

**RSPO – Recertification Assessment (RC)
Public Summary Report**

Sime Darby Plantation Sdn. Bhd.
Head Office: Level 3A, Main Block, Plantation Tower, No 2 Jalan P.J.U 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.

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Section 1 Scope of the Recertification 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 P.J.U 1A/7, 47301 Ara Damansara, Selangor, Malaysia.		
Mill Address	Certification Unit: Elphil Palm Oil Mill, Jalan Lintang, Sungai Siput Utara 31100 Sungai Siput, Perak, Malaysia		
Subsidiary of (if applicable)	N/A		
Contact Name	Mdm. Shylajadevi Vasudevan Nair (Head Office) Mr. Azman Talkah (Elphil Palm Oil Mill Manager)		
Website	www.simedarby.com	E-mail	shylaja.vasudevan@simedarby.com kks.elphil@simedarby.com
Telephone	+603 – 78484371 (Head Office) +605 - 5940178 (Mill)	Facsimile	+603 – 78484363 (Head Office) +605 - 5940167 (Mill)

2. RSPO Certification Information			
Certificate Number	RSPO	Date	18/06/2011
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
AC5404	Quality Environment Management System (5S)	Malaysian Productivity Corporation	27/5/2016
MPOB-CoP/NN/0163	Code Of Good Nursery Practice	Malaysian Palm Oil Board	16/4/2016

3. Location(s) of Mill & Supply Base			
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"
Kamuning Estate	Ladang Kamuning/Changkat Salak, 31100 Sungai Siput, Perak	101 ° 3' 35"	4 ° 50' 41"
Kinta Kellas Estate	Ladang Kinta Kellas, PO Box 7, 31007 Batu Gajah, Perak	101 ° 4' 59"	4 ° 28' 0"

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4. Description of Certified Supply Base						
Estate	Mature (ha)	Immature (ha)	Infrastructure & Other (ha)	Total Planted Area (ha)	Total Hectareage	% of Planted
Elphil Estate	1,600	76	200	1,676	1,876	89%
Kamuning Estate	3,049	511	329	3,560	3,889	92%
Kinta Kellas Estate	731	219	111	950	1,061	90%
TOTAL	5,380	806	640	6,186	6,826	91%

5. Plantings & Cycle								
Estate	Age (Years) & Hectare					FFB Tonnage / Year		
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30	Estimated (ASA4) 01/04/14-31/03/16	Actual (ASA4) 01/04/15-31/03/16	Forecast (RAV) 01/04/16-31/03/17
Elphil Estate	76	136	1081	277	106	39,197	39,536	41,843
Kamuning Estate	511	93	2896	60	0	68,526	56,769	61,953
Kinta Kellas Estate	219	5	558	135	33	19,435	17,774	18,799
TOTAL						127,158	114,080	122,595

Note: * Plantings age 0-3 & 4-10 years involved replanting only since no new planting activity conducted.

6. Certified Tonnage									
Mill	Estimated (ASA4) 01/04/15-31/03/16			Actual (ASA4) 01/04/15-31/03/16			Forecast (RAV) 01/04/16-31/03/17		
	FFB	CPO	PK	FFB	CPO	PK	FFB	CPO	PK
Elphil Palm Oil Mill	127,158	27,975	7,629	114,080	23,763	5,704	122,595	26,419	6,559
*FFB from trader	40,000	8,800	2,360	43,463	9,053	2,173	51,040	10,999	2,731

Note: *FFB received and processed from Trader is not included in the certified tonnage.

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
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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 and an office at Singapore, Jakarta, Bangkok and Australia which involve in RSPO Certification Program.

Assessment Methodology, Programme, Site Visits

The on-site recertification assessment was conducted from 22-24 March 2016. 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. 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 P&C MYNI 2014 and RSPO SCCS 2014 were used as Checklists and questionnaires 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 where the stakeholder notification was made on 17 Feb 2016 through BSI website as per following link: [http://www.bsigroup.com/LocalFiles/en-MY/RSPO/Public%20Notification/2016/Public%20Notification%20for%20Re-Certification_Sime%20Darby%20Elphil%20Palm%20Oil%20Mill%20and%20Supply%20Base%20\(English\)_v1.pdf](http://www.bsigroup.com/LocalFiles/en-MY/RSPO/Public%20Notification/2016/Public%20Notification%20for%20Re-Certification_Sime%20Darby%20Elphil%20Palm%20Oil%20Mill%20and%20Supply%20Base%20(English)_v1.pdf)

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 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 ASA1 are detailed in Section 3.3.

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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 internally reviewed by 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 (ASA1)	Year 3 (ASA2)	Year 4 (ASA3)	Year 5 (ASA4)
Elphil Palm Oil Mill	✓	✓	✓	✓	✓
Elphil Estate		✓	✓		✓
Kamuning Estate	✓		✓	✓	
Kinta Kellas Estate	✓	✓		✓	✓

Tentative Date of Next Visit: 20th March 2017

Total No. of Mandays: 9

BSI Assessment Team:

Hafriazhar Mohd Mokhtar – Lead Assessor

Hafriazhar Mohd. Mokhtar is a Chemical Engineer by qualification. He has more than five years of direct work experience in the upstream processes of palm oil within the plantation industry. He is a qualified Lead Auditor for CDM, ISO 14001, ISO 50001 and ISO 9001 and has accumulated more than 500 audit days throughout his current career as the auditor for multiple disciplines covering Malaysia, Indonesia and Thailand. He has been trained in the RSPO P&C and SCCS standards and recently completed his RSPO P&C Lead Assessor training and has been involved in RSPO audits within Malaysia, Papua New Guinea and Solomon Islands. During assessment, he covered the mill and estate best practices, legal issues, social issues, workers consultation, stakeholder consultation, environmental and occupational safety & health. He is fluent in Bahasa Malaysia and English languages.

Mohamed Hidhir Bin 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 14001, 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.

Muhammad Haris B. Abdullah – Team member

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He graduated from the Open University Malaysia with a Bachelor of Business Administration (Hons) Majored in Human Resource Development and completed his Master's Degree in Business Administration from the University Utara Malaysia in January 2014. He has more than 3 years working experience in oil palm plantation and conducting social impact assessments of agriculture, agriculture best practices, and environmental impact assessment and workers welfare. He completed the RSPO Lead Auditor Training in April 2013 and passed the course. He is also passed the ISO 14001 Lead Auditor Training, OHSAS 18001 Lead Auditor Training Course and qualified as EICC auditor. He has completed International Sustainable and Carbon Certification (ISCC) Lead Auditor Training Courses. Recently he has attended the RSPO P&C Social and Labour Standards and the Mechanics of Social Auditing Workshop on 17 – 19 September in Bangkok, Thailand. He had assisted with conducting audits of oil palm plantation for more than 7 companies against the RSPO P&C in Indonesia and in Malaysia 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, Tamil and Bahasa Indonesia.

Accompanying Persons: Not Applicable.

Section 3 Assessment Findings

3.1 Details of audit results are provided in the following Appendix:

- RSPO P&C MYNI 2014 Summary of the Assessment – Appendix A
- Sime Darby Time Bound Plan – Appendix B
- RSPO Supply Chain Certification Assessment – Appendix F

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.

1. There is no any other isolated lapse in Time Bound Plan.
2. No systematic failures to proceed with implementation of the Time Bound Pan since first certified.
3. 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 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.

BSI considers that Sime Darby complies with the RSPO requirements for Partial Certification rules.

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 RC there were two (2) Major & four (4) Minor nonconformities raised. The Elphil 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 implementation of the corrective action plans to address the minor nonconformity will be followed up during the next surveillance assessment.

Non-Conformity		
NCR #	Description	Category (Major/Minor)
1306204M1	Requirements 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
	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.	
	Statement of Nonconformity Implementation of management plan for identified HCV was not effective.	
	Action: Root cause analysis: Area with 25° slope was not properly surveyed in the previous assessment report. Another survey was done by R&D team after the conduct of HCV assessment, indicated the	

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	<p>affected areas were not fall under 25° slope. Therefore, the estate management decided to plant rubber trees at that area.</p> <p>Immediate action: PSQM-SEPU to conduct HCV reassessment to update the report done in 2010. Development to be put on hold while assessment conducted.</p> <p>Long term corrective action: HCV areas identified in the upcoming assessment to be managed and enhanced accordingly.</p> <p>Status: 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>	
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Non-Conformity		
NCR #	Description	Category (Major/Minor)
1306204M2	<p>Requirements 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>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>	Major

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	<p>Immediate action: Mill: Elphil POM immediately communicated with Kejuruteraan Seriting and to provide employment contract, foreign workers compensation (insurance) & legal work permit. 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> <p>Status: The CAP and evidence submitted confirmed that the issue has been fully addressed hence the Major NC was closed on 19/5/2016.</p>	
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Non-Conformity		
NCR #	Description	Category (Major/Minor)
1306204N1	<p>Requirements 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>	Minor
	<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>Action: Root cause analysis: Area with 25° slope was not properly surveyed in the previous assessment report.</p>	
	<p>Corrective action plan: HCV areas identified in the upcoming assessment to be managed and enhanced accordingly.</p>	
	<p>Status: CAP implementation will be verified during next surveillance audit. NC remains open.</p>	

Non-Conformity		
NCR #	Description	Category (Major/Minor)
1306204N2	<p>Requirements 4.4.1 An implemented water management plan shall be in place.</p>	Minor
	<p>Evidence of Nonconformity Kinta Kellas Estate: No rain water harvesting activity implementation as per water management plan established.</p>	
	<p>Statement of Nonconformity Implementation action for the water management plan not in place.</p>	
	<p>Action: Root cause analysis: Kinta Kellas Estate not implemented the revised water management plan for FY15/16</p>	
	<p>Corrective action plan: Kinta Kellas Estate will implement the water management plan especially for rain water harvesting.</p>	
	<p>Status: CAP implementation will be verified during next surveillance audit. NC remains open.</p>	

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Non-Conformity		
NCR #	Description	Category (Major/Minor)
1306204N3	Requirements 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: 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.	
	Statement of Nonconformity Emergency preparedness was not fully implemented.	
	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.	
	Status: CAP implementation will be verified during next surveillance audit. NC remains open.	

Non-Conformity		
NCR #	Description	Category (Major/Minor)
1306204N4	Requirements 6.6.2 Minutes of meetings with main trade unions or workers representatives shall be documented	Minor
	Evidence of Nonconformity Kamuning Estate: Minutes of meeting with workers union (NUPW) was not available during the site audit	
	Statement of Nonconformity Minutes of meetings with main trade unions or workers representatives was not documented	
	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.	

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	Status: CAP implementation will be verified during next surveillance audit. NC remains open.	
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Observation	
OBS #	Description
-	Nil

Positive Findings	
PF #	Description
1	Safety signs are continuously maintained well and clearly marked with walkways.
2	The palm oil mill has maximised the use of renewable energy by consuming shell and fibre produced internally.
3	The Mill and Estates have maintained good relationship with internal and external stakeholders.

Issues raised by Stakeholders

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 Certification Unit’s environmental and social performance, legal and any known dispute issues.

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.

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.

IS #	Description
1	<p>Issues Mill external FFB suppliers - Why OER awarded usually up to max 21% has been reduced now? - FFB receiving hours at 5pm too early, need to extend to at least 6pm due to transporting distance.</p> <p>Management Responses - OER awarded based on FFB quality through MPOB’s FFB grading criteria. - Mill gate closes at 5pm as per security procedures implemented within company group.</p> <p>Audit Team Findings Issues raised were already taken action by the mill management. No further issue.</p>
2	<p>Issues Mill cleaning & waste transport contractor – no issue.</p> <p>Management Responses Noted by mill management</p> <p>Audit Team Findings No further issue.</p>

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3	<p>Issues FFB Transporter for Kinta Kellas Estate</p> <ul style="list-style-type: none"> - Road condition bad – road shoulder too deep - Why own crop (Kinta Kellas estate) not allowed to be delivered after 8pm
	<p>Management Responses</p> <ul style="list-style-type: none"> - Road maintenance program has been included for the maintenance of estate main road. However public road maintenance was done by the government - No any FFB lorry allowed to deliver after 8pm even for own crop due to security procedure. Estates should already know since it is companywide policy.
	<p>Audit Team Findings Issues raised were already taken action by the mill and estate management. No further issue.</p>
4	<p>Issues Electrical service work contractor cum local community representative (Kampung Sri Jaya – Kinta Kellas Estate)</p> <ul style="list-style-type: none"> - House renovation work – past 2 years – not paid - Too narrow road access – road shoulder too deep - Lorry move so fast – no speed limit signboard
	<p>Management Responses</p> <ul style="list-style-type: none"> - Work was done during transition period of the account computer system. POs and invoices not fully captured in system. Issues has been on-going process and all amount has been finalized for payment - Road maintenance program has been included for the maintenance of estate main road. However public road maintenance was done by the government. - Road maintenance program has been included for the maintenance of estate main road together with the installation of speed limit signboard as control measures. Additionally, auxiliary police also monitor the movement of vehicles within estate compound. However public road maintenance and monitoring were done by the government including with installation of speed signboards.
	<p>Audit Team Findings Issues raised were already taken action by the estate management. No further issue.</p>
5	<p>Issues Local villager cattle owner’s representative</p> <ul style="list-style-type: none"> - Meeting was conducted by the estate management from time to time to discuss issues related to cattle within field
	<p>Management Responses Noted by estate management.</p>
	<p>Audit Team Findings No further issue.</p>

3.3.1 Status of Nonconformities Previously Identified and Observations

All the previous Major nonconformities are remains closed. There was one Minor nonconformity raised during Recertification

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

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1171760M1	Requirements: 5.3.3: A waste management and disposal plan to avoid or reduce pollution shall be documented and implemented	Major
	Evidence of Nonconformity: Traces of diesel oil contaminated the soil at the water outlet of the diesel storage tank oil interceptor within the facilities complex of main division for Kamuning Estate. This nonconformity was already raised during the last assessment. The operating units have not addressed the issue appropriately. As per the RSPO Annual Surveillance Assessment Procedure, the nonconformity was upgraded to major nonconformity	
	Statement of Nonconformity: Pollution avoidance activity for significant environmental impact (land contamination) not effectively implemented	
	Corrective Action: 1. Clean up the spillages by scraping the contaminated soil. 2. Install new valve at the oil trap. 3. Schedule maintenance by foreman/store clerk. 4. Re-constructed appropriate oil trap to ensure effective trapping. 5. Re-drain the outlet from the oil trap to the nearest drainage. Based on the submitted evidences, the audit team have reviewed and accepted the evidences to close out the nonconformity.	
	Status: The Major NC was closed on 16/05/2015. Verifications during on-site visit confirmed no recurrence of issue related to this NC.	

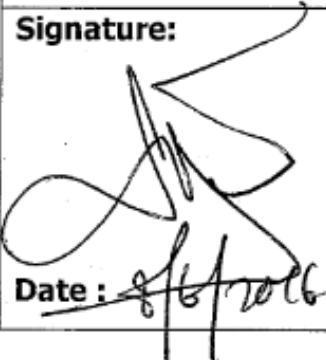

Observation	
OBS #	Description
Nil	Nil

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	Upgraded to Major on 28/3/2015 (Refer NC #1171760M1)
1171760M1	Major	28/3/2015	Closed out on 16/5/2015
1306204M1	Major	24/3/2016	Closed out on 7/6/2016
1306204M2	Major	24/3/2016	Closed out on 19/5/2016
1306204N1	Minor	24/3/2016	Open

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1306204N2	Minor	24/3/2016	Open
1306204N3	Minor	24/3/2016	Open
1306204N4	Minor	24/3/2016	Open

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, Malaysian National Interpretation (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: Mr. Azman Talkah	Name: Hafriazhar Bin Mohd Mokhtar
Company name: Elphil Palm Oil Mill	Company name: BSI Services Malaysia Sdn. Bhd.
Title: Mill Manager	Title: Lead Auditor
Signature:  Date: 8/6/2016	Signature:  Date: 8 June 2016

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 DOSH during compliance visit were attended and no noncompliance or complaints were noted.	Complied
1.1.2	Records of requests for information and responses shall be maintained. -Major compliance	All operating units maintain records of information request and response. Request for information are attended promptly and confirmed by stakeholders interviewed.	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.			

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Criterion / Indicator	Assessment Findings	Compliance	
1.2.1	<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.</p> <p>Sime Darby Plantations 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 Plantations Sdn Bhd website at following link: 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 Programmes • Complaint and Grievances procedure. • Environmental Conservation <p>These documents highlight current Sime Darby Plantations Sdn Bhd practices and their continual improvement plans. Besides the above document Sime Darby Plantations 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>	Complied
<p>Criteria 1.3: Growers and millers commit to ethical conduct in all business operations and transactions.</p>			
1.3.1	<p>There shall be a written policy committing to a code of ethical conduct and integrity in all operations and transactions, which shall be documented and communicated to all levels of the workforce and operations.</p> <p>-Minor compliance</p>	<p>Committing to a code of ethical conduct and integrity in all operations and transactions documented and communicated to all levels of the workforce and operations. The code of business conduct available since December 2011 includes elements of human right as well.</p>	Complied
<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>			

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Criterion / Indicator	Assessment Findings	Compliance
2.1.1	<p>Evidence of compliance with relevant legal requirements shall be available. - Major compliance -</p> <p>SOU 3 had continued to comply with legal requirements as per indicator. Compliance to each applicable law and regulation is monitored by the operating units and PSQM sustainability team. SOU 3 had obtained and renewed license and permits as required by the law. Sample of licenses or permit viewed were as follows:</p> <p><u>Elphil Palm Oil Mill</u></p> <ul style="list-style-type: none"> a) MPOB: 540132004000, processing capacity 150,000 Mt, valid until 31/5/16 b) DOE License: JPKKS 001845 (validity period 1/7/2015 - 30/6/2016) for 90mt/hr. and method of POME discharge is land application with BOD final discharge limit <50mg/l. Quarterly report was submitted to DOE as per legal requirement where recent submission for 3rd and 4th quarter 2015 was submitted on 10/10/2015 & 21/1/2016 respectively. c) Pemasangan am, PK/10/01/3207. Licenses for Steam Boiler (SB)(PK PMD 745 (valid until 26/6/16), unfired pressure vessel (UPV) (sterilizers PK PMT 3878, PK PMT3879, PK PMT 3880, PK PMT 3881, back pressure receiver , steam separator, air receiver and found to be valid until 26/6/16 d) License for electricity generation from Electrical Commission (No. ST (PIP) 647766V/SGSP/0001-P) validity period (19/12/15 to 18/12/16) for 3000 kW. e) Electrical Charge man license – A4 registration number (PJ-T-4-B-2559-1996) valid until 26/1/2020. f) Confined space competence person license – AGT (NW-HQ-AGT- 0931-M) valid until 14/10/16 AESP (NW-HQ-AE-3593-M) valid until 9/9/16. AGT (NW-HQ-AGT-1265-M) valid until 20/10/16. AESP (NW-HQ-AE-R4118-M) valid until 29/9/16. g) Competent Person for ETP – CePPOME (Certified Professional in Palm Oil Mill Effluent) Part I &2, Mohd Jamil Ismail, EiMAS training on 2/1/2014. h) Competent Person for Scheduled Waste – CePSWaM (Certified Professional in Scheduled Waste Management) by EiMAS, Muhammad Zulhanafi Yahya, CePSWaM/00902 i) Fire Certificate (28479) (JBPM:PK/7/3/2013) pending for renewal. Inspection for renewal schedule on 31/3/16. j) Steam Engineer, 011/2009 (1st Grade Steam Engineer) k) JTKSM Permit Kebenaran Menggunakan Bekalan Air Persendirian Seksyen 6(1)(a) Akta Standard Minimum Perumahan dan Kemudahan Pekerja 1990 serial no.: 2015/006, dated: 8/1/2016 <p><u>Kinta Kellas Estate</u></p> <ul style="list-style-type: none"> l) MPOB license, 528648002000, valid until 31/7/17 m) Diesel license, SK/018/14(D)/KPDNKK.PK, A024833 quantity: 8,500 liters, valid until 8 July 2016. <p><u>Kamuning Estate</u></p> <ul style="list-style-type: none"> n) MPOB license: 558418011000 valid until 28/2/17 (nursery license) o) MPOB license: 524034002000 valid until 30/9/16 p) Diesel license, SK/20/BPGK.Kin making excellence a habit.™ 10,000 liters, valid until 28/2/17) 	Complied

Criterion / Indicator		Assessment Findings	Compliance
2.1.2	A documented system, which includes written information on legal requirements, shall be maintained. - Minor compliance -	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.	Complied
2.1.3	A mechanism for ensuring compliance shall be implemented. - Minor compliance -	A mechanism to ensure compliance to legal and other requirement has been documented in EQMS & MQMS (Estate & Mill Quality Management System) under Standard Operation Manual distributed to all operating units under SOU3. PSQM Department and respective operating units will undertake the responsibility of identifying, managing, updating and tracking the legal requirement as well as monitoring the status of legal compliance. 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.	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 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 as well as from MAPA circulars. The latest FMA 1967 and OSHA 1994 regulation has been updated related for FMA 1967, Person In Charge Regulations 2014 and CLASS Regulations 2013.	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. As for Kinta Kellas Estate, Sime Darby Land Management Department still in the process of changing the land use term to oil palm from current rubber and fruit tree. Last communication with land management department dated 25/1/2016 was sighted during the audit. Kamuning Estate holds 38 freehold land titles.	Complied
2.2.2	Legal boundaries shall be clearly demarcated and visibly maintained. - Minor compliance -	Field visit to P16A noted that boundary is visibly maintained with Smallholder and "Kampong Seri Jaya" village verified during the visit. Legal boundaries are clearly demarcated and visibly maintained throughout the estate. Mill is located inside Elphil Estate and sharing the estate boundary. All the boundaries are visibly maintained as per company SOP.	Complied

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Criterion / Indicator	Assessment Findings	Compliance
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 -	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	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	Complied
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

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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
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	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 -	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 -	Complied
Principle 4: Use of appropriate best practices by growers and millers		

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Criterion / Indicator		Assessment Findings	Compliance
Criterion 4.1: Operating procedures are appropriately documented, consistently implemented and monitored.			
4.1.1	Standard Operating Procedures (SOPs) for estates and mills are documented - Major compliance -	SOP available for the Palm Oil Mill and the Estates. Palm 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 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.	Complied
4.1.2	A mechanism to check consistent implementation of procedures shall be in place. - Minor compliance -	Mill Advisor and a Planting Advisor inspect and report on the operations on annual basis. The on-site managers develop Action Plans from the Advisory Reports for improvement of the operations. Review of Advisory Reports, Action Plans and site inspections confirmed consistent records of implementation of SOPs. During mill visit it was noted that that operating parameters were consistently recorded by the operators.	Complied
4.1.3	Records of monitoring and any actions taken shall be maintained and available, as appropriate. - Minor compliance -	Kinta Kellas Estate: Agronomist visit: 29/7/2015 PA Visit: 23-25/11/2015 (Report No.:SOU03/KKE/01/15-16) Kamuning Estate: PA Visit: 22-24/6/2015 (Report No.:SOU03/KAE/02/14-15) Agronomist Visit: 10-11/6/2015 Internal RSPO audit was conducted on 15/12/2015 by the RSPO & Certification Unit, PSQM. All NCs raised were followed up and closed out. Trunk injection records: Last bagworm treatment in January 2016 using Methamidophos (Class 1A). Form I, II & III, PTW, pre & post treatment form used for monitoring purposes. Application date :3/10/15, field 2000, quantity: 8 liters	Complied
4.1.4	The mill shall record the origins of all third-party sourced Fresh Fruit Bunches (FFB). - Major compliance -	Elphil mill maintains a daily record of all FFB received. The records show the origin, weight, transporters details and etc. of the FFB received.	Complied
Criterion 4.2: Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.			
4.2.1	There shall be evidence that good agriculture practices, as contained in Standard Operating Procedures (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 contains Standard Operating Procedures to ensure soil fertility is managed to a level that ensures optimal and sustained yield.	Complied

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Criterion / Indicator		Assessment Findings	Compliance
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. Sample checked at Kinta Kellas Estate: Fertilizer application follows the recommendation from the agronomist. Records verified shows that on 10/3/2016 field P99B applied with Rock Phosphate covering 33.17ha at the rate of 1.50kg/palm.	Complied
4.2.3	There shall be evidence of periodic tissue and soil sampling to monitor changes in nutrient status. - Minor compliance -	Sime Darby Seeds and Agriculture Services 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 June 2015 by Sime Darby R&D Department personnel. Periodic soil sampling is carried out at 5 years interval.	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. Average about 45mt/ha EFB applied. POME is applied at field in Elphil estate through furrow system.	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. Mostly are Malacca series.	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 map available. Slope area constructed with terrace and side drainage. Planting terraces had been constructed where slope >10°. Fields are established with cover crops such as muccuna and soft grasses and ferns. However, at 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. Thus, minor nonconformity was raised.	Minor Nonconformity
4.3.3	A road maintenance programme shall be in place. - Minor compliance -	Estates visited have implemented annual Road Maintenance Programme. Roads inspected during field audit are generally in a good condition due to the lateritic soil. Road maintenance carried out internally with grader and compactor. Road maintenance includes road grading, laterite re-surfacing wherever necessary, road side drain upkeep, culvert upkeep, road side silt pits construction etc.	Complied
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

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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 -	Mill water management plan dated 20/11/2015 sighted. Plan included contingency during shortage: Action plan to reduce water usage – rainwater harvesting, collection on boiler blow down, collection of steam condensate from steam coil, collection from sand cyclone. Estate water management plan focus on reduction of water usage as well as water conservation including rainwater harvesting. However during the visit at Kinta Kellas Estate, no rain water harvesting activity was implemented as per water management plan established. A minor nonconformity was raised due to this.	Minor Nonconformity
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 –	Mill: Sampled water monitoring records: Quarterly Water Analysis Test Report no. IE61/2016 dated 19/1/2016 for samples taken on 8/1/2016 by Sime Darby Research Sdn. Bhd.; parameters monitored-: pH, BOD, COD, SS & AN. Samples was taken from each point of mill drain flowing towards monsoon drain. Results shown water quality was in conformance with Class IIA/IIB of INWQS for natural waterways. Previous sampling was done on 15/10/2015 (Report no.: IE929/2015 dated 15/12/2015). Estate: Sampled water monitoring records: Quarterly Water Analysis Test Report no. IE75/2016 dated 28/1/2016 for samples taken on 12/1/2016 by Sime Darby Research Sdn. Bhd.; parameters monitored-: pH, BOD, COD, SS & AN. Samples was taken from outgoing water points from Kinta Kellas division flowing towards Sungai Raia. Rainfall received by Kinta Kellas Estate for 2015 was 4599.00mm. Pesticide Analysis Test Report no.: PL148/2016 dated 14/3/2016 for samples taken on 4/3/2016 by Sime Darby Research Sdn. Bhd.; parameters monitored: Aldrin, Dieldrin, t-DDT, Heptachlor, Heptachlor Epoxide, Chlordane, Lindane and Endosulfan. All parameters were not detected in the water sample.	Complied

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Criterion / Indicator	Assessment Findings	Compliance
4.4.3 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 -	Palm Oil Mill Effluent (POME) treated through anaerobic pond treatment system where the licensed limit for final discharge BOD allowed by DOE was 50mg/l through land application. Regular monitoring was conducted by the mill by taking the sample of waste water in final discharge point on monthly basis and water at the upstream, midstream and downstream of the river on quarterly basis. Sampled effluent monitoring records: Monthly Effluent Analysis Test Report no. EP92/2016 dated 18/2/2016 for sample taken on 8/1/2016 by Sime Darby Research Sdn. Bhd.; parameter monitored:- pH, Total Alkalinity, VFA, BOD, COD, TS, SS, VSS, TN, AN, O&G. Samples were taken from each point of treatment in the system consist of raw pond, acid ponds, digester tanks and final pond before field application. BOD limit for final discharge <50mg/L were met as well as all parameters that were within allowable limit.	Complied
4.4.4 Mill water use per tonne of Fresh Fruit Bunches (FFB) (see Criterion 5.6) shall be monitored. - Minor compliance -	Mill water usage for 2014/2015: 0.86 mt/FFB while for the year 2015/2016: 0.93 mt/FFB as of 29/2/2016.	Complied
Criterion 4.5: Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management techniques.		
4.5.1 Implementation of Integrated Pest Management (IPM) plans shall be monitored. - Major compliance -	Similar to last assessment, the IPM is documented in Agriculture Reference Manual. The estates continue to implement biological control for the oil palm pest in the plantation such as leaf eating pest and rat. IPM techniques applied at the estates include monitoring of pest numbers and the use of triggers for initiation of control measures. Barn owls <i>Tyto alba</i> has been introduced for biological control of rats. Barn owl boxes are constructed at the rate of 1 box to 10ha. Census records show that there was outbreak of leaf eating pest in August 2015. After treatment and follow up census records shows the outbreak was in control. Last trunk injection was done in December 2015. Beneficial plants are being established along roadsides to attract natural predators. The estates have planted beneficial plants such as <i>Cassia cobanensis</i> and <i>Turnera subulata</i> and <i>Antigonon leptopus</i> (4.5.1 & 4.5.2). It was noted that the census interval for barn owl occupancy was as per Sime Darby SOP in Agricultural Reference Manual v.1 Section 15.	Complied
4.5.2 Training of those involved in IPM implementation shall be demonstrated. - Minor compliance -	Training records for staff on IPM implementation were available and verified to be satisfactory during on-site assessment.	Complied
Criterion 4.6: Pesticides are used in ways that do not endanger health or the environment		

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Criterion / Indicator	Assessment Findings	Compliance
<p>4.6.1</p> <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.</p> <p>- Major compliance -</p>	<p>Justification of pesticides applied is available in the Sime Darby Agriculture Reference Manual Section 15 item 3.4. The use of pesticide is specific to the target pest, weed and disease. Justification takes consideration to minimise effect on non-target species.</p> <p>The written justification in Standard Operating Procedure (SOP) of all agrochemical are available the Agricultural Reference Manual (ARM), SOP and in the Safety Pictorial Book prepared by Sime Darby Plantation Sdn Bhd. Refer to Sime Darby Agricultural Reference Manual, issue:1 version:3 dated 1/7/2011. Selected products are specific to the target pest, weed and disease. Some of recommended pesticides are:</p> <p>Immature planting (sample):-</p> <ul style="list-style-type: none"> - General weeds : Glyphosate - Legume & broad leave : Metsulfuron Methyl - Stenochlaena palustris : Sodium chlorate <p>Mature planting:-</p> <ul style="list-style-type: none"> - VOPs : glyphosate & sodium chlorate <p>The selection is also evaluated by the agronomist during his visit to the estate.</p>	<p>Complied</p>
<p>4.6.2</p> <p>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.</p> <p>- Major compliance -</p>	<p>Records of pesticides and their active ingredients used, LD50, area treated, amount of a.i. applied per ha, and number of applications was maintained. Kinta Kellas Estate has last used Methamidaphos (Class I) in December 2015.</p> <p>Ai/Ha for January 2016: 0.077 Ai/Ha</p> <p>Highest Ai/Ha in Oct 15 : 0.14 Ai/Ha</p>	<p>Complied</p>
<p>4.6.3</p> <p>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.</p> <p>- Major compliance -</p>	<p>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.</p>	<p>Complied</p>
<p>4.6.4</p> <p>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.</p> <p>- Minor compliance -</p>	<p>Paraquat was eliminated. Alternatives such as Glyphosate were used with the elimination of Paraquat. Methamidaphos has been last used in December 2015. Upon clearance of the remaining balance, it will be replaced by less hazardous chemical (class III) named Acephate for the trunk injection activities.</p>	<p>Complied</p>

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Criterion / Indicator	Assessment Findings	Compliance
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 -	Complied
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 -	Complied
4.6.7	Application of pesticides shall be by proven methods that minimise risk and impacts. - Minor compliance -	Complied
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 -	Complied
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 -	Complied
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 -	Complied

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Criterion / Indicator		Assessment Findings	Compliance
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 carried out once a year for all chemical handlers and trunk injector. Last medical check-up was conducted on 9/3/2015 by DOSH registered doctor, form Klinik Edina HQ/08/DOC/00/649. 23 workers were sent for check-up and found to be fit to work.</p> <p><u>Kamuning Estate</u></p> <p>Medical surveillance carried out once a year for all chemical handlers and workshop operator. Medical surveillance was done by batches, April, July 2015 and February 2016 and sent to DOSH registered doctor, form Klinik Tweedie HQ/08/DOC/00/200. All workers were sent for check-up and found to be fit to work except one worker was found unfit and medical removal protection was initiated by management</p>	Complied
4.6.12	No work with pesticides shall be undertaken by pregnant or breast-feeding women. - Major compliance -	There were women sprayers at Kinta Kellas Estate. Medical surveillance has been established for the women sprayer and found to be fit to work.	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>			

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Criterion / Indicator	Assessment Findings	Compliance
<p>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> <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 FY2015/2016 were:</p> <p><u>Audiometric Testing</u> Last audiometric testing was done on 3/3/15 by Procoma Environmental (M) Sdn Bhd, OHD number (127/669/1(641). Refer to report PRO-AUD15-0023. Total of 55 workers were sent for the annual testing. 3 workers were reported affected with HI and 1 worker was referred to ENT Specialist on 11/6/15. Result found that the patient having mild bilateral hearing impairment and was advised to use ear protector and repeated annually.</p> <p><u>Medical Surveillance Programme</u> As per CHRA recommendation dated 11/8/15 by (JKKP HIE 127/171-(2)124, medical surveillance programme has been planned for those exposed to N-hexane, IPA and manganese. The latest medical surveillance was carried out by registered OHD, (HQ/08/DOC/00(200) for 14 workers from laboratory and process operator on 15/5/15. From the results, all workers sent for medical surveillance are fit to work with no detrimental of heath.</p> <p><u>Local Exhaust Ventilation (LEV) Testing & Inspection</u> The latest LEV inspection was conducted on 6/8/15 by Procoma Environmental (M) Sdn Bhd. JKKP HIE 127/171-3/2(23). Cubic feet meter (CFM) measured for face and transport velocity above the requirement of ACGIH at half and full opening hood cover.</p> <p><u>Permit To Work and Contractor's Management</u> Permit to Work (PTW) has been implemented for internal and external works involving confined space, hot work, working at height, LOTO and etc. Sample of PTW for confined space entry : i) Thermal deaerator, 5/2/16 ii) Mud drum cleaning, 3/2/16</p>	<p>Complied</p>

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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.</p> <p>- 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. All recommended under form F have been implemented based on site review. Verified chemical register dated 27/3/15.</p> <p>HIRARC review: KP cleaning activity & motorcycle accident Cleaning activity – revised on 18/4/15.</p> <p>Accident dated 1/4/15 – floor cleaning activity at KP. Road accident – commuting to work. Revised 10/5/15.</p> <p><u>Kinta Kellas Estate</u> Revisited CHRA dated 9 September 2015 was carried out by registered assessor (JKKP HIE 127/171-2(124). Recommendation : i) Medical surveillance – Sprayer, truck injector and workshop operator.</p> <p>HIRARC revision: Vehicle repair and maintenance dated 3/12/15.</p> <p>P&D: Bagworm treatment, P&D census, barn owl box etc. Replanting : 5/1/16</p> <p><u>Kamuning Estate</u> Revisited CHRA dated 28 September & 15 October 2015 was carried out by registered assessor (JKKP HIE 127/171-2(124). Recommendation : i) Medical surveillance – Sprayer, chemical mixer and workshop operator.</p> <p>HIRARC revised dated 29/6/15 : permanent disability case (class II)</p>	<p>Complied</p>

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Criterion / Indicator	Assessment Findings	Compliance
<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.</p> <p>- 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. Suitable PPE has been provided to the workers based on the information in the MSDS/CSDS and CHRA assessor's recommendation.</p> <p>List of Personal Protective Equipment (PPE) Provided – identifies the type of PPE for the respective activities.</p> <ul style="list-style-type: none"> i) Sterilizer and boiler/power operator – Safety Helmet, Semi leather Hand Glove, Cotton Gloves, Safety Shoes, Safety Vest and Ear Muff ii) Lab operator – Respirator (double cartridge) 3M 6006, Nitrile Glove (chemical resistant), safety boots, Ear plug (NRR = 24 dB) iii) Field workers (sprayer, manurer & harvester) – N95 respirator/3m 9002, anti-mist goggles, wellington boots, apron and sickle cover. 	<p>Complied</p>
<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.</p> <p>- Major compliance -</p>	<p>Assistant manager 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 last meeting was conducted on the 23/12/15 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 Palm Oil Mill</u></p> <p>SHC meeting : #4 - 23/12/15, #3 - 21/9/15, #2 - 12/6/15, #1- 13/3/15</p> <p><u>Kinta Kellas Estate</u></p> <p>18/9/15, 18/6/15, 10/3/15</p> <p><u>Kamuning Estate</u></p> <p>4#: 31/12/15, 3#: 16/10/15, 2#: 12/6/15. #1: 16/3/15</p>	<p>Complied</p>

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Criterion / Indicator	Assessment Findings	Compliance
<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.</p> <p>- 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 15/16. The following Emergency Response Plan were addressed: Fire Outbreak, Accident and incident occurrence, Oil Spillage and etc. Latest joint fire evacuation drill with Sg Siput Fire Department was done on 31/3/15 involving 71 employees 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 JKPP 6 & 8 forms.</p> <p><u>Elphil Palm Oil Mill</u></p> <p>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.</p> <p><u>Kinta Kellas Estate</u></p> <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.</p> <p>Thus, minor NC was issued.</p>	<p>Minor Nonconformity</p>
<p>4.7.6</p> <p>All workers shall be provided with medical care, and covered by accident insurance.</p> <p>- 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. Mill: RHB Insurance Berhad Policy No.: FW145070 valid till 30/6/2016 covering 17 workers.</p> <p><u>Kinta Kellas Estate</u></p> <p>Policy number: FW145088, valid until 30/6/16. Covered for the total of 56 workers.</p> <p><u>Kamuning Estate</u></p> <p>Policy number: FW149413, valid until 30/6/16. Covered for the total of 239 workers.</p>	<p>Complied</p>

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Criterion / Indicator	Assessment Findings	Compliance												
4.7.7 Occupational injuries shall be recorded using Lost Time Accident (LTA) metrics - Minor compliance -	<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="699 562 1275 723"> <thead> <tr> <th>Year</th> <th>Elphil POM</th> <th>Kinta Kellas Estate</th> <th>Kamuning Estate</th> </tr> </thead> <tbody> <tr> <td>2015</td> <td>2 (12 LTA)</td> <td>7 (73 LTA)</td> <td>5(64 LTA)</td> </tr> <tr> <td>2016</td> <td>0</td> <td>0</td> <td>0</td> </tr> </tbody> </table> <p><u>Kamuning Estate</u> 1 permanent disability case/class II accident involving foreign workers: 37 LTA recorded. Compensation paid on 29/9/15.</p>	Year	Elphil POM	Kinta Kellas Estate	Kamuning Estate	2015	2 (12 LTA)	7 (73 LTA)	5(64 LTA)	2016	0	0	0	Complied
Year	Elphil POM	Kinta Kellas Estate	Kamuning Estate											
2015	2 (12 LTA)	7 (73 LTA)	5(64 LTA)											
2016	0	0	0											
<p>Criterion 4.8: All staff, workers, smallholders and contract workers are appropriately trained.</p>														
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. 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 complied.	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 r 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 Quality Management System Subsection 6.1 Appendix 6.2.2 Version 1, Year 2008 Issue 1 (2008).</p> <p><u>Elphil Palm Oil Mill:</u> i) Chemical handling Training - 8/4/2015. ii) Autonomous Maintenance Training dated 26/6/2015. iii) First Aid Refresher Training - 19/3/2015.</p> <p><u>Kinta Kellas estate:</u> i)Accident Classes & Reporting – 6/11/15 ii)Chemical Handling Training – 10/3/15 iii)Schedule Waste Training – 16/2/15 iv)Manuring Training – 21/3/16 v) EFB application training – 12/3/16 vi)Chemical Spraying Training – 1/3/16 vii)Trunk Injection Training – 16/12/15`</p> <p><u>Kamuning Estate</u> i) Inter-pump Spray Training – 3/3/16 ii) First Aid Training – 17/3/16 iii) Safety Townhall – 5/1/16</p>	Complied												

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Criterion / Indicator	Assessment Findings	Compliance	
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.			
5.1.1	An environmental impact assessment (EIA) shall be documented. - Major compliance -	Plans and impact assessments relating to environmental impacts based on documents as following: <ul style="list-style-type: none"> Appendix 5.4.1b - Environmental Aspect and Impact Evaluation Procedure, Version 1; Year 2008 Issue no. 1; Dated 1 April 2009 Appendix 5.4.1c - Environmental Aspect and Impact Identification form, Version 1; Year 2008 Issue no. 1; Dated 1 April 2009 Appendix 5.4.1d – Environmental Impacts Evaluation form, Version 1; Year 2008 Issue no. 1; Dated 1 April 2009 	Complied
5.1.2	Where the identification of impacts requires changes in current practices, in order to mitigate negative effects, a timetable for change shall be developed and implemented within a comprehensive management plan. The management plan shall identify the responsible person/persons. - Minor compliance -	Elphil Mill: Environmental Aspect Identification (EAI) and Environmental Evaluation (EIE) reviewed and updated on 2/1/2016 where no changes identified to operations. Kinta Kellas Estate: Environment Aspect and Impact Identification review meeting on 22/7/2015. No changes identified. Kamuning Estate: Environment Aspect and Impact Identification review meeting on 2/1/2016. No changes identified It was observed that the reviewing and updating on the registers were done annually if there's no any new activity within respective sites. Next reviews are due on January 2016.	Complied

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<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.</p> <p>- Minor compliance -</p>	<p>Elphil mill: 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>Based on Sustainable Plantation Management System Appendix 10 Procedure for Mill Environmental Performance version 1, year 2008, issue no. 1, dated 1 October 2008. Uses the Mill Environmental Performance Review (Form A) Mill environmental monitoring records available/sighted:</p> <ul style="list-style-type: none"> • Sampled effluent monitoring records: Monthly Effluent Analysis Test Report no. EP92/2016 dated 18/2/2016 for sample taken on 8/1/2016 by Sime Darby Research Sdn. Bhd.; parameter monitored:- pH, Total Alkalinity, VFA, BOD, COD, TS, SS, VSS, TN, AN, O&G. Samples were taken from each point of treatment in the system consist of raw pond, acid ponds, digester tanks and final pond before field application. BOD limit for final discharge <50mg/L were met as well as all parameters that were within allowable limit. • Boiler stack sampling records: Stack Emission Monitoring Report on 22/12/2015 by Procoma Environmental (M) Sdn. Bhd. (Report ref. PR15-ISS-0132). Result in certificate of analysis shown the stack emissions are within limit at 25.651 mg/m3 for particulates. Previous monitoring was done on 28/7/2015 (Report ref. PR15-ISS-0057). • Mill online scheduled waste inventory & consignment (file ref. no. A 31/152/000/055 jld 01; Inventory no. 0803A2346400132016) – updated as of 1/3/2016 where the quantity and storage period were within allowable limit. Latest Scheduled Waste disposal done on 26/11/2015, consignment # 1008781 for SW 409, # 1008802 (SW 410), # 918105 (SW 322), # 1008839 (SW 110), # 1008766 (SW 306), # 1008821 (SW 418) and # 1008839-1 (SW 102) by Kualiti Alam Sdn. Bhd. • Estate clinical waste (SW 404) latest disposal consignment # AJS37924 dated 20/10/2015. <p>The monitoring was based on Sustainable Plantation Management System version 1, year 2008, issue no. 1, dated 1 October 2008.</p> <p>An environmental performance indicator monitoring masterlist has been established to monitor the effectiveness of the mitigation measures and being used for annual review.</p>	<p>Complied</p>
<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 and operations managed to best ensure that they are maintained and/or enhanced.</p>		

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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 -	As reported during ASA4, estate lands were cleared during the original land development in the early 1920s and remnant vegetation is limited to small areas of steep limestone hills. HCV4 which was assigned to remnant vegetation and riparian buffer zones are continuously maintained.	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 -	Based on baseline HCV assessment dated April 2010, it was noted that area more than 25o 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 25o was being cleared for rubber tree planting. Thus, major nonconformity has been raised.	Major Nonconformity
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 -	Staff and workers were given briefing on company policies that prohibit disturbance of designated protected areas. Signages are maintained at the entrance to the estates prohibiting illegal hunting, fishing and the use of fire. Posters are displayed on the notice boards at muster areas.	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 -	The management plan created has not been effectively implemented. Therefore, a Major NC has been raised in the indicator 5.2.2 above.	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 -	It is verified that there has been no instance of HCV set aside that conflicts with the rights of local communities at the estates visited. Thus negotiated agreement of such nature is not applicable.	Complied
Criterion 5.3: Waste is reduced, recycled, re-used and disposed of in an environmentally and socially responsible manner.			

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Criterion / Indicator		Assessment Findings	Compliance
5.3.1	All waste products and sources of pollution shall be identified and documented. - Major compliance -	As per Sustainable Plantation Management System Appendix 9 Procedure for Handling of Domestic Waste version 1, year 2008, issue no. 1, dated 1 October 2008 Mill: type of waste – effluent, fibre/shell, EFB, boiler clinker, wash water, scrap metal, scheduled waste, boiler blowdown, hydro-cyclone wash water, methane gas Estate: type of waste – scheduled waste – SW102, SW305, SW306, SW409, SW410, SW404 – workshop, clinic, SW store, store; domestic waste – rubbish & sewage – line-site, office, workshop, store, shop & recycle waste – empty container, scrap metal. Records on the usage and disposal were well recorded and documented. Appropriate secondary containment for the diesel skid tanks, chemical and scheduled waste storage areas was verified to be maintained accordingly.	Complied
5.3.2	All chemicals and their containers shall be disposed of responsibly. - Major compliance -	Based on policy to reduce, reuse and recycle, the management of used chemicals and containers were done in accordance Scheduled Waste regulations. For estates, the empty pesticides container were collected in scheduled waste store after being triple rinsing and punctured at the bottom of the container. Stores for scheduled waste were inspected at audited sites in mill and estates 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.	Complied
5.3.3	A waste management and disposal plan to avoid or reduce pollution shall be documented and implemented. - Minor compliance -	Scheduled waste is managed well with designated storage area at the mill and each of the estates not to less than 180 days in accordance with the requirements of the Environmental Quality Act 1974 (Scheduled Wastes), Regulations, 2005. Disposal was through licensed collector. The company has continued managing scheduled waste stores at the mill and each of the estates. Agrochemical containers are triple rinsed and punctured to avoid any misuse. Sampled mill pollution prevention plan dated 2/1/2016 including control of black smoke, POME, oil spillage domestic and scheduled waste sighted during the visit as well as for estates.	Complied
Criterion 5.4: Efficiency of fossil fuel use and the use of renewable energy is optimised.			

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5.4.1	<p>A plan for improving efficiency of the use of fossil fuels and to optimise renewable energy shall be in place and monitored.</p> <p>- 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.</p>	Complied
<p>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. Monthly records of energy consumption of non-renewable and renewable fuel per metric tonne of palm product for electricity generation at the Mill were available including diesel usage lt/mt FFB, TNB consumption kWh/mt FFB and turbine kWh/mt FFB.</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>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>			
5.5.1	<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.</p> <p>- 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. No open burning noted during the field visit.</p>	Complied
5.5.2	<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.</p> <p>- Minor compliance -</p>	<p>No use of fire for land preparation during replanting.</p>	Complied
<p>Criterion 5.6: Plans to reduce pollution and emissions, including greenhouse gases, are developed, implemented and monitored.</p>			

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Criterion / Indicator	Assessment Findings	Compliance
5.6.1 An assessment of all polluting activities shall be conducted, including gaseous emissions, particulate/soot emissions and effluent (see Criterion 4.4). - Major compliance -	Mill: pollution prevention plan base on environmental issue: 1) Black smoke emission from boiler – control operational, regular black smoke monitoring and calibrate smoke chart recorder, preventive maintenance of all fins and damper’s to ensure in good condition 2) Effluent discharge/overflow/leakage – op. cont. 3) Oil leakage/spillage – op. cont., collect spillage and handle as scheduled waste, clean spillage using rags and handled as scheduled waste, provide spill kits 4) Waste water discharge from mill cleaning/processing – op. cont. Estates: pollution prevention plan 2015/2016 1) Minimize use of certain pesticide/herbicide - Controlled purchased of pesticide - IPM implementation 2) Waste management - Zero open burning - SW handling as per regulations - Land applications for EFB 3) Maximizing recycling - Organic fertilizer (EFB) - Collaboration with chemical supplier to collect empty container 4) Oil spillage - Secondary containment - Concrete bunding 5) Domestic waste management - Waste segregation - Recycle bin	Complied
5.6.2 Significant pollutants and greenhouse gas (GHG) emissions shall be identified, and plans to reduce or minimise them implemented. - Major compliance	An additional plan to reduce or minimized the impacts for the identified GHG emissions has been established at the HQ level for all mills under the group company. It was noted that the plan was to install the methane capture facilities in the POME treatment that were projected for each nominated mills under the group to be completed by the year 2020. However no any confirmation on the kick-off of the plan in Elphil Palm Oil Mill.	Complied
5.6.3 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 -	The proposed monitoring system will be tabled upon finalization of the methane capture system design to be installed. Basically, it was noted that it will involve the monitoring of captured methane volume and its utilization. The company was already in communication with RSPO on GHG emission reporting as per records of email sighted.	Complied
Principle 6: Responsible consideration of employees and of individuals and communities affected by growers and millers		
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.		

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Criterion / Indicator		Assessment Findings	Compliance
6.1.1	A social impact assessment (SIA) including records of meetings shall be documented. - Major compliance -	Re-assessment of Social Impact (SIA) for SOU 3 was conducted by Sustainability Department (PSQM) on 24 – 27 August 2015. The assessment includes representatives from local government agencies, local communities, service providers, and neighbouring estates. The review mechanism had appropriately involved stakeholders by the sustainability team. Based on the meeting feedback each estate and the mill prepared their specific Mitigation Plan with dates and person in-charges clearly stated.	Complied
6.1.2	There shall be evidence that the assessment has been done with the participation of affected parties. - Major compliance -	The participation of both internal and external stakeholders (including local from Governmental organizations) which was evident with the list of participants recorded in the attendance list. Minutes of meetings as appended to the SIA Report were maintained as records. Reviewed list of stakeholders that included government bodies, group associated stakeholders, management staff and workers including representative of migrant workers such as Indonesians, Bangladeshis, Indians, Contractors/suppliers and government clinic staff.	Complied
6.1.3	Plans for avoidance or mitigation of negative impacts and promotion of the positive ones, and monitoring of impacts identified, shall be developed in consultation with the affected parties, documented and timetabled, including responsibilities for implementation. - Major compliance -	The participation of both internal and external stakeholders (Including local from Governmental organizations) which was evident with the list of participants recorded. Minutes of meetings as appended to the SIA Report were maintained as records. List of stakeholders were verified and included, school teachers, auxiliary police, government bodies, management staff and workers (incl. representative of migrant workers i.e. Indonesians), contractors/suppliers and health clinic staff. Sighted records of appointed teams headed by estate managers and assisted by assistant managers. The roles and responsibilities of these appointed officials were defined.	Complied
6.1.4	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 -	Elphil operating units have planned to review the SIA plans every year for follow-up and updating to current practices if needed. The social documents had plans for avoidance or mitigation of negative impacts, such as continue monitoring the level of smoke release from the mill, improving current workers housing, road maintenance programs, incentives for school children who have done well in studies, more efficient garbage collection, security and safety monitoring by auxiliary police, etc.	Complied
6.1.5	Particular attention shall be paid to the impacts of smallholder schemes (where the plantation includes such a scheme). - Minor compliance -	SOU3 does not include smallholders.	Complied
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.			
6.2.1	Consultation and communication procedures shall be documented. - Major compliance -	Consultation and communication procedure is similar to the procedure reported during the previous assessments.	Complied

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Criterion / Indicator		Assessment Findings	Compliance
6.2.2	A management official responsible for these issues shall be nominated. - Minor compliance -	Estate and Mill managers are the nominated persons responsible for communication with the stakeholders. The organization has a list of stakeholders/registrars including local authorities, government departments, suppliers and contractors.	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 -	The mill and estates have an updated list of stakeholders. It includes internal and external stakeholders such as government departments, contractor, suppliers and workers representatives.	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 -	Sime Darby has an established and documented system for dealing with complaints and grievances. Record shows that "Complaints and Grievances Book" in all estates visited are still active in recording complaints/requests made by employees and other stakeholders. Over the past 12 months, entries made were mainly on minor repairs needed to the road conditions, delay in rubbish collections, housing facilities repairs and mill road entrance which were verified to be attended to in a timely manner.	Complied
6.3.2	Documentation of both the process by which a dispute was resolved and the outcome shall be available. - Major compliance -	SOP to resolve social disputes "Handling Social Issues" SOP dated 01 Nov 2008 has been established. Stakeholder meetings are held regularly to identify and give opportunity to stakeholders to complaint or raise disputes. Issues are discussed and consensual agreements reached during stakeholder meetings. Follow-up actions had timelines, responsibilities, and details of actions were included in the social action plan and monitored by managers for satisfactory conclusion. Minutes of meetings are maintained and reviewed.	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 -	SOP to identify legal and customary rights as well as people entitled to compensation has been established- titled "Handling Land Disputes" SOP dated 01 Nov 2008. There have been no issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders.	Complied

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Criterion / Indicator		Assessment Findings	Compliance
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 -	SOP is as per in 6.4.1 above.	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.			
6.5.1	Documentation of pay and conditions shall be available. - Major compliance -	All the workers are covered by the MAPA/NUPW agreement and the staff covered with MAPA/AMESU agreement. This is documented at all the operating units. Migrant workers make up the majority of the workforce who are engaged on 2 or 3 year contracts. Payments are made as per the agreement. Inspection of contracts of both local and foreign workers confirmed that pay and conditions are available in local language and the language that the foreign workers speak.	Complied
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. - Major compliance -	Employment contract are available in languages understood by workers. Pay and conditions explained to workers by the operating units. The contract follows MAPA/NUPW agreements. Basic daily pay was verified to be in accordance with the Minimum Wage Order 2012. However, at 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 subsidies by the company. Thus, Major nonconformity was raised.	Minor Nonconformity
6.5.3	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 -	All the housing meets the government standard and interview of staff and workers raised no issues related to housing and facilities provide by the company. Schools are within close proximity such as the Primary School (SJKT Ladang Elphil) is located at Elphil mill and Estate.	Complied

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Criterion / Indicator		Assessment Findings	Compliance
6.5.4	Growers and millers shall make demonstrable efforts to monitor and improve workers' access to adequate, sufficient and affordable food. - Minor compliance –	Accesses to food for the workers are considered adequately and sufficiently.	Complied
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.			
6.6.1	A published statement in local languages recognising freedom of association shall be available. - Major compliance -	A Social Policy is in place and it has a statement on how employees are free to express their views in their own representative institution. All employees have right to form and join trade unions of their choice and to bargain collectively. This is carried out by the employees by joining the NUPW (National Union of Plantation Workers) and AMESU (All Malay Estate Staff Union).	Complied
6.6.2	Minutes of meetings with main trade unions or workers representatives shall be documented. - Minor compliance -	Local and foreign workers are represented in the NUPW. Latest meeting was conducted on 23/12/2015 attended by 9 workers representatives. The objective of the meeting was to discuss any outstanding issues/disputes related to workers. However, at Kamuning Estate, minutes of meeting with workers union (NUPW) was not available during the audit. Thus, Minor nonconformity was raised.	Minor Nonconformity
Criterion 6.7: Children are not employed or exploited.			
6.7.1	There shall be documentary evidence that minimum age requirements are met. - Major compliance -	Reviewed inspection of employee contract agreement and list of registration confirmed that those employed are as per company policy on minimum age. The minimum working age is 18 and above. During field visit and consultation with stakeholders confirm that there is no child labour at any of the operation sites.	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 -	Sime Darby Social Policy signed by the MD on Jan 2015 is displayed at noticeboard at the mill and estates. This was communicated with all employees. Interview of male and female workers confirmed understanding and awareness of the policy. Pay record and interview with employees confirm that there is no any kind of discrimination. All workers have access to the grievance and resolution mechanism.	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 -	The employment of foreign workers was implemented without affecting the opportunities for local communities. Interviews with foreign workers revealed satisfaction with the estates for job opportunities and they enjoy all common welfare amenities like free housing, free water and electricity supplies and medical care	Complied

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Criterion / Indicator		Assessment Findings	Compliance
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 -	Recruitment selection, hiring and promotion are based on skills, capabilities, qualities, and medical fitness necessary for the jobs available. It was noted during the audit that there is no discrimination based on nationality, race, gender, age, 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 -	A statement to prevent sexual harassment and violence is documented in the Sime Darby Plantation Social Policy and Gender Policy. A woman representative (internal staff) has been appointed at every site for gender committee in representing each operating units and work category that involve female workers.	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 -	Sime Darby has a policy to protect the reproductive rights of all, especially women which was incorporated in Gender Policy (signed by MD on Jan 2015). This was communicated and implemented through gender committee.	Complied
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 -	The company has developed specific grievance mechanism on sexual harassment and violence. Female workers interview confirmed understanding of the mechanism and no issue was raised during the audit. The last gender committee meeting was held on 27/1/2016 at mill level with 14 members. As for Kinta Kellas estate, the last meeting was done on 28/1/16 attended by 8 members. The meeting minutes at all 3 sites visited shows that there were no harassment issue that was raised. The meeting follows the guidelines as per the Gender Committee Manual.	Complied
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.	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 -	Interview with the contractors and suppliers confirmed that they understand the terms and conditions of the contract.	Complied
6.10.4	Agreed payments shall be made in a timely manner. - Minor compliance -	Interview with contractors also confirmed that the payments are made on time. E.g.: 15 th / 30 th of the following month as per contract.	Complied
Criterion 6.11: Growers and millers contribute to local sustainable development where appropriate.			

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Criterion / Indicator		Assessment Findings	Compliance
6.11.1	Contributions to local development that are based on the results of consultation with local communities shall be demonstrated. - Minor compliance -	Elphil mill and estates contribute to local development through donations to local schools, temples and mosques, which are considered an appropriate form of assistance.	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.	Complied
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 -	Workers, staff and stakeholder interview confirm that there is no any form of forced labour or trafficked labour in the operating units. All employees have employment contract and paid the agreed national minimum wages.	Complied
6.12.2	Where applicable, it shall be demonstrated that no contract substitution has occurred. - Minor compliance -	There was no evidence of contract substitution and this was confirmed from interviews with workers and relevant stakeholders.	Complied
6.12.3	Where temporary or migrant workers are employed, a special labour policy and procedures shall be established and implemented. - Major compliance -	The special policy on recruitment of foreign workers and equal opportunities are established and the implementations are verified to be satisfactory. Review on employment contracts of foreign workers also confirmed that the policy includes MAPA/NUPW Agreement in force; including minimum wages have also been duly implemented. Contracts for foreign employees were available and recorded.	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 policy to respect human rights- Social & Humanity Management Policy has been established and implementations are verified to be satisfactory. Review on employment contracts of local and foreign workers also confirmed that the policies, including minimum wages have also been duly implemented.	Complied
Principle 7: Responsible development of new plantings West Certification unit and supply base did not carry out any new plantings after Nov 2005. Therefore, the requirement of Principle 7 is not applicable during this assessment.			
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.			

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Criterion / Indicator	Assessment Findings	Compliance
<p>8.1.1 The action plan for continual improvement shall be implemented, based on a consideration of the main social and environmental impacts and opportunities of the grower/mill, and shall include a range of Indicators covered by these Principles and Criteria.</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><u>Kaizen project</u></p> <p>i) Process improvement – Baffle plate installed at Fuel Distribution Conveyor(to avoid accumulation of fibre)</p> <p>ii) Operational Control – Installation of cover frame. Easy opening and to avoid loose fruit spillage (housekeeping)</p> <p>There’s also a new boiler has been budgeted for the mill as part of the mill’s process continual improvement.</p>	<p>Complied</p>

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Appendix B: Sime Darby Plantation Sdn. Bhd. Time Bound Plan

TIME BOUND PLAN – Certification Units in Malaysia			
No.	MANAGEMENT UNIT		LOCATION
	P O M	Time Bound	
1	Sg Dingin	Certified 2010 - Recertification Completed	Kedah
2	Chersonese	Certified 2011	Perak
3	Elphil	Certified 2011	Perak
4	Flemington	Certified 2011	Perak
5	Seri Intan	Certified 2011 – Recertification Completed.	Perak
6	Selaba	Certified 2011 – Recertification Completed.	Perak
7	Tennamaram	Certified 2011 - Recertification Completed.	Selangor
8	Bkt. Kerayong	Certified 2011 – Recertification Completed.	Selangor
9	East	Certified 2010 - Recertification Completed	Selangor
10	West	Certified 2010 - Recertification Completed	Selangor
11	Bukit Puteri	Certified 2011	Pahang
12	Kerdau	Certified 2011	Pahang
13	Jabor	Certified 2011	Pahang
14	Labu	Certified 2011	N. Sembilan
15	Tanah Merah	Certified 2010 - Recertification Completed	N. Sembilan
16	Sua Betong	Certified 2014	N. Sembilan
17	Kok Foh	Certified 2011	N. Sembilan
18	Kempas	Certified 2010 - Recertification Completed	Malacca
19	Diamond Jubilee	Certified 2011	Malacca
20	Pagoh	Certified 2014	Johor
21	Chaah	Certified 2010 – Recertification Completed	Johor
22	Gunung Mas	Certified 2010 – Recertification Completed	Johor
23	Bukit Benut	Certified 2011	Johor
24	Ulu Remis	Certified 2011	Johor
25	Hadapan	Certified 2011	Johor
26	Sandakan Bay	Certified 2008 - Recertification completed.	Sabah
27	Melalap	Certified 2011- Recertification Completed.	Sabah
28	Binuang	Certified 2009 - Recertification completed.	Sabah
29	Giram	Certified 2009 - Recertification completed.	Sabah
30	Merotai	Certified 2009 - Recertification completed.	Sabah
31	Lavang	Certified 2011	Sarawak
32	Rajawali	Certified 2011	Sarawak
33	Derawan	Certified 2011	Sarawak
34	Pekaka	Certified 2011	Sarawak

TIME BOUND PLAN – Certification Units in Indonesia			
No.	MANAGEMENT UNIT		LOCATION
	P O M	Time Bound	
1	Sekunyir (PT. Indotruba Tengah)	Certified 2010 (Recert. Completed)	Seruyan and West Kotawaringin District – Central Kalimantan
2	Manggala (PT. Tunggal Mitra Plantation)	Certified 2010 (Recert. Completed)	Rokan Hilir District – Riau
3	Bk. Ajong (PT. Sime Indo Agro)	Certified 2010 (Recert. Completed)	Sanggau District –West Kalimantan
4	Teluk Siak (PT Aneka Inti Persada)	Certified 2011	Pekanbaru, Siak District – Riau
5	Sungai Pinang (PT. Bina Sains Cemerlang)	Certified 2012	Musi Rawas District – South Sumatera

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6	Sukamandang (PT. Kridatama Lancar)	Certified 2011	Seruyan and East Kotawaringin District – Central
7	Pematang (PT. Teguh Sempurna)	Certified 2011	Seruyan and East Kotawaringin District – Central
8	Alur Dumai (PT Lahan Tani Sakti)	Certified 2012	Rokan Hilir District – Riau
9	Teluk Bakau (PT. Bhumireksa Nusa Sejati)	Certified 2011	Indra Giri Hilir District – Riau
10	Mandah (PT. Bhumireksa Nusa Sejati)	Certified 2014	Indra Giri Hilir District – Riau
11	Angsana Mini (PT Sajang Heulang)	Certified 2011	Tanah Bumbu District – South Kalimantan
12	AngsanaPT Ladangrumpun Suburabadi	Certified 2011	Tanah Bumbu District – South Kalimantan
13	Mustika (PT Sajang Heulang)	Certified 2013	Tanah Bumbu District – South Kalimantan
14	Gunung Aru (PT Bersama Sejahtea Sakti)	Certified 2011	Kotabaru District – South Kalimantan
15	Bebunga (PT. Langgeng)	Certified 2012	Kotabaru District – South Kalimantan
16	Blang Simpo (PT Padang Palma Permai)	Certified 2013	Aceh Tamiang, Nangroe Aceh Darussalam
17	Pondok Labu (PT Paripurna Swakarsa)	Certified 2012	Kotabaru District – South Kalimantan
18	Selabak (PT Swadaya Andhika)	Certified 2012	Kotabaru District – South Kalimantan
19	Rantau (PT Laguna Mandiri)	Certified 2012	Kotabaru District – South Kalimantan
20	Betung (PT Laguna Mandiri)	Certified 2014	Kotabaru District – South Kalimantan
21	Ungkaya (PT Tamaco Graha Krida)	Certified 2012	Morowali District – Sulawesi Tengah
22	Ladang Panjang (PT Bahari Gembira Ria)	Certified 2012	Muaro Jambi District - Jambi
23	Rantau Panjang (PT Guthrie Pecconina Indonesia)	Certified 2012	Musi Banyuasin District – South Sumatera

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24	<p>MAS (PT Mitra Austral Sejahtera) 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. Regular discussions are ongoing between Sime Darby Plantation and the project affected communities.</p>	2016	<p><u>Sanggau District – West Kalimantan</u> RSPO Certification Target Date for PT MAS</p> <ul style="list-style-type: none"> - The target date for certification is by 2016. However the progress of the matter being resolved. <p><u>Progress Update (As at end Oct 2015)</u></p> <ul style="list-style-type: none"> - Regular discussion is ongoing between Sime Darby Plantation and the project affected communities (PAC) through bi-monthly Tim Kerja Perwakilan Petani (TKPP) meeting since November 2012. - In October 2013, representatives from two of nine villages (Kerunang and Entapang) left TKPP and backed by TuK and OXFAM. They have then requested SDP to enter into Dispute Settlement Facility (DSF) in June 2014. - Hence, there are two groups of PAC: 1) TKPP (7 of 9 villages) and 2) Kerunang & Entapang (2 of 9 villages) <p><u>Engagement with TKPP:</u></p> <ul style="list-style-type: none"> - The most recent TKPP meeting was held on 16th October 2015. The meeting was on reviews on the current and planned CSR activities for the communities. - Engagement with Kerunang/ Entapang: - SDP visited the communities on 27 August 2014 to listen and have a better understanding on their requests - The subsequent meeting with the communities was held on 12 Dec 2014 where the communities highlighted that they will not join the current SDP-PAC committee (TKPP) meetings and will continue to engage directly with SD. <p><u>Engagement with RSPO:</u></p> <ul style="list-style-type: none"> - RSPO Secretariat is well informed on the progress through regular briefing and progress reports. The latest report submitted to RSPO dated 7th August 2015. <p><u>Engagement with TuK-Indonesia:</u></p> <ul style="list-style-type: none"> - In May 2015, TuK submitted a proposal (in the form of concept note). SDP has requested for a presentation from TuK for better understanding, before signing of agreement. - To-date, 12 out of 14 demands have been resolved whilst, another two remaining demands are related to land matters. SDP is in engagement with TuK-Indonesia to resolve the remaining issues involving land matters. - Latest meeting with community was held on 14 Jan 2016 and pending for the outcome. <p>SDP continues to work on direct engagement with PAC – working towards a consensus with the PAC to withdraw their complaint.</p>
25	Lembiru (PT Sandika Nata Palma)	Certified 2014	Ketapang District – West Kalimantan

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Appendix C: Sime Darby Plantation Sdn Bhd – Elphil 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

BSI RSP0 Certificate No: RSP0 550180
 Date of Initial Certificate Issued: 18/06/2011
 Date of Expiry: 17/06/2021
 RSP0 membership number: 1-0008-04-000-00
 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	Elphil Palm Oil Mill, Jalan Lintang, Sungai Siput Utara 31100 Sungai Siput, Perak, Malaysia				
GPS Location	E 101° 5' 37" : N 4° 53' 24"				
CPO Tonnage Total	37,418 mt				
PK Tonnage Total	9,290 mt				
CPO Claimed for Certification*	26,419 mt				
PK Claimed for Certification *	6,559 mt				
Own estates FFB Tonnage	122,595 mt				
Scheme Smallholder FFB Tonnage	51,040 mt				
Estates	Production Area		Other use (ha)	Certified Area / Total land lease (ha)	Annual FFB Production (mt)
	Mature (ha)	Immature (ha)			
Elphil Estate	1,600	76	200	1,876	41,843
Kamuning Estate	3,049	511	329	3,889	61,953
Kinta Kellas Estate	731	219	111	1,061	18,799
TOTAL	5,380	806	640	6,826	122,595

**Certified Production*

Appendix D: Assessment Plan

PRELIMINARY AGENDA					
Date	Time	Subjects	Hafri	Hidhir	Haris
Monday 21/03/2016	PM	Audit Team travelling to the site.	✓	✓	✓
Tuesday 22/03/2016 Elphil Palm Oil Mill	08.30 – 09.00	Opening Meeting: • Opening Presentation by Audit team leader. • Confirmation of assessment scope and finalize Audit plan (including stakeholder’s consultation).	✓	✓	✓
	09.00 – 12.00	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, etc.	✓	✓	✓
	10.00 – 12.00	Meeting with stakeholders (Government, village rep, smallholders, Workers Leader, contractor etc.)	✓	-	✓
	12.00 – 13.00	Lunch	✓	✓	✓
	13.00 – 16.30	Elphil Palm Oil Mill: Visit to laboratory, weighbridge and palm product storage area. Document Review P1 – P8: SOPs, Supply chain for CPO mill, Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation etc. Verify previous nonconformities.	✓	✓	✓
	16.30-17.00	Interim Closing briefing.	✓	✓	✓
Wednesday 23/03/2016 Kinta Kellas Estate	08.30 – 12.00	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.	✓	✓	✓
	12.00 – 13.00	Lunch	✓	✓	✓
	13.00 – 16.30	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.).	✓	✓	✓
	16.30-17.00	Interim Closing Briefing	✓	✓	✓

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PRELIMINARY AGENDA					
Date	Time	Subjects	Hafri	Hidhir	Haris
Thursday 24/03/2016 Kamuning Estate	8.30 – 12.00	Kamuning 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.	✓	✓	✓
	12.00 – 13.00	Lunch	✓	✓	✓
	13.00 – 16.30	Kamuning 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.).	✓	✓	✓
	16.30-17.00	Closing Meeting: <ul style="list-style-type: none"> Presentation of report and findings 	✓	✓	✓
Friday 25/03/2016	AM	Audit Team travelling back to KL.	✓	✓	✓

Appendix E: Stakeholders Contacted

<p>Internal Stakeholders</p> <p>Managers and Assistants Male Mill Staff/Workers Female Mill Staff/Workers Foreign Workers Male and Female Estate workers Hospital Assistant Female Assistant at Clinic Union Representatives Gender Committee Secretary</p>	<p>Local Communities</p> <p>Village Committee representative Joint Consultative Committee (cattle owners) at village NUPW Representative AMESU Representative</p>
<p>Government Departments</p> <p>Government School Headmistress Department of Safety and Health Department of Environment</p>	<p>Contractors/NGO/Consultants</p> <p>General Supplier FFB Transport contractor Engineering work contractor AMESU NUPW</p>

Appendix F: CPO Mill Supply Chain Assessment Report (Module E-CPO Mills: 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>Elphil Mill has procedures for the incoming FFB, processing and outgoing Crude Palm Oil and Palm Kernel for the traceability with Mass Balance model covering certified and non-certified FFB received.</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>
E.4 Purchasing and goods in	
<p>E.4.1 The site shall verify and document the volumes of certified and non-certified FFBs received.</p>	<p>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.</p>
<p>E.4.2 The site shall inform the CB immediately if there is a projected overproduction.</p>	<p>The facilities aware of this procedure.</p>

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E.5 Record keeping	
<p>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.</p> <p>(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.</p> <p>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. (i.e. product can be sold before it is in stock.)</p>	<p>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. Computerized system in place. Records verified by internal and external audit.</p> <p>Computerized system in place with the delivery deducted accordingly.</p> <p>The Mill aware that only positive stock can be delivered. No short selling.</p>
<p>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</p>	<p>No outsourcing activities.</p>

Actual Tonnage Certified Palm Production - 01 April 2015 – 31 March 2016 (ASA4)

Mill	Capacity	CPO	PK
Elphil Palm Oil Mill	45 mt/hr	23,763	5,704

Actual Tonnage Sales of Certified Palm Products - 01 April 2015 – 31 March 2016 (ASA4)

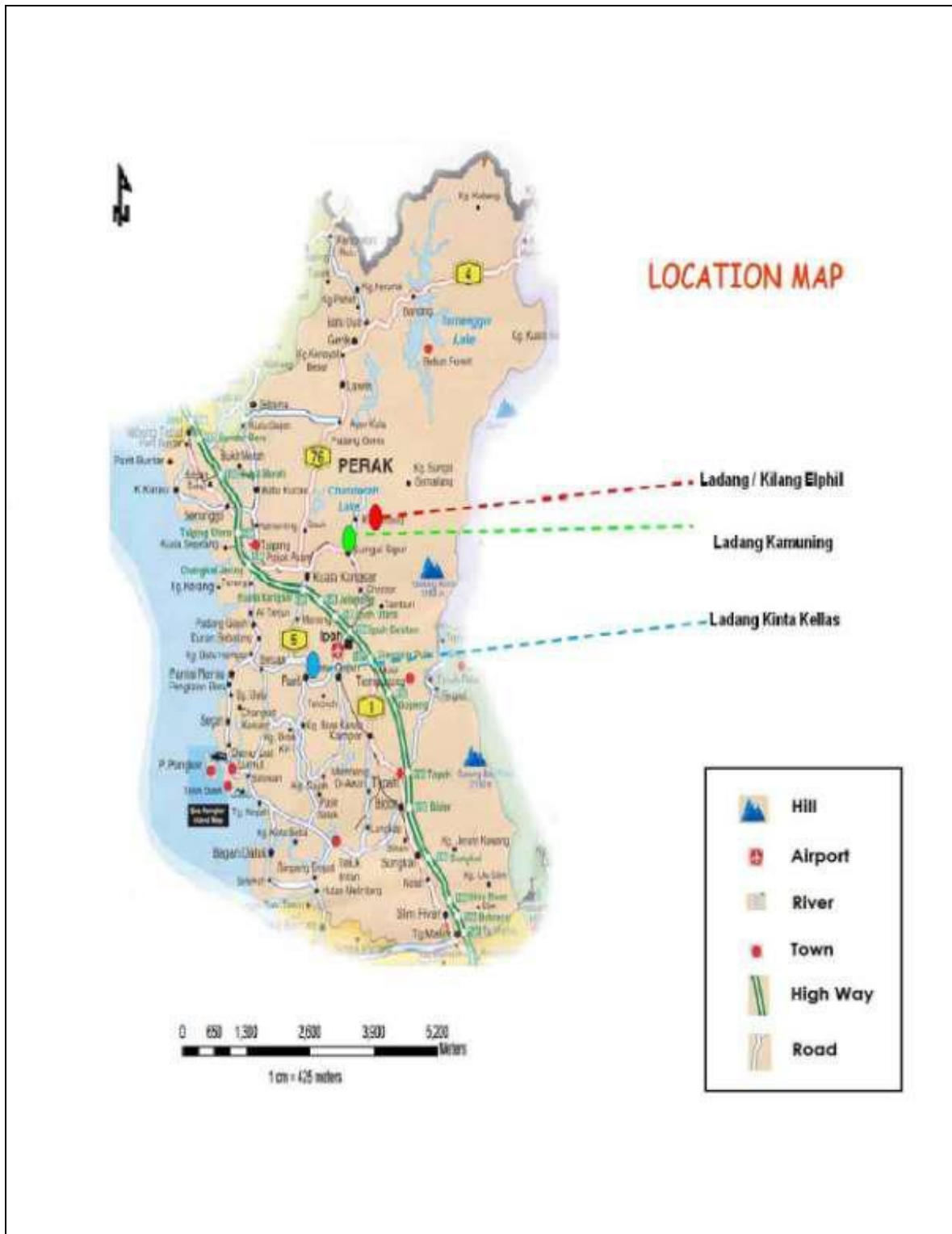
Mill	Certified CPO Sales	Certified PK Sales	Remarks
Elphil Palm Oil Mill	15,952.42 Mt	0	-Green Palm Certificates allocated: 12,000 -Physical sales in Etrace system: 3,952.42

Actual Tonnage Certified FFB Received Monthly - 01 April 2015 – 31 March 2016 (ASA4)

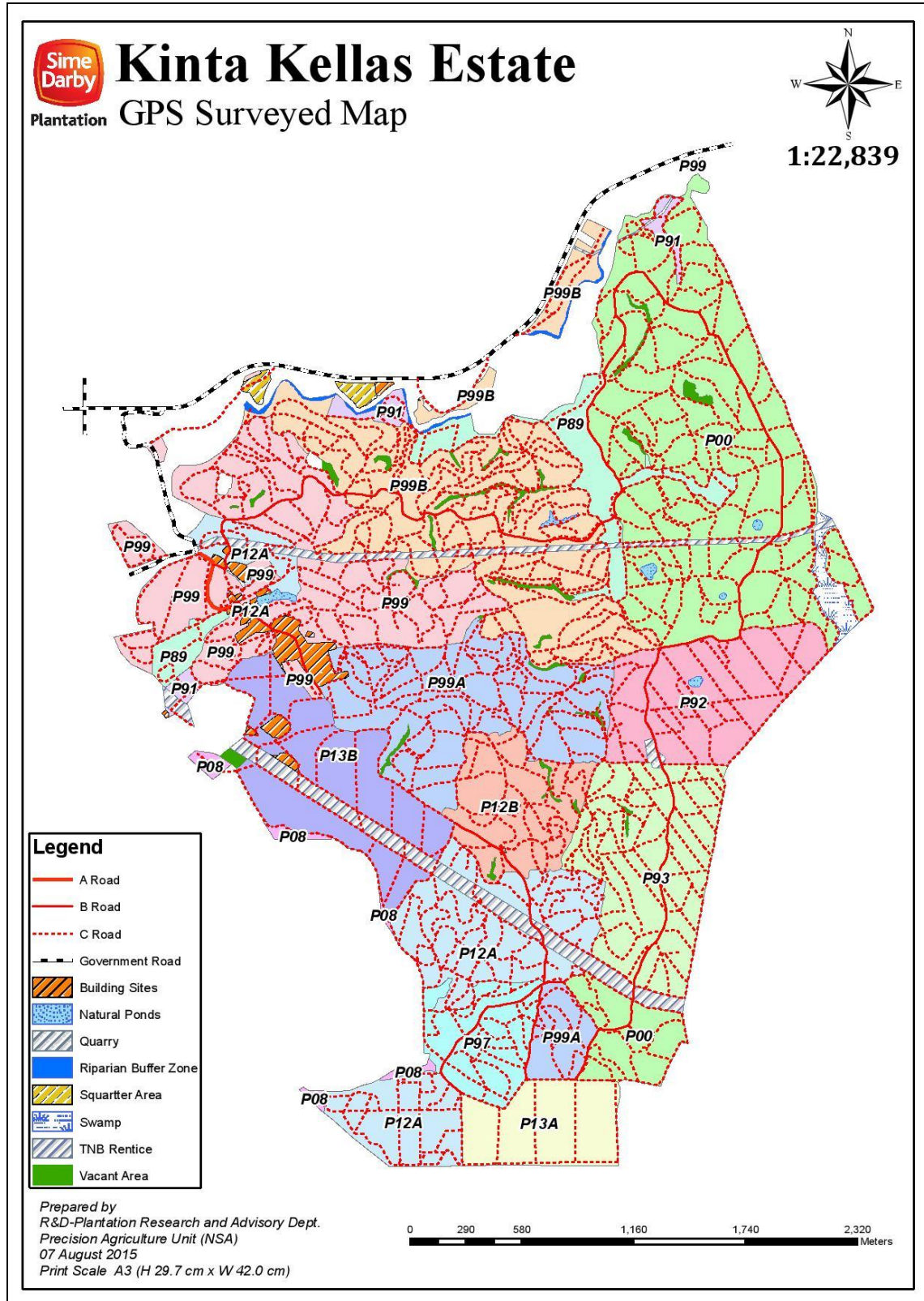
Month	Elphil Estate	Kamuning Estate	Kinta Kellas Estate	Total FFB/Month
April 2015	4,222	6,225	2,117	12,564
May 2015	4,018	5,774	1,702	11,495
June 2015	4,006	5,620	1,953	11,579
July 2015	4,377	5,667	1,916	11,959
Aug. 2015	4,022	6,074	2,185	12,281
Sept. 2015	3,455	5,386	1,710	10,551
Oct. 2015	3,421	4,886	1,229	9,536
Nov. 2015	2,381	3,555	1,015	6,952
Dec. 2015	2,173	3,211	1,094	6,478
Jan. 2016	2,183	3,407	925	6,515
Feb. 2016	1,507	2,182	546	4,235
*Mar. 2016	3,771	4,782	1,382	9,935
Total	39,536	56,769	17,774	114,080

*March 2016: Estimation

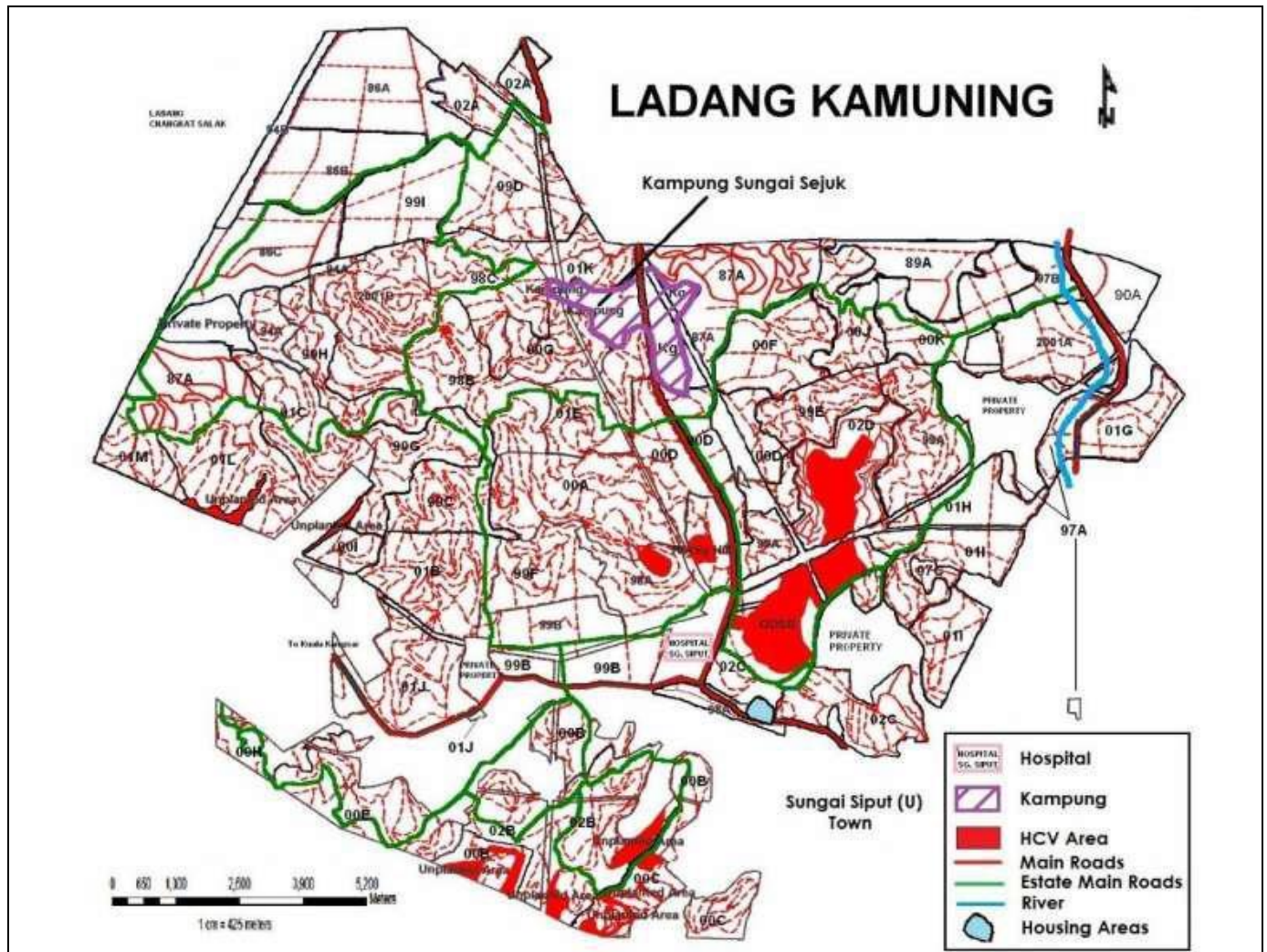
Appendix G: Location Map of Elphil Certification Unit and Supply bases



Appendix H: Kinta Kellas Estate Field Map



Appendix I: Kamuning Estate Field Map



Appendix J: List of Abbreviations Used

AMESU	All Malaysian Estate Staff Union
AN	Ammoniacal Nitrogen
ASA1	Annual Surveillance Assessment 1
BOD	Biological Oxygen Demand
CHRA	Chemical Health Risk Assessment
CPO	Crude Palm Oil
DDE	Dusun Durian Estate
DOE	Department of Environment
DOSH	Department of Occupational Safety & Health
EFB	Empty Fruit Bunch
EMS	Environmental Management System
FFB	Fresh Fruit Bunch
GMP	Good Manufacturing Practice
HCV	High Conservation Value
IAV	Initial Assessment Visit
IPM	Integrated Pest Management
ISCC	International Sustainable Carbon Certification
MAPA	Malaysian Agriculture Producers Association
MPOA	Malaysian Palm Oil Association
MSDS	Material Safety Data Sheet
MY-NI	Malaysian National Interpretation
NUPW	National Union of Plantation Workers
O&G	Oil and Grease
PK	Palm Kernel
PPE	Personal Protective Equipment
PSQM	Plantation Sustainability and Quality Management
PQR	Performance Quality Rating
RC	Re-Certification
RED	Renewable Energy Directive
RSPO P&C	Roundtable on Sustainable Palm Oil Principle & Criteria
SCCS	Supply Chain Certification Standard
SEIA	Social & Environmental Impact Assessment
SIA	Social Impact Assessment
SOP	Standard Operating Procedure
SOU	Strategic Operating Unit
SS	Suspended Solids
TN	Total Nitrogen
TS	Total Solids
VFA	Volatile Fatty Acids