

**RSPO PRINCIPLE AND CRITERIA
1st Annual Surveillance Assessment (ASA1_1)
Public Summary Report**

<p>Sime Darby Plantation Sdn Bhd</p>
<p>Head Office: Level 3A, Main Block Plantation Tower, No. 2, Jalan P.J.U 1A/7 47301 Ara Damansara Selangor, Malaysia</p>
<p>Strategic Operating Unit (SOU 3) Elphil Palm Oil Mill Jalan Lintang, Sungai Siput Utara 31100 Sungai Siput, Perak, Malaysia</p>

TABLE of CONTENTS

Page No

Section 1: Scope of the Certification Assessment.....	3
1. Company Details	3
2. Certification Information	3
3. Location(s) of Mill & Supply Bases	3
4. Description of Supply Base	4
5. Plantings & Cycle	4
6. Certified Tonnage of FFB (Own Certified Scope)	4
7. Non-Certified Tonnage of FFB (outside supplier – excluded from certificate) if applicable	5
8. Certified Tonnage (Own Certified Scope).....	5
Section 2: Assessment Process	6
1. Assessment Program	7
Section 3: Assessment Findings	9
3.1 Details of audit results	9
3.2 Progress against Time Bound Plan.....	9
3.3 Details of findings	13
3.3.1 Status of Nonconformities Previously Identified and Observations	26
3.3.2 Summary of the Nonconformities and Status.....	32
Assessment Conclusion and Recommendation:	33
Appendix A: Summary of Findings	34
Appendix B: Approved Time Bound Plan.....	67
Appendix C: Certification Unit RSPO Certificate Details.....	73
Appendix D: Assessment Plan.....	74
Appendix E: Stakeholders Contacted	76
Appendix F: CPO Mill Supply Chain Assessment Report (Module E: Mass Balance).....	77
Appendix H: Location Map of Elphil Palm Oil Mill Certificatio Unit and Supply bases.....	80
Appendix I : Kinta Kellas Estate Field Map	81
Appendix K: GHG Reporting Executive Summary	82
Appendix L: List of Abbreviations Used.....	84

Section 1: Scope of the Certification Assessment

1. Company Details			
RSPO Membership Number	1-0008-04-000-00	Date	Member since: 6 September 2004
Company Name	Sime Darby Plantation Sdn Bhd		
Address	Head Office: Level 3A, Main Block, Plantation Tower, No. 2, Jalan PJU 1A/7 47301 Ara Damansara, Selangor, Malaysia Certification Unit: Strategic Operating Unit (SOU 3) – Elphil Palm Oil Mill, Jalan Lintang, Sungai Siput Utara 31100 Sungai Siput, Perak, Malaysia		
Subsidiary of (if applicable)	N/A		
Contact Name	Mdm. Shylaja Devi Vasudevan Nair (Head, Sustainability Unit PSQM) Mr Azman Talkah (Elphil Palm Oil Mill Manager)		
Website	www.simedarby.com	E-mail	Shylaja.vasudedvean@simedarby.com Kks.elphil@simedarby.com
Telephone	+603-78484371 (Head Office) +603-5940178 (Mill)	Facsimile	+603-78484363 (Head Office) +603-5940167 (Mill)

2. Certification Information			
Certificate Number	RSPO 543543	Original Certificate Issued Date	18/06/2011
		Expiry Date	17/06/2021
Scope of Certification	Palm Oil and Palm Kernel Production from Elphil Palm Oil Mill and Supply Base (Elphil Estate, Kamuning Estate and Kinta Kellas Estate)		
Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
Nil			

3. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base)	Location [Map Reference #]	GPS	
		Easting	Northing
Elphil Palm Oil Mill (Capacity: 45 mt/hr)	Elphil Palm Oil Mill, Jalan lintang, Sungai Siput Utara 31100 Sungai Siput, Perak, Malaysia	101° 5' 37"	4° 53' 24"
Elphil Estate	Ladang Elphil, Jalan Lintang 31100 Sungai Siput, Perak	101° 5' 37"	4° 53' 24"

**RSP0 Public Summary Report
Revision 4 (November /2016)**

Kamuning Estate	Ladang Kamuning/Changkat Salak 31100 Sungai Siput, Perak	101° 3' 35"	4° 50' 41"
Kinta Kellas Estate	Ladang Kinta Kellas P.O Box 31007 Batu Gajah, Perak	101° 4' 59"	4° 28' 0"

4. Description of Supply Base							
Estate	Mature (ha)	Immature (ha)	Total Planted (ha)	HCV (ha)	Infras & Other (ha)	Total Hectarage	% of Planted
Elphil Estate	1,552.21	123.79	1,676.00	126.43	173.57	1,876	89
Kamuning Estate	2,298.00	548	2,846.00	84.59	2958.41	3,889.00	92
Kinta Kellas Estate	708.45	241.55	950.00	3.69	107.31	1,061	90
Total	4,558.66	913.34	5,472.00	114.71	1,239.29	6,826	

¹Additional to HCV because after new assessment new HCV area is 26.43 HA as per new HCV assessment.

²In total 714 ha planted oil palm has been converted to rubber plantation. Out of 714 ha, 107 ha in progress for replanting for rubber

5. Plantings & Cycle								
Estate	Age (Years)					Tonnage / Year		
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30	Estimated (ASA1_1) (Apr 16-Mar 17)	Actual (ASA1_1) (Apr 16-Mar 17)	Forecast (ASA2_1) (Apr 17-Mar 18)
Elphil Estate	119.16	238.03	1,021.99	284.30	7.89	41,843.00	30,311.90	34,217.00
Kamuning Estate	359.00	259.00	2,209.00	19.00	0	61,953.00	36,709.70	46,300.00
Kinta Kellas Estate	254.31	134.13	574.32	-	-	18,799.00	12,832.15	16,706.98
Total	732.47	631.16	3,805.31	303.3	7.89	122,595.00	79,853.75	97,223.98

6. Certified Tonnage of FFB (Own Certified Scope)			
Estate	Tonnage / year		
	Estimated (ASA1_1) (Apr 16-Mar 17)	Actual (ASA1_1) (Apr 16-Mar 17)	Forecast (ASA2_1) (Apr 17- Mar 18)
Elphil Estate	41,843.00	30,311.90	34,217.00
Kamuning Estate	61,953.00	36,709.70	46,300.00
Kinta Kellas Estate	18,799.00	12,832.15	16,706.98
Total	122,595.00	79,853.75	97,223.98

**RSPO Public Summary Report
Revision 4 (November /2016)**

7. Non-Certified Tonnage of FFB (outside supplier – excluded from certificate) if applicable			
Independent FFB Supplier	Tonnage / year		
	Estimated (ASA1_1) (Apr 16-Mar 17)	Actual (ASA1_1) (Apr 16-Mar 17)	Forecast (ASA2_1) (Apr 17- Mar 18)
Tang Tatt	N.A	32,099.56	N.A
Eng Huat Latex	N.A	6,464.13	N.A

8. Certified Tonnage (Own Certified Scope)									
Mill	Estimated (ASA1_1) (Apr 16-Mar 17)			Actual (ASA1_1) (Apr 16-Mar 17)			Forecast (ASA2_1) (Apr 17- Mar 18)		
	FFB	CPO	PK	FFB	CPO	PK	FFB	CPO	PK
Elphil Palm Oil Mill	122,595.00	26,419.00	6,559.00	79,853.75	16,537.71	4407.93	97,223.98	20,135.09	5,325.52
OER/KER%					20.71%	5.52%		20.71%	5.48%

Section 2: Assessment Process

Certification Body:

BSI Services Malaysia Sdn Bhd,
(ASI Accreditation Number: RSPO-ACC-19)
Unit 3, Level 10, Tower A
The Vertical Business Suites, Bangsar South
No. 8, Jalan Kerinchi
59200 Kuala Lumpur
Tel +603 2242 4211 Fax +603 2242 4218
Nicholas Cheong: Nicholas.Cheong@bsigroup.com
www.bsigroup.com

BSI is a leading global provider of management systems assessment and certification, with more than 60,000 certified locations and clients in over 100 countries. BSI Standards is the UK's National Standards Body. BSI provides independent, third-party certification of management systems. BSI is ASI Accredited (RSPO-ACC-19) to conduct RSPO assessment since 31/10/2014 with accredited office located at Kuala Lumpur, Malaysia. BSI is accredited for RSPO Supply Chain Certification Systems (SCCS) and Principles & Criteria for Sustainable Palm Oil Production (P&C, Single Site & Group) certification Worldwide.

Assessment Methodology, Programme, Site Visits

This 1st Annual Surveillance Assessment was conducted from 21-23 March 2017 and the on-site closure of Major Non-conformity was conducted on 9 May 2017. The audit programme is included as Appendix D. The approach to the audit was to treat the mill and its supply base as an RSPO Certification Unit. Mill was audited together with the sample estates (Elphil Estate & Kinta Kellas Estate). A range of environmental and social factors were covered. This includes consideration of topography, palm age, proximity to areas with HCVs, declared conservation areas and local communities.

The methodology for collection of objective evidence included physical site inspections, observation of tasks and processes, interviews of staff, workers and their families and external stakeholders, review of documentation and monitoring data. RSPO Principles & Criteria 2013 (MYNI-2014) and RSPO Supply Chain Certification Standard 2014 were used to guide the collection of information to assess compliance. The comments made by external stakeholders were also taken into account in the assessment.

The approach to the audit was to treat the mill and its supply base as an RSPO Certification Unit. The mill was audited together with the estates (or smallholders) of its supply base. The estates sample were determined based on formula $N = 0.8\sqrt{y}$ where y is the number of estates while when applicable.

Meetings were held with stakeholders to seek their views on the performance of the company with respect to the RSPO requirements and aspects where they considered that improvements could be made. At the start of each meeting, the interviewer explained the purpose of the audit followed by an evaluation of the relationship between the stakeholder and the company before discussions proceeded. The interviewer recorded comments made by stakeholders and these have been incorporated into the assessment findings.

Structured worker interviews with male and female workers and staff were held in private at the workplace in the mill and the estates. Fieldworkers were interviewed informally in small groups in the field. In addition, the wives of workers and staff were interviewed in informal group meetings at their housing. Separate visits were made to each

**RSPO Public Summary Report
Revision 4 (November /2016)**

of the local communities to meet with the village head and residents. Company officials were not present at any of the internal or external stakeholder interviews. A list of Stakeholders contacted is included as Appendix E.

All the previous nonconformities are remains closed. The assessment findings for the 1st Annual Surveillance Assessment are detailed in Section 3.3.

This report is structured to provide a summary of assessment finding as attached in the Appendix A. The assessment was based on random samples and therefore nonconformities may exist that have not been identified.

This report was externally reviewed by RSPO approved Certification Reviewer prior to certification decision by BSI.

The following table would be used to identify the locations to be audited each year in the 5 year cycle

1. Assessment Program					
Name (Mill / Supply Base)	Year 1 (Recertification)	Year 2 (ASA 1)	Year 3 (ASA 2)	Year 4 (ASA 3)	Year 5 (ASA 4)
Elphil Palm Oil Mill	√	√	√	√	√
Elphil Estate		√	√		√
Kamuning Estate	√		√	√	
Kinta Kellas Estate	√	√		√	√

[Click here to enter a date.](#)

Tentative Date of Next Visit: March 1, 2018 – March 3, 2018

Total No. of Mandays: 9 mandays

BSI Assessment Team:

Hoo Boon Han – Lead Auditor

He holds Master of Technology (Environmental Management) from the University Malaya and Bachelor of Science Forestry (Hons) Majored in International Tropical Forestry from University Malaysia Sabah. He has more than 3 years working experience in in environmental monitoring & audit, carbon accounting & reduction, wastewater treatment, waste management and sustainable development. He has successfully completed the RSPO Lead Auditor and RSPO Supply Chain Training in April 2012. He has been involved in RSPO P&C audit in Indonesia and Malaysia as well as RSPO SC audit across different region including Asia, Europe and North America for the past 4 years. During this assessment, he assessed on the aspect of environment, Safety and Health, Legal, social and community engagements, stakeholders consultation, and workers welfare. He is able to speak and understand Bahasa Malaysia, English and Mandarin.

Mohamed Hidhir Zainal Abidin – Team Member

He holds Bachelor Degree in Chemical Engineering, graduated from National University of Malaysia on 2006. He has 7 years working experience in palm oil industry specifically on palm oil milling for 5 years. He also has the experiences as auditor for several standards including ISO 9001, ISO 140001, OHSAS 18001, MSPO and RSPO in his previous certification body. He completed the ISO 9001 Lead Auditor Course, ISO 14001 Lead Auditor Course and OHSAS 18001 Lead Auditor Course in 2012, Endorsed RSPO P&C Lead Auditor Course in 2013, MSPO Awareness Training in 2014 and Endorsed RSPO SCCS Lead Auditor Course in 2015. He had been involved in RSPO auditing since May 2012 in more than various companies in Malaysia. During this assessment, he assessed on the aspects of legal, mill best practices, safety and health, environmental and workers and stakeholders consultation.

Hu Ning Shing - Team Member

She holds Bachelor Degree in Science majoring in Applied Chemistry, graduated from University of Malaya on 2011. She has 5 years working experience in rubber and palm oil industry. She also has the experiences as auditor for several standards including ISO 9001, MSPO and RSPO in her previous certification body. She completed the ISO 9001 Lead Auditor Course on 2016, Endorsed RSPO P&C Lead Auditor Course in 2012 and Endorsed RSPO SCCS Lead Auditor Course in 2015. She had been involved in RSPO auditing since November 2015 in more than various companies in Malaysia. During this assessment, she assessed on the aspects of social. She is fluent in Bahasa Malaysia and English languages.

Accompanying Persons:

Nicholas Cheong (Observer/BSI RSPO Scheme Manager)

Norashikin Rasikon (Observer/ASI Assessor)

Selvanathan Grapragasem (Observer/ASI Assessor)

Kisho Kumar (Observer/ASI Assessor)

Section 3: Assessment Findings

3.1 Details of audit results

This assessment has been assessed using the following RSPO normative requirements. The assessment details are provided in Appendix A.

- Sime Darby Plantation Sdn Bhd Time Bound Plan
- RSPO P&C MY-NIWG 2014 Checklist
- RSPO Supply Chain Certification Checklist November 2014

3.2 Progress against Time Bound Plan

Sime Darby Time Bound Plan (TBP) is included as Appendix B. Sime Darby has achieved RSPO certification for 34 management units in Malaysia and 24 Management Units in Indonesia. There are no any changes in the existing certified units in Malaysia. All units' certifications are valid. Sime Darby has acquired NBPOL. NBPOL is managed as a separate management unit. NBPOL has its own RSPO membership (1-0016-04-000-00) and have achieved certification for all the certification units. As for the Plantation in Liberia, Sime Darby has completed the NPP in 2011. However, the plantation sites will be included in TBP upon completion of the mill which is delayed due to Ebola and long drought season.

There was a change of the Time Bound Plan (TBP) under Sime Darby Indonesia Operation due to the on-going mediation and DSF facilitation Process by RSPO DSF at PT Mitra Austral Sejahtera (PT MAS). This was the result from the mediation meeting held on 22 July 2014. PT MAS was audited as per the original TBP by RSPO accredited Certification Body in 2011. Due to the on-going mediation process, the CB that assessed PT MAS is yet to issue the certificate. BSI has accepted the revision as justified revision due to the commitment shown by all parties involves resolving the community issue. This is also accepted by the CB that assessed PT MAS. Discussion was held with the CB that assessed the PT MAS and Sime Darby.

Due to the present mediation process, PT Mitra Austral Sejahtera TBP was revised to 2016 by Sime Darby pending on the resolution and mediation process which is acknowledged by RSPO. The final decision of issuing the certificate is under the CB that audited the PT MAS. BSI has contacted the CB and consultation was held. The CB that audited PT MAS accepted the revision of the TBP. BSI accepted the feedback from the CB that audited PT MAS as per the RSPO Certification System requirement "Where the Certification Body conducting the surveillance audit is different from that which first accepted the time-bound plan, the later Certification Body shall accept the appropriateness of the time-bound plan at the moment of first acceptance and shall only check continued appropriateness". BSI understands that there are community issue still under negotiation through agreed process.

The improvement is in progress and acknowledge by RSPO and all parties as mutually agreed process. Latest meeting among the community and Sime Darby was held on 14 January 2016. The current status details are provided in the Appendix B. BSI has consider that Sime Darby still comply with the RSPO requirement for partial certification and has justified the revision to TBP.

- a) There is no any other isolated lapse in Time Bound Plan.
- b) No systematic failures to proceed with implementation of the Time Bound Pan since first certified.
- c) The changes in the Time bound Plan for PT Mitra Austral Sejahtera was justified and appropriate.

BSI has continued involvement with assessments of Sime Darby Management Units during the 2014 period and beginning 2015. BSI is also communicating with other Certification Bodies that auditing Sime Darby's other operating units to identify any noncompliance with rules of partial certification as per requirement in RSPO Certification System. During this assessment BSI has contacted the certification body that audited PT MAS to get the latest update of the

**RSPO Public Summary Report
Revision 4 (November / 2016)**

progress. Sime Darby consistently has kept BSI informed of any emerging issues and claims made against it. Other than the PT MAS issue, at the time of preparation of this Report, BSI is not aware of any new issues involving:

- a. Any unresolved significant land disputes;
- b. Any replacement of primary forest or loss of HCVs;
- c. Any labour disputes that are not being resolved through an agreed process;
- d. Any evidence of noncompliance with any law at any of the landholdings.

Time Bound Plan		
Requirement	Remarks	Compliance
Summary of the Time Bound Plan		
Does the plan include all subsidiaries, estates and mills?	The time bound plan includes all SOUs in Malaysia and Indonesia. Malaysia- Effectively 34 SOUs: Sg Samak and Jeleta Bumi, Yong Peng, Sepang, Mostyn and Segaliud POM has been closed down. Indonesia- Effectively 25 SOUs. For Liberia operations, a new mill is being set up and commissioned in Feb 2016. Preparation to undergo the RSPO Certification process is in progress and SDP targets to undergo RSPO Certification by end 2017.	Yes
Is the time bound plan challenging? <ul style="list-style-type: none"> • Age of plantations. • Location. • POM development • Infrastructure. • Compliance with applicable law. 	Sime Darby Plantation's time bound plan for certification is initially 3 years, starting 2008 – 2011. SDP has had all its SOUs (Malaysian & Indonesian) completing the RSPO Main Assessment by end Dec 2011 in accordance to the initial timebound plan. As at Dec 2011, all Malaysian SOUs have been RSPO certified (with the exception of 2 new oil mills commissioned to replace the current oil mills after the initial timebound plan targets). The 2 new mills have been RSPO Certified in Jan and Feb 2014. For Indonesian operations, currently, 1 SOU in Indonesia (PT MAS) is pending for RSPO Certification due to social legacy issues. SDP's is actively working on its certification targets given the span across a large geographical location and over 200 estates and mills in operation.	Yes
Have there been any changes since the last audit? Are they justified?	97% of Sime Darby Plantation's upstream operations is RSPO certified, one SOU - PT MAS pending certification in Indonesia due to some social disputes and a new oil mill in Liberia has been commissioned in Feb 2016. SDP's time bound plan has been revised to take into consideration the social challenges encountered in Indonesia for the remaining SOU (PT MAS) yet to be certified. Sime Darby Plantation will proceed with the next steps of certification upon satisfactory resolution of the matter.	Yes

**RSPO Public Summary Report
Revision 4 (November /2016)**

<p>If there have been changes, what circumstances have occurred?</p>	<p>Indonesia- PT MAS has undergone RSPO Main Assessment in July 2011. The certification body for PT MAS has considered that Sime Darby Plantation still meets the requirements of the RSPO for Partial Certification and the report has been submitted for EB review. A verification audit was conducted by the Certification Body in early 2013 and Sime Darby Plantation will proceed with the next steps of certification upon satisfactory resolution of the matter. Ongoing and regular (bi-monthly) discussions is ongoing between Sime Darby Plantation and the project affected communities. Reports on the progress update are submitted to RSPO on a regular basis since November 2012. The latest progress report submitted to RPSO dated 30th June 2016.</p> <p>Smallholders- As at June 2016, total of 24,820 Ha (59%) of total Ha, (42,008 Ha) of associated smallholders in Indonesia has been certified. Certification process for the remaining associated smallholders areas is on-going. SDP expect to achieve 100% RSPO certification of associated smallholders and outgrowers by end 2019.</p> <p>Liberia- A new mill will be set up in Liberia and planned for commissioning in Feb 2016. Preparation to undergo the RSPO Certification process is in progress and SDP targets to undergo RSPO Certification by end 2017. RSPO NPP process has been completed in 2011. Internal assessment against the draft Liberia NI has been completed and closing of gaps is in progress.</p>	<p>Yes</p>
<p>Have there been any stakeholder comments?</p>	<p>Up to date, there is no comment. SDP continues to engage all affected parties through regular discussions and progress reporting is being made to the RSPO Secretariat.</p>	<p>Yes</p>
<p>Have there been any newly acquired subsidiaries?</p>	<p>In March 2015, Sime Darby Plantation completed the acquisition of New Britain Palm Oil Limited (NBPOL). NBPOL is managed under a separate entity and the reporting of timebound plan will be under NBPOL's management. NBPOL is considered as a different entity/member under the RSPO and NBPOL is 100% RSPO Certified.</p> <p>A new mill has been set up in Liberia and planned for commissioning in Feb 2016. Preparation to undergo the RSPO Certification process is in progress and SDP targets to undergo RSPO Certification by end 2017. *RSPO NPP process has been completed in 2011. Internal assessment against the draft Liberia NI has been completed and closing of gaps is in progress.</p>	<p>Yes</p>
<p>Have there been any isolated lapses in implementation of the plan?</p>	<p>No lapses.</p>	<p>Yes</p>
<p>Un-Certified Units or Holdings</p>		

**RSPO Public Summary Report
Revision 4 (November /2016)**

<p>Did the company conduct an internal audit? If so, has a positive assurance statement been produced?</p>	<p>Indonesia - PT Mitra Austral Sejahtera has undergone RSPO Main Assessment in July 2011. The certification body for PT MAS has considered that Sime Darby Plantation still meets the requirements of the RSPO for Partial Certification and the report has been submitted for EB review. A verification audit was conducted by the Certification Body in early 2013 and Sime Darby Plantation will proceed with the next steps of certification upon satisfactory resolution of the matter. Reports on the progress update are submitted to RSPO on a regular basis since November 2012. The latest progress report submitted to RPSO dated 30th June 2016. Further details please refer to the RSPO Complaints Website: http://www.rspo.org/members/complaints/status-of-complaints/view/29 Liberia – New mill commissioned in Feb 2016, identification of gaps and preparation to meet the requirements of the RSPO P&C is in progress.</p>	<p>Yes</p>
<p>No replacement after dates defined in NIs Criterion 7.3:</p> <ul style="list-style-type: none"> • Primary forest. • Any area identified as containing High Conservation Values (HCVs). • Any area required to maintain or enhance HCVs in accordance with RSPO criterion 7.3. 	<p>HCV assessment has been conducted for uncertified units i.e. PT Mas (by Aksenta in March 2009) and Sime Darby Plantation Liberia operations (by RSPO approved assessors – Dr SK Yap in 2011).</p>	<p>Yes</p>
<p>Any new plantings since January 1st 2010 must comply with the RSPO New Plantings Procedure.</p>	<p>A new mill will be set up in Liberia and planned for commissioning in Feb 2016. Preparation to undergo the RSPO Certification process is in progress and SDP targets to undergo RSPO Certification by end 2017. RSPO NPP process has been completed in 2011. Internal assessment against the draft Liberia NI has been completed and closing of gaps is in progress. *Note: RSPO NPP Announcements for SDP can be http://www.rspo.org/certification/new-planting-procedures/public-consultations/page/14?</p>	<p>Yes</p>
<p>Any Land conflicts are being resolved through a mutually agreed process, e.g. RSPO Grievance procedure or Dispute Settlement Facility, in accordance with RSPO criteria 6.4, 7.5 and 7.6.</p>	<p>Sime Darby (Liberia) Plantation Inc. Status: Box H - Close for Monitoring Further details please refer to: http://www.rspo.org/members/complaints/status-of-complaints/view/46 PT Mitra Austral Sejahtera (Sime Darby Sdn Bhd) Further details please refer to: http://www.rspo.org/members/complaints/status-of-complaints/view/29</p>	<p>Yes</p>
<p>Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO criterion 6.3.</p>	<p>No stakeholder comments or complaints received.</p>	

**RSPO Public Summary Report
Revision 4 (November /2016)**

Any Legal non- compliance is being resolved in accordance with the legal requirements, with reference to RSPO criteria 2.1 and 2.2.	None noted. No stakeholder comments or complaints received.	Complied.
---	---	-----------

3.3 Details of findings

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

During the 1st Annual Surveillance Assessment there were 9 (nine) Major nonconformities & 5 (five) Minor nonconformities raised. However, reoccurrence of major finding regarding deduction for union fee (NUPW) was not following the latest Collective Agreement (NC# 1306204M2) raised during RAV had lead to the suspension of the certificate started from 23rd March 2017.

The Major NC #1306204M2 raised was successfully closed on 11th April 2017 and thus the suspension has been lifted up. The verification on corrective action plan together with the supporting documented evidences provided to us and our interview with the affected workers has deemed it is satisfactory to close this NC. As there is no physical verification is required, hence no on-site assessment is required to reinstate the certification.

The Elphil Palm Oil Mill Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted. The on-site closure of Major Non-conformity was conducted on 9 May 2017.

The implementation of the Corrective Actions for the Major Nonconformity(ies) has been verified for it effectiveness and closed accordingly.

Non-Conformity		
NCR #	Description	Category (Major / Minor)
1453612-201703-M1	<p>Requirements Indicator 4.7.1 A health and safety policy shall be in place. A health and safety plan covering all activities shall be documented and implemented, and its effectiveness monitored.</p>	Major
	<p>Evidence of Nonconformity Elphil POM: i) Medical surveillance record was not available for contractor (Kejuruteraan Serting). The worker is workshop fitter and exposure to manganese fumes for welding works. ii) Annual audiometric testing dated 16/6/17 did not included contractor's workers under (Kejuruteraan Serting) for baseline audiometric. iii) Contractor management - PTW was not issued for the sub-contractor of Sime Darby Industrial (Tye Chong Engineering), only gate pass available dated 21/3/17 - Health declaration records was not available for the authorized entrant (AE) under Dynamecea based on PTW records dated 21/3/17 - Flashback arrestor was not installed/used by the contractor, Tye Chong Engineering. No proper check prior to entry for the contractor.</p>	
	<p>Statement of Nonconformity</p>	

	<p>Health and safety plan was not effectively implemented.</p> <p>Corrective Actions</p> <p>Elphil POM:</p> <ul style="list-style-type: none"> i. Medical surveillance will be done to the workshop fitter that exposure to manganese fumes for welding works either local or contractor. The medical surveillance will be keep as record for reference. One of the contract worker under Kejuruteraan Seriting has been send for medical surveillance to the panel clinics on 27/03/2017 and waiting for report. ii. Annual audiometric testing will include all contractor's workers for baseline audiometric for next testing. iii. Contractor management <ul style="list-style-type: none"> - PTW will be given to all contractor before start the work. Auxiliary Police is responsible to inform all contractor to request work permit from person in-charge prior to start the work. Person in-charge for work permit to issue and get approval before start the work. - Health declaration records for the authorized entrant (AE) will be attached together with PTW Confined Space. - To proper check all safety equipment for the contractor prior to entry. All instruction will be given together with permit to work. <p>New checklist (contractor checklist) use during kick off meeting to ensure all legal and compliance meet before they start working.</p> <p>Assessment Conclusion</p> <p>The CAP and evidence has been submitted on 09/4/2017. However, an on-site visit was carried out on 9/5/2017 for major closure. Evidence submitted verified and on-site verification updates :</p> <ul style="list-style-type: none"> a. Medical surveillance report dated 27 March 2017 for the contractor sighted onsite. Similar report for other workers sighted during onsite major closure verification. b. Certificate of fitness of audiometric testing dated 07 April 2017 of the contractor workers sighted during site visit. c. During the site visit of major closure, there is no contractor working onsite. However, the checklist using for contractor management was sighted during onsite. <p>It has confirmed that the issue has been fully addressed hence the Major NC was closed on 9/5/2017. The continuous implementation on the effectiveness will be furthered verified in the next audit.</p>	
--	--	--

Non-Conformity		
NCR #	Description	Category (Major / Minor)
1453612-201703-M2	<p>Requirements Indicator 4.7.2</p> <p>All operations where health and safety is an issue shall be risk assessed, and procedures and actions shall be documented and implemented to address the identified issues. All precautions attached to products shall be properly observed and applied to the workers.</p>	Major

**RSPO Public Summary Report
Revision 4 (November /2016)**

	<p>Evidence of Nonconformity HIRARC register did not cover the following activities: i) Boiler repair and service ii) Excavation works iii) Working at height iv) Revised HIRARC after accident occurrence dated 14/6/16 with 79 days LTI. The related corrective action and mitigation plan @ risk control was not clearly identified and implemented.</p>	
	<p>Statement of Nonconformity All operations where health and safety was not comprehensively risk assessed, and procedures and actions was not effectively implemented to address the identified issues.</p>	
	<p>Corrective Actions HIRARC has been updated and incorporated as per listed no (i), (ii), and (iii). Revised HIRARC as stated no (iv) has been updated on 22/03/2017. ESH Risk Management was establish to ensure all activities is cover.</p>	
	<p>Assessment Conclusion The CAP and evidence has been submitted on 09/4/2017. However, an on-site visit was carried out on 9/5/2017 and evidence verified as below: a. HIRARC had been reviewed on 27 March 2017 by incorporating department such as threshing station, boiler station and clarification. During onsite audit, there is no other new activity in the mill and estate. Thus, the Major NC is closed on 9/5/2017.</p>	

Non-Conformity		
NCR #	Description	Category (Major / Minor)
1453612-201703-M3	<p>Requirements Indicator 4.7.5 Accident and emergency procedures shall exist and instructions shall be clearly understood by all workers. Accident procedures shall be available in the appropriate language of the workforce. Assigned operatives trained in First Aid should be present in both field and other operations, and first aid equipment shall be available at worksites. Records of all accidents shall be kept and periodically reviewed</p>	Major
	<p>Evidence of Nonconformity Eplhil POM: i) Expired item (flanil cream) found in the first aid box located at workshop and engine room. The item was expired on 23/8/16. ii) Some of the item was found missing/insufficient i.e hand plaster, eye ointment at workshop and engine room.</p>	
	<p>Statement of Nonconformity Emergency and preparedness was not effectively implemented.</p>	
	<p>Corrective Actions Elphil POM:</p>	

**RSPO Public Summary Report
Revision 4 (November /2016)**

	<p>i) Expired item (flanil cream) in the first aid box located at workshop and engine room has been replace immediately on 22/3/2017. The action taken will be done immediately after checking. Schedule checking for First Aid Kit has been established. ii) Some of the item was found missing/insufficient will be fill up and available as per Fourth Schedule in Factory and Machinery Act 1967 (Act139). iii) Re training for all first aider is already done on March 2017 by HA. The First Aid checklist establish followed as per FMA (16 Item) as generic and apply to all OU.</p>	
	<p>Assessment Conclusion The CAP and evidence has been submitted on 09/4/2017. However, an on-site visit was carried out on 9/5/2017 and evidence verified as below:</p> <ul style="list-style-type: none"> a. During major closure verification, all the sampled first aid kit at POM and estate were complete and no item was expired or missing. b. Interviewed with the HA and confirmed all the first aid kit are equipped with 17 items as per Fourth Schedule in Factory and Machinery Act 1967 (Act139). c. Interviewed the workers in POM and estates confirmed they were trained for the first aid on 22 March 2017. Attendance of the training sighted onsite. <p>Thus, the Major NC is closed on 9/5/2017.</p>	

Non-Conformity		
NCR #	Description	Category (Major / Minor)
1453612-201703-M4	<p>Requirements Indicator 4.4.2 Protection of water courses and wetlands, including maintaining and restoring appropriate riparian and other buffer zones (refer to national best practice and national guidelines) shall be demonstrated.</p> <p>Evidence of Nonconformity i) No demarcation for the buffer zone along the river at block 99G ii) Observed evidence of spraying at the buffer zone area, block 99G</p> <p>Statement of Nonconformity Riparian buffer zone was not effectively maintained and restored.</p> <p>Corrective Actions</p> <ul style="list-style-type: none"> i. Marking at the end palm along the buffer zone. ii. To put additional signboard of buffer zone/ no spraying beyond this area along the river. iii. Train all new worker and brief them regarding maintaining buffer zone area and ensure to evaluate the worker after training for their level of understanding <p>Assessment Conclusion The CAP and evidence has been submitted on 09/4/2017. However, an on-site visit was carried out on 9/5/2017 and evidence verified as below:</p> <ul style="list-style-type: none"> a. Signages of HCV4 and no spraying beyond this boundary have been established in several area. 	Major

**RSPO Public Summary Report
Revision 4 (November /2016)**

	<p>b. Interviewed with the sprayer operator and confirmed they attended the buffer zone training on 30th March 2017. They well aware no spraying activity shall be carried out at buffer zone area. Attendance of the training sighted onsite.</p> <p>No new evidence was observed at the buffer zone during major closure verification. Thus, the Major NC is closed on 9/5/2017.</p>	
--	---	--

Non-Conformity		
NCR #	Description	Category (Major / Minor)
<p>1453612-201703-M5</p>	<p>Requirements Indicator 5.1.1 An environmental impact assessment (EIA) shall be documented.</p> <hr/> <p>Evidence of Nonconformity Following activities’ aspect and impacts has not been identified in the POM Registration of Environmental Aspects and Impacts conducted in 14 January 2016 at POM: a. Maintenance of furrow system b. Mini Lab at the ETP c. Composting plant d. Scrapyard in POM e. Pump House f. Construction of the buffer pond is not identified in the POM’s Registration of Environmental Aspects and Impacts.</p> <hr/> <p>Statement of Nonconformity Registration of Environmental Aspects and Impacts is incomplete</p> <hr/> <p>Corrective Actions Following activities’ aspect and impacts identify and updated in the POM Registration of Environmental Aspects and Impacts at POM: a. Maintenance of furrow system b. Mini Lab at the ETP c. Composting plant d. Scrapyard in POM e. Pump House f. Construction of the buffer pond.</p> <p>ESH Risk Management has been established to ensure all activities is cover.</p> <hr/> <p>Assessment Conclusion The CAP and evidence has been submitted on 09/4/2017. However, an on-site visit was carried out on 9/5/2017 and evidence verified as below: a. All the identified activities has been updated in the Registration of Environmental Aspects and Impacts on 27 March 2017.</p> <p>During onsite audit, there is no other new activity in the mill and estate. Replanting activities also documented in their registration of environmental aspect and impacts (E-REAI; 27/03/2017). Thus, the Major NC is closed on 9/5/2017.</p>	<p>Major</p>

Non-Conformity		
NCR #	Description	Category (Major / Minor)
1453612-201703-M6	Requirements Indicator 5.3.2 All chemicals and their containers shall be disposed of responsibly.	Major
	Evidence of Nonconformity In Kinta Kellas, schedule waste such as empty containers, used lubricants and oil filter were found store more than 180 days based on inventory record. The schedule waste without proper labelling and segregation. No spill kit available at the store.	
	Statement of Nonconformity Scheduled waste did not disposed responsibly.	
	Corrective Actions To take SS Setia Sdn Bhd. the recycler contractor. All scheduled waste already dispose as recycle waste at SS Setia Sdn Bhd. Implement E-swis and monitored by Scheduled waste competent person or SQM to ensure all in place as per legal requirement	
	Assessment Conclusion The CAP and evidence has been submitted on 09/4/2017. However, an on-site visit was carried out on 9/5/2017 and evidence verified as below: <ul style="list-style-type: none"> a. All the schedule waste disposed through licensed recycler under Department of Agriculture (ref: JP KRP 207/12/471 JLD VI; dated 7 December 2015). Receipt and record sighted onsite. Spill kit available on at the schedule waste store. b. Further verification on the oil trap behind the schedule waste store and it was clean and functional during on major closure verification. c. No oil stain was observed surrounding the area of the workshop during site visit. <p>Thus, the Major NC is closed on 9/5/2017.</p>	

Non-Conformity		
NCR #	Description	Category (Major / Minor)
1453612-201703-M7	Requirements Indicator 6.3.1 The system, open to all affected parties, shall resolve disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants and whistleblowers, where requested.	Major
	Evidence of Nonconformity Kinta Kellas Estate: Through interviewed with the workers found that the understanding of the complaint procedure is not sufficient. For example, owner of House No. 43/79 complained that his water tank leakage and he has informed to Medical Assistant on this issue 15 days ago. However, no action has been taken. Besides, during site visit to the linesite found that House No. B7 and B8's toilet door were found broken. The owner told that this	

**RSPO Public Summary Report
Revision 4 (November /2016)**

	<p>was happened since they moved into the new housing. She has complained on this matter but unfortunately no action was taken to repair the door. Document reviewed on the complaint book and housing repair book was not found any complaints related to the above issues lodged into the book. Therefore, the complaint system was not effectively implemented according to the procedure.</p>	
	<p>Statement of Nonconformity The complaint procedure was not effectively implemented.</p>	
	<p>Corrective Actions To brief all the workers and their dependent about the complaint procedure and evaluate the understanding regarding to complaint procedure. Complaint procedures distributed and attached at each of the houses. Contacts and procedures available on the notice.</p>	
	<p>Assessment Conclusion The CAP and evidence has been submitted on 09/4/2017. However, an on-site visit was carried out on 9/5/2017 and evidence verified as below: <ul style="list-style-type: none"> a. Interviewed the workers and they understand the procedures for complaints and grievances. b. Visit to the linesites and the procedures of complaints & grievances being attached at each door of the houses. The residents aware of the procedures. <p>Thus, the Major NC is closed on 9/5/2017.</p> </p>	

Non-Conformity		
NCR #	Description	Category (Major / Minor)
<p>1453612-201703-M8</p>	<p>Requirements Indicator 6.5.2 Labour laws, union agreements or direct contracts of employment detailing payments and conditions of employment (e.g. working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc.) shall be available in the languages understood by the workers or explained carefully to them by a management official.</p> <p>Evidence of Nonconformity Elphil POM: According to MAPA/NUPW Circular No. 22/2015 dated 4/8/2015, the employer required to fully subsidize RM 3.00 per month for each of the members of NUPW as premium towards NUPW/AIA Personal Accident Group RM 10.00 for Great Eastern insurance. However, the management has yet to subsidize and deducted RM 11.00 and RM 20.00 from sampled workers below: <ul style="list-style-type: none"> a. Employee No.: 49835 (EPOM) – only AIA Insurance b. Employee No.: 119973 (EPOM) – both AIA & GE c. Employee No.: 114387 (EPOM) – both AIA & GE d. Employee No.: 123480 (EPOM) – both AIA & GE e. Employee No.: 72004 (EPOM) – both AIA & GE f. Employee No.: 123747 (EPOM) – both AIA & GE <p>There are total 11 workers are Union members and 6 of them were found not complied with the agreement.</p> </p>	<p>Major</p>

	<p>Composting Plant Contractor: Contract of employment for the total 4 foreign workers were not available.</p> <p>Statement of Nonconformity Labour laws, union agreements or direct contracts of employment detailing payments and conditions of employment (e.g. working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc.) was not available.</p> <p>Corrective Actions</p> <p>Elphil POM:</p> <ol style="list-style-type: none"> To brief and create awareness to NUPW members pertaining MAPA/NUPW Circular. The employee is fully subsidize RM 3.00 per month for each of the members of NUPW as premium towards NUPW/AIA Personal Accident Group RM 10.00 for Great Eastern insurance. To establish IOM for Operation to ensure the commitment of deduction NUPW. To train the OU office management and NUPW members on allowance & deduction of NUPW and their roles in implementing the instruction by MAPA thru circular No. 22/2015. The region SQM Team and PSQM Team have conducted check on entire workers of SOU Elphil on NUPW deduction and insurance reimbursement. Found total 6 workers of KKS Elphil insurance was not reimburse accordingly. Workers : Ganeshkumar Sukumaran (49835), Isa Ansori (72004), Mohamad Amirul (119973), Hari Dass (123480), Mohamad Ardi (123747) and Mohd Sahil (131717). All over deduction of this workers have been reimbursed on March 2017. <p>Assessment Conclusion</p> <p>The CAP and evidence has been submitted on 09/4/2017. However, an on-site visit was carried out on 9/5/2017 and evidence verified as below:</p> <ol style="list-style-type: none"> All the NUPW fees have been reimbursed and reflect on their the payslip. Sampled other NUPW member/employee found the NUPW and insurance fee has been deducted accordingly. Visited to the composting plant and confirmed all the contracts of the foreign workers are available. <p>Thus, the Major NC is closed on 9/5/2017.</p>	
--	--	--

Non-Conformity		
NCR #	Description	Category (Major / Minor)
1453612-201703-M9	<p>Requirements Indicator 2.1.1 Evidence of compliance with relevant legal requirements shall be available.</p>	Major
	<p>Evidence of Nonconformity Composting Plant Contractor: 4 out of 11 local workers' daily rate were found less than RM 38.46 which is only RM 37/ day and 1 out of 11 local workers' monthly pay was only RM 850. Kejuruteraan Serting (Contractor): Foreign worker's permit (Passport No.: BC 0761054) was expired on 7/2/2017. No evidence of renewal of permit was carried out.</p>	
	<p>Statement of Nonconformity</p>	

**RSPO Public Summary Report
Revision 4 (November /2016)**

	<p>The contractors did not comply with the Minimum Wage Order 2016 and Immigration Act 1959/63.</p> <p>Corrective Actions</p> <p><u>Composting Plant Contractor:</u></p> <ol style="list-style-type: none"> 1. To ensure the employment contract will keep by the PCM for all worker who are working with PCM. 2. To guide the composting plant contractor and ensure regarding to the Min Wage 2016 <p><u>Kejuruteraan Serting (Contractor):</u> Contractor of foreign worker's permit to be monitor together with Elphil POM foreign worker's checklist and keep in the file for record. Foreign worker's permit (Passport No.: BC 0761054) has been submitted for renewal work permit and valid until 7/2/2018.</p> <p>Assessment Conclusion</p> <p>The CAP and evidence has been submitted on 09/4/2017. However, an on-site visit was carried out on 9/5/2017 and evidence verified as below:</p> <ol style="list-style-type: none"> a. Visited to the composting plant and confirmed all the contract of the foreign workers are available. Wages stated in the contract accordingly. Sampeld their latest payslip and observed that all the wages according Minimum Wage Order 2016 and Immigration Act 1959/63. b. Contractor's worker permit being verify onsite during major closure verification. It has been renewed and valid until 7/2/2018. <p>Thus, the Major NC is closed on 9/5/2017.</p>	
--	---	--

Non-Conformity		
NCR #	Description	Category (Major / Minor)
1453612-201703-N1	<p>Requirements Indicator 4.7.3 All workers involved in the operation shall be adequately trained in safe working practices (see Criterion 4.8). Adequate and appropriate protective equipment shall be 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.</p> <p>Evidence of Nonconformity Elphil POM i) Contractor (Tye Chong Engineering) - PPE used was incomplete. No hand glove available</p> <p>Kinta Kellas Estate i) Manurer & Chemical Store - Non approved respirator was used and not as per SDPSB pictorial safety standard. (3M 3000 series) ii) Observed PPE was not appropriately worn by the manurer as per SDPSB pictorial safety standard.</p> <p>Statement of Nonconformity</p>	Minor

**RSPO Public Summary Report
Revision 4 (November /2016)**

	<p>All workers involved in the operation shall be adequately trained in safe working practices (see Criterion 4.8). Adequate and appropriate protective equipment shall be available to all workers at the place of work</p>	
	<p>Corrective Actions</p> <p><u>Elphil POM:</u></p> <ul style="list-style-type: none"> i) All contractor will be given briefing about safety and complete with required PPE when issue the permit to work before start to work. ii) To ensure all new worker need to be train and guide during working. Already order new PPE as required by SDPSB pictorial safety standard <p><u>Kinta Kellas estate:</u></p> <ul style="list-style-type: none"> iii) Will refer the CHRA recommendation before make the order for PPE. To train the worker regarding to wear the PPE as per SDPSB pictorial safety standard 	
	<p>Assessment Conclusion</p> <p>The CAP has been submitted on 09/4/2017. Effectiveness of corrective action taken will be verified in the next audit.</p>	

Non-Conformity		
NCR #	Description	Category (Major / Minor)
1453612-201703-N2	<p>Requirements Indicator 4.7.6 All workers shall be provided with medical care, and covered by accident insurance.</p>	Minor
	<p>Evidence of Nonconformity Elphil POM i) No record of accident insurance available for contractor's workers: passport# AA3658248, BC 0761054 and check-roll worker AS932163</p>	
	<p>Statement of Nonconformity Accident insurance was not comprehensively covered to all workers</p>	
	<p>Corrective Actions</p> <p>Elphil POM: i) To check the record and ensure of availability of accident insurance for contractor's workers. Record of accident insurance available for contractor's workers: passport# AA3658248, BC 0761054 and check-roll worker AS932163.</p>	
	<p>Assessment Conclusion</p> <p>The CAP has been submitted on 09/4/2017. Effectiveness of corrective action taken will be verified in the next audit.</p>	

Non-Conformity		
NCR #	Description	Category (Major / Minor)

1453612-201703-N3	Requirements Indicator 5.3.3 A waste management and disposal plan to avoid or reduce pollution shall be documented and implemented	Minor
	Evidence of Nonconformity In POM, waste management action plan 2016/2017 updated on 15 Jan 2017 incomplete without incorporating all the waste available in POM, for example: contaminated rags, paint container and etc. In Kinta Kellas, rubbish found scattered surrounding the line site although the rubbish bin has been provided to all the residents. Paint container which categorize as the schedule waste observed in the dump site. In Elphil estate; Kamiri Division; block 99F, chemical container observed in the dump site.	
	Statement of Nonconformity A waste management and disposal plan did not implement effectively	
	Corrective Actions <ol style="list-style-type: none"> 1. Waste management action plan will update and complete with incorporating all the waste available in POM, for example: contaminated rags, paint container and etc as per identification of waste. 2. To give training for all level regarding schedule waste management for better understanding. 	
	Assessment Conclusion The CAP has been submitted on 09/4/2017. Effectiveness of corrective action taken will be verified in the next audit.	

Non-Conformity		
NCR #	Description	Category (Major / Minor)
1453612-201703-N4	Requirements Indicator 6.9.3 A specific grievance mechanism which respects anonymity and protects complainants where requested shall be established, implemented, and communicated to all levels of the workforce.	Minor
	Evidence of Nonconformity Elphil POM and Elphil Estate: SDPSB has implemented Gender Committee Handbook, First Edition 2014 which developed by Plantation Sustainability & Quality Management (PSQM) Department. According to the handbook, the meeting shall be conducted quarterly (every 3 months once). However, the meeting was conducted half yearly on 21/6/2016 and 25/1/2017 for the mill and 21/6/2016 and 24/1/2017 for the estate.	
	Statement of Nonconformity Frequency of the meeting was not accordance to the Gender Committee Handbook.	
	Corrective Actions <ol style="list-style-type: none"> 1. Already done the training on 6 and 7 March 2017 for Gender, Human and Reproductive right. 2. Gender committee will be schedule for every 3 months once. 	

**RSPO Public Summary Report
Revision 4 (November /2016)**

	Assessment Conclusion The CAP has been submitted on 09/4/2017. Effectiveness of corrective action taken will be verified in the next audit.	
--	---	--

Non-Conformity		
NCR #	Description	Category (Major / Minor)
1453612-201703-N5	<p>Requirements Indicator 6.10.3 Evidence shall be available that all parties understand the contractual agreements they enter into, and that contracts are fair, legal and transparent.</p> <p>Evidence of Nonconformity Elphil POM: The agreement with FFB Traders were found expired as below: a. Contract No.: P/P/0415/FFB00645L expired on 31/3/2016</p> <p>Statement of Nonconformity Contract agreement of the FFB Trader was expired.</p> <p>Corrective Actions</p> <ol style="list-style-type: none"> 1. To inform GTM to ensure for all contract update need to inform and pass the copy of contract to mill. 2. To ensure to have contract tracking by AAO for validity of the contract. 3. Contract for FFB Traders is available for Tang Tatt Trading and valid as per agreement. Another one FFB Trader Eng Huat Latex still pending from GTM and follow up to get the document immediately. <p>Assessment Conclusion The CAP has been submitted on 09/4/2017. Effectiveness of corrective action taken will be verified in the next audit.</p>	Minor

Observation	
OBS #	Description
5.2.4	HCV Signage for water catchment area of Kinta Kellas estate and Limestone hill and cave of the Elphil estate is accordance HCV Assessment Report dated Feb 2017. However, it is deemed insufficient information as only "HCV" signage display onsite.

Positive Findings	
PF #	Description
1.	The organization has a mature management system and has demonstrated a satisfactory implementation of the system particularly on areas being assessed during this visit.
2.	All personnel were cooperative during the assessment process

Issues raised by Stakeholders	
<p>Stakeholder consultation involved internal and external stakeholders. External stakeholders were contacted by telephone to arrange meetings at a location convenient to them to discuss Elphil Palm Oil Mill Certification Unit's environmental and social performance, legal and any known dispute issues.</p> <p>Meetings were conducted with stakeholders to seek their views on the performance of the company with respect to the RSPO requirements and aspects where they considered that improvements could be made. At the start of each meeting, the interviewer explained the purpose of the audit followed by an evaluation of the relationship between the stakeholder and the company before discussions proceeded. The interviewer recorded comments made by stakeholders and later was verified with the management team. These have been incorporated into the assessment findings.</p> <p>Structured worker interviews with male and female workers and staff were held in private at the workplace in the mill and the estates. Fieldworkers were interviewed informally in small groups in the field. In addition, the wives of workers and staff were interviewed in informal group meetings at their housing. Separate visits were made to each of the local communities to meet with the village head and residents. Company officials were not present at any of the internal or external stakeholder interviews. A list of Stakeholders contacted is included as Appendix E.</p>	
IS #	Description
1	<p>Issues: Headmaster from SJK © Shing Chung – No any complaint on the management's activities.</p> <p>Management Responses: The management will ensure the activities will not affecting the school.</p> <p>Audit Team Findings: No other issue.</p>
2	<p>Issues: Pengerusi Penghulu Mukim Sg. Siput – No land dispute reported by the local communities. The management has maintained boundary to avoid any encroachment. Local people were recruited in the management too.</p> <p>Management Responses: The management acknowledged it and will ensure no land dispute in future.</p> <p>Audit Team Findings: No further issue.</p>
3	<p>Issues: Contractors – They have signed on the contract agreement prior to work. The payment was made promptly according to the agreement.</p> <p>Management Responses: The management acknowledged the comment.</p> <p>Audit Team Findings: Document reviewed on the contract agreement confirmed that they have signed on it and payment was made by headquarter.</p>
4	<p>Issues: Workers' Representatives – They were understood on the pay and condition. Their salary has achieved Minimum Wage Order 2016. They were treated equally without any discrimination. PPE was provided to them without any charges.</p> <p>Management Responses: The management will ensure they comply with the legal requirement.</p> <p>Audit Team Findings: Document reviewed on payslips found the wages have achieved RM 1000 and above.</p>
5	<p>Issues: Squatters – No land dispute issue.</p>

	<p>Management Responses: The management has conducted re-survey on the land. Planning to have meeting with the Land Department in HQ to further discuss the issue.</p> <p>Audit Team Findings: No further issue.</p>
6	<p>Issues: NUPW Representatives – Pay and conditions were satisfied which according to Minimum Wage Order 2016. No discrimination from the management towards the employees.</p> <p>Management Responses: The management will continue to comply with Minimum Wage Order 2016.</p> <p>Audit Team Findings: No further issue.</p>

3.3.1 Status of Nonconformities Previously Identified and Observations

Non-Conformity		
NCR #	Description	Category (Major / Minor)
1306204M1	<p>Requirements: Indicator 5.2.2 Where rare, threatened or endangered (RTE) species, or HCVs, are present or are affected by plantation or mill operations, appropriate measures that are expected to maintain and/or enhance them shall be implemented through a management plan.</p> <p>Evidence of Nonconformity: Based on baseline HCV assessment dated April 2010, it was noted that area more than 25 degree were classified as HCV4 and management plan has been established to maintain and/or enhance the area. However, during the site visit, it was found that there was an area more than 25 degree was being cleared for rubber tree planting. Thus, major nonconformity has been raised.</p> <p>Statement of Nonconformity: Implementation of management plan for identified HCV was not effective.</p> <p>Corrective Action: <u>Previous Corrective Action:</u> PSQM-SEPU to conduct HCV reassessment to update the report done in 2010. Development to be put on hold while assessment conducted. HCV areas identified in the upcoming assessment to be managed and enhanced accordingly.</p> <p><u>Additional Corrective Action During ASA2:</u> An additional corrective action due to the additional root cause was identified. It is due to the oversight of the management during the conversion of oil palm to rubber at the area. The review process of the HCV management plan has not been conducted. Therefore, the area has not been taken into consideration during the conversion.</p> <p>For the corrective action:</p>	Major

	<p>A survey will be conducted by our R&D team to identify areas at the affected slope and to conserved the areas as Conservation Set Aside areas.</p> <p>Planting of cover crops for erosion control at the area in accordance to the slope survey outcome by R&D team.</p> <p>The review of HCV management plan has to be done periodically during operational meetings and outcome documented. This will be enforced and closely monitored by the Sustainability and Quality Management (SQM) team at each region.</p> <p>Communication of any new guidelines/procedures will be done through the SQM team which is now regionalized, the SQM team will also assist to ensure implementation of HCV management plans at site.</p> <p>It is acknowledged that the rubber planting was developed on ex-oil palm fields (P98A), moving forward, suitable forest tree species will be identified at the CSA area to enrich the area in the long run.</p> <p>Assessment Conclusion: <u>Previos Assessment Conclusion:</u> Resurvey report has been submitted entitled Consultation Visit at Strategic Operating Unit (SOU) 3 (Elphil) - Kamuning Estate. The report indicated that On 04/06/2016 PSQM – Social & Environment Projects Unit team has conducted an HCV re-assessment at Kamuning Estate with assistance from R&D – Precision Agriculture Unit. The survey concluded the following:</p> <ul style="list-style-type: none"> i. The total hectares of HCV for control of erosion of vulnerable soils and slopes is 38.13 hectares which greater than listed in the report previously. ii. The HCV areas for control of erosion of vulnerable soils and slopes have been maintained and undisturbed. iii. Kamuning Estate will work closely with R&D PAU for slope determination training and ground verification. <p>The CAP and evidence submitted confirmed that the issue has been fully addressed hence the Major NC was closed on 7/6/2016.</p> <p><u>Assessment Conclusion During ASA2 & major closure visit:</u> Verified onsite and confirm the slope more than area with 25° slope are left undisturbed without any activities. During major closure visit, enhancement of slope through planting of cover crop were sighted. The Lion Hill area will set aside as conservation area.</p> <p>The reviewed of HCV Management & Monitoring plan FY2016/2017 has enhance the monitoring and protection of the slope area.</p> <p>New guidelines/procedures- Guidelines on Classification of Land Use and Land Covers For Upstream Operations: Planted, Unplanted and Unplantable Areas (Including Conservation Set Aside And High Conservation Value Areas) will be done through the SQM team which is now regionalized, the SQM team will also assist to ensure implementation of HCV management plans at site.</p>	
--	--	--

**RSPO Public Summary Report
Revision 4 (November / 2016)**

	The Major NC was remain closed on 23/3/2017 and additional corrective action verified during major closure visit on 9/5/2017.	
--	---	--

Non-Conformity		
----------------	--	--

NCR #	Description	Category (Major / Minor)
1306204M2	<p>Requirements: Indicator 6.5.2 Labour laws, union agreements or direct contracts of employment detailing payments and conditions of employment (e.g. working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc.) shall be available in the languages understood by the workers or explained carefully to them by a management official</p> <p>Evidence of Nonconformity: Elphil Palm Oil Mill: Contractor’s workers (Kejuruteraan Serting Sdn. Bhd – contract dated 23/11/2015) employment contract, foreign workers compensation (insurance) and legal work permit was not available during the audit.</p> <p>Kinta Kellas Estate: Review of workers’ payslip for the month of February 2015 found deduction for union fee (NUPW) was not following the latest MAPA/NUPW Collective Agreement dated 28 April 2015. Sample checked: Employee ID.: 630304-08-6111, 650110-08-6680 and 801020-08- 6658 found RM 11.00 deducted for union fee whereas, the CA required RM 3.00 Insurance to be fully subsidies by the company.</p> <p>Statement of Nonconformity: Deduction for union fee (NUPW) was not following the latest Collective Agreement</p> <p>Corrective Action: Root cause analysis: Mill: Elphil POM did not obtain the employment contract, foreign workers compensation (insurance) & legal work permit from Kejuruteraan Serting Sdn Bhd. Kinta Kellas Estate: Estate office already made deduction for NUPW base on previous MAPA/NUPW Collective Agreement due to recruitment of new staff and unaware of the latest MAPA/NUPW agreement.</p> <p>Immediate action: Mill: Elphil POM immediately communicated with Kejuruteraan Serting and to provide employment contract, foreign workers compensation (insurance) & legal work permit.</p> <p>Estate: Kinta Kellas reimbursed the workers their union fee deduction according to new MAPA/NUPW collective agreement.</p> <p>Long term corrective action: Mill: Mill will asking photocopy of related document to be place at mill. Estate: Person-in-charge will always keep track of any changes or updates of union fee.</p>	Major

**RSPO Public Summary Report
Revision 4 (November /2016)**

	The CAP and evidence submitted confirmed that the issue has been fully addressed hence the Major NC was closed on 19/5/2016.	
	<p>Assessment Conclusion: Same recurrence of issues found at the POM with regards to NUPW fee. The corrective action was not effectively closed. Refer to Major NC raised under 6.5.2.</p>	

Non-Conformity		
NCR #	Description	Category (Major / Minor)
1306204N1	<p>Requirements: Indicator 4.3.2 A management strategy shall be in place for plantings on slopes above a certain limit (this needs to be soil and climate specific)</p> <p>Evidence of Nonconformity: Kamuning Estate: During the audit it was noted that slope area more than 25% were undergoing planting of rubber trees which is against the Sime Darby policy for Slope Protection & River dated January 2015 signed by the Managing Director.</p> <p>Statement of Nonconformity: Strategy for plantings on slope above certain limit was not as per the Sime Darby policy</p> <p>Corrective Action: HCV areas identified in the upcoming assessment to be managed and enhanced accordingly.</p> <p><u>Additional Corrective Action During ASA2:</u> An additional corrective action due to the additional root cause was identified. It is due lack of proper procedures to address the conversion from oil palm to other crops e.g. rubber in accordance to company's policy. The company's procedures is mostly focused on the conversion of other crops to oil palm.</p> <p>Therefore, the corrective action: Set aside and enhancing the existing planted area at steep slope of Lion Hill</p> <p>To establish clear guidance/procedures on the conversion of oil palm to rubber plantation and to communicate the guidance effectively to the operations.</p> <p>The formalization of an additional guidance on the CSA areas shall be communicated to the operations. The document is entitled "Guidelines on Classification of Land Use and Land Covers for Upstream Operations: Planted, Unplanted And Unplantable Areas (Including Conservation Set Aside And High Conservation Value Areas)".</p> <p>Assessment Conclusion: The management has implemented the corrective action plan accordingly. The set aside of the steep slope of Lion Hill as well as the guidelines as the preventive action. Therefore, the minor non-conformance was closed on 23/03/2017.</p>	Minor

Non-Conformity		
NCR #	Description	Category (Major / Minor)
1306204N2	Requirements: Indicator 4.4.1 An implemented water management plan shall be in place.	Minor
	Evidence of Nonconformity: Kinta Kellas Estate: No rain water harvesting activity implementation as per water management plan established.	
	Statement of Nonconformity: Implementation action for the water management plan not in place.	
	Corrective Action: Root cause analysis: Kinta Kellas Estate not implemented the revised water management plan for FY15/16 Corrective action plan: Kinta Kellas Estate will implement the water management plan especially for rain water harvesting.	
	Assessment Conclusion: Kinta Kellas Estate has implemented the corrective action plan accordingly. Verified on site installation of rain water collection tank which located near to chemical mixing area. Therefore, the minor non-conformance was closed on 23/03/2017.	

Non-Conformity		
NCR #	Description	Category (Major / Minor)
1306204N3	Requirements: Indicator 4.7.5 Accident and emergency procedures shall exist and instructions shall be clearly understood by all workers. Accident procedures shall be available in the appropriate language of the workforce. Assigned operatives trained in First Aid should be present in both field and other operations, and first aid equipment shall be available at worksites. Records of all accidents shall be kept and periodically reviewed.	Minor
	Evidence of Nonconformity: Elphil Palm Oil Mill: First aid kit at Supervisor room was found to be incomplete as certain items was missing e.g. Flavine solution, burn cream, plaster etc. Oral medicine was also found inside the first aid kit located at boiler and supervisor room. Kinta Kellas Estate: Workshop first aid kit – Flavine solution was found without proper labelling (hazard label) and date of expiry as per re-labelling requirements under USECHH Regulations 2000. Kamuning Estate:	

**RSPO Public Summary Report
Revision 4 (November /2016)**

	<p>Workshop first aid kit – Flavine solution was found without proper labelling (hazard label) and date of expiry as per re-labelling requirements under USECHH Regulations 2000. Antiseptic cream was found expired on March 2015.</p>	
	<p>Statement of Nonconformity: Emergency preparedness was not fully implemented.</p>	
	<p>Corrective Action: Root cause analysis: Person-in-charge together with Hospital Assistant not conducted regular inspection on the First Aid Kit. Corrective action plan: Person-in-charge together with Hospital Assistant will regularly conducted inspection and ensures all items in the first aid kit area in place with proper labelling and ensure the validity of medicine.</p>	
	<p>Assessment Conclusion: Same recurrence of issues found at the visited operating units with regards to first aid kit. The corrective action was not effective thus escalated to major NC as per RSPO certification system. Please refer to Major 1453612-201703-M3.</p>	

Non-Conformity		
NCR #	Description	Category (Major / Minor)
1306204N4	<p>Requirements: Indicator 6.6.2 Minutes of meetings with main trade unions or workers representatives shall be documented</p> <p>Evidence of Nonconformity: Kamuning Estate: Minutes of meeting with workers union (NUPW) was not available during the site audit</p> <p>Statement of Nonconformity: Minutes of meetings with main trade unions or workers representatives was not documented</p> <p>Corrective Action: Root cause analysis: Kamuning Estate did not conduct union (NUPW) meeting. Corrective action plan: Kamuning Estate will plan to conduct NUPW (union) immediately and on regular basis.</p> <p>Assessment Conclusion: Meeting was conducted on 30/9/2016 in mill, 8/9/2016 in Kinta Kellas Estate and 20/2/2017 in Elphil Estate . The meeting was attended by total 16 participants from the management and NUPW representatives. Meeting minutes was sighted. Issues raised during the meeting was recorded in the minutes and actions have been taken. The corrective action has been implemented effectively. Therefore, the minor non-conformance was closed on 23/03/2017.</p>	Minor

**RSPO Public Summary Report
Revision 4 (November /2016)**

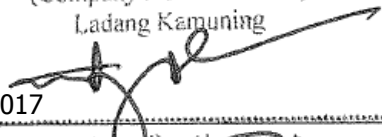
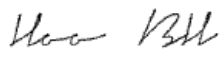
Observation	
OBS #	Description

3.3.2 Summary of the Nonconformities and Status

CAR Ref.	CLASS	ISSUED	STATUS
CR01	Minor	12/3/2011	Closed out on 12/4/2012
CR01	Minor Major	12/3/2011 Upgraded on 12/4/2012	Closed out on 29/5/2012
CR03	Minor	12/4/2012	Closed out on 11/04/2013
911210NO	Minor	12/4/2012	Closed out on 19/3/2014
1028800M0	Major	18/3/2014	Closed out on 2/4/2014
1028800N1	Minor	19/3/2014	Escalated to Major on 28/3/2015 (Refer NC #1171760M1)
1171760M1 – 5.3.3	Major	28/3/2015	Closed out on 16/5/2015
1306204M1 – 5.2.2	Major	24/3/2016	Closed out on 7/6/2016
1306204M2 – 6.5.2	Major	24/3/2016	Closed out on 19/5/2016
1306204N1 – 4.3.2	Minor	24/3/2016	Closed out on 23/03/2017
1306204N2 – 4.4.1	Minor	24/3/2016	Closed out on 23/03/2017
1306204N3 – 4.7.5	Minor	24/3/2016	Closed out on 23/03/2017
1306204N4 – 6.6.2	Minor	24/3/2016	Closed out on 23/03/2017
1453612-201703-M1 – 4.7.1	Major	23/03/2017	Closed out on 09/05/2017
1453612-201703-M2 – 4.7.2	Major	23/03/2017	Closed out on 09/05/2017
1453612-201703-M3 – 4.7.5	Major	23/03/2017	Closed out on 09/05/2017
1453612-201703-M4 – 4.4.2	Major	23/03/2017	Closed out on 09/05/2017
1453612-201703-M5 – 5.1.1	Major	23/03/2017	Closed out on 09/05/2017
1453612-201703-M6 – 5.3.2	Major	23/03/2017	Closed out on 09/05/2017
1453612-201703-M7 – 6.3.1	Major	23/03/2017	Closed out on 09/05/2017
1453612-201703-M8 – 6.5.2	Major	23/03/2017	Closed out on 09/05/2017
1453612-201703-M9 – 2.1.1	Major	23/03/2017	Closed out on 09/05/2017
1453612-201703-N1 – 4.7.3	Minor	23/03/2017	"Open"
1453612-201703-N2 – 4.7.6	Minor	23/03/2017	"Open"
1453612-201703-N3 – 5.3.3	Minor	23/03/2017	"Open"
1453612-201703-N4 – 6.9.3	Minor	23/03/2017	"Open"
1453612-201703-N5 – 6.10.3	Minor	23/03/2017	"Open"

**RSPO Public Summary Report
Revision 4 (November /2016)**

Assessment Conclusion and Recommendation:

Based on the findings during the assessment Elphil Palm Oil Mill Certification Unit and supply base complies with the RSPO P&C 2013 (MY-NI 2014) and the RSPO Supply Chain Certification Standard (Nov 2014) for CPO Mill. It is recommended that the certification of Elphil Palm Oil Mill Certification Unit is approved and continued.	
Acknowledgement of Assessment Findings	Report Prepared by
Name: Tn. Nor Azam Bin Abu Samah	Name: Mr Hoo Boon Han
Company name: Sime Darby Plantation Bhd	Company name: BSI Services Malaysia Sdn Bhd
Title: Manager	Title: Lead Auditor
Signature: SIME DARBY PLANTATION SDN. BHD (Company No.: 647766-V) Ladang Kamuning  Date: 15 July 2017	Signature:  Date: 15 July 2017
<i>Nor Azam Bin Abu Samah Manager</i>	

Appendix A: Summary of Findings

Criterion / Indicator		Assessment Findings	Compliance
Principle 1: Commitment to Transparency			
Criterion 1.1: Growers and millers provide adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.			
1.1.1	There shall be evidence that growers and millers provide adequate information on (environmental, social and/or legal) issues relevant to RSPO Criteria to relevant stakeholders for effective participation in decision making. - Minor compliance -	Adequate information covering on environmental, social and legal issues which are relevant to RSPO Criteria and relevant to stakeholders is shared for effective participation and decision making. Requests for information from the Regulatory Department such as DOE quarterly reports were attended and no noncompliance or complaints were noted. Information on environmental, social and legal issues relevant to RSPO Criteria was made available to relevant stakeholders for effective participation in decision making. Publicly available documents such as land title, OSH plan, HGV documents, negotiation procedure, complaint records, RSPO public summary reports, EIA, Management Plans & Continuous Improvement Plans and company policies are available.	Complied
1.1.2	Records of requests for information and responses shall be maintained. -Major compliance	Records of request for information maintained in individual files by the chief clerk. Records of stakeholder requesting information recorded in the visitor's book.	Complied
Criterion 1.2: Management documents are publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes.			

**RSPO Public Summary Report
Revision 4 (November /2016)**

Criterion / Indicator	Assessment Findings	Compliance
<p>1.2.1</p> <p>Publicly available documents shall include, but are not necessary limited to:</p> <ul style="list-style-type: none"> • Land titles/user rights (Criterion 2.2); • Occupational health and safety plans (Criterion 4.7); • Plans and impact assessments relating to environmental and social impacts (Criteria 5.1, 6.1, 7.1 and 7.8); • HCV documentation (Criteria 5.2 and 7.3); • Pollution prevention and reduction plans (Criterion 5.6); • Details of complaints and grievances (Criterion 6.3); • Negotiation procedures (Criterion 6.4); • Continual improvement plans (Criterion 8.1); • Public summary of certification assessment report; • Human Rights Policy (Criterion 6.13). <p>- Major compliance –</p>	<p>There was no restriction noted as to the documents made available to the public except those prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes. Sime Darby Plantation Sdn Bhd continued to use the internet for disseminating public information. Information relating to land titles, safety and health plans, pollution prevention plans was made available at all operating units. Procedure for complaints and grievances were available through Sime Darby Plantation Sdn Bhd website: http://www.simedarbyplantation.com/Sustainability.aspx</p> <p>Among the documents that were made available for viewing are:</p> <ul style="list-style-type: none"> • Good Agricultural Practices • Social Enhancement • Sustainability Management Programs • Complaint and Grievances procedure. • Environmental Conservation <p>These documents highlight current Sime Darby Plantation Sdn Bhd practices and their continual improvement plans. Besides the above document Sime Darby Plantation Sdn Bhd policy on the followings are also available at the same website:</p> <ol style="list-style-type: none"> 1. Social 2. Quality 3. Food Safety 4. Occupational Safety & Health 5. Environment & Biodiversity 6. Slope Protection and Buffer Zone 7. Lean Six Sigma 8. Gender <p>In addition to the website, the policies were also displayed at various locations including the main notice boards of the estates, mill offices and muster ground notice boards for employees and visitors to view.</p>	<p>Complied</p>
<p>Criteria 1.3: Growers and millers commit to ethical conduct in all business operations and transactions.</p>		
<p>1.3.1</p> <p>There shall be a written policy committing to a code of ethical conduct and integrity in all operations and transactions, which shall be documented and communicated to all levels of the workforce and operations.</p> <p>-Minor compliance</p>	<p>Sime Darby plantation has established policy on code of ethical conduct and integrity which covers all operations in the plantation operation under Corporate Policy Statement dated January 2015. Policy displayed on the notice board and communicated to employees.</p> <p>Code of Business Conduct (COBC) Refresher Course had provided to all the workers on 20 March 2017. Attendance list and signed of code of business conduct sighted during onsite visit. Interviewed with employees reveal that they are aware of the policy.</p>	<p>Complied</p>
<p>Principle 2: Compliance with applicable laws and regulations</p>		
<p>Criterion 2.1: There is compliance with all applicable local, national and ratified international laws and regulations.</p>		

**RSPO Public Summary Report
Revision 4 (November /2016)**

Criterion / Indicator	Assessment Findings	Compliance
<p>2.1.1 Evidence of compliance with relevant legal requirements shall be available. - Major compliance -</p>	<p>SOU3 had continued to comply with the legal requirements as per indicator. Compliance to each applicable law and regulation is monitored by the operating units and PSQM sustainability team. SOU3 had obtained and renewed license and permits as required by the law.</p> <p>In POM, following license and permit available:</p> <ul style="list-style-type: none"> a. Department of Environment’s License no: 001845 b. Akta Bekalan Elektrik 1990- License no: ST(PIP)P/S/PRK/00429 issue on 19/12/2016 c. Permit to purchase, store and use of sodium hydroxide- License 3103 d. Certified Environmental professional in the treatment of POM- Pond Processes (CEPPOME; No: 16001) e. Water Tube Boiler; PK PMD 745 certified till 10 May 2017 f. Air Receiver Tank; PK PMT 3875 certified till 10 May 2017 g. MPOB License: 54132004000; expired 31 May 2017 h. Fire certificate no: 2922748 i. Weighbridge calibration record dated 20 Oct 2016 <p>In Kinta Kellas estate:</p> <ul style="list-style-type: none"> a. Permit Barang Kawalan Berjadual; No: A027584 expiring 29 June 2017 <p>MPOB License no: 528648002000 expiring 31 March 2018</p> <p><u>Composting Plant Contractor:</u> 4 out of 11 local workers’ daily rate were found less than RM 38.46 which is only RM 37/ day and 1 out of 11 local workers’ monthly pay was only RM 850.</p> <p><u>Kejuruteraan Serting Contractor:</u> Foreign worker’s permit (Passport No.: BC 0761054) was expired 7/2/2017 and no evidence of renewal was carried out.</p>	<p>Major nonconformance</p>
<p>2.1.2 A documented system, which includes written information on legal requirements, shall be maintained. - Minor compliance -</p>	<p>List of applicable legal and other requirements was made available during the assessment and compiled in the QSHE/04/5.2.4 folder. Documented procedure has been established and implemented; refer to Estate/Mill Quality Management System, Level 2: Standard Operating Manual, Appendix 5.2.4: Procedure for Legal and Other Requirements dated 10 December 2008.</p> <p>In POM, a summary of compliance FY2016 incorporating all the legal requirements are sighted during onsite. Similar documents sighted in the estate. Latest requirements such as Minimum Wages Order 2016 and Electric Supply Act 1990 (amended 2015) are registered in the list.</p>	<p>Complied</p>

**RSPO Public Summary Report
Revision 4 (November /2016)**

Criterion / Indicator	Assessment Findings	Compliance	
2.1.3	A mechanism for ensuring compliance shall be implemented. - Minor compliance -	Internal audit has been conducted on 15-16 Feb 2017 by three internal auditors in POM and all estates. Assessment report for respective area with all the findings have been documented All corrective action taken with the evidence submitted.	Complied
2.1.4	A system for tracking any changes in the law shall be implemented. - Minor compliance -	Tracking system available to identify changes in the relevant regulations through head office, website information and the information are communicated from the Group's Head Office. On the site verification, interviews with office personnel and records indicate that the system is appropriate to the operations. Tracking system on any changes in the law been well implemented. E.g. regular notification by Head Office and regular updates from the DOE/DOSH websites.	Complied
Criterion 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.			
2.2.1	Documents showing legal ownership or lease, history of land tenure and the actual legal use of the land shall be available. - Major compliance -	The Estates and Mill are on freehold land and they hold copies of Land Titles. Kinta Kellas estate in total has 58 land titles. Quit rent payment dated 23 rd May 2016 was verified during onsite visit.	Complied
2.2.2	Legal boundaries shall be clearly demarcated and visibly maintained. - Minor compliance -	In Kinta Kellas, the recent resurvey of the whole area by the licensed surveyor- Juruukur May has completed in March 2017. Peg and boundary stone sighted during site visit, following coordinates sampled: a. 4°28.458'N; 101°5.170'E b. 4°28.441'N; 101°4.523'E c. 4°28.471'N; 101°4.569'E	Complied
2.2.3	Where there are or have been disputes, additional proof of legal acquisition of title and evidence that fair compensation has been made to previous owners and occupants shall be available, and that these have been accepted with free, prior and informed consent (FPIC). - Minor compliance -	There is no land dispute in the Elphil POM & Supply base at the time of audit. The land belongs to Sime Darby with further verification of document and stakeholder interview	Complied
2.2.4	There shall be an absence of significant land conflict, unless requirements for acceptable conflict resolution processes (see Criteria 6.3 and 6.4) are implemented and accepted by the parties involved. -Major compliance	There is no land dispute in the SOU3 at the time of audit. The land belongs to Sime Darby and land ownership documents verified.	Complied
2.2.5	For any conflict or dispute over the land, the extent of the disputed area shall be mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable). -Minor compliance	There is no land dispute in the SOU3 at the time of audit. The land belongs to Sime Darby and land ownership documents verified	Complied

**RSPO Public Summary Report
Revision 4 (November /2016)**

Criterion / Indicator	Assessment Findings	Compliance
2.2.6	To avoid escalation of conflict, there shall be no evidence that palm oil operations have instigated violence in maintaining peace and order in their current and planned operations. -Major compliance	Complied
Criterion 2.3: Use of the land for oil palm does not diminish the legal rights, customary or user right of other users without their free, prior and informed consent.		
2.3.1	Maps of an appropriate scale showing the extent of recognized legal, customary or user rights (Criteria 2.2, 7.5 and 7.6) shall be developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities). - Major compliance -	Complied
2.3.2	Copies of negotiated agreements detailing the process of free, prior and informed consent (FPIC) (Criteria 2.2, 7.5 and 7.6) shall be available and shall include: a) Evidence that a plan has been developed through consultation and discussion with all affected groups in the communities, and that information has been provided to all affected groups, including information on the steps that shall be taken to involve them in decision making; b) Evidence that the company has respected communities' decisions to give or withhold their consent to the operation at the time that this decision was taken; c) Evidence that the legal, economic, environmental and social implications for permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal status of their land at the expiry of the company's title, concession or lease on the land. - Minor compliance -	Complied
2.3.3	All relevant information shall be available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements. -Minor compliance	Complied

**RSPO Public Summary Report
Revision 4 (November /2016)**

Criterion / Indicator		Assessment Findings	Compliance
2.3.4	Evidence shall be available to show that communities are represented through institutions or representatives of their own choosing, including legal counsel. -Major compliance	There is no land dispute in the SOU3 at the time of audit. The land belongs to Sime Darby and land ownership documents verified.	Complied
Principle 3: Commitment to long-term economic and financial viability			
Criterion 3.1: There is an implemented management plan that aims to achieve long-term economic and financial viability.			
3.1.1	A business or management plan (minimum three years) shall be documented that includes, where appropriate, a business case for scheme smallholders. - Major compliance -	Annual business plan in the form of annual budget and the projection for 5 years prepared as guidance for future planning. The business plan contains FFB yield, CPO, OER, and KER, OPEX, CAPEX etc. Elphil Palm Oil Mill and supply bases have made progress towards achieving their performance production targets for the current financial year. CAPEX allocation for mill and estate was made available for review for FY 16/17: Mill : lab equipment with fume hood for ETP mini lab, surface aerator for ETP Estate: new tractor, workers house and workshop garage	Complied
3.1.2	An annual replanting programme projected for a minimum of five years (but longer where necessary to reflect the management of fragile soils, see Criterion 4.3), with yearly review, shall be available. - Minor compliance -	Long range replanting programme available for projection of 10 years until FY24/25. <u>Kinta Kellas</u> FY16/17: 37.51 ha (previous field 1989, 26 yrs) FY19/20: 28.7 ha (previous field 1997, 23 yrs)	Complied
Principle 4: Use of appropriate best practices by growers and millers			
Criterion 4.1: Operating procedures are appropriately documented, consistently implemented and monitored.			

**RSPO Public Summary Report
Revision 4 (November /2016)**

Criterion / Indicator	Assessment Findings	Compliance
<p>4.1.1</p> <p>Standard Operating Procedures (SOPs) for estates and mills are documented - Major compliance -</p>	<p>SOP available for the Palm Oil Mill and the Estates.</p> <p>Palm Oil Mill holds two SOPs: Sustainability Plantation Management System (MQMS/SOM/08 v.1 dated 1/11/2008) includes mill SOP and Mill Quality Management Manual v.1 2008/MQMS/QMM/08 as a guidance document to operate the mill. SOP for the Composting Plant dated 15/8/2011: Composting Management System version 1:2011</p> <p>Estates have a separate SOP (Sime Darby SOP issued 2/1/2008 and Agricultural reference Manual) covers land preparation, planting material, upkeep, harvesting, transport etc. Noted updated procedure under SOP for water analysis and RSPO SCCS procedure:</p> <ul style="list-style-type: none"> i) SPMS, Appendix 7: SOP for water quality monitoring, issue:2 dated 1/6/16. <p>SOP for sampling guideline</p> <ul style="list-style-type: none"> i) Water and Wastewater Sampling Guideline, issue:1 dated 1/6/16. ii) RSPO Supply Chain Certification Standard and Traceability for handling certified and non-certified FFB under Appendix 15, version:2, issue: 2 dated October 2016 	<p>Complied</p>
<p>4.1.2</p> <p>A mechanism to check consistent implementation of procedures shall be in place. - Minor compliance -</p>	<p>External Mill Advisor and a Planting Advisor inspect and report on the operations on annual basis. There were other audits by PSQM and GCAD to ensure compliance against company policy and procedure with regards to operation, finance as well as safety, health and welfare requirements.</p>	<p>Complied</p>
<p>4.1.3</p> <p>Records of monitoring and any actions taken shall be maintained and available, as appropriate. - Minor compliance -</p>	<p>Mill Advisor's latest visit was on 22-24/12/16. (report No.: ELM/01/16-17). Report includes monitoring of all activities in the mill covering the OER & KER performance, process losses, mill throughput (maintenance, downtime), product quality and compliance monitoring.</p> <p>Agronomist report, FY2016/2017 was carried out on 20/9/16. Monitoring of (rainfall, yield [performing and under-performing], palm nutrition status, fertilizer recommendation has been included in the report. Other matters such as field observation and agronomic matters was also incorporated in the report i.e bagworm infestation etc.</p>	<p>Complied</p>
<p>4.1.4</p> <p>The mill shall record the origins of all third-party sourced Fresh Fruit Bunches (FFB). - Major compliance -</p>	<p>Elphil mill maintains a daily record of all FFB received from 3rd party source. Sample of FFB supplier contracts checked; Eng Huat Latex Concentration (P/P/0415/FFB006454) and Tang Tatt Trading Sdn Bhd (P/P/1214/FFB005581). The records show the origin, weight, transporters details and etc. of the FFB received. For 3rd party sourced FFB, non-certified ID appeared in the weighbridge ticket.</p>	<p>Complied</p>

Criterion 4.2:
Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.

RSPO Public Summary Report
Revision 4 (November /2016)

Criterion / Indicator		Assessment Findings	Compliance
4.2.1	There shall be evidence that good agriculture practices, as contained in Standard Operating Procedures (SOPs), are followed to manage soil fertility to a level that ensures optimal and sustained yield, where possible. - Minor compliance -	Good agriculture practices which follows the group agriculture manual (ARM) contains Standard Operating Procedures to ensure soil fertility is managed to a level that ensures optimal and sustained yield.	Complied
4.2.2	Records of fertiliser inputs shall be maintained. - Minor compliance -	Fertilizers are applied as per agronomist recommendation. Record shows application date, filed number, dosage applied per palm, type of fertilizer and number of applicators. Refer to fertilizer recommendation, appendix I under Kinta Kellas Estate under immature area. Recommendation for field 2016A (57.04 ha), soil series Munchong, Mar 2017 (CCM45, 2 kg/palm). Actual to date application record for field 2016A : 103 bags @ 5.156 MT.	Complied
4.2.3	There shall be evidence of periodic tissue and soil sampling to monitor changes in nutrient status. - Minor compliance -	Sime Darby Research Sdn Bhd prepare the annual fertilizer recommendation. Leaf analysis result which shows the nutrient level was used as guidance for the fertilizer recommendation. Leaf sampling carried out on August 2016 and summarized under leaf nutritional status for a few sample blocks. Periodic soil sampling is carried out at 5 years interval. The latest soil sampling analysis was done in 2014, refer to soil analysis test report# S74/2014 dated 22/8/14. 6 soil samples were sent for analysis.	Complied
4.2.4	A nutrient recycling strategy shall be in place, and may include use of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), and palm residues after replanting. - Minor compliance -	EFB application only applied to selected fields at the estates. Recommendation is 45mt/ha per year for selected matured fields (OP99A, OP99B & OP2000) at Kinta Kellas Estate. For immature, recommendation rate is 40 mt/ha. Actual application records: i) Field 2017 : 37 palms, 8.38 mt applied.	Complied
Criterion 4.3: Practices minimise and control erosion and degradation of soils.			
4.3.1	Maps of any fragile soils shall be available. - Major compliance -	Soil series map available for both estates visited. There are no peat soils or soil categorised as problematic or fragile soil at all estates. <u>Kinta Kellas Estate</u> Soil series available : Bungor/Malacca, Munchong	Complied
4.3.2	A management strategy shall be in place for plantings on slopes above a certain limit (this needs to be soil and climate specific). - Minor compliance -	Slope and river protection policy dated January 2015. Slope protection, slopes of > 25° : excluded from any new plantation development and replanting programme. Slopes < 25°: existing crop and vegetation shall be maintained accordingly. For Kinta Kellas Estate, most of the area is undulating with slope within 6-12 °	Complied
4.3.3	A road maintenance programme shall be in place. - Minor compliance -	Road maintenance programme for Kinta Kellas Estate is outsourced to 3 rd party. Plan for road grading and compacting for Type A1 (main road 5-6M) and Type A2(Collection Road 4M) for total of 77,200 meter @ 77.2 km.	Complied

**RSPO Public Summary Report
Revision 4 (November /2016)**

Criterion / Indicator	Assessment Findings	Compliance												
4.3.4	Subsidence of peat soils shall be minimised and monitored. A documented water and ground cover management programme shall be in place. - Minor compliance -	There are no peat soils or soil categorized as problematic or fragile soil at all estates. Complied												
4.3.5	Drainability assessments shall be required prior to replanting on peat to determine the long-term viability of the necessary drainage for oil palm growing. - Minor compliance -	There are no peat soils or soil categorized as problematic or fragile soil at all estates. Complied												
4.3.6	A management strategy shall be in place for other fragile and problem soils (e.g. sandy, low organic matter, acid sulphate soils). - Minor compliance -	There are no peat soils or soil categorized as problematic or fragile soil at all estates. Complied												
Criterion 4.4: Practices maintain the quality and availability of surface and ground water.														
4.4.1	An implemented water management plan shall be in place. - Minor compliance -	Water management plan: Contingency plan during water shortage for financial year 2016/2017 for Elphil POM are: a. Water shortage/dry spell - Purchase water from Lembaga Air Perak (LAP) - Train staff/workers to conserve water - To proposed tube well application b. Severe water pollution - Water supply to be purchased from Lembaga Air Perak - To perform treatment of polluted water Complied												
4.4.2	Protection of water courses and wetlands, including maintaining and restoring appropriate riparian and other buffer zones (refer to national best practice and national guidelines) shall be demonstrated. - Major compliance -	Documented as a Guidelines on River Reserve Management (Management of River Reserve in Sime Darby Plantation; dated April 2014). Buffer zones established as following: <table border="1" data-bbox="660 1350 1299 1534"> <thead> <tr> <th>River width</th> <th>Buffer zone</th> </tr> </thead> <tbody> <tr> <td>> 40 meters</td> <td>50 meters</td> </tr> <tr> <td>20 to 40 meters</td> <td>40 meters</td> </tr> <tr> <td>10 to 20 meters</td> <td>20 meters</td> </tr> <tr> <td>5 to 10 meters</td> <td>10 meters</td> </tr> <tr> <td>< 5 meters</td> <td>5 meters</td> </tr> </tbody> </table> Monitoring based on Sustainable Plantation Management System Appendix 7 Standard Operation Procedure (SOP) for taking water samples from streams/ivers, version 1, year 2008, issue no. 1, dated 1/11/2008. However, following were observed: a. No demarcation for the buffer zone along the river at block 99G b. Observed evidence of spraying at the buffer zone area, block 99G Major nonconformance	River width	Buffer zone	> 40 meters	50 meters	20 to 40 meters	40 meters	10 to 20 meters	20 meters	5 to 10 meters	10 meters	< 5 meters	5 meters
River width	Buffer zone													
> 40 meters	50 meters													
20 to 40 meters	40 meters													
10 to 20 meters	20 meters													
5 to 10 meters	10 meters													
< 5 meters	5 meters													

**RSPO Public Summary Report
Revision 4 (November /2016)**

Criterion / Indicator	Assessment Findings	Compliance	
4.4.3	<p>Appropriate treatment of mill effluent to required levels and regular monitoring of discharge quality, especially Biochemical Oxygen Demand (BOD), shall be in compliance with national regulations (Criteria 2.1 and 5.6). - Minor compliance -</p>	<p>Effluent Analysis conducted by Sime Darby Research and submitted to DOE every 3 months through OER (Online Environmental Report). Following report sighted:</p> <ul style="list-style-type: none"> a. Report dated 2016-10-14 (BOD: 13mg/L); 2016-11-12 (BOD: 14mg/L); 2016-12-28 (BOD: 18mg/L) b. Report dated 2016-07-13 (BOD: 15mg/L); 2016-08-09 (BOD: 12mg/L); 2016-09-07 (BOD: 5mg/L) 	Complied
4.4.4	<p>Mill water use per tonne of Fresh Fruit Bunches (FFB) (see Criterion 5.6) shall be monitored. - Minor compliance -</p>	<p>In POM, the water usage monitoring for FFB/tonne:</p> <ul style="list-style-type: none"> a. Nov 2016: 1.14 m³/t FFB b. Dec 2016: 1.26 m³/t FFB c. Jan 2017: 1.17 m³/t FFB 	Complied
<p>Criterion 4.5: Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management techniques.</p>			
4.5.1	<p>Implementation of Integrated Pest Management (IPM) plans shall be monitored. - Major compliance -</p>	<p>Implementation of Integrated Pest Management (IPM) plans was continuously monitored and documented under Kinta Kellas IPM programme, document# MR-03/QSHEP. Among the programme(s) sighted:</p> <ul style="list-style-type: none"> i) Planting of beneficial plant (target 2 dm per ha) – Ratio of BP, 6:2:2 – actual todate 0.2 dm per ha. ii) Ganoderma problem – Census results less than threshold limit. iii) Barn Owl Box census – Occupancy rate recorded at 93% iv) Bagworm problem – census done on specific effected field, OP2000. Method of treatment is trunk injection using class III chemical, Acephate (organophosphate chemical) 	Complied
4.5.2	<p>Training of those involved in IPM implementation shall be demonstrated. - Minor compliance -</p>	<p>Training of those involved in IPM implementation was demonstrated. Roll-out programme for the new SOP on trunk injection using Acephate was carried out by R&D Department on 26/10/16. Training was given to the management team, staff and workers for the new implementation of new SOP.</p>	Complied
<p>Criterion 4.6: Pesticides are used in ways that do not endanger health or the environment</p>			
4.6.1	<p>Justification of all pesticides used shall be demonstrated. The use of selective products that are specific to the target pest, weed or disease and which have minimal effect on non-target species shall be used where available. - Major compliance -</p>	<p>Justification of all pesticides used documented in Sime Darby Plantation's Agriculture Reference Manual, SDP/OP/ARM/10348, version:3, issue:1 dated 1/7/2011. Weed Management under section 16 has described the use of selective products that are specific to the target pest, weed or disease. For the immature area weeds such as (legume and broadleaves) herbicide with active ingredient (metsulfuron methyl) was used.</p> <p>For bagworm treatment, SOP ref# CS-SOP-M-21, dated 3/3/15 has been established. Alternative chemical for class IB was introduced, with the used of Acephate 75% soluble powder insecticide for leaf eating caterpillar control in oil palm plantation.</p>	Complied

**RSPO Public Summary Report
Revision 4 (November /2016)**

Criterion / Indicator	Assessment Findings	Compliance
4.6.2 Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) shall be provided. - Major compliance -	Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) were maintained. Ai per Ha records for FY16/17 (1 st quarter of FY) July 2016: Basta, Ally and Kenlon (0.95 ai/ha) Aug 2016: Basta, Kenlon, Glyphosate, Cypermetrin, Multiphos 60 and wet and stick (0.19Ai/ha) September 2016 : Kenlon, Glyphosate, Cypermetrin, Multiphos 60 and wet and stick (0.11 Ai/Ha) 2 nd quarter of FY16/17 October 2016: Basta, Kenlon, Glyphosate, Cypermetrin, Multiphos 60 and impact 75 (0.11 Ai/Ha) November 2016: Basta, Glyphosate, Cypermetrin, wet and stick and impact 75 (0.23 Ai/Ha) December 2016: Basta, Kenlon, Cypermetrin, wet and stick and impact 75 (0.10 Ai/Ha)	Complied
4.6.3 Any use of pesticides shall be minimised as part of a plan, and in accordance with Integrated Pest Management (IPM) plans. There shall be no prophylactic use of pesticides, except in specific situations identified in national Best Practice guidelines. - Major compliance -	The quantity of agrochemicals required for various field conditions are documented and justified in Sime Darby Plantation Agriculture Reference Manual Section 16.5. The implementation in the field is consistent with the Agriculture Reference Manual Section 16.5	Complied
4.6.4 Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, are not used, except in specific situations identified in national Best Practice guidelines. The use of such pesticides shall be minimised and eliminated as part of a plan, and shall only be used in exceptional circumstances. - Minor compliance -	Based on chemical register dated 1/1/17 and on site visit at chemical store, there were no class 1A, 1B and paraquat used at SOU3 estates. At Kinta Kellas estate, alternative chemical for bagworm treatment was used namely Acephate (class III). As per Highly Toxic Pesticides Regulation 1996, permit to by the said chemical is required. Verified permit# PK/ACP(GL)/17/005 for 150 kg. Permit is valid until 5/3/17.	Complied
4.6.5 Pesticides shall only be handled, used or applied by persons who have completed the necessary training and shall always be applied in accordance with the product label. Appropriate safety and application equipment shall be provided and used. All precautions attached to the products shall be properly observed, applied, and understood by workers (see Criterion 4.7). - Major compliance -	Pesticide operators given training on the safe handling and application of the pesticides. Suitable personal protective equipments and application equipment provided to the operators. All precautions attached to the products explained to operators and understood by them. This was noted during the interview with workers	Complied

RSPO Public Summary Report
Revision 4 (November /2016)

Criterion / Indicator	Assessment Findings	Compliance
4.6.6	Storage of all pesticides shall be according to recognised best practices. All pesticide containers shall be properly disposed of and not used for other purposes (see Criterion 5.3). - Major compliance -	The operating units comply with Regulation 9 of the Pesticides Act 1974 requiring balance of remaining solution to be kept under lock and key. During visit it was noted that all the remaining pesticides are kept in the store and securely locked and comply with regulation.
4.6.7	Application of pesticides shall be by proven methods that minimise risk and impacts. - Minor compliance -	The quantity of agrochemicals required for various field conditions are documented and justified in Sime Darby Plantation Agriculture Reference Manual Section 16.5. The implementation in the field is consistent with the Agriculture Reference Manual Section 16.5
4.6.8	Pesticides shall be applied aerially only where there is documented justification. Communities shall be informed of impending aerial pesticide applications with all relevant information within reasonable time prior to application. - Major compliance -	No aerial spray at SOU3
4.6.9	Maintenance of employee and associated smallholder knowledge and skills on pesticide handling shall be demonstrated, including provision of appropriate information materials (see Criterion 4.8). - Minor compliance -	No associated smallholders at SOU3. Employees demonstrate knowledge and skills on pesticide handling. MSDS/SDS was displayed in local Bahasa Malaysia language at the agrochemical store for each chemical stored as well as the use of safety pictorial poster for the easy understanding of the agrochemical handlers
4.6.10	Proper disposal of waste material, according to procedures that are fully understood by workers and managers shall be demonstrated (see Criterion 5.3). - Minor compliance -	Disposal method of all identified waste was already included in the pollution prevention plan where the site visit confirmed that the practice of reduce, reuse and recycle of materials has been implemented throughout the company within mill and estates.
4.6.11	Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, shall be demonstrated. - Major compliance -	<p><u>Kinta Kellas Estate</u></p> <p>Medical surveillance was carried out by OHD, HQ/08/DOC/00/649 under Edina Clinic for total of 17 workers from different work units based on CHRA recommendation. Group of sprayers, trunk injector, sprayer, store keeper and foreman was sent for medical surveillance. Results found that there were no detrimental of health and fit to work.</p> <p><u>Elphil Estate</u></p> <p>Medical surveillance was carried out by OHD, HQ/11/DOC/00/200 under Tweedie Clinic for total of 29 workers from different work units based on CHRA recommendation. Group of sprayers, store keeper and foreman was sent for medical surveillance. Results found that there were no detrimental of health and fit to work.</p>

**RSPO Public Summary Report
Revision 4 (November /2016)**

Criterion / Indicator	Assessment Findings	Compliance	
4.6.12	<p>No work with pesticides shall be undertaken by pregnant or breast-feeding women.</p> <p>- Major compliance -</p>	<p><u>Kinta Kellas Estate</u></p> <p>Noted there were a few women working as sprayer Reproductive age – UPT (urine pregnancy test), randomly checked for the women sprayer.</p> <p><u>Elphil Estate</u></p> <p>Noted there were a few women working as sprayer. Verified that the sprayers were over the reproductive age.</p>	Complied
<p>Criterion 4.7: An occupational health and safety plan is documented, effectively communicated and implemented. The health and safety plan shall cover the following:</p>			
4.7.1	<p>A health and safety policy shall be in place. A health and safety plan covering all activities shall be documented and implemented, and its effectiveness monitored.</p> <p>- Major compliance -</p>	<p>SOU3 has maintained an approved Health and Safety Policy dated January 2015 that is displayed prominently on notice boards in English and local language Bahasa Malaysia. The Policy is implemented through the OSH activities by the on-site safety officers and monitored by OSH Manager from Head Office. Sample of Elphil Palm Oil Mill ESH programme for FY2016/2017:</p> <p>i) Medical surveillance – Tweedie Clinic, 29/8/16 (HQ/11/DOC/00/200. 4 from workshop, 3 from lab. All fit to work. Verified Operational Control Procedure, SD/SDP/PSQM(ESH)202-OH8, rev:0 dated 26/2/15 for the medical surveillance and related medical removal protection procedure. Noted that medical surveillance record was not available for contractor (Kejuruteraan Serting). The worker is workshop fitter and exposure to manganese fumes for welding works.</p> <p>ii) Audiometric testing – was last done by Procoma Environmental on 16/6/16 for 62 workers. 13 HI cases recorded with 5 STS cases which require retest. Retest was carried out on 18/8/16 at Tweedie Clinic, and results found that no permanent STS cases recorded for the said workers. Annual audiometric testing dated 16/6/17 did not included contractor's workers under (Kejuruteraan Serting) for baseline audiometric.</p> <p>iii) Contractor management</p> <ul style="list-style-type: none"> - PTW was not issued for the sub-contractor of Sime Darby Industrial (Tye Chong Engineering), only gate pass available dated 21/3/17 - Health declaration records was not available for the authorized entrant (AE) under Dynamecea based on PTW records dated 21/3/17 - Flashback arrestor was not installed/used by the contractor, Tye Chong Engineering. No proper check prior to entry for the contractor. <p>Based on the above non-compliance issues, a major NC was issued.</p>	Major nonconformance

**RSPO Public Summary Report
Revision 4 (November /2016)**

Criterion / Indicator	Assessment Findings	Compliance
<p>4.7.2</p> <p>All operations where health and safety is an issue shall be risk assessed, and procedures and actions shall be documented and implemented to address the identified issues. All precautions attached to products shall be properly observed and applied to the workers. - Major compliance -</p>	<p>SOU 3 had identified and reviewed significant hazards and risks and determined appropriate risk control measures. The hazard identification, risk assessment and risk control (HIRARC) records, as well as CHRA reports were verified during the assessment. Refer to revisited CHRA report for Elphil POM, (JKKP HIE 127/171-(2)124 dated August 2015.</p> <p>Observed a few contractors' activities during plant visit at boiler station and near to sludge recovery sump which involved excavation work. Further trailed the HIRARC register, it was found that the above activities were not identified.</p> <p>For Kinta Kellas Estate, CHRA report dated 9 September 2015 by JKKP HIE 127/171-2(124) has yet to include the new chemical used for trunk injection, namely Acephate under class III category. Assessment was done on 9/3/17 and pending for the report. Full report will be further verified in the next audit.</p> <p>Revised HIRARC were checked at the visited operating units:</p> <p><u>Kinta Kellas Estate</u></p> <p>HIRARC revised after accident occurrence. (unloading fertilizer from trailer to store) 13/2/17.</p> <p><u>Elphil Estate</u></p> <p>Revised after accident occurrence, (security) travelling in the field using motorcycle. Date of revision 4/1/17.</p> <p><u>Elphil POM</u></p> <p>Revised HIRARC after accident occurrence dated 14/6/16 with 79 days of LTI. The related corrective action and mitigation plan @ risk control was not clearly identified and implemented.</p> <p>A major non-compliance raised for the above identified issues.</p>	<p>Major nonconformance</p>
<p>4.7.3</p> <p>All workers involved in the operation shall be adequately trained in safe working practices (see Criterion 4.8). Adequate and appropriate protective equipment shall be 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. - Minor compliance -</p>	<p>Awareness and training programme had been carried out. All workers involved had been adequately trained in safe working practices. The objective was to ensure all workers involved have been adequately trained in understanding MSDS, safe working practices and the correct use of PPE.</p> <p>Noted that during site review, unsuitable PPE has been used by workers based on Sime Darby Plantation's Pictorial Safety Standard (PSS) 2008 at Kinta Kellas Estate. As per the PSS, 3M 3000 series respirator shall be used for manurer and chemical mixer/store keeper. Non approved respirator was used by the operator. Furthermore, observed during field visit, PPE was not appropriately worn by the manurer as well as the mill contractor Tye Ching Engineering. No hand glove worn by the workers while doing works. Thus, Minor NC was issued.</p>	<p>Minor nonconformance</p>

**RSPO Public Summary Report
Revision 4 (November /2016)**

Criterion / Indicator	Assessment Findings	Compliance
<p>4.7.4</p> <p>The responsible person/persons shall be identified. There shall be records of regular meetings between the responsible person/s and workers. Concerns of all parties about health, safety and welfare shall be discussed at these meetings, and any issues raised shall be recorded. - Major compliance -</p>	<p>Assistant manager and QA at each of the operating units are appointed as OSH Coordinators and Estate Hospital Assistant as Safety and Health Committee Secretary. OSH Committees meeting conducted quarterly and meeting minutes includes issues raised and action taken from workplace inspection report etc. The latest meeting was conducted on the 29/12/16 at Elphil Palm Oil Mill. All members has attended the meeting with discussion on the accident review, safety improvement plan, issues from workers has been discussed and action to be taken. There was no major issue.</p> <p><u>Elphil POM</u> Record of meeting 29/12/16, 30/9/16, 28/6/16, 28/3/16.</p> <p><u>Kinta Kellas Estate</u> SHC meeting – 3/3/16, 24/6/16, 27/9/16, 27/12/16</p> <p><u>Elphil Estate</u> PIC for OSH – HA and Estate assistant SHC meeting – 28/12/16, 27/9/16, 15/6/16, 3/3/16</p>	<p>Complied</p>
<p>4.7.5</p> <p>Accident and emergency procedures shall exist and instructions shall be clearly understood by all workers. Accident procedures shall be available in the appropriate language of the workforce. Assigned operatives trained in First Aid should be present in both field and other operations, and first aid equipment shall be available at worksites. Records of all accidents shall be kept and periodically reviewed. - Minor compliance -</p>	<p>Emergency Response Plan (ERP) has been established and defined in procedure, Level 2, Standard Operation Manual, Sub Section 5.5, Management Responsibility, Appendix 5.5.3.3 Emergency Preparedness and Response Procedure, version:1, issue :1 dated 1/11/2008. Emergency response activities were also included in the ESH plan FY 16/17. The following Emergency Response Plan were addressed: Fire Outbreak, Accident and incident occurrence, Oil Spillage and etc. Latest fire evacuation drill was done on 27/3/17 at Elphil Oil Mill.</p> <p>Records on all accidents kept and summary sent to Head Office. Quarterly review on accident cases carried out during OSH quarterly meeting. All operating units keeping all the JKKP 6 & 8 forms.</p> <p>Same recurrence of issues found at the visited operating units with regards to first aid kit. Expired item (flanil cream) found in the first aid box located at workshop and engine room. The item was expired on 23/8/16. Noted that some of the item was found missing/insufficient i.e hand plaster, eye ointment at workshop and engine room.</p> <p>The corrective action was not effective thus escalated to major NC as per RSPO certification system.</p>	<p>Major nonconformance</p>

**RSPO Public Summary Report
Revision 4 (November /2016)**

Criterion / Indicator	Assessment Findings	Compliance												
<p>4.7.6 All workers shall be provided with medical care, and covered by accident insurance. - Minor compliance -</p>	<p>Medical care is provided to all the employees. Local workers are covered under SOCSO scheme while foreign workers are covered under foreign workers compensation scheme. Sample of insurance policies checked:</p> <p><u>Elphil POM</u></p> <p>22 foreign workers. Sample policies:</p> <ul style="list-style-type: none"> i) FW184729, valid until 11/5/17 (2) ii) FW180502, valid until 25/9/17 (2) iii) FW185861, valid until 1/6/17 (2) iv) FW185863, valid until 18/4/17 <p>No record of accident insurance available for contractor's workers: passport# AA3658248, BC 0761054 and check-roll worker AS932163.</p> <p><u>Kinta Kellas Estate</u></p> <p>67 foreign workers. Sample of workers checked</p> <ul style="list-style-type: none"> i) H1413670, FW190214 valid until 4/7/17 ii) F6734521, FW 191462 valid until 4 /9/17 iii) J6844521, FW 191462 valid until 4/9/17 iv) O6249366, FW 199448 valid until 21/12/17 v) N8964724, FW 196022 valid until 30/10/17 vi) M7233582, FW197701 valid until 23/11/17 <p><u>Elphil Estate</u></p> <ul style="list-style-type: none"> i) AS703125, FW 184211 valid until 17/4/17 <p>Thus, a minor NC was issued.</p>	<p>Minor nonconformance</p>												
<p>4.7.7 Occupational injuries shall be recorded using Lost Time Accident (LTA) metrics - Minor compliance -</p>	<p>Records on Lost Time Accident (LTA) metrics displayed at the operating units through Safety Statistic Billboard and reported to PSQM-ESH department using new online system called SMS-IT. Sample of accident statistic as shown below:</p> <table border="1" data-bbox="660 1514 1300 1771"> <thead> <tr> <th>Year</th> <th>Elphil POM</th> <th>Kinta Kellas Estate</th> <th>Elphil Estate</th> </tr> </thead> <tbody> <tr> <td>2016</td> <td>1 case (79 LTA)</td> <td>4 cases (187 LTA)</td> <td>4 cases (41 LTA)</td> </tr> <tr> <td>2017 to date</td> <td>0 case</td> <td>2 cases, (1 LTA)</td> <td>1 case (18 LTA)</td> </tr> </tbody> </table> <p>*Summary of LTA is based on GSQM ESH Portal as at February 2017</p>	Year	Elphil POM	Kinta Kellas Estate	Elphil Estate	2016	1 case (79 LTA)	4 cases (187 LTA)	4 cases (41 LTA)	2017 to date	0 case	2 cases, (1 LTA)	1 case (18 LTA)	<p>Complied</p>
Year	Elphil POM	Kinta Kellas Estate	Elphil Estate											
2016	1 case (79 LTA)	4 cases (187 LTA)	4 cases (41 LTA)											
2017 to date	0 case	2 cases, (1 LTA)	1 case (18 LTA)											

Criterion 4.8:
All staff, workers, smallholders and contract workers are appropriately trained.

**RSPO Public Summary Report
Revision 4 (November /2016)**

Criterion / Indicator	Assessment Findings	Compliance
4.8.1 A formal training programme shall be in place that covers all aspects of the RSPO Principles and Criteria, and that includes regular assessments of training needs and documentation of the programme. - Major compliance -	A formal training programme on all aspects of RSPO Principles and Criteria has been established and implemented. Refer to training programme FY 16/17. Training for various categories of operators, including all field and office staff, with regards to individual duties and training needs had been reviewed and found to be in compliance.	Complied
4.8.2 Records of training for each employee shall be maintained. - Minor compliance -	<p>Records of training for employees available and maintained. Records verified on a sampling basis at the Mill and estates visited covers all aspect of training and RSPO P&C. Training need and plan for FY2015/2016 was verified as per Form RM-01/TNP – Estate/Mill Quality Management System Subsection 6.1 Appendix 6.2.2 Version 1, Year 2008 Issue 1 (2008). Training records checked :</p> <p><u>Elphil POM</u></p> <ul style="list-style-type: none"> i) Townhall safety – 11/1/16 ii) CBOC – 28/2/16 iii) LOTO procedure – 28/3/16 iv) SOP for KRP – 8/8/16 v) SOP for STR operation – 2/7/16 vi) ESH refresher (SMS IT, R&R, LTI reporting, SIME card reporting) <p><u>Kinta Kellas Estate</u></p> <ul style="list-style-type: none"> i) First Aid Training – 26/8/16. <p>Induction training for the new workers Foreign workers induction training – 13/3/17 by MPOA and MAPA. Verified training for the new manure (06249366, M7233582)</p> <p><u>Elphil Estate</u></p> <ul style="list-style-type: none"> i) First aid training – 22/3/17 ii) Fire Drill Training – 18/6/16 iii) Water Treatment Plant – 2/2/17 iv) Beneficial Plant Training – 2/2/17 v) Chemical Handling and P&D Spraying Training – 25/1/17 	Complied

Principle 5: Environmental responsibility and conservation of natural resources and biodiversity

Criterion 5.1:

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

**RSPO Public Summary Report
Revision 4 (November /2016)**

Criterion / Indicator	Assessment Findings	Compliance
<p>5.1.1</p> <p>An environmental impact assessment (EIA) shall be documented. - Major compliance -</p>	<p>POM and Estates carried out the annual review of environmental impacts documented in Registration of Environmental Aspects and Impacts. The last review was conducted in 14 January 2016 at POM,</p> <p>However, following activities' aspect and impacts has not been identified in the POM Registration of Environmental Aspects and Impacts:</p> <ul style="list-style-type: none"> a. Maintenance of furrow system b. Mini Lab at the ETP c. Composting plant d. Scrapyard in POM e. Pump House f. Construction of the buffer pond is not identified in the POM's Registration of Environmental Aspects and Impacts. <p>In Kinta Kellas estate, environmental aspect and impact identification form FY: 2016/17 (SM/5.2/EAI) which list down all the activities in the estates.</p>	<p>Major nonconformance</p>
<p>5.1.2</p> <p>Where the identification of impacts requires changes in current practices, in order to mitigate negative effects, a timetable for change shall be developed and implemented within a comprehensive management plan. The management plan shall identify the responsible person/persons. - Minor compliance -</p>	<p>In POM, Environment Management Programme for Financial Year 2016/2017:</p> <ul style="list-style-type: none"> a. To ensure boiler smoke comply with the stipulate limit of Ringlemann Chart No.2 940% obscuration on smoke density meter); Conducted by Procoma Laboratories (M) Sdn Bhd dated 20 December 2016 and 21 June 2016. b. Continuous monitor to achieve and maintain parameter at DOE Specification limit c. Mill will do watch list on daily basis, weekly or monthly if any water discharge from both farm. Snap photo and preparation report for DOE reference. 	<p>Complied</p>
<p>5.1.3</p> <p>This plan shall incorporate a monitoring protocol, adaptive to operational changes, which shall be implemented to monitor the effectiveness of the mitigation measures. The plan shall be reviewed as a minimum every two years to reflect the results of monitoring and where there are operational changes that may have positive and negative environmental impacts. - Minor compliance -</p>	<p>Monitoring plan was established based on DOE license compliance schedule which include scheduled waste storage and disposal record, POME final discharge BOD and boiler stack sampling.</p> <p>Pollution of Sg Kerdah and Sg Pellus coming from upstream of Swine Farm to downstream Sg Kerdah Point 1; no leakage occur at furrow system and Effluent Treatment Plant. Weekly monitoring has been documented as evidence. Latest date: 25 Feb 2017.</p>	<p>Complied</p>

Criterion 5.2:

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

**RSPO Public Summary Report
Revision 4 (November /2016)**

Criterion / Indicator	Assessment Findings	Compliance
5.2.1	Information shall be collated in a High Conservation Value (HCV) assessment that includes both the planted area itself and relevant wider landscape-level considerations (such as wildlife corridors). - Major compliance -	Complied
5.2.2	Where rare, threatened or endangered (RTE) species, or HCVs, are present or are affected by plantation or mill operations, appropriate measures that are expected to maintain and/or enhance them shall be implemented through a management plan. - Major compliance -	Complied
5.2.3	There shall be a programme to regularly educate the workforce about the status of these RTE species, and appropriate disciplinary measures shall be instigated in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect or kill these species. - Minor compliance -	Complied
5.2.4	Where a management plan has been created there shall be ongoing monitoring: • The status of HCV and RTE species that are affected by plantation or mill operations shall be documented and reported; • Outcomes of monitoring shall be fed back into the management plan. - Minor compliance -	Complied
5.2.5	Where HCV set-asides with existing rights of local communities have been identified, there shall be evidence of a negotiated agreement that optimally safeguards both the HCVs and these rights. - Minor compliance -	Complied
Criterion 5.3: Waste is reduced, recycled, re-used and disposed of in an environmentally and socially responsible manner.		

**RSPO Public Summary Report
Revision 4 (November /2016)**

Criterion / Indicator	Assessment Findings	Compliance
<p>5.3.1</p> <p>All waste products and sources of pollution shall be identified and documented. - Major compliance -</p>	<p>Visits made to Mill together with Kinta Kellas Estate and Elphil Estate showed that all waste products and sources of pollution were identified and documented. The documentation and identification of all the waste products such as scheduled waste, domestic waste, industrial waste. Updated on 04 Jan 2017</p> <p>Besides, notification of scheduled waste to Department of Environment has been implemented. The latest notification no: 2017011914AXFL4S sighted during onsite visit. All types of schedules waste balance and quantity generated are well recorded.</p>	<p>Complied</p>
<p>5.3.2</p> <p>All chemicals and their containers shall be disposed of responsibly. - Major compliance -</p>	<p>The disposal of used chemicals and containers were done in accordance with their schedule on waste management as planned. Stores for scheduled waste were inspected at audited sites i.e. Mill and disposal was done by scheduled waste disposal company authorized and licensed by Department of Environment. The mill and estates also have a proper Scheduled Waste Store for storing scheduled waste until time of disposal by DOE authorized waste disposal contractor.</p> <p>In POM, schedule waste dispose through licensed contractor: Kualiti Alam Sdn Bhd. Latest consignment note dated 17 Oct 2016 for SW 110 and SW 409 sighted during onsite visit.</p> <p>In Kinta Kellas, schedule waste such as empty containers, used lubricants and oil filter were found store more than 180 days based on inventory record. The schedule waste without proper labelling and segregation. No spill kit available at the store.</p>	<p>Major nonconformance</p>
<p>5.3.3</p> <p>A waste management and disposal plan to avoid or reduce pollution shall be documented and implemented. - Minor compliance -</p>	<p>In POM, waste management action plan 2016/2017 updated on 15 Jan 2017 incomplete without incorporating all the waste available in POM, for example: contaminated rags, paint container and etc.</p> <p>In Kinta Kellas, rubbish found scattered surrounding the line site although the rubbish bin has been provided to all the residents. Paint container which categorize as the schedule waste observed in the dump site.</p> <p>In Elphil estate; Kamiri Division; block 99F, chemical container observed in the dump site.</p> <p>For clinical waste, the consignment note record dated 18 October 2016 sighted during site visit.</p>	<p>Minor nonconformance</p>
<p>Criterion 5.4: Efficiency of fossil fuel use and the use of renewable energy is optimised.</p>		

**RSPO Public Summary Report
Revision 4 (November /2016)**

Criterion / Indicator	Assessment Findings	Compliance
<p>5.4.1</p> <p>A plan for improving efficiency of the use of fossil fuels and to optimise renewable energy shall be in place and monitored. - Minor compliance -</p>	<p>Monthly record on energy consumption for both renewable and non-renewable sources were kept and documented. It is monitored to optimise use of renewable energy. Data is being compiled for comparison and control for future improvement. Apart from use of grid supply (TNB) for electricity, palm fibre and shells were also used to generate electricity through steam turbine and boiler. The use of energy in palm oil mill and line site was monitored monthly to compare the energy usage against the production of CPO. Electricity generation was through steam turbine and boiler where Palm fibre and PK shells were used as renewable energy/fuel on a 70:30 ratio basis respectively.</p> <p>Monthly records of energy consumption of non-renewable and renewable fuel per metric tonne of palm product at the Mill were available. For example: Diesel consumption showing total average 6.25 FFB mt/liter and 2.35 CPO t/litre for month of April 2016 to march 2017 due to low FFB intake as the result low mill processing hours.</p> <p>At the estates, diesel consumption per metric ton FFB was also monitored on a monthly basis. It was verified that energy usage are being monitored at the operating units for better control and comparison of trends. Domestic electricity was supplied by TNB while diesel was used for vehicles and machineries.</p>	<p>Complied</p>
<p>Criterion 5.5: Use of fire for preparing land or replanting is avoided, except in specific situations as identified in the ASEAN guidelines or other regional best practice.</p>		
<p>5.5.1</p> <p>There shall be no land preparation by burning, other than in specific situations as identified in the 'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003, or comparable guidelines in other regions. - Major compliance -</p>	<p>Zero open burning policy as per SOP Section B2 - Felling/Land Clearing & Land Preparation dated November 2008. Management complying with the Malaysian environmental law –EQA and Regulations 1974.</p> <p>No open burning noted based on the records on the land clearing and felling for the replanting plot at Kinta Kellas estate.</p>	<p>Complied</p>
<p>5.5.2</p> <p>Where fire has been used for preparing land for replanting, there shall be evidence of prior approval of the controlled burning as specified in 'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003, or comparable guidelines in other regions. - Minor compliance -</p>	<p>The SOU3 operating unit had adhered to the zero burning policy for replanting at the estates. It was further confirm during visit to replanting plot at Kinta Kellas estate.</p> <p>There was no evidence of any burning of domestic waste at the housing line sites and at the domestic landfills of the estate during on site field assessment.</p>	<p>Complied</p>
<p>Criterion 5.6: Plans to reduce pollution and emissions, including greenhouse gases, are developed, implemented and monitored.</p>		

**RSPO Public Summary Report
Revision 4 (November /2016)**

Criterion / Indicator	Assessment Findings	Compliance
<p>5.6.1</p> <p>An assessment of all polluting activities shall be conducted, including gaseous emissions, particulate/soot emissions and effluent (see Criterion 4.4). - Major compliance -</p>	<p>Smoke emission was monitored using online system (CEMS-DIS) to DOE based on the transmitted data from boiler smoke density indicator and recorder. Emission result was found in compliance with the regulatory limit. To ensure boiler smoke comply with the stipulate limit of Ringlemann Chart No.2 940% obscuration on smoke density meter); Conducted by Procoma Laboratories (M) Sdn Bhd dated 20 December 2016 and 21 June 2016.</p> <p>Effluent Analysis conducted by Sime Darby Research and submitted to DOE every 3 months through OER (Online Environmental Report). Following report sighted:</p> <ul style="list-style-type: none"> c. Report dated 2016-10-14 (BOD: 13mg/L); 2016-11-12 (BOD: 14mg/L); 2016-12-28 (BOD: 18mg/L) d. Report dated 2016-07-13 (BOD: 15mg/L); 2016-08-09 (BOD: 12mg/L); 2016-09-07 (BOD: 5mg/L) 	<p>Complied</p>
<p>5.6.2</p> <p>Significant pollutants and greenhouse gas (GHG) emissions shall be identified, and plans to reduce or minimise them implemented. - Major compliance</p>	<p>For the estate, GHG emissions identified including CO_x, SO_x and NO_x from various sources including fossil fuel, chemical, peat oxidation, sinks, crop sequestration, fertilizer consumptions and sequestration in conservation area.</p> <p>For mill, GHG emission identified from POME, fuel consumption and grid electricity utilization. 5 years plan for GHG reduction (phase I, 20 mills (Malaysia) was sighted. Programme such as feed in tariff (FIT), flaring, CNG, CaP, Co-gen was included in the plan.</p>	<p>Complied</p>
<p>5.6.3</p> <p>A monitoring system shall be in place, with regular reporting on progress for these significant pollutants and emissions from estate and mill operations, using appropriate tools. - Minor compliance -</p>	<p>Monitoring and reporting of the significant pollutants to water, gaseous emissions to air and contamination on land are in place. Tools and systems used include the DOE online CEMS monitoring for air emissions, water quality at discharge points as per DID regulations and SW disposal were adhering to DOE requirements. Water samples were regularly taken every month and tested by mill environment officer in charge and analysed to ensure compliance to DOE requirements at final discharge points. The water samples were sent to Sime Darby R&D Laboratory for analysis. Records are maintained and verified on-site to have met the permissible regulatory limits. Quarterly reporting to DOE was also done and record documented.</p> <p>Monitoring of the GHG quantity was done through RSPO PalmGHG Calculator Version 3.0.1 is used and the management opted for full version was applied. The report prepared on 22 Jan 2017.</p> <p>These GHG calculations were done as per certification unit basics including 5 estate and mill. Summary emissions:</p> <ul style="list-style-type: none"> a. Emission/ mt CPO= 0.66 tCO₂ e/mt CPO b. Emission/ mt PK= 0.66 tCO₂ e/mt PK <p>Details of GHG calculation can be found under Appendix K: GHG Reporting Executive Summary.</p>	<p>Complied</p>

RSPO Public Summary Report
Revision 4 (November /2016)

Criterion / Indicator	Assessment Findings	Compliance	
<p>Principle 6: Responsible consideration of employees and of individuals and communities affected by growers and millers.</p>			
<p>Criterion 6.1: Aspects of plantation and mill management that have social impacts, including replanting, are identified in a participatory way, and plans to mitigate the negative impacts and promote the positive ones are made, implemented and monitored, to demonstrate continual improvement.</p>			
<p>6.1.1</p>	<p>A social impact assessment (SIA) including records of meetings shall be documented. - Major compliance -</p>	<p>SIA was conducted on 24-27 August 2015 conducted by Social & Environment Projects Unit, PSQM Department. The assessment was covered whole SOU 3 Elphil which consists of Elphil POM, Elphil Estate, Kamuning Estate and Kinta Kellas Estate. The methods of the assessment was through interview with the relevant stakeholders such as workers' representatives, community leaders, government authorities, contractors and etc, site observations and documentation review. Attendance list of the involved stakeholders such as representative from police department, school, local community, government clinic, workers and etc was sighted.</p>	<p>Complied</p>
<p>6.1.2</p>	<p>There shall be evidence that the assessment has been done with the participation of affected parties. - Major compliance -</p>	<p>The assessment was involved the relevant stakeholders such as school representative, local community leaders, government authorities, internal workers and contractors. The attendance list was sighted.</p>	<p>Complied</p>
<p>6.1.3</p>	<p>Plans for avoidance or mitigation of negative impacts and promotion of the positive ones, and monitoring of impacts identified, shall be developed in consultation with the affected parties, documented and timetabled, including responsibilities for implementation. - Major compliance -</p>	<p>The management has developed a management plan for the issues raised during the Social Impact Assessment. The management plan has incorporate the area of concerns, action to be taken, status of the issue, person in charge with the completion date. Evidences of action taken were verified and recorded. Some of the area of concern in Kinta Kellas Estate were still under progress such as installation of water pump to rectify the water rationing problem. The plan has incorporated the input from stakeholder meeting conducted on 3/2/2017.</p>	<p>Complied</p>
<p>6.1.4</p>	<p>The plans shall be reviewed as a minimum once every two years and updated as necessary, in those cases where the review has concluded that changes should be made to current practices. There shall be evidence that the review includes the participation of affected parties. - Minor compliance -</p>	<p>The management plan was reviewed on yearly basis where the last review was conducted on 7/7/2016 by Quality Assurance Supervisor in the mill, March 2017 and February 2017 for both estates respectively.</p>	<p>Complied</p>
<p>6.1.5</p>	<p>Particular attention shall be paid to the impacts of smallholder schemes (where the plantation includes such a scheme). - Minor compliance -</p>	<p>No smallholder schemes were involved in the operating units.</p>	<p>Not applicable</p>
<p>Criterion 6.2: There are open and transparent methods for communication and consultation between growers and/or millers, local communities and other affected or interested parties.</p>			

**RSPO Public Summary Report
Revision 4 (November /2016)**

Criterion / Indicator	Assessment Findings	Compliance
6.2.1 Consultation and communication procedures shall be documented. - Major compliance -	Sime Darby Plantation Sdn Bhd has developed Sime Darby Plantation Mill Quality Management System, under Level 1 Quality Management Manual (QMM), Section 5 Management Responsibility, and Issue No.3, dated 30/10/2009, point 5.5.3 Communication. The communication procedure was involved internal communication and external communication. Procedure for External Communication was available with the set time frame of 2 weeks of the date of receipt for communication requiring direct feedback and one week to complete the investigation.	Complied
6.2.2 A management official responsible for these issues shall be nominated. - Minor compliance -	Quality Assurance Supervisor from the mill and Assistant Manager from estates has appointed to be the officer to handle any social issues. Appointment letter dated 10/3/2017 and 1/2/2017 was sighted appointed by the Manager.	Complied
6.2.3 A list of stakeholders, records of all communication, including confirmation of receipt and that efforts are made to ensure understanding by affected parties, and records of actions taken in response to input from stakeholders, shall be maintained. - Minor compliance -	<p>Stakeholder list was developed and has included relevant stakeholders such as government authorities, local communities, contractors and suppliers and etc in the mill and estates.</p> <p>Stakeholder meeting was conducted on yearly basis and the last meeting was conducted on 3/2/2017 which combined Elphil Mill and Elphil Estate. The meeting has involved government authorities, school, contractors and etc. Meeting minutes and attendance list was recorded. No issue has been raised during the meeting.</p> <p>In Kinta Kellas Estate, meeting with cattle owners was conducted on 11/1/2017 to shift their cattle out from the estate. Meeting minutes was sighted. Meeting with squatters on 8/4/2016 to discuss issue on the resurvey and encroachment of land on the estate's land. The survey was received recently and still under progress.</p>	Complied
Criterion 6.3: There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all effected parties.		
6.3.1 The system, open to all affected parties, shall resolve disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants and whistleblowers, where requested. - Major compliance -	<p>Sime Darby Plantation Sdn Bhd has developed a Flowchart and Procedure on Handling Social Issues, Issue No. 1 dated 1/11/2008. The procedure has detailing the process of handling social issues raised by the stakeholders and resolve in an effective, timely and appropriate manner.</p> <p>Through interview with the workers found that the awareness of understanding on the complaint procedure is not sufficient. For example, in Kinta Kellas Estate, House No. 43/79 complained that his water tank leakage and he has informed Medical Assistant on this issue 15 days ago. However, no action has been taken. Besides, during site visit to the linesite found that House No. B7 and B8's toilet door was found broken. The owner told that this happened since they moved into the new housing. She has complained on this matter but unfortunately no action was taken to repair the door. Document reviewed on the complaint book and housing repair book was not found any complaints related to the above issues lodged into the book. Therefore, the complaint system was not effective implemented.</p>	Major nonconformance

**RSPO Public Summary Report
Revision 4 (November /2016)**

Criterion / Indicator	Assessment Findings	Compliance	
6.3.2	Documentation of both the process by which a dispute was resolved and the outcome shall be available. - Major compliance –	Sime Darby Plantation Sdn Bhd has developed a Flowchart and Procedure on Handling Social Issues, Issue No. 1 dated 1/11/2008. Any complaints or grievances will be recorded in Internal & External Complaint Book and Gender Complaint Book. To-date, no complaint has been recorded. Complaint related to housing will be recorded in the Repair & Jobs Requisition Bungalows and Linesite Book. Most of the complaints were related to housing repair.	Complied
Criterion 6.4: Any negotiations concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.			
6.4.1	A procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, shall be in place. - Major compliance -	Sime Darby Plantation Sdn. Bhd. has developed a procedure and flowchart for handling boundaries disputes dated 1/11/2008. The purpose of the procedure is to explain and identify the customary land or any social land dispute reported by the people. Negotiation process was involved and compensation is required to the local communities for the loss of land rights. The Land Management Department was the one who determine the calculation and distribution of compensation to the affected parties.	Complied
6.4.2	A procedure for calculating and distributing fair compensation (monetary or otherwise) shall be established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. This procedure shall take into account: gender differences in the power to claim rights, ownership and access to land; differences of transmigrants and long-established communities; and differences in ethnic groups' proof of legal versus communal ownership of land. - Minor compliance -	As per the above criteria 6.4.1.	Complied
6.4.3	The process and outcome of any negotiated agreements and compensation claims shall be documented, with evidence of the participation of affected parties, and made publicly available. - Major compliance -	No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders to date.	Complied
Criterion 6.5: Pay and conditions for employees and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages.			

**RSPO Public Summary Report
Revision 4 (November /2016)**

Criterion / Indicator	Assessment Findings	Compliance
<p>6.5.1</p> <p>Documentation of pay and conditions shall be available. - Major compliance -</p>	<p>The mill and estates consist of local workers, foreign workers and contractor’s workers. The management has included basic pay, net pay, gross pay, deduction of salary, phone allowance, holiday pay and etc on the pay slip. Payslip for workers have been sampled as below:</p> <ul style="list-style-type: none"> a) Employee No.: 63933 (EPOM) (Dec’16 – Feb’17) b) Employee No.: 119973 (EPOM) (Dec’16 – Feb’17) c) Employee No.: 125373 (EPOM) (Dec’16 – Feb’17) d) Employee No.: 95807 (EPOM) (Dec’16 – Feb’17) e) Passport No.: AA 3658248 (Contractor’s Worker in EPOM) (Dec’16 – Feb’17) f) Passport No.: BB 5625985 (Contractor’s Worker in EPOM) (Dec’16 – Feb’17) g) Employee No.: 53177 (KKE) (Dec’16 – Feb’17) h) Employee No.: 57392 (KKE) (Dec’16 – Feb’17) i) Employee No.: 110267 (KKE) (Dec’16 – Feb’17) j) Employee No.: 74617 (KKE) (Dec’16 – Feb’17) k) Employee No.: 22535 (KKE) (Dec’16 – Feb’17) l) Employee No.: 24708 (EE) (Mar’16, July’16 and Feb’18) m) Employee No.: 98763 (EE) (Mar’16, July’16 and Feb’18) n) Employee No.: 126087 (EE) (Feb’16) o) Employee No.: 129171 (EE) (Feb’16) <p>All the sampled workers below were achieved Minimum Wage Order.</p> <p><u>Composting Plant Contractor:</u></p> <p>They have total 11 local workers and 4 foreign workers. Workers’ payment vouchers were sampled as below:</p> <ul style="list-style-type: none"> a) Passport No.: BE 0559954 b) Passport No.: BC 0191279 c) Passport No.: BB 0616152 d) Passport No.: F0541389 	<p>Complied</p>

**RSP0 Public Summary Report
Revision 4 (November /2016)**

<p>6.5.2</p>	<p>Labour laws, union agreements or direct contracts of employment detailing payments and conditions of employment (e.g. working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc.) shall be available in the languages understood by the workers or explained carefully to them by a management official. - Major compliance -</p>	<p>Employment contract are available in language that understood by workers. The contract has detailing the payments and employment conditions such as period of working, working hour, medical assistance, transportation provided, holiday and annual leave, termination of services and etc. The contract was signed by the workers and sampled contracts as below:</p> <p><u>Elphil POM:</u></p> <ul style="list-style-type: none"> a. Employee No.: 115547 b. Employee No.: 120915 c. Employee No.: 125371 d. Employee No.: 125373 <p><u>Contractors in EPOM:</u></p> <ul style="list-style-type: none"> a. Passport No.: BB5625985 b. Passport No.: AA3658248 <p>Both the workers were signed on contract of employment on 21/11/2015 where the contract has stated the pay and condition, working days, working hours and public holiday entitlement.</p> <p><u>Kinta Kellas Estate:</u></p> <ul style="list-style-type: none"> a. Employee No.: 53177 b. Employee No.: 129835 c. Employee No.: 116762 d. Employee No.: 116765 <p><u>Elphil Estate:</u></p> <ul style="list-style-type: none"> a. Employee No.: 98763 b. Employee No.: 110398 c. Employee No.: 126087 d. Employee No.: 129171 <p>Extension contracts were signed by the workers who have worked more than 3 years. Sampled workers as below:</p> <ul style="list-style-type: none"> a. Employee No.: 66677 (EPOM) b. Employee No.: 66682 (EPOM) c. Employee No.: 73049 (KKE) d. Employee No.: 88012 (KKE) e. Employee No.: 24708 (EE) f. Employee No.: 85012 (EE) <p><u>Composting Plant Contractor:</u> Contract of employment for the total 4 foreign workers were not available.</p> <p>In the mill, deduction of salary was made towards the workers for temple/mosque fund, electricity bill, advance, NUPW subscription fee and etc. The workers have signed consent form to authorize management to deduct RM 5 for the mosque fund and RM 10 for temple fund. Sampled consent letters were sighted.</p> <p>According to MAPA/NUPW Circular No. 22/2015 dated 4/8/2015, the employer required to fully subsidize RM 3.00 per month for each of the members of NUPW as premium</p>	<p>Major nonconformance</p>
--------------	--	---	-----------------------------

**RSPO Public Summary Report
Revision 4 (November /2016)**

Criterion / Indicator	Assessment Findings	Compliance
	<p>towards NUPW/AIA Personal Accident Group RM 10.00 for Great Eastern insurance. However, the management has yet to subsidize and deducted RM 11.00 and RM 20.00 from sampled workers below:</p> <ul style="list-style-type: none"> a. Employee No.: 49835 (EPOM) – only AIA Insurance b. Employee No.: 119973 (EPOM) – both AIA & GE c. Employee No.: 114387 (EPOM) – both AIA & GE d. Employee No.: 123480 (EPOM) – both AIA & GE e. Employee No.: 72004 (EPOM) – both AIA & GE f. Employee No.: 123747 (EPOM) – both AIA & GE <p>Total 11 workers are Union members and 6 of them were found not complying the agreement.</p> <p>Besides, if the workers who work on task basics unable to complete their task, it has to continue eventhough is the rest day such as Sunday. For workers who request to work on rest day, the wages will remain the same as normal day rate unless the work instructed by the company.</p>	
6.5.3	<p>Growers and millers shall provide adequate housing, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. - Minor compliance –</p>	Complied
6.5.4	<p>Growers and millers shall make demonstrable efforts to monitor and improve workers’ access to adequate, sufficient and affordable food. - Minor compliance –</p>	Complied
<p>Criterion 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.</p>		
6.6.1	<p>A published statement in local languages recognising freedom of association shall be available. - Major compliance -</p>	Complied
6.6.2	<p>Minutes of meetings with main trade unions or workers representatives shall be documented. - Minor compliance -</p>	Complied
<p>Criterion 6.7: Children are not employed or exploited.</p>		

**RSPO Public Summary Report
Revision 4 (November /2016)**

Criterion / Indicator		Assessment Findings	Compliance
6.7.1	There shall be documentary evidence that minimum age requirements are met. - Major compliance -	The company has developed Child Protection policy, Social & Humanity Management policy and Social policy dated January 2015 which they are committed not to employ children who are underage. Operating units are complied with the minimum age requirement. No employees below the age of 18 were sighted through the master list of active employee list. The youngest employee was 20 year old.	Complied
Criterion 6.8: Any form of discrimination based on race, caste, national origin, religion, disability, gender, sexual orientation, union membership, political affiliation, or age, is prohibited.			
6.8.1	A publicly available equal opportunities policy including identification of relevant/affected groups in the local environment shall be documented. - Major compliance -	SDPSB has implemented Social Policy, Social & Humanity Management Policy dated January 2015 where the management is committed to treat all employees fairly in terms of recruitment, progression, terms and conditions of work and representation regardless of race, caste, nationality, gender, sexual orientation, union membership, political view, religion and/or age.	Complied
6.8.2	Evidence shall be provided that employees and groups including local communities, women, and migrant workers have not been discriminated against. - Major compliance -	Through document reviewed on the list of employees found that the composition of workers are local and foreign workers, male and female workers. No discrimination was sighted based on interview with the workers. The management treated all the workers fairly and equally without discrimination. It was also further verified through interviewed the workers and no complaints regarding the Muslim stop work at 12 on Friday but other work till 2pm.	Complied
6.8.3	It shall be demonstrated that recruitment selection, hiring and promotion are based on skills, capabilities, qualities, and medical fitness necessary for the jobs available. - Minor compliance -	Workforce Management Unit has developed a procedure on recruitment drive & interview/ Selection of Foreign Workers dated 30/3/2016 with Doc. No. WMU/LR-SOPP/MARCH2016. The procedure has detailing the process of recruitment from the original country up to Malaysia. The recruitment was based on the criteria and requirement set by the company such as capabilities, medical fitness and etc.	Complied
Criterion 6.9: There is no harassment or abuse in the work place, and reproductive rights are protected.			
6.9.1	Policy to prevent sexual and all other forms of harassment and violence shall be implemented and communicated to all levels of the workforce. - Major compliance -	SDPSB has implemented Social Policy, Gender Policy and Social & Humanity Management Policy dated January 2015. The management is committed to prevent any form of sexual harassment and violence occurred in the workplace. The policy was communicated to employees during morning muster and refresher training was conducted on 6-7/3/2017. The policy was displayed outside the mill office.	Complied
6.9.2	A policy to protect the reproductive rights of all, especially of women, shall be implemented and communicated to all levels of the workforce. - Major compliance -	SDPSB has implemented Social Policy and Social & Humanity Management Policy dated January 2015. The management is respected and protected the reproductive rights of the female employee. The policy was communicated to employees during morning muster and refresher training was conducted on 6-7/3/2017. The policy was displayed outside the mill office.	Complied

**RSPO Public Summary Report
Revision 4 (November /2016)**

Criterion / Indicator	Assessment Findings	Compliance	
6.9.3	A specific grievance mechanism which respects anonymity and protects complainants where requested shall be established, implemented, and communicated to all levels of the workforce. - Minor compliance -	SDPSB has implemented Gender Committee Handbook, First Edition 2014 which developed by Plantation Sustainability & Quality Management (PSQM) Department. The handbook has explained the types of Gender-based violence & grievance procedures. Organization Chart and appointment letter for Gender Committee in mill and estates was available. According to the handbook, the meeting shall be conducted quarterly (every 3 months once). However, the meeting was conducted half yearly on 21/6/2016 and 25/1/2017 in Elphil POM and 21/6/2016 and 24/1/2017 in Elphil Estate. In Kinta Kellas Estate, meeting was conducted on 15/3/2017, 12/11/2016, 15/8/2016 and 15/5/2016. No sexual harassment or violence case has reported. The issues raised in the meeting was incorporated into the management plan with the set time frame for action to be taken.	Minor nonconformance
Criterion 6.10: Growers and mills deal fairly and transparently with smallholders and other local businesses.			
6.10.1	Current and past prices paid for Fresh Fruit Bunches (FFB) shall be publicly available. - Minor compliance -	Current and past prices paid for Fresh Fruit Bunches (FFB) has been displayed at the mill weighbridge counter. Pricing was according to the MPOB pricing.	Complied
6.10.2	Evidence shall be available that growers/millers have explained FFB pricing, and pricing mechanisms for FFB and inputs/services shall be documented (where these are under the control of the mill or plantation). - Major compliance -	Elphil mill have only purchased outside FFB from traders. Interview with the traders have confirmed that they have been briefed on the FFB pricing mechanisms.	Complied
6.10.3	Evidence shall be available that all parties understand the contractual agreements they enter into, and that contracts are fair, legal and transparent. - Minor compliance -	Contractor's contract agreement was signed by the contractors before the commencement of work. Sampled contract as below: <ul style="list-style-type: none"> a. Company No.: IP0168972-D for rubbish collection at mill which valid until 31/3/2017. (EPOM) b. Contract No.: T/SDPSB/PEN/FFB/0815/007 for FFB transporting work which valid for 2 years from 1/9/2016. (KKE) c. Replanting work contract agreement effective from date of 20/9/2016 until the work has been completed. (KKE) d. Company No.: IP0194496-W for backhoe, cambering, hired tractor and resurfacing with literate effective on 1/5/2015 and valid for one year. (EE) e. Land preparation letter of offer and acceptance was effective from 1/7/2015 – 30/6/2016. (EE) However, the agreement with FFB Trader in EPOM was found expired as below: <ul style="list-style-type: none"> a. Contract No.: P/P/0415/FFB00645L expired on 31/3/2016 	Minor nonconformance

RSPO Public Summary Report
Revision 4 (November /2016)

Criterion / Indicator		Assessment Findings	Compliance
6.10.4	Agreed payments shall be made in a timely manner. - Minor compliance -	Interview with the contractor confirmed that the payment was made promptly. No any issue on the delaying payment	Complied
Criterion 6.11: Growers and millers contribute to local sustainable development where appropriate.			
6.11.1	Contributions to local development that are based on the results of consultation with local communities shall be demonstrated. - Minor compliance –	The mill and the estate has contributed to local development through donations to local schools, provided employment opportunities to local communities, school transport allowances, gas reimbursement, transport to send Muslim workers for Friday Pray, Gotong-Royong activity in District Police Station and etc.	Complied
6.11.2	Where there are scheme smallholders, there shall be evidence that efforts and/or resources have been allocated to improve smallholder productivity. - Minor compliance –	No scheme smallholders involved in the operating unit.	Not applicable
Criterion 6.12: No forms of forced or trafficked labour are used.			
6.12.1	There shall be evidence that no forms of forced or trafficked labour are used. - Major compliance -	<p>Employees recruited by the management are with the legal identification for local and valid passport and work permit for foreign workers. The workers were signed on the contract of employment prior commencement of work. They were provided with induction training in Sua Betong Estate before being assigned to each estate. Sampled workers with valid work permit as below:</p> <ul style="list-style-type: none"> a. Permit No.: PD 7534140 valid until 22/4/2018 (EPOM) b. Permit No.: PD 5495609 valid until 29/8/2017 (EPOM) c. Permit No.: PD 5495612 valid until 29/8/2017 (EPOM) d. Permit No.: PD 5778089 valid until 8/7/2017 (EPOM) e. Passport No.: AA 3658248 valid until 11/4/2017 (Contractor’s worker EPOM) f. Permit No.: PD 6087938 valid until 2/10/2017 (KKE) g. Permit No.: PD 7317437 valid until 21/12/2017 (KKE) h. Permit No.: PD 6941359 valid until 1/9/2017 (KKE) i. Permit No.: PD 6534352 valid until 3/11/2017 (EE) j. Permit No.: PD 6534352 valid until 3/11/2017 (EE) k. Permit No.: PD 6534352 valid until 3/11/2017 (EE) l. Permit No.: PD 6534352 valid until 3/11/2017 (EE) <p>The workers have signed on a voluntarily surrender of passport for safe-keeping by the management. Consent letters were sampled as below:</p> <ul style="list-style-type: none"> a. Employee No: 95807 signed on 9/10/2013 b. Employee No.: 120915 signed on 29/4/2016 c. Employee No.: 125371 signed on 30/8/2016 d. Employee No.: 125373 signed on 30/8/2016 	Complied

**RSPO Public Summary Report
Revision 4 (November /2016)**

Criterion / Indicator		Assessment Findings	Compliance
6.12.2	Where applicable, it shall be demonstrated that no contract substitution has occurred. - Minor compliance –	Interviewed with the foreign workers found that no substitution of contract occurred. It was confirmed that the company has send their sub-agent for socialization process at Bangla. The company will conduct interview for recruitment if the workers agree on the condition. It was verified only one signed contract is available due to Government to Government memorandum in hiring the Bangladeshi worker. Besides, the explanation of the contract terms and contract provided during induction training. Attendance and acknowledgement of the contract sighted during site visit.	Complied
6.12.3	Where temporary or migrant workers are employed, a special labour policy and procedures shall be established and implemented. - Major compliance -	SDPSB has implemented a Sime Darby's Responsible Agriculture Charter on 21/9/2016 where they covered Human Rights and Social Development in order to respect human right and empowering communities, protect labour standard and enhance employment condition that eliminating all forms of bonded and forced labour including charging of recruitment fees for the purpose of restriction free movement. Besides, they are also implemented Social policy and Social & Humanity Management policy where they are committed not to practice force labour.	Complied
Criterion 6.13: Growers and millers respect human rights.			
6.13.1	A policy to respect human rights shall be documented and communicated to all levels of the workforce and operations (see Criteria 1.2 and 2.1). - Major compliance -	The Social and Humanity management policy was implemented dated January 2015 and it covers the necessary aspects of human rights. Employees are aware of their rights. The policy was communicated to employees during morning muster and refresher training was conducted on 6-7/3/2017. The policy was displayed outside the mill and estate office.	Complied
6.13.2	As long as children of foreign workers in Sabah and Sarawak are ineligible to attend government school, the plantation companies should engage in a process to secure these children access to education as a moral obligation.	Not applicable for Peninsular Malaysia.	Not applicable
Principle 7: Responsible development of new plantings Elphil Palm Oil Mill and supply base did not carry out any new plantings after November 2005. Therefore, the requirement of Principle 7 is not applicable during the annual surveillance. It was verified through the land statement, land title and planting history.			
Principle 8: Commitment to continual improvement in key areas of activity			
Criterion 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.			

**RSPO Public Summary Report
Revision 4 (November /2016)**

Criterion / Indicator	Assessment Findings	Compliance
<p>8.1.1</p> <p>The action plan for continual improvement shall be implemented, based on a consideration of the main social and environmental impacts and opportunities of the grower/mill, and shall include a range of Indicators covered by these Principles and Criteria.</p> <p>As a minimum, these shall include, but are not necessarily be limited to:</p> <ul style="list-style-type: none"> • Reduction in use of pesticides(Criterion 4.6); • Environmental impacts (Criteria 4.3, 5.1 and 5.2); • Waste reduction (Criterion 5.3); • Pollution and greenhouse gas (GHG) emissions (Criteria 5.6 and 7.8); • Social impacts (Criterion 6.1); <ul style="list-style-type: none"> • Optimising the yield of the supply base. <p>- Major compliance -</p>	<p>All Sime Darby Plantation estates are no longer using paraquat. This is one of the major commitment by the operating unit to stop using paraquat. For bagworm control, alternative such as Acephate was introduced which less hazardous compared to class 1A, methamidophos.</p> <p>Environmental impacts of the operations were identified. Environmental Impact Management details the impact mitigation measures and actions required to improve environmental performance for the identified significant impacts.</p> <p>At Effluent Treatment Pond, an automatic reading device of BOD were installed under experimental stage to enable the reading can complete onsite and accurate. The data can transmit to the R&D centre which is located at Carey Island.</p> <p>There are few ongoing Kaizen project in Kinta Kellas estate. For example:</p> <ol style="list-style-type: none"> a. To reduce the searching time for Black Bunch Census (BBC) palms b. To reduce the time for searching documents in office c. To reduce the inspection time for Pest and Disease Spraying d. To reduce the time for searching bag for collecting loose fruit 	<p>Complied</p>

Appendix B: Approved Time Bound Plan

SDP- RSPO Certification Status for Malaysia Operations

SOU NO	Name of SOU	Location	Date of Certification	End Date of Certification	Certificate Number	Remarks
1	Sg. Dingin	Karangan, Kedah	12 Aug '10	11-Aug-20	RSPO 550179	N.A
2	Chersonese	Kuala Kurau, Perak	5 Oct '11	4-Oct-21	CU-RSPO-815148, RSPO 590800	N.A
3	Elphil	Sg Siput, Perak	18 Jun '11	17-Jun-21	RSPO 550180	N.A
4	Flemington	Teluk Intan, Perak	5 Oct '11	4-Oct-21	CU-RSPO-819144, RSPO 590802	N.A
5	Seri Intan	Teluk Intan, Perak	3 Mar '11	2-Mar-21	CU-RSPO-811218, RSPO 0015	N.A
5	Selaba	Teluk Intan, Perak	3 Mar '11	2-Mar-21	CU-RSPO-819142, RSPO 0016	N.A
5a	Sg Samak		3 Mar '11	NA	NA	N.A
6	Tennamaram	Bestari Jaya, Selangor	3 Mar '11	2-Mar-21	CU-RSPO-819143, RSPO 0014	N.A
7	Bkt Kerayong	Kapar, Selangor	15 Apr '11	14-Apr-21	RSPO 550181	N.A
8	East	Carey Island, Selangor	19 May '10	18-May-20	RSPO 543543	N.A
9	West	Carey Island, Selangor	19 May '10	18-May-20	RSPO 543594	N.A

**RSPO Public Summary Report
Revision 4 (November /2016)**

9a	Selangor	Selangor, Selangor	19 May '10	NA	NA	N.A
10	Bukit Puteri	Raub, Pahang	7 Jul '16	6-Jul-21	CU-RSPO-815147, 18502206 001, 824 502 14020	N.A
11	Kerdau	Temerloh, Pahang	7 Jul '16	6-Jul-21	CU-RSPO-819155, 18502207 001, 824 502 14019	N.A
12	Jabor	Kuantan, Pahang	7 Jul '16	6-Jul-21	CU-RSPO-819156, RSPO 928288, 824 502 16049	N.A
13	Labu	Nilai, Negeri Sembilan	30 Dec '11	29-Dec-16	CU-RSPO-819163, SGS-RSPO/PM/MY13/01284, 824 502 16039	Recertification of Labu POM is in progress. PalmTrace License is valid till end of March 2017 in the PalmTrace system.
14	Tanah Merah	Port Dickson, Negeri Sembilan	19 May '10	18-May-20	RSPO 541905	
15	Sua Betong	Port Dickson, Negeri Sembilan	18/2/2014	17-Feb-19	SGS-RSPOPM-MY14/01364, 824 502 16032	Sua Betong Oil Mill has been commissioned to replace Rantau Oil Mill with Certificate No: CU- RSPO-819165, certification date: 30 Dec 2011.
16	Kok Foh	Bahau, Negeri Sembilan	7 Jul '16	6-Jul-21	CU-RSPO-819157, RSPO 928188, 824 502 16051	N.A
17	Kempas	Jasin, Melaka	19 May '10	18-May-20	RSPO 005	N.A
18	Diamond Jubilee	Jasin, Melaka	5 Oct '11	4-Oct-21	CU-RSPO-819146, RSPO 591224	N.A
19	Pagoh	Muar, Johor	28/1/2014	27-Jan-19	RSPO 600305	Pagoh Oil Mill has been commissioned to replace Nordanal Oil Mill with Certificate No: SPO 549297, certification date: 7 Jan 2011.
19a	Yong Peng	Yong Peng, Johor	20 Oct '10	19-Oct-15	RSPO 550182	N.A
20	Chaah	Chaah, Johor	18 Nov '10	17-Nov-20	RSPO 548299	N.A
21	Gunung Mas	Kluang, Johor	19 May '10	18-May-20	RSPO 901888	N.A
22	Bukit Benut	Kluang, Johor	5 Oct '11	4-Oct-21	CU-RSPO-819147, RSPO 591229	N.A

**RSPO Public Summary Report
Revision 4 (November /2016)**

23	Ulu Remis	Layang-layang, Johor	11 Apr '16	10-Apr-21	SGS-RSPO/PM-00722, 824 502 16042	N.A
24	Hadapan	Layang-layang, Johor	29 Mar '11	28-Mar-21	SGS-RSPO/PM-00715, 824 502 16040	N.A
25	Segaliud	Sandakan, Sabah	20 May '10	19-May-15	RSPO 547123	N.A
26	Sandakan Bay	Sandakan, Sabah	1 Oct '08	30-Sep-18	RSPO 537872	N.A
27	Melalap	Tenom, Sabah	21 Jan '11	20-Jan-21	RSPO 547124	N.A
28	Binuang	Kunak, Sabah	16 Jan '09	12-Jul-20	RSPO 001	N.A
29	Giram	Kunak Sabah	16 Jan '09	12-Jul-20	RSPO 002	
30	Merotai	Tawau, Sabah	16 Jan '09	12-Jul-20	RSPO 004	
30a	Jeleta Bumi	Kunak, Sabah	24/5/2010	NA	NA	N.A
30b	Mostyn	Kunak Sabah	16 Jan '09	NA	NA	N.A
31	Lavang	Bintulu, Sarawak	30 Dec '11	29-Dec-21	CU-RSPO-819166, MUTU-RSPO/053	N.A
32	Rajawali	Bintulu, Sarawak	30 Dec '16	29-Dec-21	CU-RSPO-819167, RSPO 0020	N.A
33	Derawan	Bintulu, Sarawak	30 Dec '11	29-Dec-21	CU-RSPO-819169, RSPO 0019	N.A
34	Pekaka	Bintulu, Sarawak	30 Dec '11	29-Dec-21	CU-RSPO-815150, MUTU-RSPO/054	N.A

Legends

Certification Withdrawal

NA - NOT APPLICABLE

Note: There are 2 certificate numbers for some SOUs due to transfer of CB.

**RSPO Public Summary Report
Revision 4 (November /2016)**

SDP- RSPO Certification Status for Indonesia Operations

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

**RSPO Public Summary Report
Revision 4 (November /2016)**

12	PT LAGUNA MANDIRI	RANTAU	Sungai Durian, Kotabaru, Kalimantan Selatan	30-Dec-11	30-Dec-16	MUTU-RSPO/009	Recertification of Rantau POM is in progress. PalmTrace License is valid till end of Feb 2017 in the PalmTrace system.
13		BETUNG		1-April-14	1-April-19	MUTU-RSPO/035	
14	PT INDOTRUBA TENGAH	SEKUNYIR	Kalimantan Tengah, Indonesia	23-Nov-10	22-Nov-20	MUTU-RSPO/001	
15	PT SWADAYA ANDIKA	SELABAK	Sungai Durian, Kotabaru, Kalimantan Selatan	16-Mar-12	16-Mar-17	MUTU-RSPO/015	
16	PT BINA SAINS CEMERLANG	SG PINANG	Muara Lakitan, Lubuk Linggau, Musi Rawas, Sumatera Selatan	11-Sep-12	11-Sep-17	MUTU-RSPO/020	
17	PT TEGUH SEMPURNA	PEMANTANG	Kuala Kuayan, Sampit, Kotawaringin Timur, Kalimantan Tengah	9-Sep-16	8-Sep-21	MUTU-RSPO/004	
18	PT BHUMIREKSA NUSA SEJATI	TELUK BAKAU	Pelangiran, Sg. Guntung, Indragiri Ilir, Riau	01-Dec-16	30-Nov-21	MUTU-RSPO/008	
19		MANDAH		1 April 2014	1 April 2019	MUTU-RSPO/036	
20	PT ANEKA INTIPERSADA	TELUK SIAK	Tualang, Perawang, Siak, Riau	8-Dec-16	7-Dec-21	MUTU-RSPO/007	
21	PT TAMACO GRAHA KRIDA	UNGKAYA	Witaponda, Kolonodale, Morowali, Sulawesi Tengah	10-Jul-12	10-Jul-17	MUTU-RSPO/018	
22	PT SIME INDO AGRO	BK AJONG	Kalimantan Barat, Indonesia	18-Jul-16	17-Jul-21	MUTU-RSPO/088	
23	PT PADANG PALMA PERMAI/PT PERKASA SUBUR SAKTI	BLANG SIMPO	Karang Baru, Kuala Simpang, Aceh Tamiang, Nangroe Aceh Darussalam	3-May-13	3-May-18	MUTU-RSPO/026	
24	PT SANDIKA NATAPALMA/PT	LEMBIRU	Desa Suka Karya Kec. Marau Kab. Ketapang, Kalimantan Barat	3-Jul-14	2-Jul-19	MUTU-RSPO/044	

	BUDIDAYA LESTARI	AGRO						
25	PT MITRAL SEJAHTERA	AUSTRAL	MAS Mill	Desa Rahayu Kab.Sanggau, Barat	Kec. Parindu Kalimantan	NA	NA	NA

Legends

Pending Certification by RSPO EB	Mill closed down
----------------------------------	------------------

NA - NOT APPLICABLE

Appendix C: Certification Unit RSP0 Certificate Details

Sime Darby Plantation Sdn Bhd
Strategic Operating Unit (SOU 3)
Elphil Palm Oil Mill
Jalan Lintang, Sungai Siput Utara
31100 Sungai Siput, Perak, Malaysia
RSP0 membership number: 1-0008-04-000-00

BSI RSP0 Certificate No. : RSP0 550180
Date of Initial Certificate Issued: 18/06/2011
Date of Expiry: 17/06/2021
Applicable Standards: RSP0 P&C MYNI-2014; RSP0 Supply Chain Certification Standard November 2014 Module E – CPO Mills: Mass Balance)

Elphil Palm Oil Mill and Supply Base					
Location Address	SOU 3 Managment Unit (Elphil Palm Oil Mill) Jalan Lintang, Sungai Siput Utara 31100 Sungai Siput, Perak, Malaysia				
GPS Location	101° 05' 37" E ; 4° 53' 24" N				
CPO Tonnage Total	20,135.09 mt				
PK Tonnage Total	5,325.52 mt				
CPO Claimed for Certification*	20,135.09 mt				
PK Claimed for Certification *	5,325.52 mt				
Own estates FFB Tonnage	97,223.98 mt				
Scheme Smallholder FFB Tonnage	-				
Estates	Production Area		Other use (ha)	Certified Area / Total land lease (ha)	Annual FFB Production (mt)
	Mature (ha)	Immature (ha)			
Elphil Estate	1,552.21	119.16	204.63	1,876.00	34,217.00
Kamuning Estate	2,298.00	548.00	1,043.00	3,889.00	46,300.00
Kinta Kellas Estate	708.45	254.31	98.24	1,061.00	16,706.98
TOTAL	4,558.66	921.47	1,345.87	6,826.00	97,223.98

Appendix D: Assessment Plan

Date	Time	Subjects	Hoo BH	Hidhir	Hu NS
Monday 20/03/2017	PM	Audit team traveling to site	√	√	√
Tuesday 21/03/2017 Elphil Palm Oil Mill	0830-0900	Opening Meeting: • Opening Presentation by Audit team leader. • Confirmation of assessment scope and finalize Audit plan, previous CAR verification	√	√	√
	0900-1200	Elphil Palm Oil Mill Inspection: FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment, staff, workers and contractor interview, housing and facility inspection, clinic, meeting stakeholders etc.	√	√	√
	1100-1200	Supply chain for CPO mill, weighbridge officer, production record and etc		√	
	1200-1300	Lunch	√	√	√
	1300-1630	Document review P1 – P8: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, TBP, CIP and implementation etc).	√	√	√
	1630-1700	Interim Closing briefing	√	√	√
	Wednesday 22/03/2017 Kinta Kellas Estate	0900-1100	Kinta Kellas Estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill, ,etc.	√	√
1100-1200		Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)	√	√	√
1200-1300		Lunch	√	√	√
1300-1630		Kinta Kellas Estate Document review P1 – P8: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc).	√	√	√

**RSP0 Public Summary Report
Revision 4 (November /2016)**

Date	Time	Subjects	Hoo BH	Hidhir	Hu NS
	PM	Interim Closing briefing	√	√	√
Thursday 23/03/2017	0900-1100	Elphil Estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill, etc.	√	√	√
Elphil Estate	1100-1200	Meeting with stakeholders (Government, village rep, smallholders, workers leader, contractor etc.)	√	√	√
	1200-1300	Lunch	√	√	√
	1330-1530	Elphil Estate Document review P1 – P8: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, TBP, CIP and implementation etc).	√	√	√
	1530-1600	Verify any outstanding issues & Preparation for closing meeting	√	√	√
	1600-1700	Closing meeting	√	√	√
	PM	Audit Team travelling back to KL	√	√	√

Appendix E: Stakeholders Contacted

<p>Internal Stakeholders East Certification Unit Management team and Staff Representatives from Sustainability Department On site compliance executives Mill Manager and Assistants Estate Managers and Assistants Facility Administrators Gender Committee Representatives Hospital Assistant Male and Female workers Kindergarten Teacher Workers Union Representatives Onsite NUPW secretary</p>	<p>Contractors General Supplier FFB Transport contractor Engineering work contractor</p> <p>External Stakeholders NUPW</p>
--	--

Appendix F: CPO Mill Supply Chain Assessment Report (Module E: Mass Balance)

Requirements	Compliance
E.1 Definition	
<p>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.</p>	<p>Elphil Palm Oil Mill receives and process both certified and non-certified FFB. Therefore, it uses the Mass Balance supply chain system and module. During the P&C assessment, the audit team verified the volumes and sources of certified and non-certified FFB entering the mill, the implementation of processing controls and volume sales of RSPO certified Products.</p>
E.2 Explanation	
<p>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 allowed to deliver in a year. The actual tonnage produced should then be recorded in each subsequent annual surveillance report.</p>	<p>The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill is recorded in this public summary report.</p>
<p>E.2.2 The mill must also meet all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization (RSPO IT platform or book and claim).</p>	<p>The mill has met all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization (RSPO IT platform or book and claim).</p>
E.3 Documented procedures	
<p>E.3.1 The site shall have written procedures and/or work instructions to ensure the implementation of all the elements specified in these requirements. This shall include at minimum the following:</p> <p>a) Complete and up to date procedures covering the implementation of all the elements in these requirements;</p> <p>b) The name of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the site procedures for the implementation of this standard.</p>	<p>Latest written documented procedures for the chain of custody is with Mass Balance (IMB) model covering all the RSPO Supply Chain Certification Standard and Traceability for handling certified and non-certified FFB under Appendix 15, version:2, issue: 2 dated October 2016. This developed based on the RSPO SCCS 21 November 2014.. The mill manager has the responsibility to ensure implementation assisted by the on-site compliance executive.</p> <p>The mill manager and assistant manager have awareness of the supply chain system. The manager has overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements.</p>
<p>E.3.2 The site shall have documented procedures for receiving and processing certified and non-certified FFBs.</p>	<p>Elphil Mill has documented procedures for the incoming FFB, processing and outgoing palm products (CPO and PK). System available to make marking on the receiving documents to differentiate the certified and non-certified FFB received.</p>

**RSPO Public Summary Report
Revision 4 (November /2016)**

E.4 Purchasing and goods in	
E.4.1 The site shall verify and document the volumes of certified and non-certified FFBs received.	Daily records are prepared at the entry point at the weighbridge. Daily summary and monthly summary documented for all the certified and non-certified FFB. Records verified by internal and external audit.
E.4.2 The site shall inform the CB immediately if there is a projected overproduction.	The facilities aware of this procedure.
E.5 Record keeping	
E.5.1 a) The site shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a three-monthly basis. (b) All volumes of palm oil and palm kernel oil that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO. c) The site can only deliver Mass Balance sales from a positive stock. 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.)	Daily records are prepared at the entry point at the weighbridge. Daily summary and monthly summary documented for all the certified and noncertified FFB. Computerized system in place. Records verified by internal and external audit. Computerized system in place with the delivery deducted accordingly. The Mill aware that only positive stock can be delivered. No short selling.
E.5.2 In cases where a mill outsources activities to an independent palm kernel crush, the crush still falls under the responsibility of the mill and does not need to be separately certified. The mill has to ensure that the crush is covered through a signed and enforceable agreement	No outsourcing activities.

Actual Tonnage Certified Palm Production – 01 April 2016 – 31 March 2017 (ASA1 1)

Mill	Capacity	CPO	PK
Elphil Palm Oil Mill	45 mt/hr	16,537.71	4407.93

Actual Tonnage Sales of Certified Palm Products – 01 April 2016 – 31 March 2017 (ASA1 1)

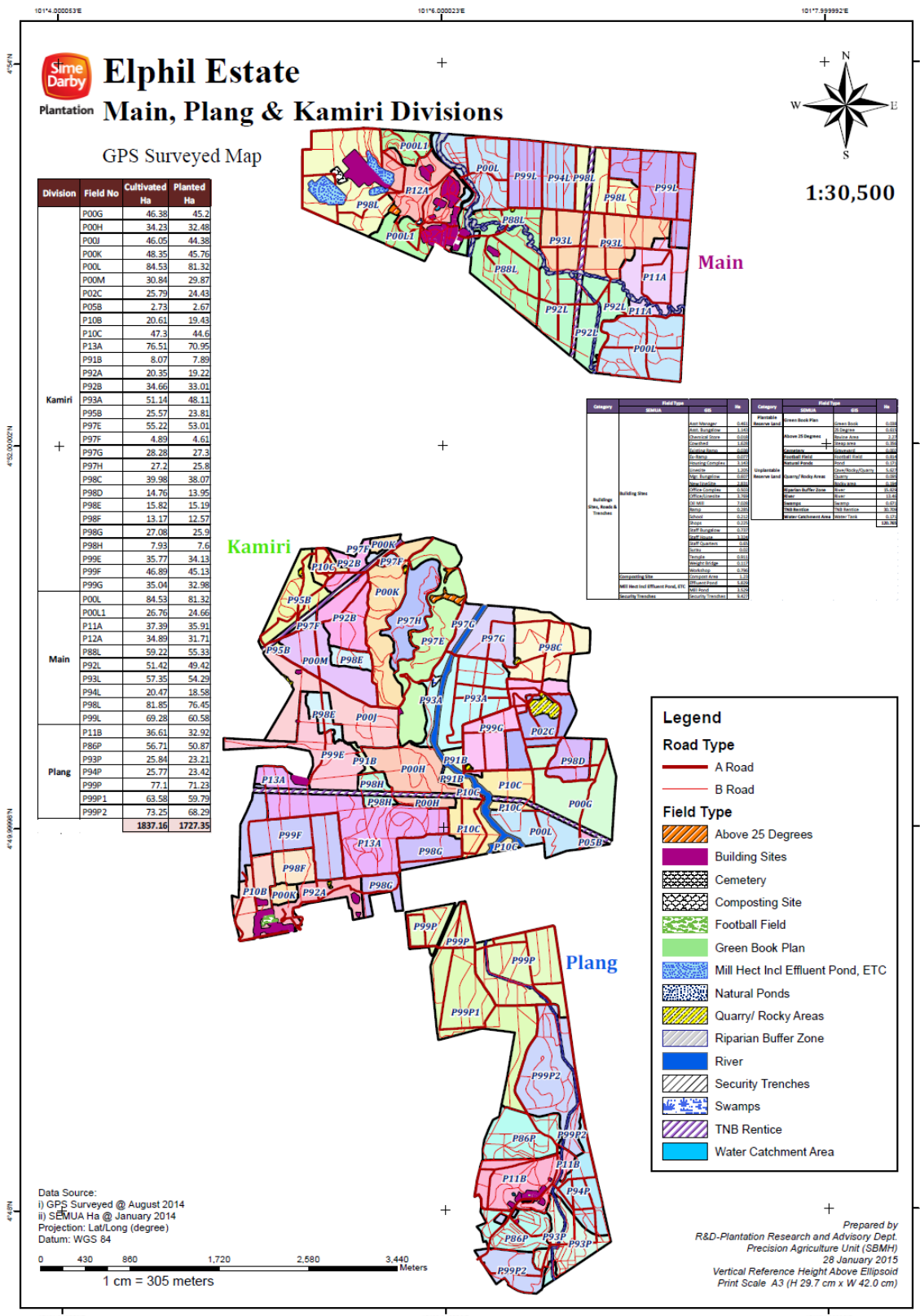
Mill	Certified CPO Sales	Certified PK Sales	Remarks
Elphil Palm Oil Mill	1,800 MT	1,450 MT	N.A

Month	Certified Supply Base (from adjacent certified supply base) (mt)			
	Elphil Estate	Kamuning Estate	Kinta Kellas	Total FFB/Month (mt)
April 2016	2,855.75	3,099.54	1,109.58	7,064.87
May 2016	2,648.18	2,914.77	1,027.31	6,590.26
June 2016	2,354.94	2,814.91	1,080.60	6,250.45
July 2016	2,061.33	3,250.39	895.42	6207.14
Aug 2016	2,345.69	3,478.21	975.51	6,799.41
Sept 2016	2,261.65	3,498.12	1,039.84	6,799.61
Oct 2016	2,494.23	3,496.50	1,025.84	7,016.57
Nov 2016	2,805.49	3,511.37	1,135.22	7,452.08

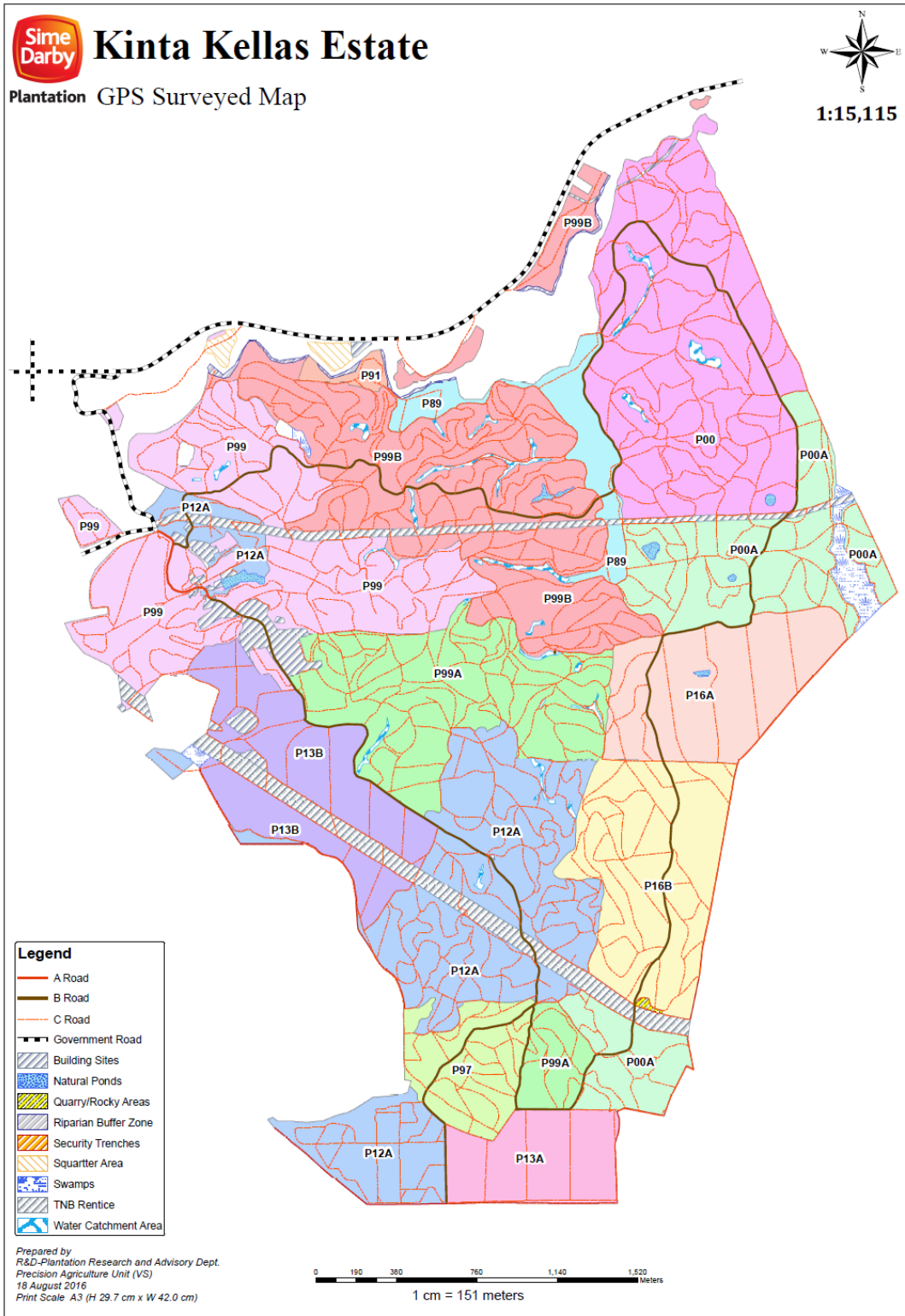
**RSPO Public Summary Report
Revision 4 (November / 2016)**

Dec 2016	2,483.70	3,055.58	1,288.68	6,827.96
Jan 2017	2,551.77	2,535.27	1,205.26	6,292.30
Feb 2017	2,819.69	2,537.57	1,085.14	6,442.40
Mar 2017	2,629.48	2,517.47	963.75	6,110.70
Total	30,311.90	36,709.70	12,832.15	79,853.75

Appendix H: Location Map of Elphil Palm Oil Mill Certificatio Unit and Supply bases



Appendix I : Kinta Kellas Estate Field Map



Appendix K: GHG Reporting Executive Summary

The GHG emissions that were produced in 2016 for Elphil mill and supply base was calculated using the GHGpalm Calculator version 3.0. The assessment team had verified the data input in the GHGpalm Calculator against operations records. Palm GHG Calculation Options selected 'Full version' and 'Exclude LUC Emission' calculation option is not applied. The records verified includes:

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

The summary of the Net GHG emitted in 2016 for Elphil Palm Oil Mill and supply base are as following:

Emission per product	tCO ₂ e/tProduct
CPO	0.66
PKO	0.66

Extraction	%
OER	25.66
KER	6.27

Production	t/yr
FFB Process	116953.28
CPO Produced	30006.99
PKO Produced	7327.79

Land Use	Ha
OP Planted Area	5735.13
OP Planted on peat	0
Conservation (forested)	0
Conservation (non-forested)	0
Total	5735.13

Summary of Field Emission and Sink

	Own Crop*		Group		3 rd Party		Total	
	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB
Emission								
Land Conversion	24,153.33	0.48	0	0	0	0	24,153.33	0.48
CO ₂ Emission from fertilizer	3,044.35	0.06	0	0	0	0	3,044.35	0.06
NO ₂ Emmision	1,876.32	0.04	0	0	0	0	1,876.32	0.04
Fuel Consumption	283.23	0.01	0	0	0	0	283.23	0.01
Peat Oxidation	0	0	0	0	0	0	0	0
Sink								
Crop Sequestration	-22,894.15	-0.45	0	0	0	0	-22,894.15	-0.45
Conservation Sequestration	0	0	0	0	0	0	0	0
Total	6,463.08	0.13	0	0	1,482.59	0	7,945.67	0.13

*Note: Includes both estates and smallholders/traders

Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	16,815.73	0.14
Fuel Consumption	39.85	0
Grid Electricity	0	0
Utilisation	0	0
Credit		
Export of Grid Electricity	0	0
Sales of PKS	0	0
Sales of EFB	0	0
Total	16,855.58	0.14

Summary of Kernel Crusher Emission and Credit (if applicable)

Emissions	tCO₂e
PK from own mill	4,867.8
PK from other source	0
Fuel Consumptions	0
Total Crusher emissions	4,867.8

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

POME Diverted to Anaerobic Digestion:	
Divert to anaerobic pond (%)	0
Divert to methane captured (flaring) (%)	0
Divert to methane captured (energy generation) (%)	0

Appendix L: List of Abbreviations Used

AMESU	All Malaysia Estate Staff Union
AN	Ammoniacal Nitrogen
ASA	Annual Surveillance Assessment
BOD	Biological Oxygen Demand
CHRA	Chemical Health Risk Assessment
CIP	Continual Improvement Plan
COD	Chemical Oxygen Demand
CPO	Crude Palm Oil
DOE	Department of Environment
DOSH	Department of Occupational Safety & Health
EFB	Empty Fruit Bunch
EIA	Environmental Impact Assessment
EMS	Environmental Management System
ERP	Emergency Response Plan
FFB	Fresh Fruit Bunch
HCV	High Conservation Value
IPM	Integrated Pest Management
ISCC	International Sustainable Carbon Certification
MAPA	Malayan Agricultural Producers Association
MPOA	Malaysian Palm Oil Association
MSDS	Material Safety Data Sheet
MSPO	Malaysian Sustainable Palm Oil
MY-NI	Malaysian National Interpretation
NGO	Non Governmental Organisation
NUPW	National Union of Plantation Workers
OSH	Occupational Safety & Health
O&G	Oil and Grease
PK	Palm Kernel
PKO	Palm Kernel Oil
POM	Palm Oil Mill
PPE	Personal Protective Equipment
RED	Renewable Energy Directive
RSPO	P&C Roundtable on Sustainable Palm Oil Principle & Criteria
SCCS	Supply Chain Certification Standard
SDPSB	Sime Darby Plantation Sdn Bhd
SEIA	Social & Environmental Impact Assessment
SIA	Social Impact Assessment
SOP	Standard Operating Procedure
SOU	Strategic Operating Unit
SS	Suspended Solids
TS	Total Solids
VFA	Volatile Fatty Acids