against Government Regulation #41/1999.  The source of pollution, type of pollution and its control was documented. The information of pollution and emission sources at	
			Negeri Lama II Mill was reviewed including boiler emission, methane from Palm Oil Mill Effluent, diesel electricity generator and vehicles and heavy equipment.	
	(M) Significant pollutants and greenhouse gas (GHG	emissions shall be identified, and pla	ns to reduce or minimise them implemented.	
5.6.2			to context and any changes should be justified. Examples of reducing gizer use, fuel efficiency, compost application and or methane capture.	reenhouse gas

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
	For 5.6.2 and 5.6.3: The treatment methodology for	POME will be recorded.		
	a. Is there a documented list of all identified significant pollutants and GHG emissions?	Greenhouse gas emissions reduction Programme year 2017.	The program was identify the source of greenhouse gas emissions as listed below:	YES
	b. Are there plans to reduce or minimise the identified pollutants and GHG emissions?		Methane from POME at mill     Fossil fuels emissions from vehicles and engines	
	c. Do the plans include objectives, targets and timelines for reduction that are responsive to context?		Chemical fertilizer     Electricity usage     Land conversion	
	d. Are the plans being implemented? Was there any changes? Is it justified?		6. Peat lands emissions	
	e. Is the treatment methodology for POME recorded? (refer to C 4.4.3)		The records of each programme were sighted as evident implementation. Negeri Lama II Mill waste water was processed through a series of waste water treatment ponds: anaerobic ponds, facultative ponds and aerobic ponds.  Process parameter monitoring and maintenance of the ponds were	
			sighted. Quality of waste water effluent is monitored quarterly in line with the requirements. The results of monitoring of waste water effluent were reviewed including measurement of BOD; the result of discharge effluent conforms to the limits for parameters.	
	A monitoring plan and results of regular reporting on	emission and pollutants from estate a	nd mill operations using appropriate methods, shall be available.	
	Specific Guidance: For 5.6.2 and 5.6.3: The treatment methodology for	POME (Palm Oil Mill Effluent) will be r	ecorded.	
5.6.3	For 5.6.3 (GHG): For the implementation period unti (including land use practices) can be used as a mon		orsed modified version of PalmGHG which only includes emissions from	operations
	In addition, during the implementation period, groweduse in November 2005 as the baseline. The implementation		ort emissions arising from changes in carbon stocks within their operations are implementation period for Criterion 7.8.	ons, using the land
	review and fine tune the tools, emission factors and	methodologies, and provide additional	oup (composed of all membership categories) which will use the inform guidance for the process. Public reporting is desirable, but remains volu up will seek to continually improve PalmGHG, recognising the challeng	untary until the

## **Audit Report**

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
	measuring GHG and carbon stock.  PalmGHG or RSPO-endorsed equivalent will be use	d to assess, monitor and report GHG 6	emissions. Parties seeking to use an alternative to PalmGHG will have to	o demonstrate its
	equivalence to the RSPO for endorsement. Methodo	logy for calculating GHG refers to 7.8.		y domonociato no
	a. Is there a system in place to monitor emission of pollutants including greenhouse gases from estate (plantation) and mill operations?	Calculation of GHG emission, calculation Year assessment 2016	The GHG emission calculation for Negri Lama of PT. Hari Sawit Jaya use Palm GHG V 3.0. as RSPO requirement.	YES (Minor NCR 2017 – 18)
	b. Is there regular reporting of the monitoring outcomes? How often and to whom is reporting done?			OPEN
	c. Is the monitoring and reporting conducted using appropriate tools? What tool is being used to assess, monitor and report on GHG emissions?			
	Please refer to specific guidance for GHG requirements.			

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

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
<b>NO</b> 6.1	CHECKLIST  Aspects of plantation and mill management that have promote the positive ones are made, implemented an Guidance: Identification of social impacts may use AMDAL as parentire requirements in the social impact assessment of Identification of social impacts should be carried out be involvement of independent experts should be soughth Participation in this context means that affected participation of impacts, reviewing findings and plans Potential social impacts may result from activities such disposal of mill effluents; clearing of remaining natural Plantation and mill management may have social impacts and use rights;  Economic livelihoods (e.g. paid employment) and Subsistence activities;  Cultural and religious values;  Health and education facilities;  Other community values, resulting from changes Traditional or customary rights owned by the local Welfare of workers/labour and women, children and Contribution to the local development, including the Regulations relating to identification of environmental regulations, such as:  1. Government Regulation No. 27 year 2012 regards.	EVIDENCE  social impacts, including replanting, and monitored, to demonstrate continual and monitored, to demonstrate continual and monitored, to demonstrate continual and of the process, however it is the concover all aspects of estate and mill open by the grower with the participation of a towhere this is considered necessary to see are able to express their views through an are able to express their views through as: building new roads, processing the as: building new roads, processing the area and social working on factors and working conditions;  as such as improved transport /communical community, if identifiable and vulnerable group improvement of human resources, local and social key issues including indigending Environment Permit  year 2012 regarding Involvement of the year 2016 regarding Guidance for AM	re identified in a participatory way, and plans to mitigate the negative in improvement.  Impany's responsibility to provide objective and proper evidence to the erations, and their changes along the time.  Infected parties, including women and migrant workers as appropriate to ensure that all impacts (both positive and negative) are identified.  Ingly their own representative institutions, or freely chosen spokespersor cess of implemented plans.  Intills or other infrastructure; replanting with different crops or expansion makers or employment terms; smallholder schemes.  Including the interval of substantial migrant labour force.  In and customary communities.  In and customary communities.  In and customary and Information Transparency in AMDAL Process DAL Preparation	mpacts and audit team that to the context. The ns, during the n of planting area;

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Page 121 of 228

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
0.4.4	Reserved Land of the Customary Law Abiding (			
6.1.1	<ul> <li>(M) A social impact assessment (SIA) including recording.</li> <li>a. Has an SIA been conducted? When was the last SIA conducted?</li> <li>b. Is the process in conducting the SIA and the findings documented?</li> <li>c. Does the SIA cover all of the potential impact factors, including: <ul> <li>Access and use rights;</li> <li>Economic livelihoods (e.g. paid employment) and working conditions;</li> <li>Subsistence activities;</li> <li>Cultural and religious values;</li> <li>Health and education facilities;</li> <li>Other community values, resulting from changes such as improved transport /communication or arrival of substantial migrant labour force.</li> </ul> </li> </ul>		Social impact assessment result was conducted in 1994 by third parties that was included in AMDAL Documents. The studies including pre operation and operation phase of estate and mill  Then the organisation created and updated on 2017 in Document Social impact assessment report, 2017 ,(Laporan Kajian Dampak Sosial & Ekonomi Aktifitas perusahaan perkebunan kelapa sawit PT Hari Sawit Jaya Negeri Lama Group. It was created by Team CSR and Stake holder relations of Asian Agri Group that have experience and competence related to social studies in the palm oil industry.  Participation of affected parties and local communities stated and described in the report including questioner.  Positive impacts were identified such as: Regional development, increased population of the village economy and ease of road access.  Negative impacts were identified such as: increase of road due to FFB transport (public health), Noise and dust coming from transport (social cultural), unfair donation for community estate (social cultural).  The assessment scope are:  a) Village monography  b) Relationship between company and village  c) Livelihoods  d) Religion activities  e) Village infrastructure  f) Positive impact  g) Negative impact	YES

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	CHLORLIOT	LVIDENOL	h) Replanting  Positive impacts on SIA were identified, such as:  - Alternate livelihoods - Work opportunities - General infrastructure (praying facility, sport facility, etc.) - CSR program  Negative impacts on SIA was identified, such as:  • Dust pollution due to a passing truck on the road • Air quality • Decrease in air quality • Disturbance on water biota • Decrease in ground water quality • Road damage and traffic accident • Social impact concerning welfare of workers/labour and women, children and vulnerable group has been identified in	(ILGINO)
6.1.2	(M) There shall be evidence that the assessment has	been conducted with the participation	SIA Assessment report.	
V.1.2	<ul> <li>a. Does the assessment involve consultation with the affected parties? Who are the affected parties?</li> <li>b. Is there record of how the participatory assessment has been conducted? Were the affected parties able to express their views through their own representative institutions, or freely chosen spokespersons, during the identification of impacts, review of findings and planning for mitigation?</li> </ul>	Social impact assessment report, 2017, (Laporan Kajian Dampak Sosial & Ekonomi Aktifitas perusahaan perkebunan kelapa sawit PT Hari Sawit Jaya Negeri Lama Group)     Interview with local governance and stakeholder on 19 December 2017	Social Impact assessments involve consultation with the affected parties. Evidence of participatory action from local communities was also sighted in related SIA documentation including photos.  SIA method is done by interview and questionaire. Attendance list and photograph of social impact assessment were available. Assessment has been done with the participation of affected parties such as head of villages, village representatives, and sub district police head, etc.(Sidomulyo Villages Kecamatan Bilah Hilir, Kabupaten Labuhan Batu Induk),also workers of mill and estate in Negeri Lama 2.	YES
			Affected parties have been able to express their views through their own representative institutions, or freely chosen spokespersons, during the identification of impacts, reviewing findings and plans for mitigation, and monitoring the success of implemented plans	

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
6.1.3	<ul> <li>(M) Plans for management and monitoring of social in consultation with the affected parties, shall be available.</li> <li>Specific Guidance: For 6.1.3 and 6.1.4: Plan for management and monitoring identified impacts shall be developed in consultation. Methodology to identify customary right and local corrowa. Document review</li> <li>b. Field observation</li> <li>c. Interview</li> <li>d. FGD (Focus Group Discussion)</li> <li>e. Participatory mapping</li></ul>	mpacts to avoid or reduce negative impole, documented and timetabled, including itoring of social impacts shall be establicated in with the affected parties, documented immunity and social impacts assessment and the social impacts and material social imp	pacts and promote positive ones, based on social impact assessment, the ding responsibilities for implementation.  In the distance of the positive one and and timetabled, including responsibilities for implementation.	hrough s, and monitoring
	implementation of the plans been identified?		Realization of planning have been defined and implemented within a reasonable time.	

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
	of identified impacts shall be developed in consultatic Methodology to identify customary right and local cona. Document review b. Field observation c. Interview d. FGD (Focus Group Discussion) e. Participatory mapping These involve participation of the community to	on with the affected parties, documente nmunity and social impacts assessmer define potential social impacts and ma	nagement recommendation. The process refers to Regulation of the Min Insparency in the Process of Environment Impact Assessment (SEIA).	
	<ul> <li>b. Has the plan been updated as necessary (i.e. in cases where the review has concluded that changes should be made to current practices)?</li> <li>c. Have the changes to the plan been implemented?</li> <li>d. Is there evidence that the review has been done with the participation of the affected parties?</li> <li>e. Has the process been recorded/documented?</li> </ul>	report, 2017 ,(Laporan Kajian Dampak Sosial & Ekonomi Aktifitas perusahaan perkebunan kelapa sawit PT Hari Sawit Jaya Negeri Lama Group) b. Analisis Dampak Lingkungan – PT. Hari Sawit Jaya c. Monitoring and CSR Program year 2017	Review of Social and economy impact was conducted minimum one time every year by Sustainability & CSR Department and last update was on 2017.  Management and monitoring social impact was conducted internally by the company. This can be seen on Social impact assessment report, 2017 ,(Laporan Kajian Dampak Sosial & Ekonomi Aktifitas perusahaan perkebunan kelapa sawit PT Hari Sawit Jaya Negeri Lama Group). Document was sighted and evident Review of the monitoring social impact assessment report was conducted with participation of the affected parties. Relevant stake holders was invited from surrounding of the estate/mill such as Desa Sidomulyo, Desa Tanjung Haloban, Sei Tarolat include the employee. They were provided feedback by direct interview with the company representatives. Attendance of the review were evident on July 2017.  On the SIA monitoring report review was sighted that stake holders from the organisations have been invited in a During the audit the management and monitoring plan of social impact was still relevant with the actual condition.	
6.1.5	Particular attention shall be paid to the impacts of sm			N.
	a. Are there schemed smallholders involved?	Interview with management	There was no Smallholder scheme in PT Hari Sawit Jaya	NA

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	b. Have they been considered and involved in the whole process of the SIA?			
	c. What are the main impacts affecting these smallholders?			
	There are open and transparent methods for commu	nication and consultation between grov	vers and/or millers, local communities and other affected or interested p	arties.
	Guidance: Decisions that the growers or mills are planning to m and/or consultation.	ake should be made clear, so that loca	I communities and other interested parties understand the purpose of the	ne communication
6.2	appropriate existing local mechanisms and language	s. Consideration should be given to the	ol communities and other affected or interested parties. These should communities and other affected or interested parties. These should communications show the compared to day labourers, new versus established community group	ould take into
	In these communications, consideration should be gi facilitate smallholder schemes and communities, and		interested community groups, NGOs, or government (or a combination	of these), to
6.2.1	(M) Communication and consultation procedures sha	all be documented		
	Does the company maintain a list of local communities and other affected or interested parties?	Public consultation on 19     December 2017	The Company has a list for the local community and other interested parties and mentioned in the List of Stakeholder updated on October 2017.	YES
	b. Is there SOP being developed by the company for communication and consultation between the company and the local communities and other affected or interested	SOP AA-GL-50009.1-R0 -     Mechanism local communication     / public consultation for     interested parties.	SOP related to communication and consultation is described in the SOP AA-GL-50009.1-R0 - Mechanism local communication / public consultation for interested parties.	
	parties? c. Is the FPIC approach incorporated in the SOP	Stakeholder list of PT Hari Sawit Jaya, updated October 2017	FPIC was not applicable during land acquisition in PT. Hari Sawit Jaya because it was obtained prior 2005, however FPIC approach	
	for communication and consultation with the local communities and other affected or		was incorporated in the SOP for communication and consultation with the local communities and other affected or interested parties	
	interested parties?  d. Has the SOP been developed together with the local communities and other affected or interested parties using appropriate existing		The existing communication and consultation mechanisms (SOP related to communication and consultation is described in the SOP AA-GL-50009.1-R0 - Mechanism local communication / public consultation) has been designed with consideration to the use of appropriate existing local mechanisms and languages. Consideration	

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
	local mechanisms and in languages understood by these parties?		has been given to the existence/formation of a multi-stakeholder forum.	
	e. Has the SOP been socialized with the local communities and other affected or interested parties taking into account the differential access to information by women as compared to men, village leaders as compared to day labourers, new versus established community groups, and different ethnic groups?		The Procedure has been developed and disseminated to the stakeholder. Minutes of socialization and attendance list was sighted. The existing communication and consultation was taken into account differential access to information by women as compared to men, village leaders as compared to day labourers, new versus established community groups, and different ethnic groups.	
	f. Have interviews with affected parties been carried out to verify that the SOPs are effective?		Procedure was available in Indonesian and easily to understand and it was effective. It was verified during public consultation and interview with stakeholder dated 19 December 2017.	
6.2.2	The company shall have official(s) who is responsible	for consultation and communications		
	Who in the company is appointed to be responsible for communication and consultation with the affected parties?	<ul> <li>Memorandum for Appointment Letter of Glorius A. Bangun as Humas (Public Relations)</li> </ul>	SK No: 064/HR-RO1/MEMO/04/15 dated 9 April 2015 about Assignment of Public Relations Office of PT Hari Sawit Jaya with job descriptions such as:  a. Minimize disturbance toward field operational	YES
	b. Has the position been made official with clear and proper job description?	- Jobdesk for Public Relations - Interview with local	b. Develop and maintain relationship with stakeholder     c. Collaborate with internal and external department to solve	
	c. Have the affected parties been made aware and have access to the person in charge?	communities on 19 December 2017	<ul> <li>issues concerning social, land and waste.</li> <li>d. Monitoring of waste sample delivery and process the cost for waste analysis</li> <li>e. Monitoring of legal document (estate and mill)</li> <li>f. Updating regulations and law</li> </ul>	
			Based on interview with stakeholder, they know Mr. Glorius A. Bangun as Public Realtion in Negeri Lama Group.	
6.2.3	The company shall have a list of stakeholders, records and records of actions taken in response to input from	stakeholders.	nation of receipt and that efforts are made to ensure understanding by a	·
	a. Is the following maintained?	- SOP AA-GL-5008.1-R1 dated 22 August 2011	Organization has established and implemented a mechanism for receiving and providing information in the procedure - SOP	YES
		- Logbook Communication	Penanganan Permintaan Informasi Stakeholder (Handling of	

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
	<ul> <li>List of stakeholders (local communities and other affected or interested parties etc.);</li> <li>Records of all communication, including confirmation of receipt or endorsement;</li> <li>Evidence that efforts have been made to ensure understanding by affected parties;</li> <li>Record of actions taken in response to input from stakeholders.</li> </ul>	and Consultation Y2017  Record of information request and responses Y2017  Stakeholder list of PT Hari Sawit Jaya, updated 2 February 2016  List information for stakeholder updated 5 March 2017  Interview with stakeholder on 19 December 2017	Information Request from Stakeholder) SOP AA-GL-5008.1-R1 dated 22 August 2011 which explain the mechanism of response to requests for information by referring to the list of stakeholders and stakeholder information according to the principles and criteria for sustainable palm oil. The initial response was given no later than 14 days after receipt of the request from stakeholders.  All information except confidential commercial information or information which has a negative impact on the environment and social can be provided by the organization. Request for information outside of the list of public information should be approval of top management and the provision of information comes with an official receipt.  In the procedure also described specific timeframe to respond the requests for information from stakeholder depend on its request. Organizations usually respond directly to requests for information from all interest party/stakeholder.  All information requests from stakeholder and their respond were listed and recorded by Mill and Estate on logbook "Record of information request and responses" e.g. road maintenance, donation, scholarship, invitation for memorial, etc.  Interview result with outgrower representative was concluded that the prices paid for FFB was transparent and complied with agreement. Determination of FFB's price was conducted through the pricing mechanism of government.  In general, interview result indicated that the communication between local society and Estate was evident where some agreements were made to improve social relationship.	
6.3	There is a mutually agreed and documented system  Guidance: See also to Criterion 1.2.	for dealing with complaints and grievar	ices, which is implemented and accepted by all affected parties.	

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)		
	Dispute resolution mechanisms should be establishe	d through open and consensual agreei	ments with relevant affected parties.			
	Complaints should be dealt with by mechanisms such or external.	h as Joint Consultative Committees (JC	CC), with gender representation as necessary. Grievances may be inter	rnal (employees)		
	For scheme and independent smallholders, refer to '0 2009.	For scheme and independent smallholders, refer to 'Guidance for Independent Smallholders under Group Certification', June 2010, and 'Guidance on Scheme Smallholders', July 2009.				
	Where a resolution is not found mutually, complaints can be brought to the attention of the RSPO Complaints System. This refers to United Nations Commission on Human Rights (UNCHR) document to support 'Guiding Principles on Business and Human Right' to implement UN framework to "Protect, Respect and Remedy" 2011. If all the above stages of conflict resolution have been carried out but the conflict cannot be resolved, then the next process is done through legal proceedings in court.					
	Conflict resolution process with the community is still	continued although transfer of compar	ny's ownership occurs.			
	(M) The mechanism, open to all affected parties, shall resolve disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants and whistleblowers, where requested, as long as that information is supported with adequate initial evidence.					
6.3.1	Specific Guidance: For 6.3.1: The system should aim to reduce the risks of reprisal. For 6.3.2: Records can be in the form of evidence from process or end-result of the resolution					
	a. Is there an system in place to deal with complaints and grievances for all affected parties?	SOP handling of customer complaints / stakeholders SOP: AA-HR-3085.5 – R.0.	Organization has defined the system to deal with complaints and grievances for all affected parties which documented in SOP handling of customer complaints / stakeholders SOP: AA-HR-3085.5	YES		
	b. Who in the company is responsible to receive complaints and grievances?	Interview with stakeholder on 19 December 2017	- R.0.  Person who responsible to receive complaints and grievances has			
	c. Is the existence of the system been made known and communicated to all parties?	Asian Agri Sustainability Policy	assigned by organization that was Estate Manager. In the procedure also described stages follow up of complaint, problem identification			
	d. Is there evidence that the system is understood by all parties?		and escalation of complaint to Estate Manager, General Manager, Region Head and Head Office (if necessary)			
	e. Is training provided to the workers on the procedures/systems?		The existence of the system has been communicated and made known to all parties. It has been disseminated to all parties together.			
	f. Is the system effective to ensure that complaints or grievances are addressed or resolved in an effective, timely and appropriate manner?		Socialization and procedures training have been performed to all levels of employees. The system was effective to ensure that complaints or grievances are addressed or resolved in an effective, timely and appropriate manner. Evidence that the procedures have been implemented is the logbook of complaint. Records are routinely			

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
	g. Does the mechanism or procedure provide a way for workers to report a grievance against a supervisor to someone other than the		monitored monthly. Since January to November 2017 there were no complaints identified & submitted by the public community and employees.	
	supervisor?  h. How is a complaint or grievance investigated, addressed and resolved? Are complaints dealt with by mechanisms such as JCC?		Mechanism and procedure was providing a way for workers to report a grievance against a supervisor to someone other than the supervisor.	
	i. Is there a non-retaliation or non-reprisal policy that protects complainants or whistle-blowers?  j. Is the privacy of parties protected?		The system was enable resolution of disputes in an effective and appropriate manner by way of classifying complaints into internal and external, appointed the person who responsible for handling complaints, including level of officials who make decisions for complaint resolution.	
	k. Where a resolution is not found mutually, is there a process for complaints to be brought to the RSPO Complaints System?		Non-retaliation or non-reprisal policy that protects complainants or whistle-blowers was described in Company Policy Privacy of parties who submitted the compliant and aspirations were protected if necessary.	
			Where a resolution is not found mutually by means of deliberations between two parties, the problem can be resolved through third-party mediation / authorities, including grievance if there is no agreement it will be resolved through the RSPO Complaints System and it is described in the Asian Agri Sustainability Policy.	
	(M) There shall be records of process and outcome of	dispute resolution.		
6.3.2	Specific Guidance: For 6.3.2: Records can be in the form of evidence from	m process or end-result of the resolution	on	
	Is the complaints or grievance resolution process documented?	Complaint log book	Complaints or grievance resolution process documented in the	YES
	b. Are outcomes or decisions reported to the parties?	<ul> <li>Interview with stakeholder on 19 December 2017</li> </ul>	logbook of Complaint. Records are routinely monitored monthly. However in 2017 there were no complaints submitted by the public community and employees related to social aspect, mostly about	
	c. Who has access to the documentation of the process and/or outcomes?	Interview with union, workers and committee gender on 19 - 20 December 2017	housing problems in employees complex.  It was also confirmed based on public consultation with surrounding village representative, labour union and gender committee.	

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
			Outcomes or decisions as response to followed up the complaint reported to affected parties as described in example above.	
6.4	communities and other stakeholders to express their  Guidance:  This criterion should be considered in conjunction with	views through their own representative the Criteria 2.2 and 2.3, and the associa	ted Guidance	
6.4.1	Constitution Court.  Specific Guidance: For 6.4.1: Customary Right in the Local Regulation/F mapping of customary land by the customary law con Affairs (Permendagri) No. 52 year 2014 regarding Gu	Perda (based on Constitution Court Dec nmunity who are recognized by the sui uideline of Recognition and Protection o	ng people entitled to compensation, shall be available, referring to decision No. 35/PUU-X/2012 regarding Customary Forest) determined thromogrounding customary law community and refers to Regulation of the Miniof Legitimate Customary Community and Regulation of the State Minister Settlement of Problems Related to the Communal Reserved Land of the	ough participatory ister of Home er of Agrarian
	<ul> <li>a. Are procedures for identifying legal, customary or user rights in place?</li> <li>b. Are procedures for identifying people entitled to compensation in place?</li> <li>c. Are those procedures jointly developed, agreed and accepted by local communities?</li> </ul>	SOP AA-GL-5003.1-R1 -     Calculation and compensation     method for land     Interview with stakeholder on     19 December 2017	Calculation and compensation method for land has been described in a procedure SOP AA-GL-5003.1-R1.  The steps of the procedures to identification and calculation of land compensation, consist of:  1. Identification of land owner  2. Measurement  3. Data input (mapping)  4. Negotiating compensation  5. Payment of compensation  6. Data documentation.  Procedure also described identifying people entitled to compensation.  Procedures was jointly developed, agreed and accepted by local	YES

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
			appropriate existing local mechanisms and languages. Consideration has been given to the existence/formation of a multi-stakeholder forum.	
6.4.2	result of this evaluation.  Specific Guidance: For 6.4.2: Companies should make best efforts to enschemes if the land ownership is individual.  The calculation procedure shall consider: a. Gender differences in the power to claim rights, b. Differences of transmigrants and long-established. C. Differences between legal ownership evidence was a constant.	sure that equal opportunities have bee ownership and access to land; ed communities;	Inted, monitored and evaluated in a participatory way. Corrective actions on provided to the heads of family, both female and male, to hold land tite troup (customary community)	tles in smallholder
	<ul> <li>a. Has a procedure for calculating and distributing fair compensation (monetary or otherwise) been established and implemented?</li> <li>b. Are the procedures jointly developed, agreed, accepted and clearly understood by affected parties?</li> <li>c. Is the procedure monitored and evaluated in a participatory way? Have corrective actions been taken as a result of this evaluation?</li> <li>d. Does this procedure take into account the following: <ul> <li>Gender differences in the power to claim rights;</li> <li>Ownership and access to land;</li> <li>Differences of transmigrants and long-established communities;</li> </ul> </li> </ul>	SOP AA-GL-5003.1-R1 - Calculation and compensation method for land     Public consultation with stakeholder on 19 December 2017	Procedure for calculating and distributing fair compensation (monetary or otherwise) has been established and available in procedure of Identification and calculation of land compensation SOP AA-GL-5003.1-R1 - Calculation and compensation method for land. The steps are as described in criterion 6.4.1.  Procedures was jointly developed, agreed and accepted by local communities It has been designed with consideration to the use of appropriate existing local mechanisms and languages. Consideration has been given to the existence/formation of a multi-stakeholder forum.  The procedure monitored and evaluated in a participatory way, procedures will be revised if there is a reasonable request from stakeholders.  This procedure take into account of the gender differences in the power to claim rights, ownership and access to land, differences of transmigrants and long-established communities, differences in ethnic groups' proof of legal versus communal ownership of land.	YES

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
6.4.3	Differences in ethnic groups' proof of legal versus communal ownership of land.  e. Where there are schemed smallholders, is there effort to ensure equal opportunity has been provided to.  (M) Compensation claims, process and outcome of a ls the process and outcome of negotiated agreements and compensation claims documented?  b. Does this documentation include evidence of the participation of affected parties? Is there any approval/signed by effected parties?  c. Was consent obtained from all parties to make the documents publicly available?	ny negotiated agreements shall be doc a. Procedure of Land dispute resolution mechanisms CR- AGR-102-GRL.06-11-1 b. Records of compensation c. Interview with stakeholder on 19 December 2017.	It was noted that there was no ongoing progress of new land acquisition during interview with sampled villager's representative, all previous land acquisition was solved before Land Use Title-Hak Guna Usaha (HGU).  The latest HGU processing for PT. Hari Sawit Jaya has been done on February 2016 resulting Land titles (HGU) Extension No.02-12-00-00-2-00074 issued on 29 February 2016 includes SK BPN Sumatera Utara No.3/HGU/BPN.12/XI/2015 dated 8 December 2015 regarding extension land titles issues for PT Hari Sawit Jaya for area coverage 188.75 Ha. The procedures were implemented.  PT. Andalas Intiagro Lestari, Aek Kuo Estate is now on process for HGU extension. All compensations process with local communities is completed in 1988 and 1997 based HGU certificate. The process now is process for technical consideration in gaining Location Permit from Land Agency (BPN) of Labuhan Batu Regency.	N/A
6.5	Guidance: Labor union agreement or direct contracts of employ, leave, reasons for dismissal, period of notice, etc.) st Union if any.  Regulation related to the minimum wage such as, Re	ment detailing payments and condition and be available in the languages under a gulation of the Minister of Manpower &	ustry minimum standards and are sufficient to provide decent living was sof employment (e.g. working hours, deductions, overtime, sickness, hours, hours, overtime, sickness, hours, overtime, sickness, hours, hours, overtime, sickness, hours,	oliday, maternity official or Labor nplemented.

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
	physical and social living for a month.			,
6.5.1	(M) Documentation of pay and conditions for employe	ees based on the existing manpower re	gulations shall be available.	
	<ul> <li>a. What types of employment arrangements are there in the company? (E.g. contractual, outsourced, apprenticeships, direct hires, piecemeal basis, etc.)</li> <li>b. Is there documentation of pay and conditions for each employee?</li> </ul>	<ul> <li>Payroll list</li> <li>Letter form Governor of North Sumatra Nomor: 188.44/44/KPTS/Tahun 2017 dated 3 February 2017,</li> </ul>	In PT Hari Sawit Jaya there are 2 types of worker status, SKU and PHL. Some of the workers such as harvester, manual upkeep ,sprayer and fertilizer workers were PHL. The use of PHL workers were taken from their monthly target. Whenever the organisation need to increase the target, they will add workers with PHL status. And if in the future, the company still need it, they might have	YES
	c. Is there a definition for living wage in the country? If not, how was the decision on wage for employees and contract workers made?	minimum wages (UMP) for Kabupaten Labuhan Batu is Rp. 2.467.000/month  - Internal Memorandum No.	promoted into SKU workers status. Their wages follow the national law (UMP) and for SKU, their wages follow BKS PPS letter dated 27 February 2017 about SKU wages. Beside that, the company published Internal Memorandum No. 068/HR-RO1/MEMO/04/2017 dated 12 April 2017 about PHL and SKU wages.	
		068/HR-RO1/MEMO/04/2017 dated 12 April 2017 about PHL and SKU wages.  - Collective La or <i>PKB</i>	PHL will get wages Rp. 98.680/work days for 6 days a week or Rp 2.467.000,-/month (for period 2017) Meanwhile for SKU Rp.2.369.255/month plus monthly fixed called "Catu beras". The proportion of "Catu beras" or Rice Ration can be seen on Collective Employment Agreement Letter (PKB).	
		<ul> <li>(Perjanjian Kerja Bersama)</li> <li>Period 2015 – 2017</li> <li>BKS PPS letter dated 27</li> <li>February 2017 about SKU wages</li> </ul>	KNC and KNS Payment of wages in 2017 based on the Letter form Governor of North Sumatra Nomor: 188.44/44/KPTS/Tahun 2017 dated 3 February 2017, minimum wages (UMP) for Kabupaten Labuhan Batu is Rp. 2.467.000/month	
		- Contract of employee	PND Payment of wages in 2017 based on the Letter form Governor of North Sumatra Nomor: 188.44/44/KPTS/Tahun 2017 dated 3 February 2017, minimum wages (UMP) for Kabupaten Labuhan Batu is Rp. 2.467.000/month	
			"Catu beras" or Rice Ration details are :  a. Workers alone : 15 kg b. One legal wife: 9 kg	

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			c. Children (until 3): 7,5 kg  If worker have one wife and 2 kids then he will receive 15 kg + 9 kg + 15 kg (for 2 kids), total 39 kg of rice every month.		
			Recordings are available in the employee's salary slip salary payment.		
6.5.2	management or Labor Union to the workers.  Specific Guidance: For 6.5.2: Collective Labor Agreement (Perjanjian Kocompany referring to the manpower regulations, sucl Company Regulation, and Developing and Registerin	erja Bersama/PKB) and or Company R h as the Regulation of the Minister of M ng Collective Labor Agreement.	gulations, shall be available in understandable language; and explained egulation are developed by the company together with the Labor Union, lanpower No. 6 year 2011 regarding Procedure for Establishing and End	if any, in the dorsing the	
	a. Is the pay and conditions of employment clearly detailed in the employment or service contracts? (E.g. working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc.)	<ul> <li>Collective Employment         Agreement or PKB (Perjanjian         Kerja Bersama) Period 2015 -         2017</li> <li>Contract for PHL workers in         KNS,KNC, PND</li> </ul>	Agreement / contract of employment for workers, has been included in the PKB (Collective Employment Agreement) has been endorsed by Indonesian Ministry of Manpower. In the agreement regulates the : working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc.).	YES (Major NCR 2017-19) CLOSED	
	b. Is the contract prepared in languages understood by the workers, explained carefully to workers by management officials, and signed by both the authorised signatory of the company and employee?	<ul> <li>List of employees of PT Hari Sawit Jaya updated November 2017</li> <li>Interview with workers union and workers on 19 – 20</li> <li>December 2017</li> </ul>	Sawit Jaya updated November 2017  Interview with workers union and workers on 19 – 20  December 2017  a. Contract for PHL employees was reviewed, such as I working hours, deductions, overtime, social securive established on the contract b. 10 workers were interviewed from KNC,KNS & PND	working hours, deductions, overtime, social security was established on the contract b. 10 workers were interviewed from KNC,KNS & PND during	
	<ul> <li>c. Does the pay and conditions provided in labour laws, union agreements or direct contracts of employment comply with:         <ul> <li>The decent living wage as provided in the National Interpretation for the country; or</li> <li>The local legal requirements in meeting the minimum wage; or</li> </ul> </li> </ul>		audit.Based on interview with them, they said that they not aware or not remember they have sign work contract before.  c. Employee payment slip was sight and reviewed for Period September – November 2017.The payment of the employee was according to the contract and the regulatons for PHL & SKU employee.  At the time of audit, there was no recorded breach by the company or complaint for unjust pay and conditions		

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
	<ul> <li>The industry minimum standard for a similar position or work responsibilities</li> </ul>			
	d. Is the pay received by the employee consistent with the terms of the contract and the law (relates to P2)?			
	e. Have there been any cases recorded of breach by the company, or complaint made by employees against the company on unjust pay and conditions?			
6.5.3	Growers and millers shall provide adequate housing, available or accessible.  Specific Guidance: For 6.5.3: Incentives to the employees refer to Act N		ind welfare amenities to national standards or above, where no such pu	blic facilities are
	a. Have growers and millers provided adequate housing and other basic necessities such as that listed below to national standards or above, where no such public facilities are available or accessible?  • adequate housing;	<ul> <li>List of public facilities of KAK, KNU and PND</li> <li>Site visit and field observation in emplacement</li> </ul>	Public facilities were provided by the organisation and covered residential facilities, day care, kindergarten, building for prayers, sports facility (e.g. volley ball, badminton, futsal, and tennis), etc. Housing for workers and medical facilities (clinics) were was provided by the organisation with basic facilities.	YES
	<ul> <li>adequate electricity;</li> <li>clean water supplies (availability of clear water all year round);</li> <li>medical services (distance to health care facility i.e. clinic, hospital);</li> </ul>		Company has provided housing complex for the workers, Its permanent house with two doors in one roof and permanent house. Clean water of MCK was available in housing complex, the resource is from the well or ground water. Water has been analysed by third parties.	
	<ul> <li>children education (distance to school and schooling attendance (%) of children under 12)</li> <li>welfare amenities.</li> </ul>		Housings were provided for staff, non-staff (SKU) and PHL (daily free workers). Each house has 2 bedrooms, a living room and one bath room. No charges given to the employee for electricity and water supply use.	
			List of facilities are stated below :	
			a. KNC: housing 226 unit, mosque/church 2 unit, clinic 1 unit and child care 1 unit	

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
			b. KNS & PND : housing 454 unit, mosque/church 2 unit, child care 1 unit and clinic 1 unit	
	There shall be demonstrable efforts to improve works	l ers' access to adequate, sufficient and	affordable food	
6.5.4	Specific Guidance: For 6.5.4: This applies if public facility is unavailable employee cooperative shop, weekly market, etc.	or inaccessible to provide adequate, so	ufficient and affordable food. The examples of the efforts are provision o	of transportation,
	A. Have growers and millers made demonstrable efforts to monitor and improve workers' access to adequate, sufficient and affordable food?	Interview with workers on 19-20 December 2017	Monitoring of workers access to food was conducted monthly. Organisation provided Rice for workers and the family. Markets in Posko Pekan Kamis Desa Sidodadi and Sidomulyo with the range of 500 m, every payday traders will be closer to the location of the estate to trade the basic needs of. Access to the market is always taken care of by graders regularly, so that during the rainy season can still be passable.  In Emplacement/employee housing there are also some stalls and small shops seller staple necessities. Employees are not difficult to obtain basic commodities every day. Employee housing access to the main road is less than 1 km with road conditions were pretty good, the market which provide food and basic goods needs easily found not far from the location of the company	YES
6.6	The employer respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.  Guidance:  The right of workers, including migrant and transmigrant workers (Angkatan Kerja Antar Daerah/AKAD) and contract workers, to form associations and bargain collectively with their employer should be respected, in accordance with The Act No. 21 year 2000 regarding Labor Union.			
	Labour laws and collective labor agreements, or in their absence direct contracts of employment detailing payments and other conditions, should be available in the languages understood by the workers or explained comprehensively to them by a management official.			
	Definition of Employer refers to the Act No. 13 year 2	2003 regarding Manpower.		
6.6.1	(M) A record of the company's policy in understandal	ble language recognising freedom of as	ssociation, shall be available	

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
	a. Has the company published a statement in local languages recognising the rights of employees to freedom of association?	Attendance list worker for socialization of Company Policy.	Freedom of association has been mentioned in Company Policy dated 1 December 2014. Organizations understand that workers have the right to argued, associate and organize in a labour union.	YES
	<ul> <li>Are the employees, including migrant and transmigrant workers and contract workers, allowed to form associations and bargain</li> </ul>	- Company Policy – dated 1 December 2014.	Organization committed to provides opportunities for workers to organize in unions and express an opinion.	
	collectively with their employer?	- Collective Employment	Commitment covered in the policy are:	
	<ul> <li>Was the outcome, if any, from the collective bargaining process between the company and the association respected, implemented and</li> </ul>	Agreement / PKB – PT Hari Sawit Jaya period 2015 - 2017	"Respect the right of every employee to form or join trade unions in accordance they want and to bargain collectively"	
	adopted in full or partially by the company?  d. Are there Labour laws and union agreements,		Based on interview with labour union leader, the company has accommodated employee rights to argued, associate and organize	
	or in their absence direct contracts of employment detailing payments and other conditions, made available in the languages		in a labour union. Until now there has been no bargaining between companies and unions. Normative rights of employees was already filled with the company	
	understood by the workers or explained carefully to them by a management official?		Employees, including migrant and transmigrant workers and contract workers were allowed to form associations and bargain collectively with their employer.	
			There were union workers represent estate and mill employee incorporated in the SPSI /Union Labour - <i>Perkebunan PT. Hari Sawit Jaya and registered as "PUK Serikat Pekerja Pertanian dan Perkebunan Serikat Pekerja Seluruh Indonesia PT. Hari Sawit Jaya</i> which was founded in 5 November 2003 (registration no. 284/PUK.SPPP-SPSI/DFT/07/XI/2003).	
			Labour laws, union agreements which described in working agreement/PKB and direct contracts of employment detailing payments and other conditions was made available in the languages which understood by the workers and explained carefully to them by management official.	
6.6.2	Records of meetings with labor unions or workers rep	presentatives shall be available.		

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
	<ul><li>a. Are there documented minutes of meetings between the company and main trade unions or workers representatives?</li><li>b. Are the minutes made readily available to employees upon request?</li></ul>	Minutes meeting of SPSI (worker union)	Based on the information the chairman of the union, the union meeting conducted in accordance with the requirements of temporary and existing issue,however the recording of this meeting with the unions, among others: the attendance list and note taker was not established during audit	YES (Minor NCR 2017 – 20) OPEN
6.7	Regulation of the Minister of Manpower and Tra  It is advisable to do socialisation to all level of operations.  Output  Description:	nternational Labour Organization (ILO) nsmigration No. 235 year 2003 regardi ions regarding prohibition on employing	Convention No. 138 year 1973 on Allowable Minimum Age for Work. ing Types of Work Endangering Child Health, Safety or Morale	
6.7.1	(M) There shall be documented evidence that minimu			
	Is the minimum working age for workers together with working hours clearly defined in the company's recruitment policy?	- Collective Employment Agreement / PKB period 2015 - 2017.	The company has a policy for minimum working age. It was stated that company committed to not employ underage workers required by national legislation.	NO (Major NCR 2017 - 21)
	b. Are workers employed above the minimum school leaving age of the country or who are at least 15 years of age?	- Procedure AA-HR-305-2-00 – Recruitment and Selection.	Besides that, company has a procedure AA-HR-305-2-00 – Recruitment and Selection which stated that every candidate must have identity card "(KTP), Kartu Keluarga, Surat Nikah (if married)".	CLOSED
	c. Is there evidence that the nature of work for workers under 18 is in accordance with International Labour Organisation (ILO) Convention 138?	<ul> <li>List of worker for KNC, KNS and PND updated November 2017</li> </ul>	Based on document review as listed in "Daftar Tenaga Kerja" there are no underage workers in List of workers did not show any worker under 18 years old when they joined the company.	
	d. Does ground verification show evidence of employment of workers below the minimum working age?		List of workers did not show any worker under 18 years old when they joined the company. Some copies of worker's ID were also filled as evidence.	
	Any form of discrimination based on race, caste, nation	onal origin, religion, disability, gender,	sexual orientation, union membership, political affiliation, or age, is proh	ibited.
6.8	Guidance:  Examples of compliance can be appropriate documentation (e.g. job advertisements, job descriptions, appraisals, etc.), and/or information obtained via interviews with relevant			

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
	agreements.	nedical conditions should not be used in oply. Positive discrimination to provide	n a discriminatory way.  employment and benefits to specific communities is acceptable as part	of negotiated
6.8.1	(M) A company's policy on equal opportunity and trea			
	<ul> <li>a. Is there a company policy on non-discrimination and equal opportunities? Does it at least cover the items mentioned in the criteria (6.8)?</li> <li>b. Is the policy made publicly available for the relevant stakeholders?</li> <li>c. Is there evidence that the policy has been implemented?</li> </ul>	<ul> <li>Sustainable palm oil company policy Asian Agri Group in Article 13 approved 01 December 2014</li> <li>Policy made available in the strategic area in the estate and plantation</li> <li>PHL and SKU workers contract</li> </ul>	Policies on equal opportunities and treatment to get the job described in the Sustainable palm oil policy Asian Agri Group in Article 13 states that the company <i>provides equal opportunity for all employees</i> to organize, association and develop a career according to capabilities.  There was a promotions of workers from PHL to SKU period 2017 from KNC & KNS. Supervisor propose their PHL workers to the Managers and Regional Office HR. Criteria for promotions such as working days and target achievement from supervisor .It was sighted that on period 2017 2 <sup>nd</sup> semester based on sample taken, they have promote 5 PHL workers into SKU. Letter of promotions were sighted on September 2017 for PHL workers such as Mandor & harvester at KNS.	YES
6.8.2		groups including local communities, wo	men, and migrant workers have not been discriminated.	
	a. Is there evidence that employees and groups including local communities, women, and migrant workers have not been discriminated against?  As the employees and groups including local.	<ul> <li>Procedure: AA-HR-305-2-00 – Recruitment and Selection.</li> <li>Collective Employment Agreement / PKB period 2015</li> </ul>	Recruitment process was documented in Procedure: AA-HR-305-2-00 – Recruitment and Selection.  Process covers:	YES
	<ul> <li>b. Are the employees and groups including local communities, women, and migrant workers happy with the way the company is treating them?</li> <li>c. Are there complaints against the company on</li> </ul>	<ul> <li>– 2017.</li> <li>Pay Roll List for Worker –</li> <li>October 2016</li> <li>Interview with union and</li> </ul>	<ul> <li>The collection of application file</li> <li>Selection of administration</li> <li>Announcement of the selection schedule</li> <li>Test questions and physical tests</li> </ul>	
	issues relating to discrimination?  d. What is the nature of complaints employees and groups including local communities,	workers on 19 – 20 December 2017	- Summary of the results of the selection	

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)	
	women, and migrant workers have lodged against the company, if any?	- List of worker for KAK, KNU and PND updated November 2017	<ul> <li>Announcement of selection results</li> <li>Provision of a cover letter MCU to candidates who pass the selection</li> <li>Implementation of MCU</li> <li>Through interviews with workers in mill and plantation, it confirmed that there was no discrimination on working opportunities, all workers treated equally</li> <li>List of workers and payment list shows that the payment of wages of workers also seen that there is no discrimination related to wages earned and includes working hours.</li> <li>From the interviews with workers, they feel that the basic rights of workers already filled by company.</li> <li>From the interview with Union, there is no complaint related to discrimination.</li> </ul>		
6.8.3	Records of evidence that equal opportunity and treatment for work shall be available  Specific Guidance: For 6.8.3: Recruitment and promotion are based on skills, capabilities, qualities and health conditions				
	<ul> <li>a. Does the company keep and maintain a record of their employees' work credentials and medical history?</li> <li>b. Does the company explicitly state the indiscriminatory policy during the recruitment selection, hiring and promotion process?</li> <li>c. Is the company's indiscriminatory policy reviewed regularly?</li> <li>d. Are the company's employees recruited and promoted based on skills, capabilities, qualities, and medical fitness necessary for the job? How is this evidenced?</li> </ul>	<ul> <li>Procedure AA-HR-305-2-00 – Recruitment and Selection</li> <li>Medical Records for workers</li> <li>Recruitment records</li> <li>Promotion letter and records</li> </ul>	Recruitment process was documented in procedure AA-HR-305-2-00 – Recruitment and Selection. Based on that procedure, it was described that the selection, recruitment and promotion of workers based on worker competency. Additional document for promotion of PHL to SKU status were evident. Letter from Estate Manager to Regional HR Manager that was describe the proposal for promotion after evaluation from the supervisor (mandor/Field Assisstant).  Employees credential and medical history were documented and recorded; medical history employees are available and kept by the nurse at the clinic.  All company policy reviewed every year by Sustainability Department	YES	

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)	
			Employee's evaluation was conducted every year to decide promotion of employees. Based on their competency some of worker from estate was promoted to Admin.		
			The process of recruitment, selection and promotion is conducted transparently, and this is communicated to of candidates.		
			In discriminatory policy is reviewed once a year during according that stated in the Company Policy		
			Recruitment process and promotion is done in accordance competency and medical fitness result. And this is evident from ratings performance review that conducted every year. Record of promotion was reviewed.		
			And it looks that personnel accordance with his/her competency (e. g, Estate Asst, Public Relations, Nurse, foreman, etc.).		
			Workers appraisal for Y2017 was reviewed for KNC & KNS.		
6.9	There is no harassment or abuse in the work place, and reproductive rights are protected.  Guidance:  There should be a clear policy developed in consultation with employees, contract workers and other relevant stakeholders, and the policy should be publicly available. Progress in implementing the policy should be regularly monitored, and the results of monitoring activities should be recorded.  Notwithstanding national legislation and regulation, reproductive rights are respected.				
	(M) A policy to prevent sexual and all other forms of harassment and violence, shall be documented, implemented and communicated to all levels of the workforce.  Specific Guidance: For 6.9.1 and 6.9.2: These policies should include education for women and awareness of the workforce.				
6.9.1	There should be programmes provided for particular	issues faced by women and men, such	as violence and sexual harassment in the workplace.		
	A gender committee specifically to address areas of concern to women will be used to comply with this Criterion. This committee, which should include representatives from areas of work, will consider matters such as: training on women's rights; counselling for women affected by violence; child care facilities to be provided by the growers and women to be allowed to breastfeed up to nine months before resuming chemical spraying or usage tasks; and women to be given specific break times to enable effective breastfeeding.				

NO		CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
	a. Does the company have the policy to prohibit any form of sexual and all other forms of harassment and violence?	- Company Policy dated 1 December 2014.	The company has prohibited sexual harassment and violence as committed and written in company policy dated 1 December 2014.	YES	
	b.	Has this policy been documented, implemented and communicated clearly to all levels of the workforce?	<ul><li>Attendance list worker</li><li>Organization structure Gender Committee</li></ul>	This policy has been documented, implemented and communicated to all level workers. Communication was conducted by Afdeling Assistant to his team.	
	C.	Is there a clear protocol for the company to deal/handle such issues/complaints received from the workforce?	<ul> <li>Interview with gender committee on 19 December 2017</li> </ul>	In case there is any harassment and violence, it will be reported to Gender Committee to be followed up. Documented procedure has been established to describe handling mechanism of sexual harassment case - SOP AA-HR-309.01-R0.	
	d.	Is there a list of awareness programs or training provided to the workforce in relation to these issues?		Awareness/training program was listed and discussed during Gender Committee meeting.	
	e.	Has the company formed a Gender Committee to address areas of concern to		Gender Committee has been made regular program for all employees, women and the training required.	
		women? Is there a list of the members sitting in the committee? What are the Terms of Reference of the committee? Does it include		Company has formed A Gender Committee since April 2013 and consist:	
		the handling of issues such as:		The members are :	
		<ul><li>training on women's rights;</li><li>counselling for women affected by violence;</li></ul>		- Head of Committee (Mrs. Simamora-Div 4 KNC-Mandor Tus (Spraying)	
		<ul> <li>child care facilities to be provided by the</li> </ul>		- Vice of head committee	
		growers and millers;		- Secretary	
		<ul> <li>women to be allowed to breastfeed up to nine months before resuming chemical</li> </ul>		- Vice of secretary	
		spraying or usage tasks; and		- Members	
	f.	<ul> <li>women to be given specific break times to enable effective breastfeeding.</li> <li>Is the policy regularly reviewed?</li> </ul>		Gender Committee activities such as handle complaint from female workers, reporting and data collecting if case appeared concerning sexual harassment.	
				Based on interview with Gender Committee, their activities include training on women's rights, counselling for women affected by violence, child care facilities and breastfeeding policy.	

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
			No cases concerning sexual harassment happened in PT Hari Sawit Jaya.	
6.9.2	A gender committee specifically to address areas of areas of work, will consider matters such as: training	ducation for women and awareness of issues faced by women and men, such concern to women will be used to compon women's rights; counselling for wor		ers and millers;
	<ul> <li>a. Is there a policy to protect the reproductive rights of all, especially of women?</li> <li>b. Has this policy been documented, implemented and communicated clearly to all levels of the workforce?</li> <li>c. How is this policy communicated to all levels of the workforce?</li> </ul>	Company Policy dated 1     December 2014     Attendance list worker	A company policy on reproductive riights was documented in Company Policy item 15 dated 1 December 2014.  Policy communicated to all level employees in the company on 10 December 2016 and regularly communicated every month during Posyandu services/meeting between committee and members. Sighted for period September-November 2017.  This policy has been socialized to employees based on evidences such as attendance list and Minutes of Meeting on 10 December 2016.  All company policy reviewed every year by Sustainability Department, Asian Agri.	YES

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
	<ul> <li>a. Does the company have a mechanism to handle employment grievances, that respects anonymity and protects complainants where requested?</li> <li>b. Does the mechanism provide a way for workers to report a grievance against a</li> </ul>	<ul> <li>Company Policy dated 1         December 2014     </li> <li>Attendance list worker</li> </ul>	Company mechanism about complaint (internal and external) documented in procedure SOP: AA-HR-3085.5 - R.0 "Complaints of employees - the delivery and settlement of employee complaints'.  In the procedure also described the process of complaint. Complaint process cannot report only to Supervisor but other such Union, Gender Committee. Stages of complaint were described in the	YES
	supervisor to someone other than that supervisor?  c. Is the mechanism documented, implemented and communicated clearly to all levels of the workforce?  d. Has the company identified personnel who will be responsible to receive and manage complaints received from the workforce?  e. Has the company received any reports or complaints of harassment or abuse? How was it addressed or resolved?		procedure.  In point in the procedure stated that the company will respects anonymity and protects complainants where requested.  All company policy reviewed every year by Sustainability Department, Asian Agri.  According log book and interview with related workers in the company, there is no complaint that received by company.	
	f. Is the policy reviewed regularly?			
6.10	(see Criterion 4.2) should also be considered; where through the FFB price.  Smallholders should have access to the grievance prinvolved.  The need for a fair and transparent pricing mechanism	es such as the role of middle men, trans it is not practicable to recycle wastes to ocedure under Criterion 6.3 if they con m is particularly important for outgrowe	es.  sport and storage of FFB, quality and grading. The need to recycle the report and storage of FFB, quality and grading. The need to recycle the report of smallholders, compensation for the value of the nutrients exported massider that they are not receiving a fair price for FFB, whether or not miders who are contractually obliged to sell all FFB to a particular mill.  consideration should be given to the costs of such changes, and the post	ny be considered dle men are

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
6.10.1	Current and past prices paid for Fresh Fruit Bunches  Specific Guidance: For 6.10.1: FFB pricing in Indonesia refers to the Reg	, ,	o. 14/Permentan/OT.140/2/2013	
	<ul> <li>a. How is the price of FFB determined?</li> <li>b. Is current and past prices paid for Fresh Fruit Bunches (FFB) publicly available? How?</li> <li>c. Was there any complaint on FFB pricing?</li> <li>d. How was the complaint handled?</li> <li>e. What was the solution?</li> </ul>	<ul> <li>FFB pricing mechanism</li> <li>FFB Price mill display</li> <li>Documented procedure (AA-GL-510.1-R0) regarding on how to handling the complaints</li> <li>Site observation and interviews with FFB supplier</li> </ul>	The FFB pricing mechanism were established that based on CPO and PK prices minus the transport cost and multiple with OER divide with taxes (PPN 10%) as illustrated as below: CPO and PK prices - transport (X) OER / 10% taxes. The FFB price still affected from market price, mill competitors and condition of the FFB. The price of FFB was published / displayed on the front yard of the mill. There is available the documented procedure (AA-GL-510.1-R0) regarding on how to handling the complaints may come from suppliers, the public relations (HUMAS) and/or administration had (KTU) will faced the suppliers regarding FFB pricing issues. So far there is no complaint from the suppliers regarding the FFB pricing.	YES
6.10.2	(M) Pricing mechanisms for Fresh Fruit Bunches (FFI	B) and inputs/services shall be explain	ed and documented (where these are under the control of the mill or pla	intation).
	<ul> <li>a. What is the mode of recording/documenting transactions between millers with middlemen and/or smallholders?</li> <li>b. Is there evidence that growers/millers have explained FFB pricing and pricing mechanisms for FFB?</li> </ul>	<ul> <li>FFB pricing mechanism</li> <li>FFB Price mill display</li> <li>Site observation and interviews with FFB supplier</li> </ul>	So far there is no smallholders supplied for the mill, nevertheless there are available the third party FFB suppliers. The FFB suppliers were separated into contract base and non-contract base suppliers. The FFB price still affected from market price, mill competitors and condition of the FFB. The price of FFB was published / displayed on the front yard of the mill.  The FFB pricing mechanism were established that based on CPO	YES
	<ul> <li>c. Are there any inputs/services rendered by the millers to smallholders/middle men? Are these inputs/services having any influence to the pricing and pricing mechanisms for FFB?</li> <li>d. Have inputs/services been documented</li> </ul>		and PK prices minus the transport cost and multiple with OER divide with taxes (PPN 10%) as illustrated as below: CPO and PK prices - transport (X) OER / 10% taxes. Since there is no available smallholders (plasma); so there is no applicable for the inputs/services rendered by the millers to	
	(where these are under the control of the mill or plantation)?      Where it is not practicable to smallholders to recycle waste (i.e. EFB), is there		smallholders/middle men and recycle waste.	

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
	compensation for the value of the nutrients of EFB given to the smallholders? Is this translated into the pricing factors of FFB?			
6.10.3	Specific Guidance: For 6.10.3: Referring to Regulation of the Minister o  1. K Index, which is open and transparent to the si  2. Distributing the information about the decision o  3. Method of fruit sortation  4. Involvement of smallholders institutions on the	f Agriculture No. 14/Permentan/OT.140 mallholders or their institutions f the Pricing Team to the smallholders evaluation of weigh instrument by auth	orised local agency.	
	<ul> <li>a. Is there a contractual agreement between the miller and smallholders/ middle men?</li> <li>b. Do all parties understand the contractual agreements they have entered into?</li> <li>c. Are all contractual agreements fair, legal and transparent?</li> <li>d. Who keeps the contractual agreements?</li> </ul>	<ul> <li>Agreement of FFB processing between PT. Hari Sawit Jaya and Koperasi Petani Kelapa Sawit Wahyu Agung, dated 6 August 2015, valid for 10 years.</li> <li>Agreement of FFB processing between PT. Hari Sawit Jaya and Sitolong Nadangol, dated 2 September 2015, valid for 10 years.</li> <li>Interviews with FFB supplier</li> </ul>	Contractual agreement between the miller and FFB supplier was available. Based on sign in contract and interview with FFB supplier, it was verified that all parties understood the contractual agreements they have entered into. It was evident that contractual agreements are fair, legal and transparent. Both parties keep the contractual agreement.	YES
6.10.4	Agreed payments shall be made in a timely manner.			
	<ul> <li>a. How are all payments made to the smallholders/middle men?</li> <li>b. What is the mode of recording/documenting transactions between millers with middlemen and/or smallholders?</li> <li>c. Have agreed payments been made in a timely manner?</li> </ul>	Records for cash transfer bank     Mandiri dated 20 December     2017 for all FFB suppliers, such     as, Esteria Manurung.	For the FFB suppliers there is provide with cash transfer evident. Records sighted for cash transfer bank Mandiri dated 20 December 2017 for all FFB suppliers, such as Esteria Manurung, etc. The company keep the payment voucher for the documentation. It was verified that payment has been made in a timely manner.	YES

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
6.11	process. Such consultation should be based on the p needs, including the different needs of men and wom Where candidates for employment are of equal merit conflicting with Criterion 6.8.	on the results of consultation with local principles of transparency, openness a nen. f, preference should always be given t regarding Limited Company (PT), clan and explanation whereas social and	·	consultation n priorities and ecognised as
6.11.1	Records of Contributions to local development based			
	<ul> <li>a. Have the local development needs and priorities been identified in consultation with local communities? (refer also to C 6.2)</li> <li>b. What are the contributions made to local development? Are they in accordance with the results of consultation?</li> <li>c. Are there efforts to improve or maximise employment opportunities at the company for local communities?</li> </ul>	- CSR program Y2017 - Realization and documentation of CSR program Y2017 -	The Company has a CSR program, coordinated by the CSR Team Office Region. Team is responsible for identifying the needs of rural	YES

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)		
			To improve the manpower recruitment for local communities, company through Public Relations Officer conduct communication to head of village.			
			Realization of CSR program in 2017 until September in amount of Rp. 105.436.730 for activities such as education, health, economy, maintenance of infrastructure, religion activities, social, recreation and sports activities.			
6.11.2	Where there are scheme smallholders, there shall be	evidence that efforts and/or resources	have been allocated to improve scheme smallholder productivity.			
	a. Is there a complete registry of independent smallholders in the supply base?	Interview with management	There are no scheme smallholder associated with PT. Hari Sawit Jaya	NA		
	b. Have efforts been made to improve the farming practices of independent smallholders?					
	c. Where there are schemed smallholders, have efforts and/or resources been allocated to improve smallholder productivity?					
	No forms of forced or trafficked labour are used.					
6.12 <sup>1</sup>	Guidance Migrant workers should be legalised, and a separate Any regulated deductions made should not jeopardis		wn up to meet immigration requirements for foreign workers and interna	tional standards.		
0.12	Passports should only be voluntarily surrendered.					
	There should be evidence of due diligence in applying these indicator and guidance to all sub-contract workers and suppliers.					
	Definition of types of worker refers to Acts No.13 yea	•	.,			
	(M) There shall be evidence that no forms of forced of	<b>5 6 7</b>				
	The stail be evidence that he forms of forced to	i damonou lubour uro uoou.				
6.12.1	Specific Guidance:	alumbarih anal fira ah and the add the d	of a namely, and about how the first transfer to the second transfer transfer to the second transfer transf	haut nanalt		
	given reasonable notice or as per agreement.	Diuntarily and Treely, Without the threat	of a penalty, and should have the freedom to terminate employment wit	nout penalty		
	What is the company's policy on forced or trafficked labour?	Company policy	Company's policy on forced or trafficked labour was described in Company Policy Asian Agri.	YES		
		<ul><li>Procedure : AA-HR-305-2-00</li></ul>	Company Policy Asian Agn.			

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
	b. How does the company define forced or trafficked labour?      c. What is the process of recruiting foreign/migrant workers directly and/or through licenced outsourcing agencies/ labour suppliers?	<ul> <li>Recruitment and Selection</li> <li>List of workers updated         December 2017</li> <li>Interview with union and         workers on 19-20 December</li> </ul>	Based on public consultation on 19 – 20 December 2017 with several worker and worker union it was evident that no forms of forced or trafficked labour have been used. Workers/employee entered into organization voluntarily and freely, without the threat of a penalty and they have the freedom to terminate employment without penalty given reasonable notice or as per agreement.	
	d. Who is the person responsible for selecting/ screening labour suppliers/ outsourcing agents?	2017	There were no migrant workers in estate and Mill. Its verified during audit documentation list of employee, interview with employee and stakeholders.	
	Do the foreign workers have to pay a fee to the employment recruitment agency or labour		Person who responsible for selecting/screening labour suppliers was KTU (Kepala Tata Usaha) under supervision form Estate Managers.	
	suppliers in the workers' countries of origin? If yes, does it jeopardise decent living wage?		Employees work based on contract labour agreement which contains agreements include: working time, dependents, payroll and consent	
	f. Are there restrictions on workers from leaving the mill or estate or their housing facilities outside working hours?		of both parties. Working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc described in PKB years 2015 - 2017 which have been	
	g. What is the process if a worker wants to terminate their employment before their contract expires? In this case, who pays for the return transportation?		agreed between the employees (represented by SPSI) and company.	
	h. What are the penalties imposed if the workers were terminated or fired before their contract expires?			
	Who keeps the workers passports or identity documents?			
	j. If workers do not keep their passports or identity documents, is this legally allowed?			
	k. What is the process for workers' to hand over their passports or identity documents to the company?			

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
	Do workers have unrestricted access to their passports or identity documents? Describe how workers are able to access their documents?			
	It shall be demonstrated that no contract substitution	has occurred.		
6.12.2	Specific Guidance: For 6.12.2: Contract substitution is the change of init.	ial contract without prior consultation a	nd agreement from the workers.	
	a. Is there evidence of contract substitution occurring?	Interview with workers on19-20     December 2017	There was no substitution contract occurred. Workers get the job and contract conforms to agreement between company and its	N/A
	b. Are foreign workers asked to sign a contract upon arriving in the receiving country? If yes, is that contract identical to the one signed in the country of origin?	<ul> <li>Perjanjian Kerja Bersama (Collective Employment Agreement) Period 2015 - 2017 and PHL contract</li> </ul>	workers.	
	c. Are workers given a copy of their employment contracts? If yes, is the contract identical to the one signed at the time of recruitment?			
	(M) Where migrant/foreign/honorary workers are emp	ployed, a special worker policy and pro-	cedures and the evidence of implementation shall be available.	
6.12.3	Specific Guidance: For 6.12.3: The special labour policy should include: a. Statement of the non-discriminatory practices; b. No contract substitution; c. Post-arrival orientation programme to focus esped. d. Decent living conditions to be provided.	ecially on language, safety, labour laws		
	<ul> <li>a. What is the company's policy and procedures for temporary or foreign/migrant workers?</li> <li>Does the special labour policy include:</li> <li>Statement of the non-discriminatory practices?</li> <li>No contract substitution?</li> </ul>	List of employee, interview with employee	There were no migrant workers in Negeri Lama Group Its verified during audit documentation list of employee, interview with employee and stakeholders	NA

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
	<ul> <li>Post-arrival orientation programme with emphasis on language, safety, labour laws, cultural practices etc.?</li> <li>The provision of decent living conditions?</li> </ul>			
	b. Have the policies and procedures been implemented?			
6.132	Growers and millers respect human rights.  Guidance: See Criteria 1.2, 2.1 and 6.3  All levels of operations include contracted third partie Regulations related to the Human Rights refer to the		n Riahts	
6.13.1	(M) A policy to respect human rights shall be docume			
	<ul> <li>a. Is there a company policy on human rights?</li> <li>b. How is this communicated to all employees, including outsourced workers, customers and suppliers? If by training, how often is the training conducted?</li> <li>c. Who has the task of communicating the policy internally and externally?</li> <li>d. Does the company have any outstanding cases of human rights violations?</li> </ul>	Company Policy dated 1     December 2014.     Attendance list worker.     Interview with stakeholder on 19 December 2017	Policy to respect human rights has been documented in Kebijakan Perusahaan dated 1st December 2014. Top management has commitment to respect human right refers to internationally recognised human rights set out in the International Labour Organization's Declaration on Fundamental Principles and Rights at Work. The document has been communicated to all levels of the workforce and operations based on public consultation with labour union, worker and gender committee.  The policy has been communicated to all employees, including outsourced workers, customers and suppliers by socialization/dissemination. Socialization was conduct regularly once a year.	YES
			Person in charge to communicating the policy internally are Public Officer and Estate Manager.  During audit and based on verification on public consultation with stakeholders in 22 December 2016 and interview with employee could be demonstrated that there was no cases of human rights violations in Negeri Lama Group.	

## PRINCIPLES 7: RESPONSIBLE DEVELOPMENT OF NEW PLANTINGS

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
	A comprehensive and participatory independent ones, and the results incorporated into planning,		sessment is undertaken prior to establishing new plantings or operations, or exp	anding existing
	Guidance: The result of Strategic Environment Study (Kajia planting.	n Lingkungan Hidup Strategis/KLH	S) conducted by the authority shall be a major consideration in the new land deve	elopment and
			e AMDAL as part of the process. However, it is the company's responsibility to pr If Environment Impact Analysis (SEIA) are met for all aspects of plantation and m	
	The terms of reference should be defined and impact assessment should be carried out by accredited independent experts, in order to ensure an objective process. A participatory methodology including external stakeholder groups is essential to the identification of impacts, particularly social impacts. Stakeholders such as local communities, government and NGOs should be involved through interviews and meetings, and by reviewing findings and plans for mitigation.			
7.1		end, growers and millers should se	eacts. These developments can lead to some indirect/secondary impacts which a lek to identify the indirect/secondary impacts within the SEIA, and where possible ace the positive impacts.	
	Plans and field operations should be developed a development, partially or entirely, may not proced		e results of the assessment. One potential outcome of the assessment process is lential impacts.	that the
	For smallholder schemes, the scheme managem	ent should address this criterion. F	or individual smallholders this criterion does not apply	
	For new planting with areas ≤ 3000 Ha, the asse externally.	ssment may be conducted internal	ly or externally. And for new planting with areas > 3000 Ha, the assessment shall	l be conducted
	Pengelolaan Lingkungan Hidup (UKL) – Upaya F a. Assessment of the impacts of all major plan b. Assessment, including stakeholder consulta	Pemantauan Lingkungan Hidup (UF ned activities, including planting, m tion, of High Conservation Values	sessment which may be in the form of AMDAL (SEIA) while areas ≤ 3000 Ha req PL). Social and Environment Assessment at minimum must cover: ill operations, roads and other infrastructure; (see Criterion 7.3) that could be negatively affected; velopments, including whether development or expansion will increase pressure of	
	d. Identification of watercourses and wetlands implemented to maintain the quantity, qualit	y and access to water and land res	s on hydrology and land subsidence of planned developments. Measures should ources; if steep slopes, marginal and fragile soils, areas prone to erosion, degradation, so	·

NO	CRITERION / INDICATOR	OBSERVATIONS &	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE
	CHECKLIST	OBJECTIVE EVIDENCE		(YES/NO)
	flooding; f. Analysis of type of land to be used (forest, or	dograded forest cleared land):		
	g. Analysis of land ownership and user rights;	iegraded forest, cleared farid),		
	h. Analysis of current land use patterns;			
		surrounding communities of a planta	ation, including an analysis of potential effects on livelihoods, and differential effec	cts on women
	versus men, ethnic communities, and migra		,	
	j. Identification of activities which may genera			
	If AMDAL or UKL-UPL documents still do not co	ver point a to i. additional social and	l environment impact assessment shall be conducted.	
			nen independent assessment shall be conducted.	
	Documents of environment impact assessment a			
			idup/AMDAL) for plantation with areas of > 3000 Ha	
	b. Environmental Management Effort (Upaya I with areas of < 3000 Ha.	Pengelolaan Lingkungan Hidup/UPI	L) and Environmental Monitoring Effort (Upaya Pemantauan Lingkungan Hidup/U	KL) for plantation
	c. Environmental Management Document (Do	kumen Pengelolaan Lingkungan Hi	dup/DPLH)	
	d. Environmental Evaluation Document (Doku			
	e. Environmental Information Performance (Pe			
	f. Environmental Evaluation Performance (Pe		/PEL)	
	g. Environmental Evaluation Study (Studi Eval			
	h. Environment Management and Monitoring L			
	i. Declaration Letter for Managing and Monito j. And other documents required by the regula		n Kesanggupan Pengelolaan dan Pemantauan Lingkungan Hidup/SPPL)	
	j. And other documents required by the regula	auon.		
	Regulations relate to the environment document			
	a. Government Regulation No. 27 year 2012 r			
	Monitoring Environment (SPKL)		nental Management and Monitoring Effort (UKL-UPL) and Declaration Letter for N	/lanaging and
	c. Regulation of the Minister of Environment N			
			nental Management and Monitoring Document (DPPL)	
	e. Regulation of the Minister of Environment N Environmental Management Document.	lo.12 year 2007 regarding Environn	nental Management and Monitoring Document for Business and or Activities, with	No
	f. Regulation of the Minister of Environment N			
	g. Regulation of the Minister of Environment N			
			nent of Community and Information Transparency in the AMDAL Process	
	i. Decree of the Head of Bapedal No. No. 299	) year 1996 regarding Technical Gu	idance of Social Aspects for AMDAL preparation	

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
	j. Regulation of the Minister of Environment N in Conducting Training for AMDAL Compete		ence Requirements for AMDAL preparation documents and Requirements for Trai	ining Institutions
7.1.1	M) An independent social and environmental impact assessment (SEIA), undertaken through a participatory methodology including the relevant affected stakeholders, shall be documented.			
	a. Is there any new planting or operations, or expanding existing ones by the company?     What is the size of the new planting area?	Document of ANDAL, RKL RPL #PC.220/383/B/II/1994	The organisation did not acquire any new land after 2005. It was noted that there was no ongoing progress of new land axquisition during interview with stakeholders.	NA
	b. Has an independent social and environmental impact assessment (SEIA) been documented for the new plantings?			
	c. Are the impact assessments prepared by accredited independent experts?			
	d. Are all environmental and social impacts adequately identified?			
	e. Is the SEIA undertaken based on the scope of operation?			
	f. Is the SEIA undertaken in a participatory manner, including the relevant affected stakeholders?			
	<ul> <li>g. Does the SEIA assessment include and as a minimum:</li> <li>Assessment of the impacts of all major planned activities, including planting, mill operations, roads and other infrastructure?</li> <li>Assessment, including stakeholder consultation, of High Conservation Values (see Criterion 7.3) that could be negatively affected?</li> <li>Assessment of potential effects on adjacent natural ecosystems of planned developments, including whether development or expansion will</li> </ul>			

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
	increase pressure on nearby natural ecosystems?  Identification of watercourses and wetlands and assessment of potential effects on hydrology and land subsidence of planned developments. Measures should be planned and implemented to maintain the quantity, quality and access to water and land resources?  Baseline soil surveys and topographic information, including the identification of steep slopes, marginal and fragile soils, areas prone to erosion, degradation, subsidence, and flooding?  Analysis of type of land to be used (forest, degraded forest, cleared land)?  Analysis of land ownership and user rights?  Analysis of current land use patterns?  Assessment of potential social impacts on surrounding communities of a plantation, including an analysis of potential effects on livelihoods, and differential effects on women versus men, ethnic communities, and migrant versus long-term residents?  Identification of activities which may generate significant GHG emissions?  Myat were the main findings of the assessment?			
	Were secondary impacts of oil palm development identified in the SEIA?			

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)		
7.1.2	Appropriate management planning and operational procedures shall be developed and implemented to avoid or mitigate identified potential negative impacts.					
	Does the finding of the SEIA uncover any negative impacts? If yes, has a management plan and operational procedures been developed to mitigate the negative impacts?	Area statement in 2017     Field observation	There was no new planting since November 2005.	NA		
	b. Has the management plan and operational procedures been implemented?					
7.1.3	attention.  Specific guidance:		acts of the scheme and the implications of the way it is managed shall be given particle of the scheme and millers. Schemed smallholders (plasma) included into this so			
	<ul> <li>a. Are any outgrowers involved in the new plantings?</li> <li>b. Has management prepared a plan for the outgrower scheme?</li> <li>c. Does the SEIA include an assessment of</li> </ul>	Area statement in 2017     Field observation	There was no new planting since November 2005.	NA NA		
	impacts and the implications of the way the outgrower scheme is managed?					
7.2	Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.  Guidance: These activities can be linked to the Social and Environmental Impact Assessment (SEIA) (see Criterion 7.1) but need not be done by independent experts.  Soil surveys should be appropriate to identify soil suitability of oil palm cultivation for the scale of operation.  Maps of Soil suitability or soil survey should be established in line with the operational scale and include information on soil types, topography, hydrology, rooting depth, moisture availability, stoniness and fertility to ensure long-term sustainability of the development. Soils requiring appropriate practices should be identified (see Criteria 4.3 and 7.4). This information should be used to plan planting programs, etc. Measures should be planned to minimize erosion through appropriate use of heavy machinery, terracing on slopes, appropriate road construction, rapid establishment of land cover, protection of riverbanks, etc. Areas located within the plantation perimeters that are considered unsuitable for long-term oil palm cultivation will be delineated in plans and included in operations for conservation or rehabilitation as appropriate (see Criterion 7.4).					

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDIN				COMPLIANCE (YES/NO)
	Assessing soil suitability is also important for smallholders, particularly where there are significant numbers operating in a particular location. Information should be collected suitability by companies planning to purchase Fresh Fruit Bunches (FFB) from outgrowers scheme (skema kemitraan) in certain location. Companies should assess this in and provide information to smallholders involving in the outgrowers scheme, and/or in conjunction with relevant government/public institutions and other organizations (included NGOs) provide information in order to assist independent smallholders to grow oil palm sustainably.  One of referred guidances is on the table 1 (page. 6) regarding Land Suitability Criteria for Oil Palm in the Technical Guidance for Developing Oil Palm Estate issued by Di General of Estate Crops, Ministry of Agriculture, 2006.						his information s (including
7.2.1	(M) Soil suitability maps or soil surveys adequate	to establish the long-term suitabili	ty of land for oil palm cultivation shall b	e available and ta	aken into acco	unt in plans	and operations.
	<ul> <li>a. Are soil suitability/survey maps for the planted areas available or in place?</li> <li>Is the map adequate to establish the</li> </ul>	Topographic Map, Slope     Class Maps and Map Soil     Type and Slope Class Map	Results of land surveys were prese Slope Class Maps and Map Soil Typ	e and Slope Class	s Map scale 1	20,000.	YES
	long-term suitability of land for oil palm cultivation?	scale 1: 20,000	Area of plantation has been locate considering area for conservation.	ed within the pla	antation perin	neters that	
	<ul> <li>Are the soil suitability maps or soil surveys appropriate to the scale of operation?</li> </ul>	The organisation has plan to purchase FFB from potential develop independent suppliers but not from independent supplier in particular such as forest area or illegal area.					
	<ul> <li>Does the soil suitability maps or soil surveys include information on soil types, topography, and hydrology, rooting depth, moisture availability, stoniness and fertility?</li> </ul>		Soil map and land suitability was system: Universal Transverse Merca Meredien: E 99°. Soil classification a	tor, Datum: WGS			
	<ul> <li>Do the soil suitability maps or soil surveys identify soils requiring</li> </ul>		KNU	1 =	1		
	appropriate practices?		Soil Classification	Topography (%)	На	%	
	b. Are there any areas located within the		Typic Endoaquepts	0 - 3	107	2.7	
	plantation perimeters that are considered		Histic Humaquepts	0 - 3	308	7.6	
	unsuitable for long-term oil palm cultivation?		Typic Haplosaprists (peat < 3 m)	0 - 3	774	19.2	
	Are such areas delineated in the		Typic Haplosaprists (peat 1-3 m) Typic Haplosaprists (peat > 3 m)	0 - 3 0 - 3	1,561 1,280	38.7 31.6	
	plans?		Typic Hapiosaphists (peat > 5 III)	0-3	1,200	31.0	
	Are there areas set aside for		KAK				
	conservation?		Soil Classification	Topography (%)	На	%	
			Typic Endoaquepts	0 - 3	842	31.9	

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDIN	GS FOR EACH II	NDICATOR		COMPLIANCE (YES/NO)
	<ul> <li>Or are there plans for rehabilitation</li> </ul>		Histic Humaquepts	0 - 3	291	10.9	
	as appropriate?		Typic Haplosaprists (peat < 3 m)	0 - 3	373	14.1	
	c. Does the company plan to purchase		Typic Haplosaprists (peat 1 - 3 m)	0 - 3	583	22.0	
	Fresh Fruit Bunches (FFB) from potential		Typic Haplosaprists (peat > 3 m)	0 - 3	557	21.1	
	developments of independent suppliers in a particular location?		KNS				
	d. If yes, the following information should be obtained:		Soil Classification	Topography (%)	На	%	
	Is information on soil suitability		Typic Endoaquepts	0 - 3	401	8.4	
	collected and assessed?		Histic Humaquepts	0 - 3	99	2.1	
	Has the company provided		Typic Haplosaprists (peat < 3 m)	0 - 3	171	3.6	
	information on soil suitability to the		Typic Haplosaprists (peat 1 - 3 m)	0 - 3	814	17.0	
	independent smallholders in order to		Typic Haplosaprists (peat > 3 m)	0 - 3	3307	69.0	
	assist them to grow oil palm sustainably?		KNC				
	Sustamably:		Soil Classification	Topography (%)	На	%	
			Typic Endoaquepts	0 - 3	5	0.2	
			Histic Humaquepts	0 - 3	3	0.1	
			Typic Haplosaprists (peat < 3 m)	0 - 3	12	0.4	
			Typic Haplosaprists (peat 1 - 3 m)	0 - 3	276	8.8	
			Typic Haplosaprists (peat > 3 m)	0 - 3	2834	90.5	
7.2.2	Topographic information adequate to guide the p						
	Does the area where plantings are done require drainage or irrigation?	- Topographic Map, Slope Class Maps and Map Soil	Based on the above mentioned maps drainage or irrigation. The company	y has established	d adequate t	opographic	Yes
	If yes, is there adequate topographic information to guide the planning of drainage and irrigation systems?	Type and Slope Class Map scale 1: 20,000	information to guide the planning topographic information and best prathe development of roads and infrast	ctices were taken			
	c. Is the topographic information and best practices taken into consideration during the development of roads and infrastructure?						

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)		
	New plantings since November 2005 have not replaced primary forest or any area required to maintain or enhance one or more High Conservation Values.  Guidance:  This Criterion applies to forests and other vegetation types. This applies irrespective of any changes in land ownership or farm management that have taken place since November 2005 unless if previous owner have conducted HCV assessment.  HCVs may be identified in restricted areas of a landholding, and in such cases new plantings can be planned to allow the HCVs to be maintained or enhanced. This refers to the Guidance for HCV Management and Monitoring approved by the RSPO.					
	The HCV assessment process requires appropr	iate training and expertise, and will	include consultation with local communities, particularly for identifying social HCV n Indonesia (HCV Toolkit Indonesia) of 2008 or its revision.	s. HCV		
7.3	Developments should actively seek to utilise pre forests and HCV through the use of all available		nd on mineral soil. Plantation development should not put direct or indirect pressu	re on primary		
	Although the planned development is consistent	with the landscape planning by the	local and national government, the requirements of protecting HCV still shall be r	net.		
	scheme of HCV RSPO using ALS system, asse	ssor team leader of HCV shall be a the Common Guidance for the Iden	rnally and externally. If the assessment of HCV is conducted internally, in accorda n assessor who has obtained license of HCV Assessor from HCVRN. Peer review tification of HCV 2013. For the new planting with the area > 3000 Ha, the assessr r from HVCRN.	from the		
			V areas where conversion can jeopardize large areas or species, the HCV assess m HCVRN (see Guidance: Criterion 7.2). HCV areas can be very small. Once esta			
			any area required to maintain or enhance one or more High Conservation Values the HCVs identified are maintained and/or enhanced (see Criterion 5.2).	(HCVs), since		
7.3.1	Specific Guidance: For 7.3.1: Evidence should include historical remote sensing imagery which demonstrates that there has been no conversion of primary forest or any area required to maintain or enhance one or more HCV. HCV Assessment should apply satellite or aerial photographs, land use maps and vegetation maps should be used to inform the HCV assessment.					
	Where land has been cleared since November 2005, and without a prior and adequate HCV assessment, it will be excluded from the RSPO certification programme until an adequate HCV compensation plan has been developed and accepted by the RSPO.					
	Since November 2005, have any new plantings replaced primary forest, or any area required to maintain or enhance one or more High Conservation Values	Area statement 2017     Interview with management representatives	There was no new planting since November 2005.	NA		

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)			
	(HCVs)? If yes, was an adequate HCV assessment carried out prior to the clearing of the land?						
	b. Where HCVs have been identified on the land that is intended for new plantings, have new plantings been planned and managed to best ensure the HCVs identified are maintained and/or enhanced (see Criterion 5.2)?						
	c. Are there finalised HCV maps and areas endorsed/signed off by management showing type of HCV and area coverage (ha)?						
	d. Has the company comply with NPP procedures? i.e. NPP documents was submitted and put for public notification.						
	e. Is CB verification of NPP documents include field verification? If not, field verification of HCV is required during certification audit.						
	f. Where land has been cleared since November 2005, and without a prior and adequate HCV assessment, is there evidence that an adequate HCV compensation plan for the affected area has been developed and accepted by the RSPO?						
7.3.2	(M) Deports of comprehensive HCV assessment, which involves stakeholder consultation and includes record of land use change since Nevember 2005, shall be evailable. This HCV						

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)	
	Is the prepared HCV assessment comprehensive? Was the assessment prepared in consultation with the affected stakeholders prior to any conversion or new planting?	Area statement 2017     Interview with management representatives	There was no new planting since November 2005.	NA	
	b. Do the HCV assessments include land use change analysis to determine changes to the vegetation since November 2005? (This analysis shall be used, with proxies, to indicate changes to HCV status)				
7.3.3	Records of land preparation and clearing dates s	shall be available.			
	Are the dates of land preparation and commencement recorded?	<ul><li>Area statement 2017</li><li>Interview with management representatives</li></ul>	There was no new planting since November 2005.	NA	
7.3.4	(M) An action plan shall be developed that descr procedures (see Criterion 5.2).	ibes operational actions consequen	t to the findings of the HCV assessment, and that references the grower's relevant	nt operational	
	<ul> <li>a. Has the company developed an action plan that describes operational actions consequent to the findings of the HCV assessment?</li> <li>b. Does the action plan reference the grower's relevant operational procedures (see Criterion 5.2)?</li> </ul>	Area statement 2017     Interview with management representatives	There was no new planting since November 2005.	NA	
7.3.5	Evidence of consultation with the affected community shall be available in order to identify the area required by such community to fulfill its basic needs, by considering the positive and negative changes to the livelihood as a result of plantation operations. Such matters shall be included in the HCV analysis and management plan (see Criteria 5.2).  Specific Guidance: For 7.3.5: The management plan will be adaptive to changes in HCV 5 and 6. Decisions will be made in consultation with the affected communities.				

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
	<ul> <li>a. Have areas required by affected communities to meet their basic needs, taking into account potential positive and negative changes in livelihood resulting from proposed operations, been identified in consultation with the communities?</li> <li>b. Have these areas been incorporated into HCV assessments and management plans (see Criterion 5.2)?</li> </ul>	<ul> <li>Area statement 2017</li> <li>Interview with management representatives</li> </ul>	There was no new planting since November 2005.	NA

Extensive planting on steep terrain, and/or marginal and fragile soils, including peat, is avoided.

#### Guidance:

The process of identifying fragile and marginal soil should be conducted after getting Plantation Business Permit (IUP)

Total area planting on fragile soils including peat whitin the new development shall not be greater than 100 Ha or 20% of the total area, whichever is smallest (see Criterion 4.3). Adverse impacts may include hydrological risks or significantly increased risks (e.g. fire risk) in areas outside the plantation (see Criterion 5.5). The legal aspect of compliance within this national interpretation document shall follow the changed laws and regulations but should at least meet the above minimum limit.

Planting on peat soils should not be conducted on peat with ≥3 m depth. If planting conducted on peat with <3 m depth, then the area (as regulated by Regulation of the Minister of Agriculture No. 14 year 2009: Guidance on Peatland Utilization for Oil Palm Cultivation) shall meet the following requirements:

- a. Within designated cultivation area
- b. Whereas the proportion of ≤ 3 m depth of peat and mineral soil (if any) is minimal 70% of the total concession area
  - c. The mineral soil below peat layer is not quartz sand or acidic sulfate soil
  - d. The peat soils maturity level is mature (sapric)
  - e. The fertility level is eutropic

Cultivation on peatland must also comply with Government Regulation No 71 year 2014 concerning the Protection and Management of Peatland Ecosystems

Excessive slope is defined as slope more than 40% referring to Regulation of the Minister of Agriculture No.11/Permentan/OT.140/3/2015 regarding Guidance of Indonesia Sustainable Palm Oil and the Regulation of the Minister of Agriculture No. 47 year 2006 regarding General Guidance for Agriculture at Mountain Area.

Soil conservation measures (such as terracing, individual terrace, legume cover crops, silt pit, frond stacking, etc.) should be conducted.

Soil suitability should be determined using crop and environmental suitability criteria.

Those identified as marginal and/or problematic should be avoided if the soil cannot be improved through agricultural cultivation.

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)		
	The risky and marginal soils may include sandy soils, low organic content soils, and potential or actual acid sulphate soils. Suitability of these soils is also influenced by other factors including rainfall, terrain and management practices.					
	These areas may only be developed for new plan avoided on these soil types.	ntations which have adequate man	agement plans based on best management practices. Failure due to extensive pla	intings should be		
	Fragile soils on which extensive planting shall be	e avoided include peat soils, mangro	ove sites and other wetland areas.			
	This activity should be integrated with the social	and environmental impact assessm	nent (SEIA) required by Criterion 7.1.			
	Excessive planting on fragile soil refer to Annex	2 Generic RSPO P&C, 2013.				
	Wetland definition refers to RAMSAR.					
7.4.1	(M) Indicative maps showing marginal and fragile	e soils, including excessive gradien	ts and peat soils, shall be available and used to identify areas to be avoided.			
	Are there maps identifying marginal and fragile soils, including excessive gradients and peat soils?	- Topographic Map, Slope Class Maps and Map Soil Type and Slope Class Map	Based on Map of Soil type Unit, most of HSJ plantation area are peatland. The mentioned map shows the extent, nature and depth of peat. The map does used to identify areas that are inappropriate for planting. The map have been	Yes		
	b. If peat is present, does the map show the extent, nature, and depth of peat?	scale 1: 20,000	incorporated for use in the social and environmental impact assessment (AMDAL). The company has demonstrated that planting on extensive areas of peat soils and other fragile soils have been avoided.			
	Are the maps used to identify areas that are inappropriate for planting?					
	d. Have the maps been incorporated for use in the social and environmental impact assessment (SEIA)?					
	Is there evidence that planting on extensive areas of peat soils and other fragile soils have been avoided?					
7.4.2	(M) Where limited planting on fragile and marginal soils, including peat, is proposed, a documented plan shall be developed and implemented to protect them without incurring adverse impacts.					
	Are there plans to protect planted areas on fragile and marginal soils, including peat from adverse impacts?	SOP Land Preparation     (AA-APM-OP-1100.02-R1)     Consolidation (AA-APM-OP-1100.16-R1)     Soil and Water Conservation	The organisation has management strategy for planting on slopes above certain limit such as terracing, as referred to company's SOP and work instructions. The work instruction described preparation for planting including planting on slopes area has been developed by organisation. System for planting on slopes area was provided through terracing, levelling of terrace, planting legume cover	Yes		

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)		
	<ul> <li>b. Does the plan take into consideration specific control and NI thresholds, including:</li> <li>Slope limits;</li> <li>List of soil types that need to be avoided, especially peat soil;</li> <li>Proportion of plantation areas that can include marginal / fragile soil.</li> </ul>	(AA-APM-OP-1100.05-R1)	crops and determining of planting space.  Practices to control and minimize erosion have been applied by:  • Terracing  • Making the catchment where runoff water, called: "Tapak Kuda".  • Making the catchment where runoff water, called "Rorak".  • Planting legume cover crop.			
	C. Has the plan been implemented?  No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their free, prior and informed consent. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.  Guidance:  This activity should be integrated with the Social and Environmental Impact Assessment (SEIA) required by Criterion 7.1.  Where new plantings are considered to be acceptable by the communities, management plans and operations should minimise the adverse impacts (such as disturbing sacred sites, and promote positive ones. Agreements with indigenous people, local communities and other stakeholders should be made without coercion or other undue influence (see Guidance for Criterion 2.3).					
7.5	enclaving or other mutually agreed schemes or	decide not to go ahead with its prop	·	ity land or		
	Relevant stakeholders include those affected by or concerned with the new plantings.  Free, prior and informed consent (FPIC) should be applied to all RSPO members throughout the supply chain. Please refer to FPIC guidelines approved by the RSPO (RSPO endorsed Free, Prior and Informed Consent Guide for RSPO Members, November 2015).					
	Customary and user rights shall be demonstrate	d through participatory mapping as	part of the FPIC process.			
	Verification evidence may be in the form of documents on socialization to the affected community, agreement or disagreement from the community, communication and consultation with the community.					
7.5.1			e right to say 'yes' or 'no' to operations planned on their lands before and during ir tiations, and up until an agreement with the grower/miller is signed and ratified by			

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
	Does the new planting area include 'local people's land'?	Area statement in 2017     Public consultation with	There was no new planting since November 2005.	NA
	b. If yes, has the community given their consent?	stakeholders on 19 December 2017		
	c. Is there evidence to demonstrate that the consent/agreement has been given?	- Field observation		
	d. Has the community been given the opportunity to say 'no' to the proposed development?			
	e. Are the principles of the FPIC process followed?			
	Where it can be demonstrated that local peoples their free, prior and informed consent and negotia		is, they are compensated for any agreed land acquisitions and relinquishment of r	ights, subject to
7.6		regulated by, such as, the Act No. RSPO (RSPO endorsed Free, Prio	5 year 1994 regarding Endorsement of UN Convention on Biodiversity. r and Informed Consent Guide for RSPO Members, November 2015). all be available.	
7.6.1	Specific Guidance: For 7.6.1: This activity shall be integrated with th	e social and environmental impact	assessment (SEIA) required by Criterion 7.1.	
	<ul> <li>a. Does the SEIA include the identification and assessment of legal, customary and user rights of the area?</li> <li>b. Does the company have SOPs to identify</li> </ul>	<ul> <li>Area statement in 2017</li> <li>Public consultation with stakeholders on 19 December 2017</li> </ul>	There was no new planting since November 2005.	NA
	and assess any legal, customary and user rights of the local peoples?	- Field observation		
	c. Is there any known notification from the stakeholders claiming to have legal,			

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
	customary and/or user rights on the land for the new planting area?			
	d. Has the claim been identified and assess according to the protocol/SOP? Does the process follow and respect the FPIC principles?			
	e. Has the process of identification and assessment been recorded/ documented and made publicly available?			
7.6.2	(M) A procedure for identifying people entitled to	compensation shall be available.		
	Does the company have a system in place to identify people and/or community groups entitled to compensation?	Area statement in 2017     Public consultation with stakeholders on 19	There was no new planting since November 2005.	NA
	b. Is the system documented?	December 2017		
	c. Does the system follow and respect the FPIC principles?	- Field observation		
7.6.3	(M) Records of calculation system and distribution		ilable	
	<ul> <li>a. Does the company have a system in place to calculate and distribute fair compensation (monetary or otherwise)?</li> <li>b. Is the system documented and publicly made available?</li> <li>c. Does the system follow and respect the FPIC principles?</li> </ul>	<ul> <li>Area statement in 2017</li> <li>Public consultation with stakeholders on 19 December 2017</li> <li>Field observation</li> </ul>	There was no new planting since November 2005.	NA
7.6.4			be given opportunities to benefit from plantation development.	
	Does the company provide communities that have lost access and rights to land for plantation expansion opportunities to benefit from plantation development?	Area statement in 2017     Public consultation with stakeholders on 19     December 2017     Field observation	There was no new planting since November 2005.	NA

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
7.6.5	The process and outcome of any compensation	claims shall be documented and ma	ade available to the affected communities and their representatives.	
	a. Is the process and outcome of any	- Area statement in 2017	There was no new planting since November 2005.	NA
	compensation claims documented and made publicly available?	- Public consultation with stakeholders on 19 December 2017		
		- Field observation		
7.6.6	specific Guidance: For 7.6.6: Growers and millers will confirm that to Permit (Izin Usaha Perkebunan/IUP) and if reque	of the proposed operations on their the communities (or their representa tested, Land Title (Hak Guna Usaha	ccess to information and advice that is independent of the project proponent, cond r lands.  Attives) gave consent to the initial planning phases of the operations prior to Planta (HGU)/Hak Guna Bangunan (HGB)) to the grower and miller.  If to release lands to growers and millers that a legal consequence of the grower of	tion Business
	a HGU/HGB over their lands is that this will perm	nanently extinguish their land rights	within the same area.	r miller acquiring
			om to get information, and also socialization to the affected community.	
	a. Is there record to show that the community and rights holders have freedom to access information and independent advisor(s) concerning the legal, economic, environmental and social implications of the proposed operations on their lands?	<ul> <li>Area statement in 2017</li> <li>Public consultation with stakeholders on 19 December 2017</li> <li>Field observation</li> </ul>	There was no new planting since November 2005.	NA
	b. Is there evidence to show that the company has sought the community and the right holders' consent to the initial planning phases of the operations prior to the new issuance of a concession or land title?			
	c. Did the communities (or their representatives) give consent to the initial planning phases of the operations prior to			

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
	the new issuance of a concession or land title?			
7.7	No use of fire in the preparation of new plantings	other than in specific situations as	identified in the ASEAN guidelines or other regional best practice.	
7.7.1			N Policy on zero burning (2003) and recognised techniques based on the existing	ng regulations shall
	a. Is there evidence of land preparation by burning?	Area statement 2017     Interview with management	There was no new planting since November 2005.	NA
	<ul> <li>(The auditors shall conduct site verification of the newly planted site which will include interviews with workers).</li> </ul>	representatives		
	c. Was land prepared using the burn method due to reasons or specific situations, as identified in the 'Guidelines for the Implementation of the ASEAN Policy on Zero Burnings' 2003, or comparable guidelines in other regions?			
	d. If the burn method has been used for land preparation, has the company complied with the requirements of 'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003, or comparable guidelines in other regions?			
	e. Is document showing proper justification for such activity available?			
7.7.2	In exceptional cases where fire has to be used for Implementation of the ASEAN Policy on Zero Bu		shall be evidence of prior approval of the controlled burning as specified in 'Gu es in other regions.	idelines for the
	Specific guidance			

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)		
	For 7.7.2: Fire should be used only where an assessment has demonstrated that it is the most effective and least environmentally damaging option for minimizing the risk of severe pest and disease outbreaks, and exceptional levels of caution are required for use of fire on peat. This should also refer to the ASEAN Policy on Zero Burning (2003) and respective national environment regulations.					
	a. In exceptional cases where fire has to be used for preparing land for planting, is there evidence of prior approval of the controlled burning as specified in 'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003, or comparable guidelines in other regions?	<ul> <li>Area statement 2017</li> <li>Interview with management representatives</li> </ul>	There was no new planting since November 2005.	NA		
	b. Was the activity incorporated in the SEIA report?					
	<b>c.</b> What were the mitigation measures? Was it implemented?					
	Preamble			- 1		
	It is noted that oil palm and all other agricultural crops emit and sequester greenhouse gases (GHG). There has already been significant progress by the oil palm sector, especially in relation to reducing GHG emissions relating to operations. Acknowledging both the importance of GHGs, and the current difficulties of determining emissions, the following new Criterion is introduced to demonstrate RSPO's commitment to establishing a credible basis for the Principles and Criteria on GHGs.					
7.8	Growers and millers commit to reporting on projected GHG emissions associated with new developments. However, it is recognised that these emissions cannot be projected with accuracy with current knowledge and methodology.					
	Growers and millers commit to plan developmen consensus of the RSPO GHG WG2).	t in such a way to minimise net GH	G emissions towards a goal of low carbon development (noting the recommend	dations agreed by		
	Growers and millers commit to an implementation period for promoting best practices in reporting to the RSPO, and after December 31st 2016 to public reporting. Growers and millers make these commitments with the support of all other stakeholder groups of the RSPO.					
	New plantation developments are designed to minimise net greenhouse gas emissions.					
7.8	Guidance This Criterion covers plantations, mill operations, roads and other infrastructure. It is recognised that there may be significant changes between the planned and final development area, hence the assessment may need to be updated before the time of implementation.					
	Public reporting is desirable, but remains volunta	ry until the end of the implementati	ion period.			

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)			
	Once established, new developments should report on-going operational, land use and land use change emissions under Criterion 5.6.  According to the recommendation from RSPO GHG Working Group 2, the total carbon emission (above and below ground) from new development area ideally is not bigger than carbon that can be absorbed in one rotation period of all new developments (i.e. average of oil palm trees, riparian buffer zone, and the set aside forest area). To help achieving this, the plantation should be developed in area with low carbon stock (i.e. mineral soil, area with low biomass, etc) or within area that currently is being utilized for agriculture or intensive plantation whose owner has agreed to convert the areas into oil palm. The agreed methodology to assess and report on carbon stock and emission sources as well as default number for the both estimation is now being developed by RSPO.						
	in carbon stock within the new development area	n, including set aside areas (non- pl					
7.8.1	(M) The carbon stock of the proposed development area and major potential sources of emissions that may result directly from the development shall be identified and estimated.  Specific Guidance: For 7.8.1: GHG identification and estimates can be integrated into existing processes such as HCV and soil assessments.  The RSPO carbon assessment tool for new plantings will be available to identify and estimate the carbon stocks. It is acknowledged that there are other tools and methodologies currently in use; the RSPO working group will not exclude these, and will include these in the review process.  The RSPO PalmGHG tool or an RSPO-endorsed equivalent will be used to estimate future GHG emissions from new developments using, amongst others, the data from the RSPO carbon assessment tool for new plantings.  Parties seeking to use an alternative tool for new plantings will have to demonstrate its equivalence to the RSPO for endorsement.						
	<ul> <li>a. Is there an assessment conducted to identify and estimate the carbon stock in the proposed development area and major potential sources of emissions that may result directly from the development?</li> <li>b. What are the tools and methodologies used to identify and estimate the carbon stock and potential sources of emission?</li> <li>c. Has the results of the carbon stock assessment been submitted and reported to RSPO according to RSPO procedures and timeline?</li> </ul>	<ul> <li>Area statement 2017</li> <li>Interview with management representatives</li> </ul>	There was no new planting since November 2005.	NA			

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)		
7.8.2	Records of a plan to minimize net GHG emissions shall be available.  Specific Guidance: For 7.8.2: Growers are strongly encouraged to establish new plantings on mineral soils, in low carbon stock areas, and cultivated areas, which the current users are willing to develop into oil palm. Millers are encouraged to adopt low-emission management practices (e.g. better management of palm oil mill effluent (POME), efficient boilers etc.) in new developments.					
7.0.2	Growers and millers should plan to implement RSPO best management practices for the minimization of emissions during the development of new plantations Some efforts to minimise net GHG emissions, but not limited to: a. Avoiding high carbon stock area b. Enriching HCV c. Improving carbon sequestration d. Minimising use of fossil fuel e. Implementing zero burning					
	a. Is there a plan to minimise net GHG emissions from new development?      b. Does this plan take into account avoidance of land areas with high carbon stocks, sequestration options and lowemission management practices?	Area statement 2017     Interview with management representatives	There was no new planting since November 2005.	NA		

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

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)		
8.1	Growers and millers regularly monitor and review their activities, and develop and implement action plans that allow demonstrable continual improvement in key operations.  Guidance:  Growers should have a system to improve practices in line with new information and techniques, and a mechanism for disseminating this information throughout the workforce. For smallholders, there should be systematic guidance and training for continual improvement.  The minimum specific performance for key indicators is based upon the existing regulations and best plantation practices (Criteria 4.2, 4.3, 4.4, and 4.5).  Several standards related to Criteria 4.2, 4.3, 4.4, and 4.5:  Leaf analysis at least on yearly basis.  Soil analysis should be done periodically based on company's consideration  Plantable slope < 40%.  BOD of effluent used forLand Application is maximum 5000 ppm, and for discharging to the water body is maximum 100 ppm  For planting on peat, the water table should be maintained at an average of at least 50 cm (40 – 60 cm) below ground surface measured with groundwater piezometer readings, or an average of 60 cm (between 50 – 70 cm) below ground surface as measured in water collection drains as per the Manual Best Management Practices for existing oil palm cultivation on peat, June 2012 or as per existing regulation if equal or shallower measured through a network of appropriate water control structures e.g. weirs, sandbags, etc. in fields, and watergates at the discharge points of main drains (Criteria 4.4 and 7.4).  Regulations regarding water table on peat may refer, but not limited, to:  Government Regulation No. 71 year 2014 regarding Protection and Management of Peat Ecosystem  Regulation of the Minister of Agriculture No. 14 year 2009 regarding Guideline of Oil Palm Cultivation on Peat					
8.1.1	<ul> <li>(M) The action plan for monitoring shall be available, As a minimum, these shall include, but are not neces</li> <li>Reduction in use of certain chemicals (Criterion</li> <li>Environmental impacts (Criteria 4.3, 5.1 and 5.2</li> <li>Waste reduction (Criterion 5.3);</li> <li>Pollution and greenhouse gas (GHG) emissions</li> <li>Social impacts (Criterion 6.1);</li> <li>Optimising the yield of FFB production (Criterion)</li> </ul>	ssarily be limited to: 4.6); 2); s (Criteria 5.6 and 7.8);	and environmental impacts and routine evaluation of the plantation and	nd mill operations.		

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
NO	a. Is there an action plan for continual improvement? b. Describe the main components of the plan. c. Has the action plan been implemented?		The organisation conducted monitoring and checking for mill operation performance through periodic visit of corporate engineering called VE (Visit Engineering), The Report dated 14th-15th December 2017 was sighted includes Mill key performance, assessment overall mill operations, process efficiency, plant maintenance, management supervision, manpower statement, production cost, EHS management system and sustainability. The corrective action plans was established and followed up by mill, the records was also evident.  Regular evaluation of plantation operation called VA, the report dated 30 January untul 03 february 2017 for KNC and 21 until 25 May 2017 for KNS was performed. The coverage of the audit including production planning, production, power generation and utilization, consumable, process control, quality control –, FFB incoming and inspection, and laboratory. The above audit reports indicated that all gaps against standard operation procedure of plantation and operation were noted. Corrective action plan was issued and implemented to demonstrate effort for compliance as well as continual improvement.  Evidence of several improvements was shown, e.g.  Best Practice Agronomy:  Increase productivity of circle racking.  Reduction in use of certain chemicals:	
	, , ,		Reduction in use of certain chemicals:  The organisation committed that Paraquat only used for specific species: a few species of ferns, such as: Stenochlaena and Lycopodiophyta. Reduction of Gramoxone consumption  Environmental impacts:	
			<ul> <li>Segregation of domestic water run off with industrial waste water by building trench around shell storage area to prevent</li> </ul>	

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
			contaminated water to open drainage	,
			<ul> <li>Improvement in monitoring of fuel consumption by calibrating fuel injection pumps and check fuel nozzle pipe.</li> </ul>	
			<ul> <li>Improvement in monitoring of domestic water consumption by installing flow meter to monitor water consumption in housing</li> </ul>	
			Recycle the water cooler turbine discharge water basin;	
			Recycle the condensate water discharge water dilution;	
			Minimize duration of mill cleaning to be every two weeks.	
			Waste reduction:	
			<ul> <li>Reduction in discharged waste water. The project including: Injection of water from hydro cyclone and blow down boiler to boiler chimney. It can prevent blow down boiler drain to water body, reduce waste water treated in WWTP.</li> </ul>	
			Pollution and emissions:	
			Reduction of potential particulate release to the atmosphere by increase boiler ash capture by the chimney	
			Social Impact:	
			Improve and implementation the CSR program regularly	
			Biodiversity conservation	
			Monitoring of RTE species regularly to control the population dynamics of wildlife	
			Sign board installation for HCV protection and awareness to	

## **Audit Report**

NO	CRITERION / INDICATOR CHECKLIST	OBSERVATIONS & OBJECTIVE EVIDENCE	SUMMARY OF FINDINGS FOR EACH INDICATOR	COMPLIANCE (YES/NO)
			conserve biodiversity and HCV area	
			Regular evaluation of plantation and mill operation was performed through internal and external audits. The coverage of the audit	
			including production planning, production, power generation and	
			utilization, consumable, process control, quality control – including	
			waste water treatment, maintenance, occupational health and safety, FFB incoming and inspection, and laboratory. The above audit	
			reports indicated that all gaps against standard operation procedure	
			of plantation and operation were noted. Corrective action plan was issued and implemented to demonstrate effort for compliance as well	
			as continual improvement.	

## 3.3.2 Mill Supply Chain Requirements

## **PART A COMPANY DETAIL**

Company Name (covered by certification): PT. HARI SAWIT JAYA – Negri Lama 2 Mill					
SPO member name: PT. INTI INDOSAWIT SUBUR  RSPO member number: 1-0022-06-000-00					
RSPO IT Platform Registration number: RSPO_PO1000003004					
Site Address: Negeri Lama Seberang Village, Bilah Hilir District, Labuh	an Batu Regency, North Sumatera	IDN			
Management Representative: Ms. Asrini Subrata					
Site type: Palm Oil Mill					
Site capacity: 45 MT FFB per hour (Permit 60 MT)					
Certified palm product sold: 5,719.43 MT of Palm Kernel					
Certified palm product used: 133,781.838 MT of FFB					
App/Cert No: FMS40024	Audit Type: 1 <sup>st</sup> Annual Surveillance	e Audit			
SAI Global Auditor/Team: Eko Prastio	Audit Date: 21/12/2017	Activity/Audit No: WI-887015			
Audit objectives					
To verify the volume of certified and uncertified FFB entering the mill and sold volume of RSPO certified producers.					
Supply Chain Model: Module E - CPO Mills (MB) Mass Balance					

Pertinent record period:	December 2017 to November 2018
Estimated tonnage of certified palm product produced:	71,986.14 MT CPO and 14,441.10 MT Palm Kernel
Estimated of tonnage of non certified palm product produced	Depend on non certified FFB supply
String description:	Palm Oil Mill
Outsource activity(ies) (if any):	N/A
Independent third party(ies) performing outsource activity(ies): name, address and Capability	N/A

## PART B SUPPLY CHAIN CERTIFICATION STANDARD

Requirements	Audit Findings / Objective Evidence	STATUS (NC/AOC/C)				
CPO MILLS (MB) MASS BALA	CPO MILLS (MB) MASS BALANCE SUPPLY CHAIN MODELS – MODULAR REQUIREMENTS					
E.1 Definition						
E.1.1. Certification for CPO mills is necessary to verify the volumes of certified and uncertified FFB entering the mill and volume sales of RSPO certified producers. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own certified land base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.						

Requirements	Audit Findings / Objective Evidence	STATUS (NC/AOC/C)				
E.2 Explanation						
E.2.1. The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill must be recorded by the CB in the public summary of the P&C certification report. This figure represents the total volume of certified palm oil product (CPO and PK) that the certified mill is <b>allowed to deliver in a year</b> . The actual tonnage produced should then be recorded in each subsequent annual surveillance report.						
a. Has the estimated tonnage of CPO and PK products (that could potentially be produced by the certified mill) been recorded by the certification body (CB) in the public summary of the P&C certification report?	The estimated tonnage of CPO and PK products has been recorded by certification body, i.e.: Certification audit: Estimated CPO: 51,040 MT Estimated PK: 10,640 MT  ASA1: Estimated CPO: 59,022.56 MT Estimated PK: 11,955.88 MT  ASA2: Estimated CPO: 71,986.14 MT Estimated PK: 14,441.10 MT	С				
b. Does the figure represent the total volume of certified palm oil product (CPO and PK) that the certified mill is allowed to deliver in a year?	Yes, the figure does represent the total volume of certified palm oil product (CPO and PK) that the certified mill allowed to deliver in a year.	С				

Requirements	Audit Findings / Objective Evidence	STATUS (NC/AOC/C)
	The actual tonnage produced has been recorded in each subsequent annual surveillance report, i.e:	
	ASA1:	
	Actual CPO : 31,012.85 MT Actual PK : 5,726.99 MT	С
c. Does the actual tonnage produced have to then be recorded in each subsequent annual surveillance report?	ASA2: Actual CPO : 50,604.19 MT	
	Actual PK : 9,286.84 MT	
E.2.2. The mill must also meet all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization (RSPO IT platform or book and claim).		
a. The mill must also meet all registration requirements for the appropriate supply chain through the RSPO supply chain managing organization (RSPO IT platform or book and claim)?	PT. HARI SAWIT JAYA – Negri Lama II Mill has met all registration requirements for the appropriate supply chain through the RSPO supply chain managing organization (RSPO IT platform), with register number RSPO_PO1000003004.	С
b. The mill must also meet all reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization (RSPO IT platform or book and claim)?	PT. HARI SAWIT JAYA – Negri Lama II Mill has met all reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization (RSPO IT platform).	С

# **E.3 Documented Procedure**

Requirements	Audit Findings / Objective Evidence	STATUS (NC/AOC/C)
This shall include at minimum the following:  a. Complete and up to date procedures covering t  b. The name of the person having overall responsi	uctions to ensure the implementation of all the elements specified in the he implementation of all the elements in these requirements; bility for and authority over the implementation of these requirements are able to demonstrate awareness of the site procedures for the implementation	and compliance with
a. Does the site have written procedures and/or work instructions in place to ensure the implementation of all elements specified in these requirements?  The state of the site have written procedures and/or work instructions in place to ensure the implementation of all elements specified in these requirements?	The Site has system documentation available on site to ensure the implementation of RSPO SCC requirements. The procedures are updated and appeared to be compliance with current standard.  • AA-MPM-OP-1400.17-R4, dated February 25 <sup>th</sup> , 2015, Procedure of Traceability. The procedure was established to ensure the production of sustainable and non-sustainable CPO/PK/CPKO produced by the Mill and shipped out could be traced to the suppliers of raw material, and also to ensure the palm oil production process could be described.  • AA-MPM-OP-1400.18-R4, dated February 25 <sup>th</sup> , 2015, Procedure of Book Keeping. The procedure described mechanism to monitor the supply chain of certified CPO, PK and CPK production are sustainable, from receipt of raw materials to the delivery of mill products (POM/KCP) and to ensure the record of number of "certified" and "non-certified" CPO, PK and CPKO production generated by POM/KCP and shipped out from the mill are "balance" in each 3-months period.  • AA-SM-405.2.R0, procedure of RSPO eTrace system  • AA-MPM-OP-1400.02-R2, procedure of FFB Receiving	C

Requirements	Audit Findings / Objective Evidence	STATUS (NC/AOC/C)	
	<ul> <li>AA-MPM-OP-1400.03-R1, procedure of Sterilizer station</li> <li>AA-MPM-OP-1400.06-R1, procedure of Clarifier station</li> <li>AA-MPM-OP-1400.08-R1, procedure of Kernel station</li> <li>AA-MPM-OP-1400.14-R2, procedure of Storage and Delivery.</li> </ul>		
b. Are procedures / work instructions completely covering the implementation of all the elements in these requirements?	Procedures and Work Instruction are completely covering the implementation of the elements in this requirement, i.e.:  • FFB Receiving • FFB Processing • Production Recording (CPO and PK) • Product Delivery • Mill Daily Report • Three Monthly Mass Balance Report • Certified Product Claim • Record Keeping • Shipping Announcement in e Trace	С	
c. Have the site had the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements?	Based on the Procedure of Traceability, Top Management has assigned personnel who having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements, who is the Mill Manager, Mr. Andriyanto.  Weighing clerk responsible for data input and print out weighing card. Receiving of FFB was based on SPB (delivery note) covers whether are sustainable or non-sustainable. If sustainable then delivery note must covers:  - Estate name and block number - Year of planting - Date of harvesting	С	

Requirements	Audit Findings / Objective Evidence	STATUS (NC/AOC/C)
	<ul> <li>Certificate number</li> <li>Batch number</li> <li>Transporter identity.</li> <li>All related personnel regarding Mill Manager, Head of</li> </ul>	·
	Administration, weighing clerk, security, storage keeper etc. has been trained for refreshment of Traceability and Mass Balance on 20 October 2017. Refreshment of sustainability awareness has been conducted in 07 December 2017.	
d. Is the person able to demonstrate awareness of the site's procedures for the implementation of this standard?	The assigned persons were able to demonstrate awareness of the site's procedures for the implementation of RSPO SCC standard.	
	All employees contribute to implementation of RSPO SCC have been trained by competent persons. The latest training was performed on 20 October 2017. Refreshment of sustainability awareness has been conducted in 07 December 2017.	С
E.3.2. The site shall have documented procedures for receiving	and processing certified and non-certified FFBs.	
a. Has the site had documented procedures for receiving certified FFBs?	The Procedure of Traceability (AA-MPM-OP-1400.17-R4) and Mass Balance (AA-MPM-OP-1400.18-R4) have mentioned the mechanism for receiving certified FFBs. The system has separated the recording of certified and non-certified FFB.	С
b. Has the site had documented procedures for receiving non-certified FFBs?	The Procedure of Traceability (AA-MPM-OP-1400.17-R4) and Mass Balance (AA-MPM-OP-1400.18-R4) have mentioned the mechanism for receiving non-certified FFBs. The system has separated the recording of certified and non- certified FFB.	С

Requirements	Audit Findings / Objective Evidence	STATUS (NC/AOC/C)		
c. Has the site had documented procedures for processing certified FFBs?	The Procedure of Traceability (AA-MPM-OP-1400.17-R4) and Mass Balance (AA-MPM-OP-1400.18-R4) have mentioned the mechanism for processing certified FFBs. The selected RSPO SC model is Mass Balance, so the mill does not have to separate the process of certified FFBs from non-certified FFBs.	С		
d. Has the site had documented procedures for processing non-certified FFBs?	The Procedure of Traceability (AA-MPM-OP-1400.17-R4) and Mass Balance (AA-MPM-OP-1400.18-R4) have mentioned the mechanism for processing non-certified FFBs. The selected RSPO SC model is Mass Balance, so the mill does not have to separate the process of certified FFBs from non-certified FFBs.	С		
E.4.1. The site shall verify and document the volumes of certifie	d and non-certified FFBs received.			
E.4.1. The site shall verify and document the volumes of certified and non-certified FFBs received.  It was verified that receiving of FFB was traceable to the supply base unit. During weighing on weighbridge the FFB sources is identified; whether received from own estate (block number and division) or from third party. Weighing slip and receiving report issued clearly stated the weight off FFB received and its source				
a. Does the site verify and document the volumes of certified FFBs received?	(certified or non-certified).  The documented Mill Operation Summary has recapitulated FFB received from own estate and from third party. Based on the report, certified FFB received from own estate from December 2016 to November 2017 was 192,908,924.48 Kg.	С		
	The site has two weighbridge, which are: - Presica / 1801 / Serial No. NXF F10475 with maximum capacity of 50,000 Kg. The weighbridge has been calibrated			

Requirements	Audit Findings / Objective Evidence	STATUS (NC/AOC/C)
	<ul> <li>by UPT Metrologi Rantau Prapat based on certificate No.510.3/167/MT.RP/16-TU dated 31 March 2016.</li> <li>Presica / PSC *801 / Serial No. GK.002262 with maximum capacity of 50,000 Kg. The weighbridge has been calibrated by UPT Metrologi Rantau Prapat based on certificate No.510.3/362/MT.RP/16-TU, May 2016.</li> </ul>	
	The validity period has been exhausted, but there have been reports of re-done by the Metrology Body on November 9, 2017.	
	<ul> <li>Records of certified FFB received:</li> <li>Weighbridge card No.PNDA117132282 dated 20/12/2017 described the commodity was certified FFB, sourced from Negri Lama Selatan Estate (KNS), Division 1, 597 bunches, SPB (FFB Delivery Note) 17/884. Nett tonnage was 5,900 Kg. Transporter: Internal, unit: BK9828YK.</li> <li>Weighbridge card No.PNDA117132262 dated 20/12/2017 described the commodity was certified FFB, sourced from Negri Lama Central Estate (KNC), Division 3, 501 bunches, SPB (FFB Delivery Note) 18/884. Nett tonnage was 3,760 Kg. Transporter: Internal, unit: BK9848YE.</li> </ul>	
	<ul> <li>Laporan Harian Pabrik (Mill Daily Report) dated 30 November 2017, mentioned: certified FFB received in November was 3,485,508 Kg, and until November was 192,908,924 Kg.</li> </ul>	
b. Does the site shall verify and document the volumes of non-certified FFBs received ?	It was verified that receiving of FFB was traceable to the supply base unit. During weighing on weighbridge the FFB sources is identified; whether received from own estate (block number and division) or from third party. Weighing slip and Mill Daily Report issued clearly stated the weight off FFB received and its source (certified or non-certified).  The documented Mill Operation Summary has recapitulated	С

Requirements	Audit Findings / Objective Evidence	STATUS (NC/AOC/C)
	FFB received from own estate and from third party. Based on the report, non certified FFB received from own estate from January to November 2016 was 48,269,676 Kg.	
	Records of non-certified FFB received:	
	<ul> <li>Weighbridge card No.PNDA517304883 dated 20/12/2017 described the commodity was 3<sup>rd</sup> party FFB, sourced from ESTERIA M QQ SMA 1. Nett tonnage was 5,786 Kg. Transporter BK8948YE, driver Ganong.</li> <li>Laporan Harian Pabrik (Mill Daily Report) dated 30 November 2017, mentioned: non certified FFB received in November was 4,111,321 Kg, and until November was 35,083,790 Kg.</li> </ul>	
E.4.2. The site shall inform the CB immediately if there is a proje	cted overproduction of certified tonnage.	
a. Does the site inform the CB immediately if there is a projected overproduction of certified tonnage?	The responsible personnel (Mill Manager) understood that the site have to inform CB immediately if there is a projected overproduction of certified tonnage. There is no overproduction during last certification period.	С

### **E.5 Records Keeping**

**E.5.1.** The site shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a three-monthly basis. All volumes of palm oil and palm kernel oil that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO. The site can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three months. However, a site is allowed to sell short. (ie product can be sold before it is in stock.) For further details refer to Module C.

Requirements		Audit Findings / Objective Evidence	STATUS (NC/AOC/C)
a.	Does the site record and balance all receipts of RSPO certified FFB on a three-monthly basis?	The site has record all receipts of RSPO certified FFB on daily basis, recapitulated it in monthly basis and balance it in three-monthly basis.	С
b.	The site shall record and balance all deliveries of RSPO certified CPO and PK on a three-monthly basis?	The site has record all deliveries of RSPO certified CPO and PK on daily basis, recapitulated it in monthly basis and balance it in three-monthly basis.	С
C.	Are all volumes of palm oil and palm kernel oil that are delivered being deducted from the material accounting system according to conversion ratios stated by RSPO?	All volumes of palm oil and palm kernel delivered are deducted from the material accounting system according to conversion ratios stated by RSPO.	С
d.	Is the site only able to deliver Mass Balance sales from a positive stock?  Positive stock can include product ordered for delivery within three months. However, a site is allowed to sell short.(ie product can be sold before it is in stock.)	The site is only able to deliver Mass Balance sales from a positive stock. There is no delivery of RSPO certified CPO during December 2016 to November 2017. CPO is delivered as another certification scheme. Delivery records observed are:  - Transfer Stock No. TS 11303/DD22/02/17 dated 29/11/2017 regarding delivery of 1,000 MT CPO (other scheme certified) from PT. Hari Sawit Jaya, Negeri Lama 2 Mill to PT. Hari Sawit Jaya, Tangki Timbun Lubuk Gaung, Dumai.  - Weighbridge card No. PNDC117301923 dated 02/12/2017 described the commodity was other scheme certified CPO (ISCC) from Negeri Lama 2 Mill to PT. Hari Sawit Jaya, Lubuk Gaung Bulking – Dumai based on the above Transfer Stock. Nett tonnage was 27,950 Kg. Time in 15.22, Time out 16.33. Transporter: CV. Teman Setia (SPK #11004/SPK/HSJ/CPO ISCC/RSPO/17 dated 29 November 2017), unit: BK9649VN, driver Dermawan.	С

Requirements	Audit Findings / Objective Evidence	STATUS (NC/AOC/C)
	<ul> <li>Laporan Harian Pabrik (Mill Daily Report) dated 30 November 2017, mentioned: CPO delivered from January to November 2017 was 50,604.19 MT certified CPO and 5,974.25 MT non-certified CPO.</li> <li>The mill delivered RSPO certified PK to PT. Hari Sawit Jaya – Kernel Crushing Plant. Delivery volume of certified PK from Negri Lama 2 Mill to Negri Lama 2 KCP was shown in Laporan Harian Pabrik (Mill Daily Report), e.g.:</li> <li>LHP dated 30 November 2017 mentioned that certified PK delivered in November was 666.875 MT and non-certified delivered was 229.434, and from December 2016 to November 2017 was 9,286,841 MT and non certified PK delivered was 1,763,513 MT.</li> <li>Lubuk Gaung Bulking is under PT. Sari Dumai Sejati which has been RSPO SC certified model IP, SG and MB by Control Union based on certificate number CU-RSPO SCC 821960 start date 30/08/2012 expired date 29/08/2017.</li> </ul>	
	ependent (not owned by the same organization) palm kernel crush e separately certified. The mill has to ensure that the crush is cover	
a. Does the mill outsource activities to an independent (not owned by the same organization) palm kernel crush, the crush still falls under the responsibility of the mill and does not need to be separately certified?	No outsourced activity	N/A

Requirements	Audit Findings / Objective Evidence	STATUS (NC/AOC/C)
b. Does the mill have to ensure that the crush is covered through a signed and enforceable agreement?	No outsourced activity	N/A

3.3.2.2 Supply Chain Certification System

	Supply Chain Certification System	Status ( Yes / No )
5.3.1	Has the client been made aware with necessary information concerning the RSPO Supply Chain Certification and the RSPO Rules on Communication and Claims Has the client been made aware with necessary information concerning the RSPO Supply Chain Certification and the RSPO Rules on Communication and Claims?  If potential clients have any further questions concerning the RSPO these shall be directed to the RSPO secretariat.	Yes
5.3.2	Has the client been made aware of the contractual agreement for certification services against the RSPO Supply Chain Standard and maintain a record of any agreement?	Yes
5.3.6	Has the organization been informed about the following items?	Yes
a.	Certification process	Yes
b.	Agree logistics for the assessment and time of exit (closing) meeting.	Yes
C.	Confirm acess to all relevant documents, field sites and personnel	Yes
d.	Explain confidentiality and conflict of interest	Yes

	Supply Chain Certification System	Status ( Yes / No )
5.3.7	Have the management documentation of the organization fully met to the requirements of the RSPO Supply Chain Certification Standard?	Yes
5.3.7	Have any issues or areas of concern been clarified to the organization?	Yes
5.3.7	Have the internal audits against RSPO supply chain standard been fully planned and underway before certification is awarded?	Yes
5.3.8	Have the organization sufficiently and adequately implemented the organizational systems, the management systems and the operational systems, including any documented policies and procedures, to meet the intent and requirements of the RSPO Supply Chain Certification Standard?	Yes
5.3.8	Have the client made aware that when there is outsourcing process to the third party after certification is granted therefor SAI Global shall be informed and SAI Global decides whether an interim visit is required for the next audit?	Yes
5.3.9	Has certification audit reviewed pertinent RSPO Supply Chain records relating to the receipt, processing and supply of certified oil palm products?	Yes
5.3.10	Have all activities conducted by subcontractors complied with the intent and requirements of the RSPO Supply Chain Certification Standard	N/A
5.3.11	Have the client made aware that until they receive written confirmation of their RSPO Supply Chain certification registration and its expiry date that they are not certified and can not make any claims concerning registration?	Yes
5.3.11	Have a detail records have been compiled of the entry (opening) meeting including a list of the participants in the meeting?	Yes
5.3.11	Have the client made aware of the findings of the audit team including any deficiencies which may result in a negative certification decisions or which may require further actions to be completed before a certification decision can be taken?	Yes
5.3.11	Have the client made aware that the findings of the audit team are tentative pending review and decision making by the duly designated representatives of the certification body?	Yes

#### 3.4 Recommendation

The recommendation from this audit is can continue as a producer of RSPO Principles and Criteria for Sustainable Palm Oil Production, May 2013 (Endorsed by the RSPO Board of Governors on September 30th, 2016) and the RSPO Supply Chain Certification Standard, Module E - CPO Mill: Module E Mass Balance, November 2014 when Major NCRs can be closed in accordance with the due date.

Audit recommendations are always subject to ratification by RSPO.

This report was prepared by: Eko Prastio Ramadhan, Nanang Rusmana, Jarot Widyatmaka and Fahrul

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

Environmental risk: compliance with regulations, hazardous waste management, RKL RPL

Social risk: compliance with regulations

OHS: prevention of hazard and risk, provision of PPE, first aid training

BMP: IPM and pesticide handling, production data

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

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

igned for and on behalf of PT. Hari Sawit Jaya (Negeri Lama II Mill)

Ivan Novrizaldie Date 20 March 2018

Signed for and on behalf of PT. SAI Global Indonesia

Inge Triwulandari Technical Manager Date 20 March 2018

Appendix "A" - Audit Record

Date	Auditor	Appendix "A" – Audit Record  Audit meetings plus functions/ processes/ areas/ *shifts audited:	# Shifts*	Times* From - To
18.12.2017		1 <sup>st</sup> day : Monday		
	All	Travelling Jakarta – Kualanamu (Flight GA 180)		GA 180 05.35 – 08.00
	All	Travelling Kualanamu –Medan Station (Airport Train)		09.10 – 09.57
	All	Travelling Medan – Rantau Prapat (Sribilah Train)		10.30 – 16.37
	All	Rantau Prapat - Site		16.30 – 18.30
19.12.2017		2 <sup>nd</sup> day : Tuesday		
		Opening Meeting		08.00 - 08.30
		Negeri Lama Selatan Estate		
	Rozi	Verification of corrective action on previous non conformity  Agronomy Best Practice and Legal Criteria 2.2.1, 2.2.2 Criteria 3.1 (all indicator) Criteria: 4.1.1, 4.1.2 and 4.1.3 for estate, 4.1.4 Criteria: 4.2. 4.3, 4.5 all indicators Criteria: 4.6.1, 4.6.2, 4.6.3, 4.6.4, 4.6.5 Criteria 4.6.7, 4.6.8, 4.6.9 Criteria: 6.10 Criteria: 7.2, 7.4, Criteria: 8.1		08.30 – 18.00
	Nanang	Document review, field visit, and interview  Verification of corrective action on previous non conformity  OHS: Criteria: 2.1 all indicators for OHS aspect Criteria: 4.6.11 Criteria: 4.7 all indicators Criteria: 4.8 all		08.30 – 18.00
	Pras	Environment: Criteria: 2.1 all indicators for environmental aspect Criteria: 4.4.1 Criteria: 4.6.6, 4.6.10 Criteria: 5.1, 5.3, 5.4, 5.5 and 5.6 all indicators Criteria: 7.1 (environment aspect), 7.7, 7.8 Criteria: 8.1  HCV: Criteria: 4.4.2		08.30 – 18.00

			Audit Report
		Criteria: 5.2 (all indicator) Criteria: 7.3	
	Jarot	Document review, field visit, and interview  Verification of corrective action on previous non conformity  Social: Criteria: 1.1; 1.2; 1.3 all indicators Criteria: 2.1.1 for social aspect Criteria: 2.2.3; 2.2.4; 2.2.5; 2.2.6; 2.3 all indicator Criteria: 4.6.12 Criteria: 6.1, 6.2, 6.3, 6.4, 6.5, 6.6, 6.7, 6.8, 6.9, 6.11, 6.12, 6.13 Criteria: 7.1 (social aspect), 7.5 Criteria: 8.1	08.30 – 10.00
		Public consultation with external stakeholders (village head, contractor, public figure, ect)  Interview with workers union, gender committee and workers (Negeri Lama Selatan Estate)	10.00 - 12.00
		Interview with workers union, gender committee and workers (Negeri Lama Central Estate)  Interview with workers union, gender committee	15.00 – 16.00 16.00 – 17.00
		and workers (Negeri Lama Dua Mill)	
	ALL	Break	12.00 – 14.00
20.12.2017		3 <sup>rd</sup> day : Wednesday	
		Negeri Lama Central Estate	
	Rozi	Document Review, field visit and interview  Verification of corrective action on previous non conformity  Agronomy Best Practice and Legal Criteria 2.2.1, 2.2.2 Criteria 3.1 (all indicator) Criteria: 4.1.1, 4.1.2 and 4.1.3 for estate, 4.1.4 Criteria: 4.2. 4.3, 4.5 all indicators Criteria: 4.6.1, 4.6.2, 4.6.3, 4.6.4, 4.6.5 Criteria 4.6.7, 4.6.8, 4.6.9 Criteria: 6.10 Criteria: 7.2, 7.4, Criteria: 8.1	08.00 – 18.00

			Audit Report
		Document review, field visit, and interview	
		Verification of corrective action on previous non conformity	
	Nanang	OHS:	08.00 – 18.00
		Criteria: 2.1 all indicators for OHS aspect Criteria: 4.6.11	
		Criteria: 4.6.11 Criteria: 4.7 all indicators	
		Criteria: 4.8 all	
		Environment:	
		Criteria: 2.1 all indicators for environmental aspect Criteria: 4.4.1	
		Criteria: 4.6.6, 4.6.10	
		Criteria: 5.1, 5.3, 5.4, 5.5 and 5.6 all indicators Criteria: 7.1 (environment aspect), 7.7, 7.8	
	Pras	Criteria: 8.1	08.00 – 18.00
		HCV:	
		Criteria: 4.4.2 Criteria: 5.2 (all indicator)	
		Criteria: 7.3	
		Document review, field visit, and interview	
		Verification of corrective action on previous non	
		conformity	
		Social :	
	Jarot	Criteria: 1.1; 1.2; 1.3 all indicators Criteria: 2.1.1 for social aspect	08.00 – 18.00
	Jaiot	Criteria: 2.2.3; 2.2.4; 2.2.5; 2.2.6; 2.3 all indicator	00.00 - 10.00
		Criteria: 4.6.12	
		Criteria: 6.1, 6.2, 6.3, 6.4, 6.5, 6.6, 6.7, 6.8, 6.9, 6.11, 6.12, 6.13	
		Criteria: 7.1 (social aspect), 7.5	
		Criteria: 8.1	
	ALL	Break	12.00 – 14.00
21.12.2017		4 <sup>th</sup> Day : Thursday	
		Negeri Lama Dua Mill	
		<u>Document review, field visit, and interview</u>	
	Rozi	Processing Best Practice	08.00 – 16.00
		Criteria: 4.1.1, 4.1.2, 4.1.3 for mill	
		Supply Chain – Mill	
		Document review, field visit, and interview	
		OHS	
	Nanang	Criteria: 2.1 all indicators for OHS aspects Criteria: 4.4.4	08.00 – 16.00
		Criteria: 4.6.11	
		Criteria: 4.7 all indicators Criteria: 4.8 all	
Doc ID: 7913 / Issue Dat	A 0047	© SAI Global Limited Copyright 2008 - ABN 67 050 611 64	 Page 194 of 228

	1		 Audit Report
	Pras	Document review, field visit, and interview  Time bound plan for other management units and Partial Certification Requirements  Environment: Criteria: 2.1 all indicators for environmental aspects Criteria: 4.4.1, 4.4.3 Criteria: 4.6.6, 4.6.10 Criteria: 5.1, 5.3, 5.4, 5.5 and 5.6 all indicators Criteria: 8.1	08.00 – 16.00
Jarot		Social: Criteria: 1.1; 1.2; 1.3 all indicators Criteria: 2.1.1 for social aspect Criteria: 2.2.3; 2.2.4; 2.2.5; 2.2.6; 2.3 all indicator Criteria: 4.4.2, 4.6.12 Criteria: 5.2 (all indicator) Criteria: 6.1, 6.2, 6.3, 6.4, 6.5, 6.6, 6.7, 6.8, 6.9, 6.11, 6.12, 6.13 Criteria: 8.1	08.00 – 16.00
	All	Break	12.00 – 14.00
	All	Auditors team meeting	16.00 – 16.30
	All	Closing meeting	16.30 – 18.00
22.12.2017		5 <sup>th</sup> day : Friday	
	All	Travelling Rantau Prapat – Medan (Sribilah Eksekutif U43)	07.20 – 13.15
	All	Travelling Medan - Kualanamu	14.35 – 15.06
	All	Travelling Kualanamu – Jakarta (Flight GA 191)	GA 191 17.00 – 19.40





Appendix "B" – Previous Nonconformities and Opportunity for Improvement Summary

	A	pendix B - Previous Nonc	conformities and Opportunity for Improve	ment Summary		
No	RSPO Criterion	Details	Corrective Action	Completion Date	PIC	Status
			Transfer Audit		•	
1	RSPO PC 2013 Criterion 4.3.5	Drainability assessment before replanting for peat land has not been conducted	Monitoring of water level of Penampakan River and Bilah River conducted weekly starting at April 2016.	20 December 2016	Environment and Sustainability Officer	Open Repeated refer to NCR 2016-04
2	RSPO PC 2013 Criterion 4.7.6	fon 4.7.6 accident insurance (BPJS Ketenagakerjaan). programmed proposal of registration of BPJS Ketenagakerjaan to HRD Medan Office.		20 December 2016	HRD HTU	Open Repeated refer to NCR 2016-12
3	RSPO PC 2013 Criterion 5.2.4	The outcome of HCV monitoring has not been fed back into the management plan	Carry out regular meetings to discuss and review feedback, monitoring results and progress of HCV management.	20 December 2016	Environment and Sustainability Officer	Open Repeated refer to NCR 2016-13
4	RSPO PC 2013 Criterion 5.6.3	There is no regular reporting of the monitoring outcomes	Carry out training to the site's sustainability team regarding GHG emission regular reporting to RSPO	20 December 2016	Environment and Sustainability Officer	Closed
			ASA 1 2016 (20 – 23 December 2016)			
1	RSPO P&C 2013 Criteria 2.1.1	Several regulations are not adhered to by the company	Appoint Personalia Assistant (Krani) to collecting, updating and reporting casual workers contract to Labour Agency	23 February 2017	Estate and KTU	Closed
2	RSPO P&C 2013 Criteria 2.2.2	It was found inconsistency in maintenance of legal boundary	Monitoring of HGU pegs	21 December 2017	Estate	Closed
3	RSPO P&C 2013 Criteria 4.2.2	Inconsistency data on fertilizer records	Warehouse operator make a BPPB document to everyone who want to borrow fertilizer and record it into Estate Monthly Report	21 December 2017	Estate	Open Recurrence NCR in ASA2
4	RSPO P&C 2013 Criteria 3.1.1; 3.1.2 and 4.3.	Drainability assessment before replanting for peat land has not been conducted	a. Monitoring according to drainability assessment and subsidence procedure     b. Manager and Asisstant Division will monitor and check the process (data collecting and analyse)	23 February 2017	Estate and R&D Dept	Closed



ASSURANCE SERVICES						
No	RSPO Criterion	Details	Corrective Action	Completion Date	PIC	Status
5	RSPO P&C 2013 Criteria 4.4.1	A water management plan inappropriate with the implementation.  Give an awareness annually especially about hazardous waste management		21 December 2017	Estate	Open Recurrence NCR in ASA2
6	RSPO P&C 2013 Criteria 4.6.1	pesticide uses are comply to the regulations  To calmot be demonstrated that pesticides are comply to the regulations  In calmot be demonstrated that pesticides includes include any including of pesticides includes includes includes includes include any including of pesticides includes included in including of pesticides includes includes includes included in including of pesticides includes included in including of pesticides includes includes includes included in including of pesticides includes included in including of pesticides includes included in include in includes included in included		23 February 2017	Estate	Closed
7	RSPO P&C 2013 Criteria 4.6.5 and 4.6.9	The employee who was responsible in pesticide handling is not competent	<ul> <li>Socialization to employee</li> <li>Ensure all workers have adequate competency before assignment</li> </ul>	23 February 2017	Estate	Closed
8	RSPO P&C 2013 Criteria 4.6.6	There were inconsistencies implementations of waste management procedure B3 Hazardous	Conduct sustainability awareness annually and specifically discuss about hazardous waste. The participant are Site Manager, E&S officer, Assistant (Sustainability, Division and Worksop), Supervisor team.	23 February 2017	Estate	Closed
9	RSPO P&C 2013 Criteria 4.6.10	The implementation of waste disposal has not been done in a proper manner	Conducted an annually Sustainability Awareness	21 December 2017	Estate	Closed
10	RSPO P&C 2013 Criteria 4.7.1	It was still found several poor working safety practices at site implementation.	Conducted an annually Sustainability Awarenees and coordinate with Training Centre to specifically added about electricity safety	23 February 2017	Estate	Closed
11	RSPO P&C 2013 Criteria 4.7.5	It was found the information and emergency procedures of the chemical material was not available in a language understood by the worker	Check and make a checklist of MSDS in Bahasa Indonesia	21 December 2017	Estate	Open Recurrence NCR in ASA2
12	RSPO P&C 2013 Criteria 4.7.6	Not all workers are covered by accident insurance (BPJS Ketenagakerjaan).	Their BPJS will paid after one month working.  Head of administration (KTU) monitored the BPJS every month	21 December 2017	Estate	Closed



No	RSPO Criterion	Details	Corrective Action	Completion Date	PIC	Status
13	RSPO P&C 2013 Criteria 5.2.4	Endangered species of flora yet to be monitored continuously	Sustainability assistant will be accompanied by assistant with forestry background     Scheduled HCV management review along with EMM that held every semester to discuss about HCV management	23 February 2017	Estate	Closed
14	RSPO P&C 2013 Criteria 5.3.3	Inconsistent waste management implementation	Conducted an annually Sustainability Awareness	21 December 2017	Estate	Open Recurrence NCR in ASA2
15	RSPO P&C 2013 Criteria 6.1.4	Evidence of stakeholder participation in social impact management and monitoring can't be shown	Assign PIC for Social Impact Management and review the social monitoring report	21 December 2017	Estate	Closed
16	RSPO P&C 2013 Criteria 6.5.2	Pay and conditions of employment not clearly detailed in the employment or service contracts. And also, several PHL workers not aware or not understood about their contract	Appoint a personnel to check the workers contract and explain it to PIC about the content of contract that need to covered     Ensure there are no discrimination and coercion in workers contract	23 February 2017	Estate	Closed
17	RSPO P&C 2013 Criteria 6.5.3	It was found in KAK, TPA (child care) facilities is inadequate condition	Make a registry of all facilities and their conditon	21 December 2017	Estate	Closed
18	RSPO P&C 2013 Criteria 6.8.1	It was found in employees contract, statement that considered as discrimination	Ensure there are no discrimination and coercion in workers contract  Special Audit (March 2017)	23 February 2017	Estate	Closed



No	RSPO Criterion	Details	Corrective Action	Completion Date	PIC	Status
1	RSPO INA NI 2016 Criterion 5.2 indicator 1	HCV Assessment performed on June 2012, reporting conducted in 2013 and finalised in 2014, in cooperation with Faculty of Forestry IPB. Inconsistencies were found in HCV Assessment Report.	<ul> <li>a. Ensure HCV Management and Monitoring report is reported to BKSDA of Labuhan Batu Regency</li> <li>b. Sustainability Staff from Pekanbaru Regional Office give training to Negri Lama Group HCV Officer regarding Guidance for the identification of HCV 2013</li> <li>c. Ensure HCV Monitoring in accordance with the HCV recommendations</li> </ul>	25 May 2017	Estate and Sustainability	Closed
2	RSPO INA NI 2016 Criterion 6.1 indicator 1,2, 3 and 4	Social Impact Assessment of PT. Hari Sawit Jaya was uses AMDAL document issued on 26 February 1994. Non-conformities were found in existing SIA Report.	EMS Team together with the CSR Team monitors the social impact coverage in RKL / RPL and CSR Reports and ensures identification of social impacts in accordance with RSPO guidelines	25 May 2017	Estate and Sustainability	Closed
3	RSPO INA NI 2016 Criterion 6.5 indicator 1	There was not enough evidence that Pay and conditions for PHL (casual worker) always meet at least legal or industry minimum standards and are sufficient to provide decent living wages	Coordinate with Regional Office's HRD to ensure the PHL (casual worker) contract format includes information regarding workers' rights and obligations.	25 May 2017	Estate and Sustainability	Closed



# Appendix "C" – Nonconformities and Opportunity for Improvement Summary

Organisation Name:		PT Hari Sawit Jaya and supp	ly bases	Location:		Desa Negeri Lama Seberang, Kec. Bilah Hilir,, Kab. Labuhan Batu, Labuhan Batu, Sumatera Utara, Indonesia, Negeri Lama I Mill		
Date:	21/12/2017	Audit team leader:	Eko Prastio Ramadhan	Activity/Report ID:	WI 993919	License/Certificate No.:	FMS40024	
	Organisation's acknowledge	ment of receipt of NCR	Employee Name:	Welly Joel Chandra		Welly Joel Chandra Date NCR Accepted: 2		2/01/2018

			Section 1		Section	on 2	Section 3	Section 4
NCR Nr.	Standard(s) & clause(s)	Classification	Details of non-conforming situation and Objective Evidence :	SAI Verification (how and when)	Correction : (immediate fix)	Root Cause and Corrective Action : (action to prevent recurrence)	SAI Global Response Review:	SAI Global Verification of Corrective Action for Effectiveness:
2017-01	RSPO Certificat ion System 2007 Criterion 4.2.4 point c	Minor	Non-conformance: Time bound plan is not revised in accordance with actual conditions  Objective evidence: - Kebun Aek Kuo has received new HGU covered area ± 500 Ha on March 2017, but not included in TBP version November 2017	Due Date: Next year SAI Follow up Method: Onsite	Revised TBP by including the addition of Aek Kuo Estate (500 Ha) area where the area will be certified in ASA3 2018	Root cause: The company considers that the area is included in the contract with the certification body  Corrective Action: Monitoring update certified area RSPO by PIC RO Jakarta on behalf Welly Joel Candra	Response: Acceptable (please see section 4 for details)  Reviewer: Eko Prastio Ramadhan  Date: 15/02/2018	Verification of Effectiveness: Will be checked at the next surveillance audit.  Name Eko Prastio Ramadhan  Status: Open

			Section 1		Sect	on 2	Section 3	Section 4
NCR Nr.	Standard(s) & clause(s)	Classification	Details of non-conforming situation and Objective Evidence :	SAI Verification (how and when)	Correction : (immediate fix)	Root Cause and Corrective Action : (action to prevent recurrence)	SAI Global Response Review:	SAI Global Verification of Corrective Action for Effectiveness:
2011 022	RSPO INA-NI 2016 Criteria 2.1.1	Major	Non-conformance: Several regulations are not adhered to by the company  Objective evidence:  a. It was observed in spraying activities (Block I 13C Afd IV KNS) knapscak without hazardous symbol. This not comply to Per.MenLH 3/2008 about Tata cara pemberian symbol dan label bahan berbahaya beracun.  b. Based on document review The P2K3 Report KNC is not reported every 3 month basis to the Dinas Tenaga Kerja dan Transmigrasi Labuhan Batu.	Due Date: 21/02/2018 SAI Follow up Method: Onsite	<ul> <li>a. Install the B3 symbol "dangerous" in knapsack spray and pesticide packing used for spray activity.</li> <li>b. Requesting Receipt of P2K3 Report Period I-III 2017 to previous AK3U and sending P2K3 report in the fourth quarter to DISNAKER dated 03 January 2018</li> </ul>	a. Symbol was damaged due to material of sticker that easily torn apart. Monitoring conduct by visual only and no tool for monitoring.  b. Receipt note was carried by previous AK3U, who has been transferred to Aceh. Meanwhile, copies of proof of reporting are not stored in the estate office.  Corrective Action:  a. Added item "B3 symbol installation" to risk analysis to be monitored by AK3 General as other risk analysis b. Added item "Monitoring Completeness of Fertilizer Tool" and "Monitoring Completeness of Working Tool of Spray" in Document Masterlist.  c. Internal Memorandum regarding the determination of the Document Controller PIC	Response: Acceptable (please see section 4 for details)  Reviewer: Eko Prastio Ramadhan  Date: 15/02/2018	<ol> <li>Verification of Effectiveness:         <ul> <li>The evidences reviewed includes:</li> </ul> </li> <li>Documentation of B3 sticker installation in knapsack in January 2017</li> <li>Documentation installation of B3 symbol in knapsack by using permanent paint.</li> <li>Proof of P2K3 reporting per 3 months. First Quarter was sent on April 5, 2017, second quarter on July 6, 2017, second quarter on November 4, 2017 and fourth quarter on January 4, 2018. All recipt note was signed and stamped by UPT Provincial of North Sumatera Province IV Rantau Prapat.</li> <li>Internal memorandum from GM Negeri Lama Group Number: 006/GM/INT/KNS/02/18 dated 1 February 2018 regarding the determination of Mr. Pujiono as Krani Sustainability which is one of his duties as document controller.</li> <li>Internal memorandum of KNC Estate Manager Number: 015 / MGR / KNC / 01/18 dated January 2, 2018 regarding the appointment of Julianingsih as the document controller at KNC.</li> </ol>

			Section 1		Secti	on 2	Section 3	Section 4
NCR Nr.	Standard(s) & clause(s)	Classification	Details of non-conforming situation and Objective Evidence :	SAI Verification (how and when)	Correction : (immediate fix)	Root Cause and Corrective Action : (action to prevent recurrence)	SAI Global Response Review:	SAI Global Verification of Corrective Action for Effectiveness:
								6. Internal memorandum of KNS Estate Manager Number: 002 / MGR / INT / KNS / 01/18 dated January 2, 2018 regarding the determination of Mr. Aslilawati Simangunsong as document controller at KNS.  7. Masterlist Document update January 2018  8. Revision of the 18th Risk Analysis dated January 25, 2018  Field observation in spray activity G10M Block Afd I KNS shows all spray equipment has been given symbol B3.  STATUS: CLOSED  Name  Eko Prastio Ramadhan  Date: 15/02/2018

			I	I	AUDIT KET UKT	T		Т
2017-	RSPO	Minor	Non-conformance :	Due Date:	KNC	Root cause:	Response:	Verification of Effectiveness:
03	INA-NI 2016 Criteria 4.1.3		There are inappropriate operational activities  Objective evidence:  KNC  C. Calibration of fertilizer dosage in 2017 for each division has not been demonstrated yet.  d. Spray tools calibration in 2017 can't be shown during audit  Mill  b. The temperature gauge for the press machine and digester number 3 is damaged	Next year  SAI Follow up Method: Onsite	Records of calibration of the dosage of fertilizer and spray calibration is stored in the Estate Office  Mill  a. Replacing the damaged gauge temperature on the press machine and digester no 3 dated December 22, 2017.  b. Conducting a new gauge temperature calibration on December 23, 2017.	a. Documentation of fertilizer dosage calibration is stored in each afdeling making it difficult at the time of collection  b. Calibration of spray tools is done once a week. Records are held by TUS supervisor and collected in the office after 1 month.  Mill  At the time of processing the night of December 19, 2018 temperature gauge condition is still good and works well (based on daily examination results). However, at the time of the audit visit it was note that there is damage to temperature gauge.  Corrective Action:  KNC: Estate Manager publishes Internal Memorandum regarding the determination of the Document Controller PIC with the task of collecting calibration records of all the afdeling and storing it in the estate office.  Mill  Mill manager issued Internal Memorandum No 098 / ML-PND / Int / XII / 2017 dated December 22, 2017.	Acceptable (please see section 4 for details)  Reviewer: Eko Prastio Ramadhan  Date: 15/02/2018	Evidences of correction and corrective action was sighted and reviewed such as:  a. Daily Press Service report PND dated December 19, 2017 where temperature gauge conditions are still working well. The check result shows the temperature gauge at position 900 C.  b. News event of replacement of damaged temperature gauge dated December 21, 2017.  c. Internal Memorandum No. 098 / ML-PND / Int / XII / 2017 dated December 22, 2017. The contents of the memo include instructions to Assistant Processes 1 and 2 for checking the temperature in each shift and perform temperature gauge calibration every 3 months.  d. Calibrate temperature gauge internally on December 25, 2017. Event news is signed by laboratory officer, Process Assistant and Mill Manager.  e. Internal memorandum of KNC Estate Manager Number: 015 / MGR / KNC / 01/18 dated January 2, 2018 regarding the appointment of Julianingsih as the document controller at KNC.  f. Records of the November 2017 fertilizer dosing calibration and spray calibration tape for the period of December 2017.  Field observations in the PND show that the temperature gauge has been replaced and functioning properly.

Activity ID: 993919

			Section 1		Section	on 2	Section 3	Section 4
NCR Nr.	Standard(s) & clause(s)	Classification	Details of non-conforming situation and Objective Evidence :	SAI Verification (how and when)	Correction : (immediate fix)	Root Cause and Corrective Action : (action to prevent recurrence)	SAI Global Response Review:	SAI Global Verification of Corrective Action for Effectiveness:
2017- 04	RSPO INA-NI	Major (Rec	Non-conformance : Records of fertilization activities cannot be shown	Due Date: 21/02/2018	Document storage is centralized in the estate office and	Root Cause : KNS dan KNC	Response: Acceptable (please	Name Eko Prastio Ramadhan  Date: 15/02/2018  Verification of Effectiveness: Evidences was sighted and reviewed
	2016 Criteria 4.2.2	urre nce)	Objective evidence:  KNS  Data of fertilizers recommendation and realization in 2017 can't be shown during audit  KNC  Data of fertilizer recommendation year 2017 for all Division can't be shown during audit	SAI Follow up Method: Onsite	designates the PIC Document Controller.	Documentation of fertilizer recommendations and the realization of fertilization is stored in each afdeling making it difficult at the time of collection  Corrective Action:  Estate Manager publishes Internal Memorandum on the determination of the Document Controller PIC whereby the PIC is tasked with collecting calibration records of each afdeling and storing it in the estate office.	see section 4 for details)  Reviewer: Eko Prastio Ramadhan  Date: 15/02/2018	such as:  1. KNS and KNC Fertilization Recommendation Book Y2017  2. Realization of KNS fertilization in Y2017  3. Internal memorandum of KNC Estate Manager Number: 015 / MGR / KNC / 01/18 dated January 2, 2018 regarding the appointment of Mr. Julianingsih as document controller at KNC.  4. Internal memorandum of KNS Estate Manager Number: 002 / MGR / INT / KNS / 01/18 dated January 2, 2018 regarding the determination of Mr. Aslilawati Simangunsong as document controller at KNS  STATUS: CLOSED  Name  Eko Prastio Ramadhan  Date:  15/02/2018

			Section 1		Section	on 2	Section 3	Section 4
NCR Nr.	Standard(s) & clause(s)	Classification	Details of non-conforming situation and Objective Evidence :	SAI Verification (how and when)	Correction : (immediate fix)	Root Cause and Corrective Action : (action to prevent recurrence)	SAI Global Response Review:	SAI Global Verification of Corrective Action for Effectiveness:
2017- 05	RSPO INA-NI 2016 Criteria 4.2.3	Minor	Non-conformance: LSU records Y2016 can't be shown  Objective evidence: KNC Based on document review, LSU records year 2016 can't be shown	Due Date: Next year SAI Follow up Method: Onsite	Document storage is centralized in the estate office and designates the PIC Document Controller	Root Cause: KNS dan KNC Documentation of fertilizer recommendations and the realization of fertilization is stored in each afdeling making it difficult at the time of collection  Corrective Action: Estate Manager publishes Internal Memorandum on the determination of the Document Controller PIC whereby the PIC is tasked with collecting calibration records of each afdeling and storing it in the estate office.	Response: Acceptable (please see section 4 for details)  Reviewer: Eko Prastio Ramadhan  Date: 15/02/2018	Verification of Effectiveness: Evidences was sighted and reviewed such as:  1. Internal memorandum of KNC Estate Manager Number: 015 / MGR / KNC / 01/18 dated January 2, 2018 regarding the appointment of Mr. Julianingsih as document controller at KNC.  2. Internal memorandum of KNS Estate Manager Number: 002 / MGR / INT / KNS / 01/18 dated January 2, 2018 regarding the determination of Mr. Aslilawati Simangunsong as document controller at KNS  Will be verified during next ASA.  Status: OPEN  Name  Eko Prastio Ramadhan

			Section 1		Section	on 2	Section 3	Section 4
NCR Nr.	Standard(s) & clause(s)	Classification	Details of non-conforming situation and Objective Evidence :	SAI Verification (how and when)	Correction : (immediate fix)	Root Cause and Corrective Action : (action to prevent recurrence)	SAI Global Response Review:	SAI Global Verification of Corrective Action for Effectiveness:
2017- 06	RSPO INA-NI 2016 Criteria 4.3.4	Major	Non-conformance: There is no evaluation to minimize the degradation of peat soil  Objective evidence: There is a decrease of peat subsidence during 2017 as an example of monitoring of measurement peg No. 4 block D11r of 1.8 cm and peg No. 1 block E10g of 2.4 cm. The company can't show evaluation to minimize the degradation of peat soil during audit.	Due Date: 21/02/2018  SAI Follow up Method: Evidence submitted to Team Leader	Conducting management review on peat subsidency monitoring results.	Root Cause:  Management has not conducted a review related to the decline of peat subsidency as it is still in accordance with the standard of SOP of Peatland Monitoring AA-PL-06-EFP Revision 1 dated 5 April 2017.  Corrective Action:  KTU menambahkan aktifitas "Management Pengelolaan Gambut" dalam masterlist dokumen. Masterlist dokumen. Masterlist dokumen merupakan acuan bagi KTU untuk update dokumen dan dalam mengecek progress kegiatan yang harus dilakukan sesuai dengan periodenya	Response: Acceptable (please see section 4 for details)  Reviewer: Eko Prastio Ramadhan  Date: 15/02/2018	Verification of Effectiveness: The evidences was sighted and reviewed such as:  1. Records management review dated January 10, 2018 2. The result of evaluation of management review as indicated that the average subsidency decrease in April is 0.43 cm, 0.28 cm in July and 0.158 cm in October is still in accordance with SOP AA-PL-06-EFP (Standard of 10% peat thickness / 5 year).  3. Masterlist Document update January 2018  Status: CLOSED  Name Eko Prastio Ramadhan  Date: 15/02/2018

2017-	RSPO	Major	Non-Conformities:	Due Date:	a	Record the results of	Root cause:	Resnonse:	Verification of Effectiveness:
2017-07	RSPO INA-NI 2016 Criteria 4.4.1	Major (Recurr ence)	Inconsistency in water management plan  Objective Evidence:  a. Parameters Zn, Kromium Val. 6, Khlor Bebas, Sulfida, BOD and COD in waste water from oil trap analysis (KNC workshop) dated 2 January 2017 were above the standards (Permen.LH No 5/2014)  b. Parameters Nitrit, BOD and COD in domestic waste water analysis from KNC workers emplacement dated 2 January 2017 were above the standards (Permen.LH No 5/2014)  c. Parameters COD in waste water from oil trap analysis (KNC Fuel Station) dated 2 January 2017 were above the standards (Permen.LH No 5/2014)  d. Parameters TSS and COD in domestic waste water analysis from KNC workers emplacement dated 2 June 2017 were above the standards (Permen.LH No 5/2014)  e. Parameters Fosfat and BOD in outlet Sungai Bilah Analysis on 3 April 2017 were above the standards	Due Date: 21/02/2018 SAI Follow up Method: Onsite	b.	Team to staff and employees on Environmental Management	Root cause:  For (a) – (g):  In SOP Wastewater Quality Monitoring AA-PL-03-EFP Revision 6 dated April 5, 2017 stated that if the environmental analysis exceeds the quality standard then the PIC Environment reviews and evaluates the results of the analysis. However, in practice it is inconsistent with SOPs for lack of understanding from Environment PIC  For (h):  The foreman and the fertilizer employee do not know that the PPE should not be washed at home because it is only valid for spray teams.  Corrective Action:  (a) – (g)  The ISO Team socializes SOP for Wastewater Quality Monitoring in Annual Sustainability Awareness activities  (b) and (d)  Re-socialize the Internal Memorandum on Clean Day Activities No: 162 / MGR / INT / KNS / 12/17, especially the maintenance of waterways for	Response: Acceptable (please see section 4 for details)  Reviewer: Eko Prastio Ramadhan  Date: 15/02/2018	Verification of Effectiveness: The evidences was sighted and reviewed such as:  1. Records of non-conformance regarding environmental analysis results 2. Oil trap inspection at KNC period January 2018 3. Records of socialization to the fertilizer employees at KNS include Afd I (January 9, 2018), Afd 2 (January 8, 2018), Afd 3 (January 8, 2018), Afd 4 (January 2018) and Afd 5 (January 10, 2018) 4. EMS team awareness record on January 15, 2018 5. Internal Memorandum No: 002 / MGR / INT / KNS / 01/18 dated January 2, 2018 regarding the Prohibition of Taking Home of PPE Fertilizer (Until and Tabur) 6. Internal Socialization of the Clean Friday Activities Memorandum on February 10, 2018 7. Letter to the Environmental Office of Labuhan Batu Regency No: 008 / MGR / PNS / EXT / 01/2018 dated January 8, 2018 Subject Please response regarding the water quality of River Bilah Period
			d. Parameters TSS and COD in domestic waste water analysis from KNC workers emplacement dated 2 June 2017 were above the standards (Permen.LH No 5/2014)  e. Parameters Fosfat and BOD in outlet Sungai Bilah Analysis on 3 April 2017 were above the standards				for Wastewater Quality Monitoring in Annual Sustainability Awareness activities  (b) and (d) Re-socialize the Internal Memorandum on Clean Day Activities No: 162 / MGR / INT / KNS / 12/17, especially the		Clean Friday Activities Memorandum on February 10, 2018  7. Letter to the Environmental Office of Labuhan Batu Regency No: 008 / MGR / PNS / EXT / 01/2018 dated January 8, 2018 Subject Please response regarding the water quality of River Bilah Period
			f. Parameters Fosfat and BOD in downstream Sungai Bilah Analysis on 3 April 2017 were above the standards (PP No 82/2001)  g. Parameters Nitrit and Sulfida in waste water analysis from TUS				the reduction of pollution sources.  (e) dan (f) The result of the river analysis that exceeds the quality standard will be reported specifically to the Labuhan Batu District Environmental		Semester I and II 2017.  8. Checklist Use of PPE before and after work period January 2018 and period February 2018 (as of 13 February 2018)

			Section 1		Secti	on 2	Section 3	Section 4
NCR Nr.	Standard(s) & clause(s)	Classification	Details of non-conforming situation and Objective Evidence :	SAI Verification (how and when)	Correction : (immediate fix)	Root Cause and Corrective Action : (action to prevent recurrence)	SAI Global Response Review:	SAI Global Verification of Corrective Action for Effectiveness:
			bathroom (KNS) were above the standards (KepMenLH No 5/2014) h. Based on interview with fertilizer team in KNS, it was found their aprons washed in their house			Office for response requests to the analysis results.  (h):  a. Estate Manager issues Internal Memorandum on Prohibition of Taking Home of PPE of Fertilizer (Until and Tabur)  b. Make a Checklist Use of PPE and PPE check before and after work		Field observations in TUS Bathrooms showed the apron fertilizer team washed and stored in TUS Bathrooms.  Status: CLOSED  Name Eko Prastio Ramadhan  Date: 9. 15/02/2018
2017- 08	RSPO INA-NI 2016 Criteria 4.6.2	Major	Non-conformance: Record of LD50 calculation can't be shown  Objective evidence: Based on document review, LD50 calculation 2017 for KNC can't be shown during audit	Due Date: 21/02/2018 SAI Follow up Method: Onsite	Shows LD50 records during follow up audit     Socialization to PIC regarding LD50 records	Root cause: PIC The Document Controller does not yet know that the LD50 recordings are contained in the LUK sub-chapter of Pesticide Toxicity Monitoring Recordings because the day-to-day work is in the Personnel section.  Corrective Action: Includes PIC Controlling Documents in annual routine training activities Sustainability Awareness.	Response: Acceptable (please see section 4 for details)  Reviewer: Eko Prastio Ramadhan  Date: 15/02/2018	Verification of Effectiveness: The evidences was sighted and reviewed such as:  1. LD 50 record on LUK KNC for January 2018 period  2. Recordings of awareness of ISO 14001 on 23 January 2018  Status: CLOSED  Name Eko Prastio Ramadhan  Date: 15/02/2018

			Section 1		Section	on 2	Section 3	Section 4
NCR Nr.	Standard(s) & clause(s)	Classification	Details of non-conforming situation and Objective Evidence :	SAI Verification (how and when)	Correction : (immediate fix)	Root Cause and Corrective Action : (action to prevent recurrence)	SAI Global Response Review:	SAI Global Verification of Corrective Action for Effectiveness:
2017- 09	RSPO INA-NI 2016 Criteria 4.6.4	Minor	Non-conformance: The list of pesticides from WHO Class 1A&1B, and Stockholm or Rotterdam conventions pesticide cannot be demonstrated.  Objective evidence: Based on document review, the list of pesticides from WHO Class 1A&1B, and Stockholm or Rotterdam conventions pesticide can't be shown during audit	Due Date: Next year SAI Follow up Method: Onsite	Shows WHO Class 1A and 1B pesticide list records at follow up audit	Root cause:  WHO Class 1A and 1B pesticide list records are still soft copies held by KTU. While at the time of the audit, KTU is accompanying the stock audit team.  Corrective Action: Estate Manager publishes Internal Memorandum regarding the determination of Document Controller PIC.	Response: Acceptable (please see section 4 for details)  Reviewer: Eko Prastio Ramadhan  Date: 15/02/2018	Verification of Effectiveness: Evidences was sighted and reviewed such as:  1. Internal memorandum of KNC Estate Manager Number: 015 / MGR / KNC / 01/18 dated January 2, 2018 regarding the appointment of Mr. Julianingsih as document controller at KNC.  2. Internal memorandum of KNS Estate Manager Number: 002 / MGR / INT / KNS / 01/18 dated January 2, 2018 regarding the determination of Mr. Aslilawati Simangunsong as document controller at KNS  Will be verified during next ASA.  Status: OPEN  Name  Eko Prastio Ramadhan

						AUDIT INEL OIL				
2017-	RSPO	Major	Non-conformance:	Due Date:	a.	Request MSDS Dipel to	Ro	ot cause:	Response:	Verification of Effectiveness:
10	INA-NI		Inconsistency in pesticide application and keeping PPE	21/02/2018		Dept Purchasing and EMS	a.	MSDS for Dipel has not	Acceptable (please	The evidences was sighted and
	2016		after pesticide application			Team then install it in		been supplied by the	see section 4 for	reviewed such as :
	Criteria		and position approach	SAI		warehouse		supplier	details)	a. Internal memorandum of KNS
	4.6.5		Objective evidences:	Follow up	b.	Ask for MSDS Kencepat,	b.	Warehouse officers do not		Estate Manager Number: 002 /
	&		a. At KNS, MSDS Dipel is not	Method:		Racumin, Manufer, Indostik,		monitor consistently		MGR / INT / KNS / 01/18 dated
	4.7.5		available in the pesticide	Onsite		Bionasa, Solutions, Dipel. to		(objective evidence b - d)	Reviewer:	January 2, 2018 regarding the
			warehouse .			Dept Purchasing and EMS	c.	The sprayers have	Eko Prastio	determination of Mr. Aslilawati
			b. At KNC, MSDS Kencepat,			Team then install it in the		attended limited pesticide	Ramadhan	Simangunsong as document
			Racumin, Manufer,			warehouse		training on October 7,	. tarraarrarr	controller at KNS.
			Indostik, Bionasa, Solusi,		c.	Ask MSDS Topsin in Bahasa		2014 and September 15,	D-1- 45/00/0040	b. Check the availability of Work
			Dipel, is not available in			Indonesia to Dept		2016. However, the	Date: 15/02/2018	Device Fittings The spray
			the pesticide warehouse			Purchasing and EMS Team		certificate can not be found		team before and after work
			c. At KNS, MSDS Topsin still			then install it in warehouse		(lost) because the PIC		period January 2018.
			in English and not		d.	Request MSDS Amcotin,		Document Control varies		c. Submission of spray team
			understood by the			Polidor, Topsin, and Nordok		for each section.		members for Limited Pesticide
			warehouse officer.			in Bahasa Indonesia to	d.	Lack of monitoring of PPE		Training in collaboration with
			d. At KNC, MSDS Amcotin,			Purchasing Dept and EMS		by the Mandor		Sygenta on 21 February 2018.
			<i>Polidor, Topsin,</i> and			Team then install it in	e.	MSDS is missing and not		d. Monitoring MSDS in
			Nordok still in English and			warehouse		informed by the Mandor to		warehouse period January
			not understood by the		e.	Re-submit the names of		KTU		2018
			warehouse officer.			TUS employees who are				
			e. At KNS, there is no			trained in limited pesticide	Co	prrective Action:		Field observations in the chemical
			evidence of training limited		١.	use	a.	Coordinate with Dept		warehouses of KNS and KNC
			pesticides use for sprayers		t.	Collecting Apron in TUS	۳.	Purchasing that for every		indicate that MSDS for chemicals is
			employee in the name of			Bathroom		purchase of chemical		available in a language that workers
			Andi Setiawan, Ngateni,		g.	Submit the Gramoxone		packaging must be		can understand. From the field
			Siti Fatimah, Latimani,			MSDS to Mandor Spray and		accompanied by MSDS		observation in spray activity of G10M Block Afd I KNS there are 7 spray
			Susilawati, Sutini,			to the Chemical Warehouse		(point a - d).		team working on February 15, 2018.
			Asanema, and Rusti			of KNS.	b.	Estate Manager publishes		Observation in TUS Bathroom has
			f. Based on observation in					Internal Memorandum		been done and shows the number of
			the KNS TUS bathroom					regarding the		apron according to the number of
			there was only found 15					determination of		spray team that work.
			pcs sprayer apron, while					Document Controller PIC.		
			sprayer who worked that				c.	Monitoring the		STATUS : CLOSED
			day are 19 sprayers.					completeness of spray		
			g. Based on field					team work tools before		Name
			observation, there was no					and after work by Mandor		Eko Prastio Ramadhan
			MSDS available for					Spray		Lito i fastio italifadilali
			pestiside material				d.	Monitoring availability of		
			Gramoxone at working				u.	MSDS every week		Date:
			location (spraying activity							15/02/2018
			Block I13C Divisi IV KNS)							

			Section 1		AUDIT REPORT	on 2	Section 3	Section 4
NCR Nr.	Standard(s) & clause(s)	Classification	Details of non-conforming situation and Objective Evidence :	SAI Verification (how and when)	Correction : (immediate fix)	Root Cause and Corrective Action : (action to prevent recurrence)	SAI Global Response Review:	SAI Global Verification of Corrective Action for Effectiveness:
			and in the KNS Chemical Storage					
2017-	RSPO INA-NI 2016 Criteria 4.6.6	Major	Non-Conformities: During field observation in KNS, it was found used pesticides containers used for other purposes  Objective Evidence: a. During field observation in fertilizer rag washing area (KNS), it was found used pesticides container (Metsulindo) is being cut and used for soap b. During field observation in fuel station area (KNS), it was found used pesticide container (Indostick) is used for fuel container	Due Date: 21/02/2018 SAI Follow up Method: Onsite	a. Transfer Metsulindo packaging to hazardous waste storage and provide soap container made from non ex agrochemical materials  b. Moving the packaging of pesticide to hazardous waste storage	Root cause: Estate has not appointed a PIC that specializes in B3 waste.  Corrective Action:  a. Appoint one of the traction employees as PIC Officer LB3 b. Socialization on the handling of LB3 to warehouse and traction employees (KNS) c. Askep Traksi and PIC hazardous waste will monitor directly in the field related to hazardous waste handling by warehouse and traction employees	Response: Acceptable (please see section 4 for details)  Reviewer: Eko Prastio Ramadhan  Date: 15/02/2018	Verification of Effectiveness: The evidences was sighted and reviewed such as:  1. Records of delivery of pesticide packaging to hazardous waste storage on December 21, 2017  2. Letter of appointment of Mr. Indra as hazardous waste storage Officer No: 008 / MGR / INT / KNS / 01/18 dated January 9, 2018  3. Records of the handling of hazardous waste on 18 January 2018  Field observation in the area until the fertilizer and fueling stations showed no more hazardous waste packaging reused.  STATUS: CLOSED  Name  Eko Prastio Ramadhan  Date: 15/02/2018

			Section 1		Section	on 2	Section 3	Section 4
NCR Nr.	Standard(s) & clause(s)	Classification	Details of non-conforming situation and Objective Evidence :	SAI Verification (how and when)	Correction : (immediate fix)	Root Cause and Corrective Action : (action to prevent recurrence)	SAI Global Response Review:	SAI Global Verification of Corrective Action for Effectiveness:
2017-12	RSPO P&C 2016 Criteria 4.7.2	Major	Non-conformance: The risk control for cutting process at warehouse mill and estate was not determined optimally.  Objective evidence: There was no FBA (Flash Back Arrester) equipment attached to O <sub>2</sub> and LPG gas tube used for metal cutting process at estate workshop (KNS and KNC) and Mill PND.	Due Date: 21/02/2018 SAI Follow up Method: Onsite	Make FBA purchases locally and install flashback arrester equipment in KNS, KNC, and PND.	Estate and mill have made a purchase request to the Medan Purchasing Department. However, the request can not be processed because there is no item code.  Corrective Action:  a. Coordinate with Dept Purchasing to make the item code for FBA so that in the future when there PP can be processed immediately. PIC is KTU.  b. Incorporate fire risk and control with FBA in HIRADC	Response: Acceptable (please see section 4 for details)  Reviewer: Eko Prastio Ramadhan  Date: 15/02/2018	Verification of Effectiveness: The evidences was sighted and reviewed such as:  1. FBA installation documentation at the factory on 5 January 2018 2. FBA Installation Documentation at KNS on February 10, 2018 and KNC on 12 February 2018. 3. Memorandum of purchase of FBA at KNC (11 February 2018), KNS (10 February 2018) and PND (10 Janaury 2018) 4. Revision of the 18th Risk Analysis dated January 25, 2018  Field observations in the workshop area show that FBA has been installed and works well.  STATUS: CLOSED  Name Eko Prastio Ramadhan  Date: 15/02/2018

2017-	RSPO	Major	Non-conformance:	Due Date:	Mill	Root cause:	Response:	Verification of Effectiveness:
13	P&C 2016 Criteria 4.7.3		Appropriate protective equipment was not available to all workers at the place of work  Objective evidence:  Mill  The workers from contractor (PT. Indopalmatex-Mill) was found not wearing PPE (helmet) at Mill PND.  Estate  a. The spraying workers in Block I13c Divisi IV, manuring workers in Block KNS J13L Divisi IV, and the harvester workers in Block H11V Divisi III KNS and Block F12C KNC Divisi IV was not wearing appropriate PPE (chemical mask, safety shoes and helmet).  b. The FFB loading workers in Divisi IV KNS were not wearing safety shoes.	21/02/2018  SAI Follow up Method: Onsite	Socialize to the contractor about the use of PPE while working in the field.  KNC and KNS The foreman completes a check on the use of PPE every day before the employee works.	Mill Mill has made a briefing at the beginning of the contractor's work. However, daily monitoring is done randomly so it does not monitor everything.  KNC and KNS The company already has a checklist of APD usage filled by the Mandor. However, its implementation more often uses visual rather than charging a checklist.  Corrective Action: Mill Preparation Daily APD Checklist for contractors.  KNC and KNS Check the use of PPE is known and signed by the Mandor, Assistant and HSE Officer.	Acceptable (please see section 4 for details)  Reviewer: Eko Prastio Ramadhan  Date: 15/02/2018	The evidences was sighted and reviewed such as:  1. Record of socialization to the contractor on December 26, 2017  2. Recording checklist Use of PPE period January 2018  3. Checklist Use of PPE  4. Form APD checks Indopalmatec Contractor period January 2018. Known and signed by AK3 General and Contractor Supervisor.  Field observation in PND, spray activity of G10M Block Afd I KNS, harvest activity of Block G10D KNS and harvest activity Block D11B Afd II KNC shows all workers have used PPE in accordance with SOP and risk analysis.  There has been no FFB transport activity during field observation. However, the form of APD usage checklist for TBS transport workers on 15 February 2018 has been checked and APD has been used.  Status: CLOSED  Name  Eko Prastio Ramadhan
2017- 14	RSPO P&C 2016 Criteria 4.7.5	Major (Recurr ence)	Non-conformance: The emergency equipment was not available at working location.  Objective evidence:	Due Date: 21/02/2018 SAI Follow up Method:	a. Submit the first-aid box to the Mandor     b. Complete each job foreman with first aid box according to Permenkes	The first aid kit is not carried away by the foreman because of the rush to follow the morning meeting	Response: SELECT  If response is unacceptable	Verification of Effectiveness: The evidences was sighted and reviewed such as:  1. The official report of the handover of first aid boxes to the

Activity ID: 993919

			Section 1		Section	on 2	Section 3	Section 4
NCR Nr.	Standard(s) & clause(s)	Classification	Details of non-conforming situation and Objective Evidence :	SAI Verification (how and when)	Correction : (immediate fix)	Root Cause and Corrective Action : (action to prevent recurrence)	SAI Global Response Review:	SAI Global Verification of Corrective Action for Effectiveness:
2017-15	RSPO INA-NI 2016 Criteria 5.2.3	Minor	Non-Conformities: Not enough evidences that HCV dissemination has been conducted to all employees  Objective Evidence: Based on document review, it was found that HCV dissemination on 26 August 2017 only attended by 32 peoples.	Due Date: Next Audit SAI Follow up Method: Onsite	Documenting HCV socialization to all staff, foremen, and employees.	Root cause:  HCV training is only followed by staff and supervision, while the delivery of HCV values from supervision and staff to employees during morning muster is not documented.  Corrective Action: Incorporate proof of HCV socialization documentation respectively afdeling in document masterlist.	Response: Acceptable (please see section 4 for details)  Reviewer: Eko Prastio Ramadhan  Date: 15/02/2018	Verification of Effectiveness: Evidence of corrective actions reviewed are HCV socialization records on 23 January 2018 and 10 February 2018.  Will be check during next ASA.  Status: OPEN  Name Eko Prastio Ramadhan

						AUDII KEPUKI				
2017-	RSPO	Major	Non-conformance situations: Not enough evidences that the	Due Date:	a.	Point (a), (b), (c), (f) and		oot cause:	Response:	Verification of Effectiveness:
16	INA-NI 2016 Criteria 5.3.2		Not enough evidences that the company have disposed their hazardous waste responsibly  Objective evidences:	21/02/2018 SAI	b.	(g): Moving the LB3 pack to the LB3 TPS Point (d): Fix wire storage warehouse TPS Waste B3	a.	Point (a), (b), (f) and (g): Warehouse and traction workers are not aware that LB3 packaging should be	Acceptable (please see section 4 for details)	The evidences was sighted and reviewed such as:  1. LB3 transport program dated January 10, 2018 signed by
			a. During field observation in	Follow up Method:	c.	Point (e): carrying LB3		sent to LB3 TPS		Estate Manager and KTU
			KNS, it was found used pesticides containers keep in drum in parking area beside agrochemical storage. It will be send to TPS LB3 after the drum is full.  b. During field observation in KNS, it was found 1 drum of Gramoxone keep in fuel station area. When the drum is open, there is still chemical material inside the drum.  c. During field observation in KNS, it was found used filter in used iron warehouse  d. Security wire in TPS LB3 is damaged and has not been repaired  e. Based on manifest, the company transported the hazardous waste exceeds the time limit. The time limit was 90 days but if produce (less than) < 50 kg per days may store maximal 180 days.	Method: Onsite	c.	Point (e): carrying LB3 transport in cooperation with the vendor	b. c.	immediately. So far no formal socialization on LB3 should be immediately taken to TPS LB3.  Point (c): Traction employees are not yet aware of the LB3 category and assume that the used filters are included with scrap metal.  Point (d): The repair process has not been completed because civil servants are assigned elsewhere.  Point (e): A change of PIC handling LB3 transport from ISO Team to Dept. Purchasing as of July 2017.  Point (e): The change of vendor that carries LB3 from PT Shali Riau Lestari to PT Indostar Cargo	Reviewer: Eko Prastio Ramadhan  Date: 15/02/2018	Estate Manager and KTU  2. News of the show and manifest 2 for carriage dated December 19, 2017 and January 13, 2018.  3. Records of LB3 handling socialization on 18 January 2018  Field observations in the warehouses and workshops of KNS and KNC and clinics indicate that remedial actions have been taken to cover the building wiring of TPS LB3 and the LB3 packaging has been transferred to TPS LB3.  STATUS: CLOSED  Name  Eko Prastio Ramadhan  Date: 15/02/2018
			Meanwhile the company transported the hazardous waste in 31 May 2017 and 12 December 2017, its more than 180 days. (KNS)  f. During field observation in KNC clinic, it was observed that medical waste was stored up to 3 month before transfer to hazardous waste storage in KNS.				<b>C</b> c a.	where before the transportation, all contracts and documents must be completed first.  corrective Action:  Socialization on the handling of hazardous waste per 3 months to warehouse and traction employees		

			Section 1		Section	on 2	Section 3	Section 4
NCR Nr.	Standard(s) & clause(s)	Classification	Details of non-conforming situation and Objective Evidence :	SAI Verification (how and when)	Correction : (immediate fix)	Root Cause and Corrective Action : (action to prevent recurrence)	SAI Global Response Review:	SAI Global Verification of Corrective Action for Effectiveness:
			g. During field observation in agrochemical warehouse in KNC, it was found hazardous waste stored in upfront of warehouse without proper protection. The leftover chemical in the containers can be smelled from the front door.			b. Arrange checks of hazardous waste storage(Form AA-KL-604-FM) with checking frequency once every 1 month     c. Make hazardous waste transportation program where 2 month before transportation period will be communicated with Dept. Purchasing.		

2017-17	RSPO INA-NI 2016 Criteria 5.3.3	Major (Recurrence)	Non-Conformities: Inconsistency in waste management plan implementation  Objective Evidence:  a. Based on field observation in emplacement Division I KNS, it was found traces of domestic waste burning  b. Based on field observation in landfill, it was found several used pesticides containers disposed in landfill such as Kenrane and Kencepat (KNC)  c. Landfill not equipped with open and closing note (KNC)  d. Not enough evidences that landfill capacity has been measure compare to quantity of domestic waste (KNC)  e. Domestic waste is mixed between an-organic and organic domestic waste. Beside that, domestic waste was dumped inappropriate with Domestic Waste Management Mechanism	Due Date: 21/02/2018 SAI Follow up Method: Onsite	a. b. c. d. e.	Socialization of employees about fire hazard.  Transporting B3 waste to TPS LB3  Create a plot of schedule information open and close the final dump  Make Administration capacity of the final dump  Provide "ORGANIC" and "ORGANIC" signals in the trash bin	a. b. c. Poi a. b. Po a.	to monitor domestic waste transport  Int (c) and (d) There is no administration of domestic waste management activities There is no marker for organic and organic waste in the trash bin  Incorporating the location of the emplacement in the Daily Fire Monitoring Form every day. Internal memorandum of appointment of PIC LB3 and domestic int (c) and (d) Traction employees ensure that the landfill is opened according to the specified size Socializing domestic waste management to employees every 3 months	Response: Acceptable (please see section 4 for details)  Reviewer: Eko Prastio Ramadhan  Date: 15/02/2018	Verification of Effectiveness:  Evidences was sighted and reviewed such as:  1. Recordings of transfer of LB3 packaging from landfill to TPS LB3  2. KNC waste management estimation document dated December 30, 2017. The size of landfill is 3x3x3 meter.  3. Documentation of trash marking  4. Internal memorandum No: 020 / MGR / KNC / 01/18 dated January 10, 2018 regarding the appointment of Sukarman (Mandor Civil) as PIC To collect and transport domestic waste.  Field observations in emplacement Afd I KNS and landfill indicate corrective action has been taken. The trash bin has been marked "Organic" and "Inorganic", in landfill has been completed with open and closing note and no more LB3 packaging is thrown away in landfill.  Status: CLOSED  Reviewer: Eko Prastio Ramadhan  Date: 15/02/2018
2017- 18	RSPO INA-NI	Minor	It was found data differences between data in GHG	Due Date: Next Year	a.	Coordinate with RO party on GHG calculation		e Company calculates GHG	Response: Acceptable (please	Verification of Effectiveness: Will be verified in the next

Activity ID: 993919

			Section 1		Section	on 2	Section 3	Section 4
NCR Nr.	Standard(s) & clause(s)	Classification	Details of non-conforming situation and Objective Evidence:	SAI Verification (how and when)	Correction : (immediate fix)	Root Cause and Corrective Action : (action to prevent recurrence)	SAI Global Response Review:	SAI Global Verification of Corrective Action for Effectiveness:
	2016 Criteria 5.6.3		Calculation and in audit data  Objective evidences: The company has calculated the GHG emission using PalmGHG version 3.0, but the certified area stated in GHG calculation is different with certified area which audited (in PalmGHG writed 14,515 Ha meanwhile in Audit Report is 14,054 Ha)	SAI Follow up Method: Evidence submitted to Team Leader	b. Coordination with the RSPO on GHG calculations	in total area  Corrective Action: The next GHG calculation will separate the certified and non-certified areas.	see section 4 for details)  Reviewer: Eko Prastio Ramadhan  Date: 15/02/2018	surveillance audit.  Status : OPEN  Name  Eko Prastio Ramadhan

2017-	RSPO INA-NI 2016 Criteria 6.5.2	Major	Non-conformance situations: Not all workers understand their contract and it was found workers without contracts  Objective evidences: Based on document review, it was found evidences such as: d. Based on interview, several PHL workers not aware or not understood about their contract e. On site audit interview with harvester on KNS in front of housing complex, KNS Afdeling 3/ Blok H-I V, KNC Afdeling 4/Blok F12-B, informed that they brought their family member for harvesting (siblings) f. Contract of BHL workers at KNC (3 persons) can't be shown during audit	Due Date: 21/02/2018  SAI Follow up Method: Onsite	b. c.	Submit a copy of the employment contract to the PHL employee Socialization of Prohibition brings others to help while working Shows the PHL contract to the auditor during follow up audit	a.  b.  Corr a.  b.	Employees have forgotten about their contract because they do not hold copies of the contract Harvesters bring members of their families because they want to pursue higher output so that income can be higher.  At the time of the audit, the PIC (KTU) holding the contract documents was accompanying the audit team of the stock from Medan.  Pective Action:  Each employment contract made will be made a copy to hold by the employee.  Foreman Harvest and Mandor 1 will conduct checks on the harvester while working. This is done simultaneously with a random inspection.  Internal Memorandum regarding the determination of PIC Controller Document as backup of KTU	Response: Acceptable (please see section 4 for details)  Reviewer: Eko Prastio Ramadhan  Date: 15/02/2018	Verification of Effectiveness:  Evidences was sighted and reviewed such as:  1. Internal memorandum of KNC Estate Manager Number: 015 / MGR / KNC / 01/18 dated January 2, 2018 regarding the appointment of Mr. Julianingsih as document controller at KNC.  2. Internal memorandum No: 011 / MGR / INT / KNS / 02/17 dated February 1, 2017 regarding Prohibition of bringing others to help while working  3. Documentation of contract handover to PHL employees at KNC  Field observations and harvest interviews at the G10D KNS Block harvesting and harvesting activities of Block D11B Afd II KNC indicate harvests do not bring members of their families to assist with the work.  STATUS: CLOSED  Name  Eko Prastio Ramadhan  Date: 15/02/2018
20	INA-NI 2016 Criteria 6.6.2	millo	situations: Records of meetings with labor unions or workers representatives not available	Next Audit	me forr	etings with companies in the m of minutes of meetings and endance attendance of	Minu are I	ites of meeting with union neld by PR and not stored e office	Acceptable (please see section 4 for details)	Evidences was reviewed such as : Internal memorandum of KNC Estate Manager Number: 015 / MGR / KNC

Activity ID: 993919

	Section 1				Section	on 2	Section 3	Section 4
NCR Nr.	Standard(s) & clause(s)	Classification	Details of non-conforming situation and Objective Evidence :	SAI Verification (how and when)	Correction : (immediate fix)	Root Cause and Corrective Action : (action to prevent recurrence)	SAI Global Response Review:	SAI Global Verification of Corrective Action for Effectiveness:
			Objective evidences: Based on document review, record of meeting can't be shown during audit	Follow up Method: Onsite	meeting participants.	Corrective Action:  a. Internal Memorandum regarding the determination of the Document Controller PIC  b. Centralized documents in the garden office	Reviewer: Eko Prastio Ramadhan Date: 15/02/2018	/ 01/18 dated January 2, 2018 regarding the appointment of Mr. Julianingsih as document controller at KNC.  Verification of corrective actions will be checked at the next surveillance audit.  STATUS: OPEN  Name  Eko Prastio Ramadhan

			Section 1		Section Section	on 2	Section 3	Section 4
NCR Nr.	Standard(s) & clause(s)	Classification	Details of non-conforming situation and Objective Evidence :	SAI Verification (how and when)	Correction : (immediate fix)	Root Cause and Corrective Action : (action to prevent recurrence)	SAI Global Response Review:	SAI Global Verification of Corrective Action for Effectiveness:
2017-21	RSPO INA-NI 2016 Criteria 6.7.1	Major	Non-conformance situations: It was found that there were child worked during harvesting  Objective evidences: On site audit interview with harvester on KNS in front of housing complex, KNS Afdeling 3/ Blok H-I V, KNC Afdeling 4/Blok F12-B, informed that they brought their family member for harvesting (child)	Due Date: Next Audit SAI Follow up Method: Onsite	Dissemination of socialization on minors workers	Root cause: Harvesters bring members of their families because they want to pursue higher output so that income can be higher  Corrective Action: Foreman Harvest and Mandor 1 will conduct checks on the harvester while working. This is done simultaneously with a random inspection.	Response: Acceptable (please see section 4 for details)  Reviewer: Eko Prastio Ramadhan  Date: 15/02/2018	Verification of Effectiveness:  Evidences was reviewed such as:  a. Records of the socialization of the prohibition of bringing minors and assistants on January 6, 2018 (KNC) and on January 8, 2018 (KNS)  b. Memorandum No 21 / HRD / INT / VII / 2009 dated July 6, 2009 concerning the Prohibition of Employing Underage Workers  Field observations and harvest interviews at the G10D KNS Block harvesting and harvesting activities of Block D11B Afd II KNC indicate harvests do not bring members of their families to assist with the work.  Status: CLOSED  Name  Eko Prastio Ramadhan  Date: 15/02/2018

# AUDIT REPORT Appendix "D" – Stakeholder's issues and comment

Date	Stakeholder	Feedback and or request	PT HSJ response and action to be taken	SAI Global audit observation	Relevant documentation
<b>Date</b> 19-12-2017	KNC workers	- Casual workers (PHL) doesn't know about their contract - PPE provided by company - Salary comply to national law (decent living wages) - Beside salary, SKU worker get Rice Ration every month No sexual harrasesment case - Sprayer worker get extra fooding - Workers tell their complaints directly to their supervisor - PPE will be change if the old ones is damaged - Women workers who in pregnant or breast-feeding condition are prohibited work as sprayer or fertilizer - Worker's house will be repaired upon request to Supervisor. If the material is ready in the storage then it will repaired as soon as possible - Zero burning - Riparian buffer zone is prohibited for chemical treatment - Hunting protected wildlife is	- PHL workers have given a copy of their contract	This is one of correction of NCR and was reviewed during follow up audit	Documentation of contract delivery to PHL workers

Date	Stakeholder	Feedback and or request	PT HSJ response and action to be taken	SAI Global audit observation	Relevant documentation
19.12.2017	KNC & KNS Union	Monthly contribution is Rp. 21,000 per member     Salay is comply to national law     Workers can tell their complaint directly to their superior	-	All observation during interview with workers representative have been reviewed with several supporting document     There was no issue during consultation meeting	
20-12-2017	KNS workers	<ul> <li>Salary comply to national law</li> <li>PPE provided by company</li> <li>Salary comply to national law (decent living wages)</li> <li>Beside salary, SKU worker get Rice Ration every month.</li> <li>No sexual harrasesment case</li> <li>Sprayer worker get extra fooding</li> <li>Workers tell their complaints directly to their supervisor</li> <li>PPE will be change if the old ones is damaged</li> <li>Women workers who in pregnant or breast-feeding condition are prohibited work as sprayer or fertilizer</li> <li>Worker's house will be repaired upon request to Supervisor. If the material is ready in the storage then it will repaired as soon as possible</li> <li>Zero burning</li> <li>Riparian buffer zone is prohibited for chemical treatment</li> <li>Hunting protected wildlife is prohibited</li> </ul>		<ul> <li>All observation during interview with workers representative have been reviewed with several supporting document</li> <li>There was no issue during consultation meeting</li> </ul>	

Date	Stakeholder	Feedback and or request	PT HSJ response and action to be taken	SAI Global audit observation	Relevant documentation
20-12-2016	Committee Gender (Negeri Lama Group)	<ul> <li>Committee gender activities such as socialization of sexual harassment, health for children and mother (Posyandu), religion events and PKK</li> <li>Until now, there is no case or complaints from women workers concerning sexual harrasment</li> <li>Women workers who still nursing their childen or in pregnant condition, not allowed to work as sprayer and fertilizer team or high risk job</li> </ul>		<ul> <li>All observation during interview with workers representative have been reviewed with several supporting document</li> <li>There was no issue during consultation meeting</li> </ul>	
22-12-2017	PND workers	<ul> <li>Casual workers (PHL) get wage Rp. 90.000/workdays</li> <li>Salary comply to national law (decent living wages)</li> <li>Beside salary, SKU worker get Rice Ration every month.</li> <li>No sexual harrasesment case</li> <li>Workers tell their complaints directly to their supervisor</li> <li>PPE will be change if the old ones is damaged</li> <li>Worker's house will be repaired upon request to Supervisor. If the material is ready in the storage then it will repaired as soon as possible</li> </ul>		<ul> <li>All observation during interview with workers representative have been reviewed with several supporting document</li> <li>There was no issue during consultation meeting</li> </ul>	
19-12.2017	Stakeholder (Head of Subdistrict, Head of Village,	<ul> <li>Kecamatan Bilah Hilir reprentatives:         Recruitment for local workers still minimum. Most of the workers in company were recruited from outside district or region     </li> </ul>	<ul> <li>Based on data of employees, most of workers come from Kecamatan Bilah Hilir (70%)</li> <li>The company have conduct environmental analysis per 6</li> </ul>	<ul> <li>All responses have been reviewed with several supporting document.</li> <li>Issues were closed.</li> </ul>	

			AUDIT KLFUKT		
Date	Stakeholder	Feedback and or request	PT HSJ response and action to be taken	SAI Global audit observation	Relevant documentation
	Farmers, Cooperative/K operasi)	<ul> <li>On December 2017, representatives of Sido Mulyo villages requesting for a better handling of waste and fume</li> <li>Local authorities several times request for local workers recruitment but responded by verbal communication without realization</li> <li>Sei Tampang village, Tanjung Haloban and Sei Tarolat village was late for "cuci paret" and they got flood.</li> <li>Famers group &amp; Koperasi Wahyu Agung hope the agreement to road maintenance can be realized in accordance to its program.</li> <li>Continuous communication with stakeholder need improvement especially for Manager Humas.</li> <li>CSR Program was not informed properly to all representatives of villages</li> </ul>	months and still comply to regulation standard  Job opportunities was informed to stakeholder through billboard information in security post and village hall. In 2017, mill recruit 10 workers from the village and 41 candidates is in selection process  In Sei Tarolat, "cuci parit" program was delayed due to damaged in vehicles unit.  Road maintenance was on schedule and in according to the availability of unit (vehicles).		

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

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

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

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

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

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