

**RSPO PRINCIPLE AND CRITERIA
INITIAL ASSESSMENT
Public Summary Report**

Kulim (Malaysia) Berhad
Head Office: Kulim (Malaysia) Berhad K.B 705, Ulu Tiram 80990 Johor Bahru Johor, Malaysia
Pasir Panjang Palm Oil Mill and Supply Base K.B. 527 81909 Kota Tinggi Johor, Malaysia

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Section 1: Scope of the Certification Assessment

1. Company Details			
RSPO Membership Number	1-0006-04-000-00	Date	Member since: 8 August 2004
Company Name	Kulim (Malaysia) Berhad		
Address	Head Office : K.B 705 80990 Ulu Tiram, Johor, Malaysia		
Mill Address	Certification Unit : K.B. 527 81909 Kota Tinggi, Johor, Malaysia		
Subsidiary of (if applicable)	N/A		
Contact Name	Mrs Salasah Elias		
Website	www.kulim.com.my	E-mail	salasah@kulim.com.my
Telephone	07 8611611	Facsimile	07 8631084
2. Certification Information			
Certificate Number	RSPO 657192	Certificate Issued Date	09/03/2017
		Expiry Date	08/03/2022
Scope of Certification	Production of Palm Oil and Palm Kernel from Pasir Panjang Palm Oil Mill and Supply Base (Pasir Panjang Estate, Tunjuk Laut Estate, Bukit Payung Estate, Siang Estate, Bukit Kelompok Estate & Pasir Logok Estate)		
Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
-			

3. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base)	Location [Map Reference #]	GPS	
		Easting	Northing
Pasir Panjang Palm Oil Mill	K.B. 527 81909 Kota Tinggi, Johor, Malaysia	103° 56' 54.8736" E	2° 1' 4.8504" N
Pasir Panjang Estate	K.B. 527 81909 Kota Tinggi, Johor, Malaysia	103° 57' 15.9372" E	2° 0' 34.7616" N
Tunjuk Laut Estate	K.B. 517 81909 Kota Tinggi, Johor, Malaysia	103° 59' 9.5208" E	1° 57' 41.6916" N
Bukit Payung Estate	K.B. 521 81909 Kota Tinggi, Johor, Malaysia	103° 55' 12.558" E	2° 0' 26.5572" N
Siang Estate	K.B. 515 81909 Kota Tinggi, Johor, Malaysia	104° 12' 40.2372" E	1° 39' 10.1556" N
Bukit Kelompok Estate	K.B. 512 81909 Kota Tinggi, Johor, Malaysia	103° 59' 54.3984" E	2° 0' 24.3108" N
Pasir Logok Estate	K.B. 504 81909 Kota Tinggi, Johor, Malaysia	104° 2' 20.3532" E	2° 1' 53.3856" N

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4. Description of Supply Base							
Estate	Mature (ha)	Immature (ha)	Total Planted (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Hectarage	% of Planned
Pasir Panjang	1,028.11	420.3	1,448.41	10.52	247.07	1,706.00	84.90
Tunjuk Laut	1,900.88	771.67	2,672.55	23.02	172.23	2,867.80	93.19
Bukit Payung	1,194.35	726.06	1,920.41	284.66	102.56	2,307.63	83.22
Siang	3,205.92	-	3,205.92	70.38	166.8	3,443.10	93.11
Bukit Kelompok	1,832.85	604.91	2,437.76	41.19	98.58	2,577.53	94.58
Pasir Logok	1,993.51	-	1,993.51	17.4	73.54	2,084.45	95.63
TOTAL	11,155.62	2,522.94	13,678.56	447.17	860.78	14,986.51	

*Variance in total hectarage in public notification and final summary report due to re-survey of area conducted by R&D department.

5. Plantings & Cycle								
Estate	Age (Years)					Tonnage / Year		
	0 - 3*	4 - 10*	11 - 20	21 - 25	26 - 30	Estimated (Jan 2015-Dec 2015)	Actual (Jan 2016- Dec 2016)	Forecast (Jan 2017- Dec 2017)
Pasir Panjang	420.30	486.7	0	243.48	297.93	-	14,435.76	14,950.00
Tunjuk Laut	771.67	1,457.56	244.5	0	198.82	-	28,515.90	29,208.00
Bukit Payung	726.06	487.51	0	706.84	0	-	17,038.74	18,879.00
Siang	0	1,835.96	1,369.96	0	0	-	43,315.39	74,297.00
Bukit Kelompok	604.91	1,337.85	495.00	0	0	-	36,859.72	42,454.00
Pasir Logok	0	1190.09	661.68	141.74	0	-	43,143.39	49,523.00
Total	2,522.94	6,795.67	2,771.14	1,092.06	496.75	-	183,308.9	229,311.00

*replanting

6. Certified Tonnage of FFB (Own Certified Scope)			
Estate	Tonnage / year		
	Estimated Jan 15 – Dec 15	Actual Jan 16 – Dec 16	Forecast Jan 17 – Dec 17
Pasir Panjang	-	14,435.76	14,950.00
Tunjuk Laut	-	28,515.90	29,208.00
Bukit Payung	-	17,038.74	18,879.00
Siang	-	43,315.39	74,297.00
Bukit Kelompok	-	36,859.72	42,454.00

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Pasir Logok	-	43,143.39	49,523.00
Total	-	183,308.9	229,311.00

7. Non-Certified Tonnage of FFB (outside supplier – excluded from certificate) if applicable			
Independent FFB Supplier	Tonnage / year		
	Estimated Jan 15 – Dec 15	Actual Jan 16 – Dec 16	Forecast Jan 17 – Dec 17
Not applicable			

8. Certified Tonnage									
Mill	Estimated Jan 15 – Dec 15			Actual Jan 16 – Dec 16			Forecast Jan 17 – Dec 17*		
	FFB	CPO	PK	FFB	CPO	PK	FFB	CPO	PK
Pasir Panjang Palm Oil Mill	-	-	-	183,308.90	38,331.60	9,067.62	229,311.00	49,989.80	11,465.55

*OER: 21.80%; KER: 5.00%

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
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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 initial assessment was conducted from 25 – 27 October 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.

Public Stakeholder Notification was made on 15 September 2016, more than 30 days prior to the initial certification assessment. No written negative feedback received at the end of the 30 days period. Stakeholder consultation involved internal and external stakeholders. External stakeholders were contacted by telephone and email to arrange meetings at a location convenient to them to discuss Kulim Pasir Panjang Certification Unit's environmental and social performance.

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

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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.

The assessment findings for the initial assessment are detailed in Section 3.3.

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

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

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

Assessment Program					
Name (Mill / Supply Base)	Initial Assessment (2016)	ASA1 (2017)	ASA2 (2018)	ASA3 (2019)	ASA4 (2020)
Pasir Panjang Palm Oil Mill	√	√	√	√	√
Pasir Panjang Estate		√		√	
Tunjuk Laut Estate	√			√	
Bukit Payung Estate	√				√
Siang Estate		√			√
Bukit Kelompok Estate			√		
Pasir Logok Estate			√		

Tentative Date of Next Visit: November 10, 2017

Total No. of Mandays: 9 mandays

BSI Assessment Team:

Hoo Boon Han – Lead Auditor

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

**RSPO Public Summary Report
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He holds Bachelor Degree in Plantation Technology and Management, graduated from University Technology Mara (UiTM) on 2009. He has 4 years working experience in oil palm plantation industry. He also has the experiences as an auditor for several standards including ISO 9001, ISO 140001, OHSAS 18001, MSPO and RSPO in his previous certification body. He completed the ISO 9001 Lead Auditor Course, ISO 14001 Lead Auditor Course and OHSAS 18001 Lead Auditor Course in 2013, Endorsed RSPO P&C Lead Auditor Course in 2014 and MSPO Awareness Training in 2014. He had been involved in RSPO auditing since May 2013 in more than various companies in Malaysia. During this assessment, he assessed on the aspects of legal, mill best practices, estate best practices, safety and health, environmental and workers and stakeholders consultation.

Hu Ning Shing- Team Member

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

Accompanying Persons: -

Section 3: Assessment Findings

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

- ☒ RSPO P&C MYNI 2014 Checklist – **Appendix A:** Summary report of the Assessment.
- ☒ Kulim (Malaysia) Berhad Time Bound Plan – **Appendix B:** Time Bound Plan.
- ☒ RSPO Supply Chain Certification Checklist – **Appendix F:** CPO Mill Supply Chain Assessment Report.

3.2 Progress against Time Bound Plan

Kulim (Malaysia) Berhad has disposed interest in New Britain Palm Oil Ltd in 2014. Kulim (Malaysia) Berhad previously managed the Tunjuk Laut Palm Oil Mill and Supply Base but since October 2013 this has been leased to third party operator (Awan Timur Resources) and Kulim (Malaysia) Berhad no longer manages the operations. Siang Estate previously supplies FFB to Siang Palm Oil Mill which was previously certified under Johor Corporation and now managed by third party. It is not within Kulim (Malaysia) Berhad's management control. Pasir Panjang Palm Oil Mill was under Johor Corporation, and acquired under Kulim (Malaysia) Berhad through Mahamurni Plantations Sdn Bhd in 2012. At the same time Kulim (Malaysia) Berhad has acquired Pasir Panjang Palm Oil Mill through Mahamurni Plantation Sdn Bhd in 2012. Pasir Panjang Palm Oil Mill enter time bound plan as per "work plan Kulim / Jcorp estate" document and due for certification in 2016. Since March 2015 all Jcorp Estate is now supplied to Pasir Panjang Mill which will enter RSPO Certification 2016. However due to new restructuring starting 1st January 2015, seven (7) estate will be under Kulim (Malaysia) Berhad namely Kuala Kabong, Ulu Tiram, Basir Ismail, REM, Labis Bahru, Mutiara and Sungai Sembrong. All other operating unit will be under Mahamurni Plantation Sdn. Bhd.

Kulim (Malaysia) Berhad has 100% ownership in Mahamurni Plantations Sdn Bhd. Mahamurni Plantations Sdn Bhd have 3 palm oil mills i.e.: Sedenak Palm Oil Mill, Palong Cocoa Palm Oil Mill, and Pasir Panjang Palm Oil Mill. Mahamurni Plantations Sdn Bhd also has 9 estates: Sedenak Estate, Sungai Papan which supply to certified Sedenak Palm Oil Mill; Mungka Estate, Kemedak Estate, Palong Estate, Ladang UMAC which supply to certified Palong Cocoa Palm Oil Mill; Rengam Estate supply to certified Sindora Palm Oil Mill. Pasir Panjang Estate will supply to Pasir Panjang Palm Oil Mill, which due for certification by 2016. Kulim (Malaysia) Berhad has 100% ownership in Kulim Plantations (Malaysia) Sdn Bhd. Kulim Plantations (Malaysia) Sdn Bhd has Tereh Palm Oil Mill and 2 estates i.e. Tereh Utara Estate and Tereh Selatan Estate which supply to certified Tereh Palm Oil Mill. Kulim (Malaysia) Berhad has 100% ownership in Selai Sdn Bhd. Selai Sdn Bhd has Selai Estate and Enggang Estate, both supply to certified Tereh Palm Oil Mill. Kulim (Malaysia) Berhad has 100% ownership in Sindora Berhad. Sindora Berhad has Sindora Estate, supply to certified Sindora Palm Oil Mill and Sungai Tawing Estate, supply to certified Tereh Palm Oil Mill. Kulim (Malaysia) Berhad has 94.49% ownership in Kumpulan Bertam Plantations Berhad. Kumpulan Bertam Plantations Berhad has Sepang Loi Estate supply to certified Palong Cocoa Palm Oil Mill. Kulim (Malaysia) Berhad itself has 7 estates: Basir Ismail Estate, Ulu Tiram Estate, Kuala Kabong Estate supply to certified Sedenak Palm Oil Mill; Sungai Sembrong Estate and Mutiara Estate supply to certified Tereh Palm Oil Mill; REM Estate will supply certified Sindora Palm Oil Mill; Labis Bahru Estate supply to certified Palong Cocoa Palm Oil Mill. BSi concludes that Kulim has completed all of the commitments of its Time Bound Plan that relate to company owned and managed Palm Oil Mills and Estates. The progress with the Pasir Panjang Certification planned will be followed up. During the Initial Assessment;

1. There is no any other isolated lapse in Time Bound Plan.
2. No systematic failures to proceed with implementation of the Time Bound Plan since first certified.
3. The changes in the Time bound Plan for Pasir Panjang Palm Oil Mill is acceptable because the company just took over the management control. Kulim (Malaysia) Berhad has recently purchased a property in Indonesia and undergone the RSPO NPP process to develop the land for oil palm. At the time of preparation of this Report, BSI is not aware of any new issues involving:

- a. Any unresolved significant land disputes;

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- 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 Kulim (Malaysia) Berhad complies with the RSPO requirements for Partial Certification rules.

Time Bound Plan		
Requirement	Remarks	Compliance
Summary of the Time Bound Plan		
Does the plan include all subsidiaries, estates and mills?	<p><u>Malaysia</u></p> <p>The time bound plan includes all OUs in Malaysia, The Kulim OUs have 32 units, 25 units successfully certified and 7 units current in progress.</p> <p><u>Indonesia (PT SSR and AMARA)</u></p> <p>For the Indonesia plantation have in preparation to undergo the RSPO Certification process is in progress.</p>	Yes
<p>Is the time bound plan challenging?</p> <ul style="list-style-type: none"> • Age of plantations. • Location. • POM development • Infrastructure. • Compliance with applicable law. 	<p>Kulim (Malaysia) Berhad has in 2015 continued to operate in a dynamic and volatile environment, characterised by abundant of supplies and lower price of CPO globally.</p> <p>Being one of the lowest price for the commodity, this much affected our plantation margins. The industry was also impacted by growing strength of US Dollar adding the downward pressure of the price</p> <p>Our divestment from New Britain (NBPOL) was completed on 26 February 2016, operationally at the year ended 31 December 2016, we have plantation operations in Peninsular Malaysia and Central Kalimantan Indonesia for a total of 50 999 ha in Malaysia and 40 646 ha of land in Indonesia. The planting of new palm is ongoing albeit at a slower pace, we have some 307 ha been planted.</p> <p>Age profile ranging from 0 – 23 years of age. The group remains committed to improving the age profile, during which a total of 1155 ha been replanted. Average age profile has improved to 11.72 years.</p> <p>The group has acquired Pasir Panjang Palm Oil Mill through Mahamurni Plantation Sdn Bhd in March 2015. And has since planned and prepared the mill for certification program for end of 2016</p>	Yes

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Have there been any changes since the last audit? Are they justified?	Selective Capital Reduction and Repayment Exercise (SCR) for KMB for 99.59% of shares was presented to Kulim BOD on 3 May 2015, The exercise was approved by Bursa Malaysia 1 August 2016 with Kulim being officially removed from BM on 4 August 2016.	Yes
If there have been changes, what circumstances have occurred?	KULIM is now corporatized under Johor Corporation but at the same time both are still a members of RSPO.	Yes
Have there been any stakeholder comments?	So far there no comments received.	Yes
Have there been any newly acquired subsidiaries?	After successfully acquired PT Win in central Kalimantan, Kulim has again trying their best to acquire PT AMARA which is still in progress with expected completion in 2017.	Yes
Have there been any isolated lapses in implementation of the plan?	There is no isolated lapse in Time Bound Plan except for smallholder proposed certification program that halted due to unstable supply to our mill.	Yes
Un-Certified Units or Holdings		
Did the company conduct an internal audit? If so, has a positive assurance statement been produced?	Indonesia AMDAL report had been completed and report already submitted to RSPO for Public Notification. RSPO has approved the NPP.	Yes
No replacement after dates defined in NIs Criterion 7.3: <ul style="list-style-type: none"> • Primary forest. • Any area identified as containing High Conservation Values (HCVs). • Any area required to maintain or enhance HCVs in accordance with RSPO criterion 7.3. 	So far no new planting that replaced primary forest.	Yes
Any new plantings since January 1 st 2010 must comply with the RSPO New Plantings Procedure.	No new planting activities within uncertified unit.	Yes
Any Land conflicts are being resolved through a mutually agreed process, e.g. RSPO Grievance procedure or Dispute Settlement Facility, in accordance with RSPO criteria 6.4, 7.5 and 7.6.	No land conflict	Yes

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Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO criterion 6.3.	No labour dispute	Yes
Did the company conduct an internal audit? If so, has a positive assurance statement been produced?	RSPO internal audit assessment for all certified units been conducted and the report had been submitted to all unit for improvement plan.	Yes
Any Legal non- compliance is being resolved in accordance with the legal requirements, with reference to RSPO criteria 2.1 and 2.2.	No legal non compliance	Yes

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 Initial Assessment there were three (3) Major and 1 (one) Minor nonconformities raised. The Pasir Panjang Palm Oil Mill certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted. The evidence of implementation for the major nonconformities was verified. The major nonconformity was closed on **23/12/2016 & 9/ 01/ 2017**. Following are the details of the nonconformities

Non-Conformity		
NCR #	Description	Category (Major / Minor)
1397865M1	<p>Requirements Indicator 2.1.1 Evidence of compliance with relevant legal requirements shall be available.</p>	Major
	<p>Evidence of Nonconformity <u>Tunjuk Laut Estate:</u> According to Workers’ Minimum Standards of Housing and Amenities Act 1990, section 23 sub-section (2) “It shall be the duty of the employer to ensure that all buildings used for the housing of workers, nurseries or community halls are visited and inspected weekly by an estate hospital assistant registered under the Estate Hospital Assistants (Registration) Act 1965 [Act 435] or any other responsible person authorized by the employer...”. However, the inspection was carried out on monthly basis where it did not comply with the requirement. The inspection was conducted on 16/10/2016, 15/9/2016, 12/8/2016 and 11/7/2016 and so on.</p> <p><u>Bukit Payung Estate and Tunjuk Laut Estate:</u> According to Employment Act 1955, Part II Contracts of Service under section 10 (2) “In every written contract of service a clause shall be included setting out the manner in which such contract may be terminated by either party in accordance with this Part”. However, document reviewed on the contract of employment found that did</p>	

	<p>not have any clauses mentioned on the reasons of termination of contract. Sampled workers as below:</p> <p>a) Passport No.: AS039844 joined on 5/11/2012(LBP) b) Passport No.: AS573423 joined on 1/3/2016(LBP) c) Passport No.: B1572183 joined on 8/10/2007(LBP) d) Employee No.: 626984 joined on 10/6/2016(LTL) e) Employee No.: 626863 joined on 10/10/2013(LTL) f) Employee No.: 626824 joined on 13/3/2015(LTL)</p>	
	<p>Statement of Nonconformity The management did not comply with the relevant legal requirements.</p>	
	<p>Action</p> <ol style="list-style-type: none"> 1. Estate Dept. has to communicate this directive to ALL Operating Units. 2. All inspection program has to be properly documented and recorded for future reference. 3. Review of the current contract of employment has to be carried out. 4. HRAD to coordinate with EOD and Engineering Dept. and come up with standard format of employment contract for Estates and mills workers respectively – to state and include all the terms and condition as required by Employment Act 1955. 5. The revised standard employment contract has to cover ALL workers inclusive foreign workers employed by the company 	
	<p>Status The CAP and evidence submitted confirmed that the issue has been fully addressed hence the Major NC was closed on 09/01/2017. . No onsite audit is required as the closure evidence relating to documentation is sufficient for offsite closure.</p> <p>Effectiveness of corrective action taken will be verified in the next audit.</p>	

Non-Conformity		
NCR #	Description	Category (Major / Minor)
1397865M2	<p>Requirements Indicator 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.</p> <p>Evidence of Nonconformity All Operating Units: Policy to protect reproductive rights of all is not available.</p> <p>Statement of Nonconformity Policy to protect reproductive rights of all is not available.</p> <p>Action A Right of Employee policy which incorporated the reproduced rights has been submitted. The new policy will be printed in the new handbook and distributed to all workers in March 2017.</p>	Major

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	<p>Status The CAP and evidence submitted confirmed that the issue has been fully addressed hence the Major NC was closed on 09/01/2017. . No onsite audit is required as the closure evidence relating to documentation is sufficient for offsite closure.</p> <p>Effectiveness of corrective action taken will be verified in the next audit.</p>	
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Non-Conformity		
NCR #	Description	Category (Major / Minor)
1397865M3	<p>Requirements Indicator 5.1.1 An environmental impact assessment (EIA) shall be documented.</p>	Major
	<p>Evidence of Nonconformity In POM, Documented Environmental Aspects and Impacts Register (Form No.: epa-pppom-2016; Activity code: ER001- ER017; Rev. 1/2016) available. The review was done on annual basis. However, activity of composting of the EFB in the mill area is not incorporating in the impact assessment.</p> <p>For estate Bukit Payung, the Environmental Risk Assessment (EPA-LBP-2016; activity code: ER008) for station nursery and replanting area only indicate one aspect-disposal of polybag. The assessment is incomplete to cover the all aspect for activities in nursery and during replanting.</p>	
	<p>Statement of Nonconformity The environmental impact assessment did not cover all the activities within their boundary.</p>	
	<p>Action All the activities within the estates and mills are to be included in the environmental impact assessment.</p> <p>All environmental impact assessment will be checked during annual internal audit by SSD and a copy will be reviewed and kept at SSD for verification.</p>	
	<p>Status The CAP and evidence submitted confirmed that the issue has been fully addressed hence the Major NC was closed on 23/12/2016. . No onsite audit is required as the closure evidence relating to documentation is sufficient for offsite closure.</p> <p>Effectiveness of corrective action taken will be verified in the next audit.</p>	

Non-Conformity		
NCR #	Description	Category (Major / Minor)
1397865N1	<p>Requirements Indicator 5.3.3</p>	Minor

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	<p>A waste management and disposal plan to avoid or reduce pollution shall be documented and implemented.</p>	
	<p>Evidence of Nonconformity In Bukit Payung and Tunjuk Laut estate, soakaway pit were built at the chemical mixing area to cater any runoff or spillage during mixing process.</p>	
	<p>Statement of Nonconformity The waste management and disposal plan to avoid or reduce pollution is ineffective.</p>	
	<p>Action 1) All mixing of chemical has to be done in drip tray 2) Any contaminated water from spillage will be collected and reused back as pre-mix 3) Estate to ensure the collection of contaminated water at the sump to be done at any time when the water reach $\frac{3}{4}$ level of sump capacity. 4) The water is to be used back as pre-mix PPPOM has to provide proper containment at the collation area of the drums. Respective WI to be reviewed to cater for design improvement of soak away sump and has to be communicated to all OUs</p>	
	<p>Status Effectiveness of corrective action taken will be further verified in the next assessment.</p>	

Observation	
OBS #	Description
Nil	

Positive Findings	
PF #	Description
1	The management shown good commitment towards the certification.
2	Overall stakeholders such as contractor, suppliers and local authorities for the mill and estates shown positive feedbacks towards the company.

Issues raised by Stakeholders
<p>Stakeholder consultation involved internal and external stakeholders. External stakeholders were contacted by telephone to arrange meetings at a location convenient to them to discuss Pasir Panjang Palm Oil Mill Certification Unit's environmental and social performance, legal and any known dispute issues.</p> <p>Meetings were conducted with stakeholders to seek their views on the performance of the company with respect to the RSPO requirements and aspects where they considered that improvements could be made. At the start of each meeting, the interviewer explained the purpose of the audit followed by an evaluation of the relationship between the stakeholder and the company before discussions proceeded. The interviewer recorded comments made by stakeholders and later was verified with the management team. These have been incorporated into the assessment findings.</p>

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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	Issues: Labour Department Officers – They have a good relationship with the management. They informed that the management has complied with the legal requirement such as Minimum Wage Order 2016 and Workers’ Minimum Standards of Housing and Amenities Act 1990.
	Management Responses: The management will continue to comply with the legal requirements.
	Audit Team Findings: Document reviewed on the payslip and site visit to workers’ quarters found that the management has complied with the requirement. No further verification needed.
2	Issues: Contractors and Suppliers - Contractors confirm payment is prompt as per agreed contract.
	Management Responses: Payment is made as per the agreed terms.
	Audit Team Findings: No other issue.
3	Issues: Village Representative – No land dispute has occurred. They have good relationship with the management. Trenches have been constructed to separate the boundaries.
	Management Responses: The management will continue to maintain good relationship with the villagers.
	Audit Team Findings: Document reviewed found that no land dispute is sighted.
4	Issues: Secretary of WoW – No sexual harassment case reported.
	Management Responses: The management will monitor if there is any case reported.
	Audit Team Findings: Document reviewed found that no case reported.
5	Issues: Department of Environment- Now the system monitoring emphasize in self-regulatory especially in those in aspect of schedule waste, effluent and air monitoring (CEMS). The mill need to report the status of the waste online. There is no serious issue in exception of: a. There was record of BOD exceed the permissible level in 2015 due to desludging issue of pond b. EFB accidentally burn at the mill due to the dry weather
	Management Responses: a. Action has been taken by desludging the sedimentation pond and also construct the new pond. Check on the latest BOD record and it is below required permissible level (5000mg/litre). Effluent use for land application in the estate. b. EFB being segregate into smaller group to avoid burning. Regular transportation of EFB to field application and also composting plant.
	Audit Team Findings: No further issue as the auditor has verified the implementation on field.
6	Issues: Department of Wildlife

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	<p>Management Responses: Up to date, there is no any complaint case about the area. The department had received notification from the plantation about the encroachment of the elephant every few months. The recent one found in Tunjuk Laut Plantation. The team normally will conduct investigation by plotting the GPS to track the path of the elephant.</p> <p>Audit Team Findings: No further issue as the auditor has verified the implementation on field. Management will ensure their regular monitoring at the boundary of the estate and plantation.</p>
7	<p>Issues: DOSH officer – He explained that the management has comply with the OSHA and FMA.</p> <p>Management Responses: All the issue raised by the DOSH officer during annual inspection had been corrected by the PPPOM representative.</p> <p>Audit Team Findings: All the permits were found valid. During the site review, found that the housekeeping of the mill was in good condition.</p>

3.3.2 Status of Nonconformities Previously Identified and Observations

Non-Conformity		
NCR #	Description	Category (Major / Minor)
	Not applicable	

Observation	
OBS #	Description
	Not applicable

3.3.3 Summary of the Nonconformities and Status

CAR Ref.	CLASS	ISSUED	STATUS
1397865M1 – 2.1.1	Major	25/10/2016	Closed out on 09/1/2017
1397865M2 – 6.9.2	Major	25/10/2016	Closed out on 09/1/2017
1397865M3 – 5.1.1	Major	25/10/2016	Closed out on 23/12/2016
1397865N1 – 5.3.3	Minor	25/10/2016	“Open”

Assessment Conclusion and Recommendation:

Based on the findings during the assessment Pasir Panjang Palm Oil Mill Certification Unit and supply base complies with the RSPO P&C 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 **Pasir Panjang Palm Oil Mill Certification Unit** is approved and continued.

Acknowledgement of Assessment Findings	Report Prepared by
<p>Name: Salasah Elias</p>	<p>Name: Hoo Boon Han</p>
<p>Company name: Kulim (Malaysia) Berhad</p>	<p>Company name: BSI Services Malaysia Sdn Bhd</p>
<p>Title: Deputy General Manager</p>	<p>Title: Lead Auditor</p>
<p>Signature: </p> <p>Date: 11 January 2017</p>	<p>Signature: </p> <p>Date: 9 Jan 2017</p>

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	<p>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.</p> <p>- Minor compliance -</p>	<p>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. Information on environmental, social and legal issues relevant to RSPO Criteria was made available to relevant stakeholders for effective participation in decision making.</p> <p>In company website (http://www.kulim.com.my/), publicly available documents such as OSH plan, HCV documents, negotiation procedure, complaint records, sustainability handbook and report, EIA, Management Plans & Continuous Improvement Plans. Other sensitive information such as land title and etc will be provided upon request.</p>	Complied
1.1.2	<p>Records of requests for information and responses shall be maintained.</p> <p>-Major compliance</p>	<p>All operating units maintain records of information request and response. Request for information are attended promptly and confirmed by stakeholders interviewed. In the mill, there is an enquiry register record. For example, the latest enquiries dated 6 October 2016, to apply utility for Tunjuk Laut estate.</p> <p>In Bukit Payung estate, enquiry register record made available during onsite visit. On 27 Sep 2016, one of the staff complaint on the price of the good sold in a shop was expensive. The management had taken action by meeting with the shop owners to discuss on the pricing. Similar enquiry register book available in Tunjuk Laut estate.</p>	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
<p>1.2.1</p> <p>Publicly available documents shall include, but are not necessary limited to:</p> <ul style="list-style-type: none"> • Land titles/user rights (Criterion 2.2); • Occupational health and safety plans (Criterion 4.7); • Plans and impact assessments relating to environmental and social impacts (Criteria 5.1, 6.1, 7.1 and 7.8); • HCV documentation (Criteria 5.2 and 7.3); • Pollution prevention and reduction plans (Criterion 5.6); • Details of complaints and grievances (Criterion 6.3); • Negotiation procedures (Criterion 6.4); • Continual improvement plans (Criterion 8.1); • Public summary of certification assessment report; • Human Rights Policy (Criterion 6.13). <p>- Major compliance –</p>	<p>There is a SPO Transparency Program under Kulim Malaysia Berhad. The procedure is to ensure that documents if to be release and made publicly available are readily available.</p> <p>The Corporate Dept will ensure that the following documents are available if requested and they do not impinge on confidentiality and will not cause detrimental sustainability or social outcoments.</p> <p>Among the documents that were made available for viewing are:</p> <ul style="list-style-type: none"> • Land title (held as hard copy by the property department) • Health and safety plan • Plans and impact assessment- environmental & social • Pollution prevention plans • Details of complaints and grievances • Negotiation procedures • Continuous improvement plan • Biodiversity plans • Policy documents (sustainability handbook) <p>In addition to the website, the policies were also displayed at various locations at the operating units including the main notice boards of the estates, mill offices and muster ground notice boards for employees and visitors to view.</p> <p>Records such as enquiry register and record of government visit documented the visit or request from the stakeholders. For example, JKPP visit dated 11 Jan 2016.</p>	<p>Complied</p>
<p>Criteria 1.3: Growers and millers commit to ethical conduct in all business operations and transactions.</p>		
<p>1.3.1</p> <p>There shall be a written policy committing to a code of ethical conduct and integrity in all operations and transactions, which shall be documented and communicated to all levels of the workforce and operations.</p> <p>-Minor compliance</p>	<p>Kulim Malaysia Berhad has established policy on code of ethical conduct and integrity which covers all operations in the plantation operation under Corporate Policy Statement dated 11 February 2015. Besides, the Operation Director of Kulim (Malaysia) Berhad Policy also signed on the integrity pledge on 7 Jan 2014 to set the "Tone from the Top" and oblige all members of the organization to likewise behave with integrity and carry on their responsibilities ethically.</p> <p>The policy displayed on the notice board and communicated to employees.</p> <p>Policy Training had provided to all the workers on 2 May 2016. Attendance list and signed of code of business conduct sighted during onsite visit. Interviewed with employees reveal that they are aware of the policy.</p>	<p>Complied</p>
<p>Principle 2: Compliance with applicable laws and regulations</p>		
<p>Criterion 2.1: There is compliance with all applicable local, national and ratified international laws and regulations.</p>		

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Criterion / Indicator	Assessment Findings	Compliance
<p>2.1.1 Evidence of compliance with relevant legal requirements shall be available. - Major compliance -</p>	<p>Legal register covering the applicable local and international laws and regulations are available. Compliance to each applicable law and regulation is monitored by the operating units and head office sustainability team.</p> <p>Among licences and permits sighted at the visited operating unit were:</p> <p>Pasir Panjang POM:</p> <ul style="list-style-type: none"> - MPOB license 004649; expiring in 31 Dec 2016 - DOE Licence: No License (validity period 1/7/2016 - 30/6/2017) for 45 MT/hr and method of POME discharge is land application with BOD final discharge limit and composting EFB - River water extraction license permit (No: 08/A/KT050) - Fire Certificate expiring 18th June 2017 - Certified environmental professional (CePPOME/16030) - Certified waste management professional (CePSWaM/16251) <p>Bukit Payung Estate:</p> <ul style="list-style-type: none"> - MPOB License 50147972000; expiring in 31 March 2017 - Diesel and petrol license; BPGK JH (KTG)0085 PD expiring 18 Oct 2017 - River water extraction license (07/AKT/018) expiring 31 Dec 2016 <p>Tunjuk Laut:</p> <ul style="list-style-type: none"> - Purchase & Storage Diesel License; BPGK.JH.KTG. Permit 0046PD - Air Compressor; PMT- JH 117893 - MPOB License: 501477102000 	<p>Major noncompliance</p>

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Criterion / Indicator	Assessment Findings	Compliance
	<p><u>Tunjuk Laut Estate:</u> According to Workers' Minimum Standards of Housing and Amenities Act 1990, section 23 sub-section (2) <i>"It shall be the duty of the employer to ensure that all buildings used for the housing of workers, nurseries or community halls are visited and inspected weekly by an estate hospital assistant registered under the Estate Hospital Assistants (Registration) Act 1965 [Act 435] or any other responsible person authorized by the employer..."</i>. However, the inspection was carried out on monthly basis where it did not comply with the requirement. The inspection was conducted on 16/10/2016, 15/9/2016, 12/8/2016 and 11/7/2016 and so on.</p> <p><u>Bukit Payung Estate and Tunjuk Laut Estate:</u> According to Employment Act 1955, Part II Contracts of Service under section 10 (2) <i>"In every written contract of service a clause shall be included setting out the manner in which such contract may be terminated by either party in accordance with this Part"</i>. However, document reviewed on the contract of employment found that did not have any clauses mentioned on the reasons of termination of contract. Sampled workers as below: <ul style="list-style-type: none"> a) Passport No.: AS039844 joined on 5/11/2012(LBP) b) Passport No.: AS573423 joined on 1/3/2016(LBP) c) Passport No.: B1572183 joined on 8/10/2007(LBP) d) Employee No.: 626984 joined on 10/6/2016(LTL) e) Employee No.: 626863 joined on 10/10/2013(LTL) f) Employee No.: 626824 joined on 13/3/2015(LTL) </p> <p>Thus, major non-conformance was raised.</p>	

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Criterion / Indicator	Assessment Findings	Compliance																																
2.1.2 A documented system, which includes written information on legal requirements, shall be maintained. - Minor compliance -	<p>All operating units maintain documented system for identifying, evaluating, reviewing and updating applicable regulations and other requirements. Legal and Other Requirement Register dated 1-Aug-16 was sighted at the visited operating units. For example,</p> <ul style="list-style-type: none"> i. Minimum Wages Order 2016 ii. SPAN license conditions iii. BAKAJ license conditions iv. Factory and Machinery Act Amendment 2014 v. CLASS Regulations 2013 vi. Compliance Schedule @ "Jadual Pematuhan" for Pasir Panjang Mill, license# 004649 vii. Details of other applicable regulations and sub-regulations under FMA 1967 and OHS 1994. <p>Industrial Code of Practice for Confined Space 2010.</p> <table border="1" data-bbox="659 891 1297 1249"> <thead> <tr> <th>No</th> <th>Competency</th> <th>No Perakuan</th> <th>Grade</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Jurutera (Stim)</td> <td>007/2009</td> <td>2</td> </tr> <tr> <td>2</td> <td>Enjin Stim dan Dandang</td> <td>JH/15/EIS/02/47</td> <td>2</td> </tr> <tr> <td>3</td> <td>Enjin Stim dan Dandang</td> <td>J.94/03</td> <td>2</td> </tr> <tr> <td>4</td> <td>Enjin Stim dan Dandang</td> <td>J.2/2003</td> <td>1</td> </tr> <tr> <td>5</td> <td>Enjin Stim dan Dandang</td> <td>J.315/07</td> <td>1</td> </tr> <tr> <td>6</td> <td>Penjaga Jentera</td> <td>PJ 10702563</td> <td>AO</td> </tr> <tr> <td>7</td> <td>AESP</td> <td>NW-HQ-AE-1955-O</td> <td></td> </tr> </tbody> </table>	No	Competency	No Perakuan	Grade	1	Jurutera (Stim)	007/2009	2	2	Enjin Stim dan Dandang	JH/15/EIS/02/47	2	3	Enjin Stim dan Dandang	J.94/03	2	4	Enjin Stim dan Dandang	J.2/2003	1	5	Enjin Stim dan Dandang	J.315/07	1	6	Penjaga Jentera	PJ 10702563	AO	7	AESP	NW-HQ-AE-1955-O		Complied
No	Competency	No Perakuan	Grade																															
1	Jurutera (Stim)	007/2009	2																															
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2.1.3 A mechanism for ensuring compliance shall be implemented. - Minor compliance -	<p>Evaluation of legal requirements and compliance status with legal requirement is monitored by operating units, Sustainability Team, OHS Department and head office audit Department.</p> <p>Besides, the internal audit conducted by the sustainability team from HQ will able to check on the compliance status of the operating unit. The latest internal audit for Pasir Panjang POM conducted on 6 August 2016.</p>	Complied																																
2.1.4 A system for tracking any changes in the law shall be implemented. - Minor compliance -	<p>Tracking system available to identify changes in the relevant regulations through head office, sustainability team, website information and the information are communicated from the Head Office. Kulim (Malaysia) Berhad have centralised system for tracking any changes in the law.</p>	Complied																																
<p>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.</p>																																		

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Criterion / Indicator	Assessment Findings	Compliance
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 -	<p>Land ownership such as land title and land lease documents is available. There is no change in the land ownership. All the land belongs to Kulim (Malaysia) Berhad.</p> <p>There are total 5 land titles sharing among the 6 estates.</p> <p>a. Bukit Kelompok estate and Pasir Logok estate: H.S.D: 32182; 2837.099 ha, 1055.629 ha and 144.2 ha b. Pasir Panjang estate: HS.D: 35107; 1609.869 ha c. Tunjuk Laut estate: H.S.D 7747; 2839.7879 ha; 28.02 ha (PT252) d. Siang estate: H.S.D 35429; 29.119 ha; H.S.D 33258; 3413.9842 ha e. Bukit Payung estate: H.S.D 35105; 2282.6 ha; H.S.D 35106; 25.03 ha.</p> <p>The terms stated in the land title is for agriculture/ palm plantation and the operations are consistent with the permit conditions.</p> <p>The total land title for Bukit Kelompok and Pasir Logok is 4036.928 ha but planted area is 4363 HA. Based on the JUPEM survey map dated 12 Nov 1986, the actual total hectarage suppose 4491 ha. There is variance of 326.072 ha between land title issued by Department of Land and the JUPEM survey map. This has been communicate the relevant authorities to update the land title.</p>	Complied
2.2.2 Legal boundaries shall be clearly demarcated and visibly maintained. - Minor compliance -	<p>Legal boundary well maintain as observed in the field.</p> <p>Inspection of a sample of the boundary stones at Bukit Payung and Tunjuk Laut estates confirmed that steel pipes have been installed beside the concrete boundary stones and were continuously maintained visibly. At Bukit Payung estate, visited to boundary stone P17, P18, P19 of Block P92/02.</p>	Complied
2.2.3 Where there are or have been disputes, additional proof of legal acquisition of title and evidence that fair compensation has been made to previous owners and occupants shall be available, and that these have been accepted with free, prior and informed consent (FPIC). - Minor compliance -	<p>Review on land ownership records and interview with relevant stakeholders confirmed there are no conflict or dispute over the land within legal boundary.</p>	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	<p>There is no land dispute in the operating units at the time of audit. The land belongs to Kulim Malaysia Berhad and land ownership documents verified.</p>	Complied

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Criterion / Indicator	Assessment Findings	Compliance
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
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

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Criterion / Indicator		Assessment Findings	Compliance																	
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	The estate lands are legally owned by the company and no other users were identified within the land area.	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	The estate lands are legally owned by the company and no other users were identified within the land area.	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 -	PPPOM has established and implemented its commitment to long term sustainability and improvements through a capital expenditure programme. 7 years management plan (2016 2022) was verified during the audit. Pasir Panjang Palm Oil Mill and supply bases have made progress towards achieving their performance production targets for the current financial year.	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 -	<p>The replanting programme was established.</p> <table border="1"> <thead> <tr> <th>Year</th> <th>Estate</th> <th>Ha</th> </tr> </thead> <tbody> <tr> <td>2016</td> <td rowspan="4">BPE</td> <td>149.53</td> </tr> <tr> <td>2017</td> <td>232.84</td> </tr> <tr> <td>2018</td> <td>224.84</td> </tr> <tr> <td>2019</td> <td>253.77</td> </tr> <tr> <td>2016</td> <td rowspan="2">TLE</td> <td>416.86</td> </tr> <tr> <td>2017-2030</td> <td>No replanting</td> </tr> </tbody> </table>	Year	Estate	Ha	2016	BPE	149.53	2017	232.84	2018	224.84	2019	253.77	2016	TLE	416.86	2017-2030	No replanting	Complied
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2019		253.77																		
2016	TLE	416.86																		
2017-2030		No replanting																		
Principle 4: Use of appropriate best practices by growers and millers																				
Criterion 4.1: Operating procedures are appropriately documented, consistently implemented and monitored.																				

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Criterion / Indicator	Assessment Findings	Compliance
<p>4.1.1 Standard Operating Procedures (SOPs) for estates and mills are documented - Major compliance -</p>	<p>Standards Operating Procedure and Quality Manual for PPPOM was established to cover all the station which was updated on 1/4/2015 (PPM/QM). Sighted some of the procedure related to loading ramp, sterilization station, threshing and press station, clarification station, kernel station, depericarping station, kernel station, effluent treatment plant, bio-composting plant and etc.</p> <p>Work Instructions have been derived from SOPs and are posted at work stations at the mill and at certain locations at the estates, such as the Muster Notice Boards. Eg: Scheduled Waste Management Guideliness, Desilting of Pond Management Guideliness, Landfill Management Guideliness, Linesite Management Guideliness, Effluent Sampling Management Guideliness, Diesel Engine Management Guideliness and etc.</p> <p>Kulim (M) Berhad Agriculture Manual has established covers Replanting, roads drains Bridges culverts and fences, construction of estate building, manuring, harvesting, pruning and ablation, soil conservation, justification of chemical use, weed management, inmtegrated pest management and plant diseases. There are 19 SOPs and 18 WI's covering all aspects of oil palm management.</p>	<p>Complied</p>
<p>4.1.2 A mechanism to check consistent implementation of procedures shall be in place. - Minor compliance -</p>	<p>Internal Audit was conducted twice a year by Sustainability department, the latest internal audit was conducted on 7/8/2016 for mill and both estates to cover the entire criterion stated in the standard.</p> <p>Mill Inspectorate Visit for PPPOM was conducted on 5/9/2016 by Hj Mohd Jaafar Abu Bakar (Mill Inspector).</p> <p>Plantation Inspectorate visit at Bukit Payung Estate was conducted on 24/7/2016 by Tn. Hj Mohd Yassin Hamzah.</p> <p>Plantation Inspectorate visit Tunjuk Laut Estate was conducted on 4/9/2016 by Tn. Hj Mohd Yassin Hamzah.</p>	<p>Complied</p>
<p>4.1.3 Records of monitoring and any actions taken shall be maintained and available, as appropriate. - Minor compliance -</p>	<p>All the records related to Internal Audit and Mill Inspector/Estate Inspector Visit were maintained and available at Mill and Estate Office.</p>	<p>Complied</p>
<p>4.1.4 The mill shall record the origins of all third-party sourced Fresh Fruit Bunches (FFB). - Major compliance -</p>	<p>Pasir Panjang Palm Oil Mill maintained a daily record of all FFB received. The records show the origin, weight, transporters details and etc of the FFB received. Currently, the mill only received FFB from its own supply base.</p>	<p>Complied</p>

Criterion 4.2:

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

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Criterion / Indicator	Assessment Findings	Compliance
4.2.1 There shall be evidence that good agriculture practices, as contained in Standard Operating Procedures (SOPs), are followed to manage soil fertility to a level that ensures optimal and sustained yield, where possible. - Minor compliance -	Kulim (M) Berhad Agriculture Manual has established covers Replanting, roads drains Bridges culverts and fences, construction of estate building, manuring, harvesting, pruning and ablation, soil conservation, justification of chemical use, weed management, integrated pest management and plant diseases. There are 19 SOPs and 18 WI's covering all aspects of oil palm management Both estates operate in accordance with the Agriculture Manual and standard operating procedures. The practices consistently monitored by estate operation management and estate inspectorate. The recommendations for improvements are given to maintain the sustainable practices.	Complied
4.2.2 Records of fertiliser inputs shall be maintained. - Minor compliance -	Fertilizers are applied as per agronomist recommendation. Record shows application date, filed number, dosage applied per palm, type of fertilizer and number of applicators. The latest application was carried out at P92 Block 4 (BPE) on 29-30/9/16 for AS (2.5kg/palm). <u>Bukit Payung Estate</u> Agronomist report by R&D department dated 19/1/2016, fertilizer recommendation was done by agronomist : 1. AS : 297.49 mt 2. AJIB 10/03/20(NPK+ Micronutrients): 305.22mt 3. AJIB 10/5/20 (NPK+ Micronutrients): 105.16mt 4. ERP:297.49mt 5. Kieserate:5.93mt 6. MOP:69.57mt 7. Mix 2+B:115.82mt	Complied
4.2.3 There shall be evidence of periodic tissue and soil sampling to monitor changes in nutrient status. - Minor compliance -	Leaf and soil nutrient analysis are commonly used in the diagnosis of fertilizer requirements in oil palms. The frequency for leaf sampling must be conduct for every year while for soil analysis, the frequency was at 5 years intervals. <u>Bukit Payung Estate</u> Foliar analysis was conducted on 5-12/10/16 and the samples were sent to UTCL Laboratory for tested. The foliar analysis report (L1/1510/BKP/1130-1156) dated 16/10/2015 was sighted Soil analysis was conducted on 26/9/2013 and 25/1/2013 by UTCL Laboratory. The soil analysis reports (S/1310/BKP/0677-0692 and S//1302/BKP/0640-0655) were sighted. <u>Tunjuk Laut Estate</u> Foliar analysis was conducted on 30/6/2015 and the samples were sent to UTCL Laboratory for tested. The foliar analysis report (L1/1510/BKP/1130-1156) dated 16/10/2015 was sighted Soil analysis was conducted on 29/4/2016 by UTCL Laboratory. The soil analysis reports (LI/1506/TL/0509-0551) was sighted.	Complied

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Criterion / Indicator		Assessment Findings	Compliance																																						
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 was applied at the rate of 50mt/ha on selected area and compost was used 25kg/hole for replanting. <table border="1"> <thead> <tr> <th>Date</th> <th>Tonnage</th> <th>Type</th> <th>Estate</th> </tr> </thead> <tbody> <tr> <td>27/9/16</td> <td>28.51mt</td> <td>EFB</td> <td>BPE</td> </tr> <tr> <td>22/9/16</td> <td>48.96mt</td> <td>Compost</td> <td>BPE</td> </tr> </tbody> </table>	Date	Tonnage	Type	Estate	27/9/16	28.51mt	EFB	BPE	22/9/16	48.96mt	Compost	BPE	Complied																										
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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. No other soil categorised as problematic or fragile soil. Sighted the type of soil available at BPE. <table border="1"> <thead> <tr> <th>No.</th> <th>Type of Soil</th> </tr> </thead> <tbody> <tr><td>1</td><td>Kesatuan Rengam-Batang Merbau</td></tr> <tr><td>2</td><td>Kompleks Aluvium Setempat</td></tr> <tr><td>3</td><td>Siri Batu Lapan</td></tr> <tr><td>4</td><td>Siri Binjai</td></tr> <tr><td>5</td><td>Siri Jabil</td></tr> <tr><td>6</td><td>Siri Pelepah</td></tr> <tr><td>7</td><td>Siri Penambang</td></tr> <tr><td>8</td><td>Siri Renggam</td></tr> <tr><td>9</td><td>Siri Tai Tak</td></tr> <tr><td>10</td><td>Siri Tawar</td></tr> <tr><td>11</td><td>Siri Batang Merbau</td></tr> <tr><td>12</td><td>Siri Bungor</td></tr> <tr><td>13</td><td>Siri Chat</td></tr> <tr><td>14</td><td>Siri Kemuning</td></tr> <tr><td>15</td><td>Siri Lintang</td></tr> <tr><td>16</td><td>Siri Masai</td></tr> <tr><td>17</td><td>Siri Sabrang</td></tr> <tr><td>18</td><td>Siri Tebok</td></tr> </tbody> </table>	No.	Type of Soil	1	Kesatuan Rengam-Batang Merbau	2	Kompleks Aluvium Setempat	3	Siri Batu Lapan	4	Siri Binjai	5	Siri Jabil	6	Siri Pelepah	7	Siri Penambang	8	Siri Renggam	9	Siri Tai Tak	10	Siri Tawar	11	Siri Batang Merbau	12	Siri Bungor	13	Siri Chat	14	Siri Kemuning	15	Siri Lintang	16	Siri Masai	17	Siri Sabrang	18	Siri Tebok	Complied
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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 -	Recently replanted area, the establishment of cover crop (<i>Mucuna Bracteata</i>) is well established. Field inspection showed groundcover with soft grass and soft weeds. There is no significant erosion risk was noted during the field visit. Terracing has been constructed to reduce the soil erosion. There are no peat soils or soil categorised as problematic or fragile soil at both estates.	Complied																																						
4.3.3	A road maintenance programme shall be in place. - Minor compliance -	Estates has implemented annual road maintenance programme. Example of programme checked at both Estate shows the map indicating road repairs and maintenance for the whole estate roads.	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 is no peat soil or soil categorised as problematic or fragile soil at both estates.	Complied																																						
4.3.5	Drainability assessments shall be required prior to replanting on peat to determine the long-term viability of the necessary drainage for oil palm growing. - Minor compliance -	There is no peat soil or soil categorised as problematic or fragile soil at both estates.	Complied																																						

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Criterion / Indicator	Assessment Findings	Compliance	
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 is no peat soil or soil categorised as problematic or fragile soil at both estates	Complied
Criterion 4.4: Practices maintain the quality and availability of surface and ground water.			
4.4.1	An implemented water management plan shall be in place. - Minor compliance -	Water Management Plan was established. Sighted some of the activity: <ol style="list-style-type: none"> 1. Drinking water analysis 2. Inlet and outlet analysis 3. Effluent analysis 4. Buffer zone area 5. Collecting rain water for chemical mixing 6. Upkeep drain 	Complied
4.4.2	Protection of water courses and wetlands, including maintaining and restoring appropriate riparian and other buffer zones (refer to national best practice and national guidelines) shall be demonstrated. - Major compliance -	<p>Buffer zones had been maintained on both sides of rivers/streams in the estates as verified during on-site field inspection. There was no evidence of spraying around palms marked as boundary for the buffer zones.</p> <p>There was also no construction of bunds/ weirs/dams across the main rivers or waterways passing through the estates.</p> <p>All the estates assessed has prepared map showing riparian buffer zones and demarcated the areas prior to replanting for all the estates. Field inspection confirmed that the buffer zone beside the stream has been demarcated clearly and maintained. Upstream and downstream river water analysis has been conducted on quarterly basis to confirm there was no contamination to the river activity by the POM and estate operation.</p> <p>PPPOM has implemented river water monitoring, for the upstream and downstream of Sungai Sedili Besar and drinking water analysis on monthly basis. Sampled analysis report done by UTCL Laboratory. for water sample certificate of analysis, lab report no. WI/1609/0717-0719 dated 21/9/2016 sighted available. Upstream and downstream Analysis was done against Standard B. Acceptable Conditions For Discharge of Industrial or Mixed Effluent of Standards A and B. Parameters analysed were pH, BOD, TSS, AN, O&G and TN. For drinking water, the sampling was done against Drinking Water Quality Standard Report (MOH) shown result was in compliance against the standard tested.</p>	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 -	<p>PPPOM has implemented river water monitoring, for the upstream and downstream of Sungai Sedili Besar and drinking water analysis on monthly basis. Sampled analysis report done by UTCL Laboratory. for water sample certificate of analysis, lab report no. WI/1609/0717-0719 dated 21/9/2016 sighted available. Upstream and downstream Analysis was done against Standard B. Acceptable Conditions For Discharge of Industrial or Mixed Effluent of Standards A and B. Parameters analysed were pH, BOD, TSS, AN, O&G and TN. For drinking water, the sampling was done against Drinking Water Quality Standard Report (MOH) shown result was in compliance against the standard tested.</p> <p>Effluent monitoring records: Monthly Effluent Sample Report ref. EI/1609/1043-1046 dated 29/9/2016, by UTCL Laboratory, Mahamurni Plantations Sdn Bhd. The parameter monitored-: pH, Total Alkalinity, VFA, BOD, COD, TS, SS, VSS, TN, AN, O&G. Other sampled records of BOD Analysis for the month of Sept, Aug, July, June, May and April 2015 shown that the mill effluents were in compliance with license regulations (AS(B)J31/152/000/007 Jld. 9, License No: 004649 dated 9/10/2016.</p>	Complied												
4.4.4	Mill water use per tonne of Fresh Fruit Bunches (FFB) (see Criterion 5.6) shall be monitored. - Minor compliance -	<p>PPPOM monitored its water consumption on monthly basis for the source of water supply for its mill process usage.</p> <p>Total water consumed for the period from Jan to September 2016 was 0.70 m³/mt FFB processed.</p>	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 -	<p>IPM Plan includes the planting of beneficial plants and control of damage by rodents. Beneficial plants such as Turnera subulata and Casia are grown in the estates. Records of planting of new areas and maintenance of existing areas of beneficial plants and location maps are available. Records of rat baiting and barn owl census are also available.</p> <p>The occupancy rate for Barn owl box on Aug 2016-37% (BPE) and 42% (TLE)</p>	Complied												
4.5.2	Training of those involved in IPM implementation shall be demonstrated. - Minor compliance -	<p>Training records for staff and workers on IPM implementation were available and verified to be satisfactory during on-site assessment.</p> <table border="1"> <thead> <tr> <th>Date</th> <th>Training Topic</th> <th>Trainer</th> <th>Remarks</th> </tr> </thead> <tbody> <tr> <td>27/1/16</td> <td>Spraying using Blocus (P&D)</td> <td>Sr. Asst.</td> <td>BPE</td> </tr> <tr> <td>24/5/16</td> <td>Spraying using Blocus (P&D)</td> <td>Staff</td> <td>TLE</td> </tr> </tbody> </table>	Date	Training Topic	Trainer	Remarks	27/1/16	Spraying using Blocus (P&D)	Sr. Asst.	BPE	24/5/16	Spraying using Blocus (P&D)	Staff	TLE	Complied
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Criterion / Indicator		Assessment Findings	Compliance												
Criterion 4.6: Pesticides are used in ways that do not endanger health or the environment															
4.6.1	Justification of all pesticides used shall be demonstrated. The use of selective products that are specific to the target pest, weed or disease and which have minimal effect on non-target species shall be used where available. - Major compliance -	Justification of pesticides applied is available in the agriculture manual. Refer to agriculture manual 21/10/2015, H01:Justification of Chemical Use. The use of pesticide is specific to the target pest, weed and disease. Justification takes consideration to minimize effect on non-target species.	Complied												
4.6.2	Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) shall be provided. - Major compliance -	Records of agrochemical usage (including active ingredients used and their LD 50, area treated, amount of a.i. applied per ha and number of applications) had been maintained and kept by the estate. Verified that records of monitoring were satisfactorily. <table border="1" data-bbox="660 869 1299 1010"> <tr> <td>agrochemical</td> <td>Sept 16</td> <td>Todate 2016</td> </tr> <tr> <td>BPE</td> <td>0.14% a.i/ha</td> <td>2.17% a.i/ha</td> </tr> <tr> <td>TLE</td> <td>0.14% a.i/ha</td> <td>1.45% a.i/ha</td> </tr> </table>	agrochemical	Sept 16	Todate 2016	BPE	0.14% a.i/ha	2.17% a.i/ha	TLE	0.14% a.i/ha	1.45% a.i/ha	Complied			
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4.6.3	Any use of pesticides shall be minimised as part of a plan, and in accordance with Integrated Pest Management (IPM) plans. There shall be no prophylactic use of pesticides, except in specific situations identified in national Best Practice guidelines. - Major compliance -	The quantity of agrochemicals required for various field conditions are documented and justified in agriculture manual H01:Justification of Chemical Use. The implementation in the field is consistent with the agriculture manual.	Complied												
4.6.4	Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, are not used, except in specific situations identified in national Best Practice guidelines. The use of such pesticides shall be minimised and eliminated as part of a plan, and shall only be used in exceptional circumstances. - Minor compliance -	Noted that there is no use of class I chemical at both estate.	Complied												
4.6.5	Pesticides shall only be handled, used or applied by persons who have completed the necessary training and shall always be applied in accordance with the product label. Appropriate safety and application equipment shall be provided and used. All precautions attached to the products shall be properly observed, applied, and understood by workers (see Criterion 4.7). - Major compliance -	Training for both estate was conducted accordingly. <table border="1" data-bbox="660 1648 1299 1944"> <thead> <tr> <th>Date</th> <th>Training Topic</th> <th>Trainer</th> <th>Remarks</th> </tr> </thead> <tbody> <tr> <td>27/1/16</td> <td>Spraying using Blocus (P&D)</td> <td>Sr. Asst.</td> <td>BPE</td> </tr> <tr> <td>24/5/16</td> <td>Spraying using Blocus (P&D)</td> <td>Staff</td> <td>TLE</td> </tr> </tbody> </table>	Date	Training Topic	Trainer	Remarks	27/1/16	Spraying using Blocus (P&D)	Sr. Asst.	BPE	24/5/16	Spraying using Blocus (P&D)	Staff	TLE	Complied
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Criterion / Indicator	Assessment Findings	Compliance																											
4.6.6	Storage of all pesticides shall be according to recognised best practices. All pesticide containers shall be properly disposed of and not used for other purposes (see Criterion 5.3). - Major compliance -	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 -	Not applicable																											
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																											
4.6.11	<p>Annual medical surveillance for sprayers and pesticide operators were demonstrated.</p> <p>Medical examination programme established for 1 group of sprayer which conducted by Kulim Safety Training and Services Sdn Bhd-HQ/11/DOC/00/235-Medina Occupational Health Services on Sept 16.</p> <table border="1" data-bbox="660 1671 1222 1968"> <thead> <tr> <th>ID No</th> <th>Date of Medical check up</th> <th>Result</th> <th>Estate</th> </tr> </thead> <tbody> <tr> <td>AT500657</td> <td>Sept 16</td> <td>Normal</td> <td rowspan="3">BPE</td> </tr> <tr> <td>AT500991</td> <td>Sept 16</td> <td>Normal</td> </tr> <tr> <td>AT361652</td> <td>Sept 16</td> <td>Normal</td> </tr> <tr> <td>AE0811468</td> <td>Sept 16</td> <td>Normal</td> <td rowspan="4">TLE</td> </tr> <tr> <td>AT451531</td> <td>Sept 16</td> <td>Normal</td> </tr> <tr> <td>AP417982</td> <td>Sept 16</td> <td>Normal</td> </tr> <tr> <td>AE7714818</td> <td>Sept 16</td> <td>Normal</td> </tr> </tbody> </table>	ID No	Date of Medical check up	Result	Estate	AT500657	Sept 16	Normal	BPE	AT500991	Sept 16	Normal	AT361652	Sept 16	Normal	AE0811468	Sept 16	Normal	TLE	AT451531	Sept 16	Normal	AP417982	Sept 16	Normal	AE7714818	Sept 16	Normal	Complied
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Criterion / Indicator		Assessment Findings	Compliance
4.6.12	No work with pesticides shall be undertaken by pregnant or breast-feeding women. - Major compliance -	No female pesticide operators.	Complied
Criterion 4.7: An occupational health and safety plan is documented, effectively communicated and implemented. The health and safety plan shall cover the following:			
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. - Major compliance -	<p>Occupational Safety and Health Policy was established which has been signed by Managing Director of Kulim Malaysia Berhad dated 1/1/2008.</p> <p>OHS plan for 2016 dated 1/3/2016 has been established. The OHS plan comprises of OSH legal compliance, emergency response plan (ERP), OSH management system, risk management and safety committee activities. Sample of OSH management system activities as follows :</p> <p>i) Chemical Health Risk Assessment (CHRA) CHRA was conducted on 19/7/2016 by Kulim Safety Training and Services Sdn Bhd (JKKP HIE 127/171-2(350) for PPPOM. The action plan was established through the recommendation from the assessor. The Chemical register dated 15/9/2016 was available and maintained at office.</p> <p>CHRA was conducted on 17/12/2012 by QMSPRO Training & Consultancy (JKKP HIE 127/171-2(154) for BPE. The action plan was established through the recommendation from the assessor. The Chemical register dated 19/9/2016 was available and maintained at estate office.</p> <p>CHRA was conducted on 1/11/12 by QMSPRO Training & Consultancy (JKKP HIE 127/171-2(154) for TLE. The action plan was established through the recommendation from the assessor. The Chemical register dated 15/1/2016 was available and maintained at estate office.</p> <p>ii) Chemical Exposure Monitoring The CEM was conducted on 30/5/2016 by Kulim Safety Training and Services Sdn Bhd, JKKP HIE 127/171-3/1(164).</p> <p>iii) Medical Surveillance 14 workers were sent for medical surveillance on 31/5/2016 for those who are involved with chemical, refer to medical surveillance report by registered OHD, HQ/14/DOC/00/367 under BP Healthcare Group. All the lab operators were found fit.</p> <p>iv) Audiometric Testing Baseline audiometric testing was conducted on 11/1/2016 by ENT specialist under Subra Ear Nose & Throat Klinik Bhd. Total workers tested 82. Only 1 worker we found to experience hearing impairment. The recommendation by doctor was to test that worker annually.</p> <p>v) GEV inspection Internal inspection by tech was conducted on monthly basis.</p>	Complied

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Criterion / Indicator	Assessment Findings	Compliance
4.7.2	<p>All operations where health and safety is an issue shall be risk assessed, and procedures and actions shall be documented and implemented to address the identified issues. All precautions attached to products shall be properly observed and applied to the workers. - Major compliance -</p>	<p>Complied</p>

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<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>Training Scheduled for 2016 was established. 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> <table border="1" data-bbox="657 647 1273 1662"> <thead> <tr> <th>Date</th> <th>Training Topic</th> <th>Trainer</th> <th>Remarks</th> </tr> </thead> <tbody> <tr> <td>23/10/16</td> <td>Spill Kit</td> <td>Asst Mgr</td> <td rowspan="10">PPPOM</td> </tr> <tr> <td>23/5/16</td> <td>Grading</td> <td>Asst. Mgr</td> </tr> <tr> <td>3/1/2016</td> <td>First Aid</td> <td>EHA</td> </tr> <tr> <td>3/1/16</td> <td>ERP</td> <td>Asst. Mgr</td> </tr> <tr> <td>17/3/16</td> <td>Effluent Sampling Technique</td> <td>Asst. Mgr</td> </tr> <tr> <td>4/1/16</td> <td>Safety and Health training</td> <td>DOSH</td> </tr> <tr> <td>10/1/16</td> <td>WTP</td> <td>Asst. Mgr</td> </tr> <tr> <td>10/1/16</td> <td>Boiler</td> <td>Asst. Mgr</td> </tr> <tr> <td>17/10/16</td> <td>Workshop</td> <td>Sr. Asst</td> <td rowspan="5">BPE</td> </tr> <tr> <td>14/10/16</td> <td>Waste Mgt</td> <td>Asst. Mgr</td> </tr> <tr> <td>14/10/16</td> <td>Manuring & Spraying</td> <td>Asst. Mgr</td> </tr> <tr> <td>25/9/16</td> <td>Contractor Mgt</td> <td>Asst. Mgr</td> </tr> <tr> <td>9/10/16</td> <td>Spraying</td> <td>G-Planter</td> </tr> <tr> <td>18/7/16</td> <td>Harvesting</td> <td>Asst. Mgr</td> <td rowspan="10">TLE</td> </tr> <tr> <td>24/5/16</td> <td>Spraying using Blocus (P&D)</td> <td>Staff</td> </tr> <tr> <td>24/10/16</td> <td>Triple Rinsing</td> <td>Staff</td> </tr> <tr> <td>5/10/16</td> <td>Ramp</td> <td>Asst. Mgr</td> </tr> <tr> <td>24/9/16</td> <td>Harvesting</td> <td>Staff</td> </tr> <tr> <td>6/9/16</td> <td>Chemical Handling</td> <td>Staff</td> </tr> <tr> <td>29/8/16</td> <td>Tractor handling</td> <td>Mgr</td> </tr> <tr> <td>20/7/16</td> <td>Workshop</td> <td>Ast. Mgr</td> </tr> <tr> <td>18/7/16</td> <td>Fire drill</td> <td>Asst. Mgr</td> </tr> <tr> <td>16/6/16</td> <td>Manuring</td> <td>Staff</td> </tr> <tr> <td>24/5/16</td> <td>Rat Baiting</td> <td>Staff</td> </tr> </tbody> </table>	Date	Training Topic	Trainer	Remarks	23/10/16	Spill Kit	Asst Mgr	PPPOM	23/5/16	Grading	Asst. Mgr	3/1/2016	First Aid	EHA	3/1/16	ERP	Asst. Mgr	17/3/16	Effluent Sampling Technique	Asst. Mgr	4/1/16	Safety and Health training	DOSH	10/1/16	WTP	Asst. Mgr	10/1/16	Boiler	Asst. Mgr	17/10/16	Workshop	Sr. Asst	BPE	14/10/16	Waste Mgt	Asst. Mgr	14/10/16	Manuring & Spraying	Asst. Mgr	25/9/16	Contractor Mgt	Asst. Mgr	9/10/16	Spraying	G-Planter	18/7/16	Harvesting	Asst. Mgr	TLE	24/5/16	Spraying using Blocus (P&D)	Staff	24/10/16	Triple Rinsing	Staff	5/10/16	Ramp	Asst. Mgr	24/9/16	Harvesting	Staff	6/9/16	Chemical Handling	Staff	29/8/16	Tractor handling	Mgr	20/7/16	Workshop	Ast. Mgr	18/7/16	Fire drill	Asst. Mgr	16/6/16	Manuring	Staff	24/5/16	Rat Baiting	Staff	<p>Complied</p>
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<p>4.7.4</p> <p>The responsible person/persons shall be identified. There shall be records of regular meetings between the responsible person/s and workers. Concerns of all parties about health, safety and welfare shall be discussed at these meetings, and any issues raised shall be recorded. - Major compliance -</p>	<p>OSH Committees meeting conducted quarterly and meeting minutes includes issues raised and action taken form workplace inspection report etc. The discussion on the accident review,workplace inspection, safety improvement plan, issues from workers, training, complaints has been discussed and action to be taken. There was no major issue.</p> <p>Pasir Panjang Palm Oil Mill SHC organization chart for 2016 i) Chairman – Mohd Yusiff Bin Mat (Mill Manager) ii) Secretary – Noraziah Bt Nordin (#3: 19/9/16, #2: 23/6/16, #1: 23/3/16)</p> <p>Bukit Payung Estate SHC organization chart for 2016 i) Chairman – Mohd Rosdi Ramli (Manager) ii) Secretary – Syed Huzal Syed Jaafar (#3: 22/8/16, #2: 9/5/16, #1: 22/3/16)</p> <p>Tunjuk Laut Estate SHC organization chart for 2016 i) Chairman – Mohd Salim Abu Bakar (Manager) ii) Secretary – Ahmad B. Sujang (#3: 25/8/16, #2: 23/5/16, #1: 20/3/16)</p>	<p>Complied</p>
<p>4.7.5</p> <p>Accident and emergency procedures shall exist and instructions shall be clearly understood by all workers. Accident procedures shall be available in the appropriate language of the workforce. Assigned operatives trained in First Aid should be present in both field and other operations, and first aid equipment shall be available at worksites. Records of all accidents shall be kept and periodically reviewed. - Minor compliance -</p>	<p>Accident and emergency procedures have been communicated to employees, contractors and visitors. Fire evacuation drill was last conducted on 23/10/2016 to test the state of readiness during emergency situation. Workers trained in First Aid were present in the mill and field operations. First Aid Kits were available at worksites. Records on all accidents kept and summary sent to Head Office. Quarterly review on accident cases carried out during OSH quarterly meeting. All operating units keeping all the JKKP 6 & 8 forms and available for viewing. Sighted some records of accidents :</p> <p><u>PPPOM</u></p> <ol style="list-style-type: none"> 31/3/16-Accident at Boiler, MC 17 days, and Accident report was prepared on 31/3/16 by SHO. JKKP 6 was send to DOSH on 31/3/16 by Mill Mger. JKKP 8 for 2015 was sent to DOSH on 13/1/2016. 	<p>Complied</p>

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4.7.6	All workers shall be provided with medical care, and covered by accident insurance. - Minor compliance -	<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.</p> <table border="1"> <thead> <tr> <th>Insurance</th> <th>Period</th> <th>Remark</th> </tr> </thead> <tbody> <tr> <td>MSIG Insurance (M) Bhd</td> <td>8/8/16-7/2/18 (JB-09612038-FIG)</td> <td>PPPOM</td> </tr> <tr> <td>SOCSO</td> <td>Sept 16, Aug 16</td> <td></td> </tr> <tr> <td>Takaful Ikhlas Bhd</td> <td>2/8/16-1/8/17</td> <td>BPE</td> </tr> <tr> <td>SOCSO</td> <td>Sept 16, Aug 16</td> <td></td> </tr> <tr> <td>Takaful Ikhlas Bhd</td> <td>21/9/16-20/9/16</td> <td>TLE</td> </tr> <tr> <td>SOCSO</td> <td>Sept 16, Aug 16</td> <td></td> </tr> </tbody> </table>	Insurance	Period	Remark	MSIG Insurance (M) Bhd	8/8/16-7/2/18 (JB-09612038-FIG)	PPPOM	SOCSO	Sept 16, Aug 16		Takaful Ikhlas Bhd	2/8/16-1/8/17	BPE	SOCSO	Sept 16, Aug 16		Takaful Ikhlas Bhd	21/9/16-20/9/16	TLE	SOCSO	Sept 16, Aug 16		Complied
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4.7.7	Occupational injuries shall be recorded using Lost Time Accident (LTA) metrics - Minor compliance -	<p>Records on Lost Time Accident (LTA) metrics was maintained and based on JKKP 6, 7 & 8. Sample of accident statistic as shown below :</p> <table border="1"> <thead> <tr> <th>Year</th> <th>PPOM</th> <th>BPE</th> <th>TLE</th> </tr> </thead> <tbody> <tr> <td>2015</td> <td>20</td> <td>52</td> <td>29</td> </tr> <tr> <td>2016 (as at Sept 16)</td> <td>17</td> <td>4</td> <td>22</td> </tr> </tbody> </table> <p>*LTA is equivalent to lost man days</p>	Year	PPOM	BPE	TLE	2015	20	52	29	2016 (as at Sept 16)	17	4	22	Complied									
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<p>Criterion 4.8: All staff, workers, smallholders and contract workers are appropriately trained.</p>																								

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<p>4.8.1</p> <p>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 -</p>	<p>Training Scheduled for 2016 was established. Awareness and training programme had been carried out.</p> <table border="1" data-bbox="657 488 1297 1888"> <thead> <tr> <th>Date</th> <th>Training Topic</th> <th>Trainer</th> <th>Remarks</th> </tr> </thead> <tbody> <tr> <td>23/10/16</td> <td>Spill Kit</td> <td>Asst. Mgr</td> <td rowspan="7">PPPOM</td> </tr> <tr> <td>23/5/16</td> <td>Grading</td> <td>Asst. Mgr</td> </tr> <tr> <td>3/1/2016</td> <td>First Aid</td> <td>EHA</td> </tr> <tr> <td>3/1/16</td> <td>ERP</td> <td>Asst. Mgr</td> </tr> <tr> <td>17/3/16</td> <td>Effluent Sampling Technique</td> <td>Asst. Mgr</td> </tr> <tr> <td>4/1/16</td> <td>Safety and Health training</td> <td>DOSH</td> </tr> <tr> <td>10/1/16</td> <td>WTP</td> <td>Asst. Mgr</td> </tr> <tr> <td>10/1/16</td> <td>Boiler</td> <td>Asst. Mgr</td> <td rowspan="13">BPE</td> </tr> <tr> <td>17/10/16</td> <td>Workshop</td> <td>Sr. Asst</td> </tr> <tr> <td>14/10/16</td> <td>Waste Mgt</td> <td>Asst. Mgr</td> </tr> <tr> <td>14/10/16</td> <td>Manuring & Spraying</td> <td>Asst. Mgr</td> </tr> <tr> <td>13/10/16</td> <td>Complaint Procedure</td> <td>Asst. Mgr</td> </tr> <tr> <td>13/1/16</td> <td>Social (Woman & Child)</td> <td>Asst. Mgr</td> </tr> <tr> <td>25/9/16</td> <td>Contractor Mgt</td> <td>Asst. Mgr</td> </tr> <tr> <td>22/9/16</td> <td>HCV & Workers Right</td> <td>Asst. Mgr</td> </tr> <tr> <td>20/9/16</td> <td>Zero Burning</td> <td>Asst. Mgr</td> </tr> <tr> <td>19/9/16</td> <td>Freedom of association/Child Labour</td> <td>Asst. Mgr</td> </tr> <tr> <td>9/10/16</td> <td>Spraying</td> <td>G-Planter</td> </tr> <tr> <td>18/7/16</td> <td>Harvesting</td> <td>Asst. Mgr</td> </tr> <tr> <td>24/5/16</td> <td>Spraying using Blocus (P&D)</td> <td>Staff</td> <td rowspan="10">TLE</td> </tr> <tr> <td>24/10/16</td> <td>Triple Rinsing</td> <td>Staff</td> </tr> <tr> <td>5/10/16</td> <td>Ramp</td> <td>Asst. Mgr</td> </tr> <tr> <td>24/9/16</td> <td>Harvesting</td> <td>Staff</td> </tr> <tr> <td>6/9/16</td> <td>Chemical Handling</td> <td>Staff</td> </tr> <tr> <td>29/8/16</td> <td>Tractor handling</td> <td>Mger</td> </tr> <tr> <td>20/7/16</td> <td>Workshop</td> <td>Ast. Mgr</td> </tr> <tr> <td>18/7/1</td> <td>Fire drill</td> <td>Asst. Mgr</td> </tr> <tr> <td>16/6/16</td> <td>Manuring</td> <td>Staff</td> </tr> <tr> <td>15/6/16</td> <td>Water Sampling</td> <td>Staff</td> </tr> <tr> <td>24/5/16</td> <td>Rat Baiting</td> <td>Staff</td> </tr> </tbody> </table>	Date	Training Topic	Trainer	Remarks	23/10/16	Spill Kit	Asst. Mgr	PPPOM	23/5/16	Grading	Asst. Mgr	3/1/2016	First Aid	EHA	3/1/16	ERP	Asst. Mgr	17/3/16	Effluent Sampling Technique	Asst. Mgr	4/1/16	Safety and Health training	DOSH	10/1/16	WTP	Asst. Mgr	10/1/16	Boiler	Asst. Mgr	BPE	17/10/16	Workshop	Sr. Asst	14/10/16	Waste Mgt	Asst. Mgr	14/10/16	Manuring & Spraying	Asst. Mgr	13/10/16	Complaint Procedure	Asst. Mgr	13/1/16	Social (Woman & Child)	Asst. Mgr	25/9/16	Contractor Mgt	Asst. Mgr	22/9/16	HCV & Workers Right	Asst. Mgr	20/9/16	Zero Burning	Asst. Mgr	19/9/16	Freedom of association/Child Labour	Asst. Mgr	9/10/16	Spraying	G-Planter	18/7/16	Harvesting	Asst. Mgr	24/5/16	Spraying using Blocus (P&D)	Staff	TLE	24/10/16	Triple Rinsing	Staff	5/10/16	Ramp	Asst. Mgr	24/9/16	Harvesting	Staff	6/9/16	Chemical Handling	Staff	29/8/16	Tractor handling	Mger	20/7/16	Workshop	Ast. Mgr	18/7/1	Fire drill	Asst. Mgr	16/6/16	Manuring	Staff	15/6/16	Water Sampling	Staff	24/5/16	Rat Baiting	Staff	<p>Complied</p>
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<p>4.8.2</p> <p>Records of training for each employee shall be maintained. - Minor compliance -</p>	<p>Records of training for employees were available and Maintained at mill and both estate office.</p>	<p>Complied</p>																																																																																																	

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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 -	In POM, Documented Environmental Aspects and Impacts Register (Form No.: epa-pppom-2016; Activity code: ER001-ER017; Rev. 1/2016) available. The review was done on annual basis. Activity of composting of the EFB in the mill is not incorporating in the impact assessment. For estate Bukit Payung, the Environmental Risk Assessment (EPA-LBP-2016; activity code: ER008) for station nursery and replanting area only indicate one aspect- disposal of polybag. The assessment is incomplete to cover the all aspect for activities in nursery and during replanting.	Major nonconformance
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 -	In Pasir Panjang mill, environmental improvement plan has different environmental improvement plan: a. Desludging of sedimentation pond and construction of new anaerobic pond. b. Prevent air pollution by controlling boiler smoke emission and particulate matter c. Saving of natural resources- water & diesel Environmental management plan updated in year 2016 made available for estates during site visit. In Bukit Payung estate, the management plan (EPA-LBP-2016) such as update monthly record of waste collection, weekly inspection of compound and weekly inspection of domestic rubbish collection. The responsible person are Manager, Assistant Manager, staff in charge of linesite and Estate HA. It depends on the activities and area.	Complied

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5.1.3	<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>An environmental improvement plan was implemented to monitor the effectiveness of the mitigation measures. This plan incorporated a monitoring protocol, which is adaptive to operational changes and is reviewed every year to reflect the results of monitoring operational changes that may have positive and negative environmental impacts. Continuous awareness training programme has been carried out by the company to its workers and other stakeholders.</p> <p>For example: Pasir Panjang 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. Sampled monitoring report of boiler stack #1 sampling records for March and June of 2016:</p> <p>March 2016 (24/03/15) : 0.007 g/Nm³ June 2016 (20/06/16) : 0.030 g/Nm³</p>	Complied
<p>Criterion 5.2: The status of rare, threatened or endangered species and other High Conservation Value habitats, if any, that exist in the plantation or that could be affected by plantation or mill management, shall be identified and operations managed to best ensure that they are maintained and/or enhanced.</p>			
5.2.1	<p>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).</p> <p>- Major compliance -</p>	<p>Initial HCV assessment was carried out in July 2009 by A.J.F.M. Deeker Consultant, Biodiversity. Re-assessment of HCV was carried out in September 2016 by Malaysia Environmental Consultants Sdn Bhd (ALS14023KJ & ALS15035TN) and pending for the final approval from the HCV Network. Site observation note which recorded assessment area, GPS coordination, field & division, hectarage and observation is available. The assessment cover all the estate in exception of Siang Estate which the assessment was carried out separately (by same consultant). It is due to different region and landscape.</p> <p>Based on the HCV report, HCV 1 (four threatened species were recorded on site; <u>Siang estate:</u> There are HCV 1- (vulnerable species pigtailed macaque and may breed locally) and HCV 4 were identified within the estate. <u>Other estate (5 estates):</u> There are HCV 1-6 were identified in the 5 different estate.</p>	Complied

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Criterion / Indicator	Assessment Findings	Compliance	
5.2.2	<p>Where rare, threatened or endangered (RTE) species, or HCVs, are present or are affected by plantation or mill operations, appropriate measures that are expected to maintain and/or enhance them shall be implemented through a management plan.</p> <p>- Major compliance -</p>	<p>The biodiversity improvement plan which review on 2016 has incorporated different management plan such as encroachment control, develop reserve area, animal sighting record, boundary survey and bird survey.</p> <p>Estate has taken steps to inform the Department of Wildlife and National Park which conduct regular visit to the site. Kulim (Malaysia) Berhad is also continue to support the Kulim Wildlife Defenders Program to detect illegal hunters and handing them to regulatory departments for further action.</p>	Complied
5.2.3	<p>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.</p> <p>- Minor compliance -</p>	<p>Different training program had been conducted to enhance the awareness of the worker.</p> <p>In Bukit Payung, conducted as following:</p> <ol style="list-style-type: none"> a. 22 September 2016- Briefing on the animal sighting record and need to report to management. b. 13 Oct 2016- briefing on the law of protection flora and fauna; can be penalty RM500, 000 or jail for 2 years. <p>In Pasir Panjang, training conducted as following:</p> <ol style="list-style-type: none"> a. 07 Aug 2016- Hunting prohibited and wildlife conservation b. 6 Sep 2016- Hunting prohibited and wildlife conservation and open burning <p>Interviewed the workers and confirmed that they well aware for the conservation of the wildlife.</p>	Complied
5.2.4	<p>Where a management plan has been created there shall be ongoing monitoring:</p> <ul style="list-style-type: none"> • 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. <p>- Minor compliance -</p>	<p>Regular patrols within the operating unit estates were carried out and findings recorded by the respective Estate executives to monitor the Conservation / buffer zone areas. Mechanism for reporting the sightings of various types of wildlife, were found to have been in place. Monitoring and control of any illegal hunting, fishing or collecting activities was also implemented.</p> <p>The patrolling of the HCV area conducted on monthly basics by assistant manager & field supervisor and the observation (animal sighting record) recorded on the RSPO HCV area. For example, the latest patrolling record on 20 Oct 2016 sighted during site visit to Bukit Payung estate.</p> <p>Interview with the worker and residents confirmed that no hunting activity has been carried out within the estate.</p>	Complied
5.2.5	<p>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.</p> <p>- Minor compliance –</p>	<p>There was no HCV set-aside that needs any negotiation process with the local communities.</p>	Complied
<p>Criterion 5.3: Waste is reduced, recycled, re-used and disposed of in an environmentally and socially responsible manner.</p>			

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<p>5.3.1</p> <p>All waste products and sources of pollution shall be identified and documented. - Major compliance -</p>	<p>Visits made to Mill together with Bukit Payung Estate and Tunjuk Laut Estate showed that all waste products and sources of pollution were identified and documented.</p> <p>The documentation and identification of all the waste products based on waste type and source which review on January 2016.</p> <p>Waste types such as domestic, schedule waste, rubber material, scrap, mill by products, emissions, liquid waste, office and medical waste. 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.</p>	<p>Complied</p>
<p>5.3.2</p> <p>All chemicals and their containers shall be disposed of responsibly. - Major compliance -</p>	<p>The disposal of used chemicals and containers were done in accordance with their schedule on waste management as planned. Stores for scheduled waste were inspected at audited sites i.e. Mill and disposal was done by scheduled waste disposal company authorized and licensed by Department of Environment. e.g. for POM by Kualiti Alam Sdn Bhd and following disposal records were verified.</p> <ul style="list-style-type: none"> a. Consignment note (doc no: 0098353) dated 7 August 2016; SW410 b. Consignment note (doc no: 0098352) dated 7 August 2016; SW305 <p>In Bukit Payung estate, disposal of schedule waste record as below:</p> <ul style="list-style-type: none"> a. Consignment note (doc no: 0098832) dated 20 Oct 2016; SW410 <p>Agrochemical containers are triple rinsed and punctured to avoid any misuse. In Bukit Payung estate, latest disposal record to contractor- G-Planter Sdn Bhd was done on 19/10/2016.</p> <p>In Tunjuk Laut estate, consignment note for schedule waste sighted during onsite visit:</p> <ul style="list-style-type: none"> a. Consignment note (doc: 0098438) dated 16 August 2016- SW308 <p>Consignment note (doc: 0098439) dated 16 August 2016- SW307</p>	<p>Complied</p>

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<p>5.3.3</p> <p>A waste management and disposal plan to avoid or reduce pollution shall be documented and implemented. - Minor compliance -</p>	<p>Waste & Pollution Management Plan which has incorporated waste type and source, action, frequency, records and responsibility. The plan was review on January 2016.</p> <p>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. Latest review on type of waste generated and its handling management plan was done on January 2016. Schedule waste at the mill have been disposed through Kualiti Alam on 7 Aug 2016 (i.e.: Consignment note (doc no: 0098353). Inventory record was being maintained adequately.</p> <p>Visit to dumpsite which located at Bukit Payung Block P92/05, it is far from residential area and waterways. Once the dump site full, it will close and fill with layer of soil.</p> <p>In Bukit Payung and Tunjuk Laut estate, soakaway pit were built at the chemical mixing area to cater any runoff or spillage during mixing process.</p> <p>In Pasir Panjang Mill, more than 50 empty drum were found at the mixing pond area. The drums were used to contain the sludge oil from the mixing pond. All the drums keep on the bare-ground without any containment.</p>	<p>Minor nonconformance</p>
<p>Criterion 5.4: Efficiency of fossil fuel use and the use of renewable energy is optimised.</p>		

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<p>5.4.1</p> <p>A plan for improving efficiency of the use of fossil fuels and to optimise renewable energy shall be in place and monitored. - Minor compliance -</p>	<p>Monthly record on energy consumption for both renewable and non-renewable sources were kept and documented. It is monitored to optimise use of renewable energy. Data is being compiled for comparison and control for future improvement. For Pasir Panjang POM, the diesel used for boiler, press and other transportation. For example,</p> <ul style="list-style-type: none"> a. July 2016- 0.99 litre/ MT FFB b. August 2016- 0.99 litre/ MT FFB c. September 2016- 1.11 litre/MT FFB <p>Mill using biomass fuel (palm fibre and shells) 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 FFB.</p> <p>Besides, the biogas being capture from the POME as it is still in the progress.</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. For example, in Bukit Payung estate:</p> <ul style="list-style-type: none"> a. July 2016- 6.60 litre/ MT FFB b. August 2016- 4.66 litre/ MT FFB c. September 2016- 5.62 litre/MT FFB 	<p>Complied</p>
<p>Criterion 5.5: Use of fire for preparing land or replanting is avoided, except in specific situations as identified in the ASEAN guidelines or other regional best practice.</p>		
<p>5.5.1</p> <p>There shall be no land preparation by burning, other than in specific situations as identified in the 'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003, or comparable guidelines in other regions. - Major compliance -</p>	<p>Zero open burning policy as per SOP Section B2 - Felling/Land Clearing & Land Preparation dated November 2008. Management complying with the Malaysian environmental law –EQA and Regulations 1974. Besides, in their Kulim Sustainability Handbook June 2007 also emphasize on zero burning technique for replanting</p> <p>No open burning noted during the field visit and facility visit.</p>	<p>Complied</p>
<p>5.5.2</p> <p>Where fire has been used for preparing land for replanting, there shall be evidence of prior approval of the controlled burning as specified in 'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003, or comparable guidelines in other regions. - Minor compliance -</p>	<p>No use of fire for land preparation during replanting.</p> <p>During site visit to block P16 of Bukit Payung estate, it was confirmed there is no use of fire during replanting area.</p>	<p>Complied</p>
<p>Criterion 5.6: Plans to reduce pollution and emissions, including greenhouse gases, are developed, implemented and monitored.</p>		

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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 -	Based on the assessment done by Pasir Panjang Mill of all polluting activities as of the Environment Aspect and Impact assessment, identified source was boiler chimney. Current monitoring was through online boiler smoke density and alarm and quarterly boiler stack monitoring of dust particulate. Sampled monitoring report of boiler stack #1 sampling records for March and June of 2016: March 2016 (24/03/15) : 0.007 g/Nm3 June 2016 (20/06/16) : 0.030 g/Nm3 Stack Emission Monitoring for Boiler No. 1 and 2 carried out by Spectrum Laboratories (Johore) Sdn. Bhd. Refer to report ref# ETD/SE/KKSPP/2016/03/13868 and ETD/SE/KKSPP/2016/06/14273 For effluent monitoring, all the POME being discharge for land application.	Complied
5.6.2 Significant pollutants and greenhouse gas (GHG) emissions shall be identified, and plans to reduce or minimise them implemented. - Major compliance	Main source of significant pollutants and greenhouse gas (GHG) identified was methane (CH ₄) emission through POME treatment. Other less significant GHG emissions identified including CO _x , SO _x and NO _x from various sources including fossil fuel, chemical and fertilizer consumptions	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 -	Monitoring of the GHG quantity was done through RSPO approved calculator Palm GHG. Annual quantification of all GHG sources was input into the calculator. These calculations were done in HQ level where GHG calculations were done as per certification unit basics. Total field and mill emission is 9662.78 and 5801.94 (tCO ₂ e).	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.		
6.1.1 A social impact assessment (SIA) including records of meetings shall be documented. - Major compliance -	Social Impact Assessment has been carried out on 17-21/7/2016 and 22-23/7/2016 by Malaysian Environmental Consultants Sdn. Bhd. The assessment has covered Pasir Panjang POM and its supply bases (Pasir Panjang Estate, Bukit Payung Estate, Bukit Kelompok Estate, Pasir Logok Estate, Tunjuk Laut Estate and Siang Estate). Internal and external stakeholders have participated in the process of assessment.	Complied
6.1.2 There shall be evidence that the assessment has been done with the participation of affected parties. - Major compliance -	Methodology of the assessment was through field observation, dialogues with stakeholders and in-depth interview with affected parties. The stakeholders that involved in the assessment included workers, staffs and executives, contractors and suppliers, local authorities, NGOs and adjacent plantations.	Complied

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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 -	Social finding improvement plan 2016 has been developed on 25/10/2016 for Mill and Bukit Payung Estate and 20/10/2016 for Tunjuk Laut Estate based on the findings from Social Impact Assessment conducted on July 2016. The plan has incorporated action taken, person in charge and status of the issues.	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 -	Not applicable as this is the main assessment.	Complied
6.1.5 Particular attention shall be paid to the impacts of smallholder schemes (where the plantation includes such a scheme). - Minor compliance -	No smallholder schemes involved in Pasir Panjang certification units.	Not applicable
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 -	Kulim (M) Berhad has implemented a Communication and Consultation Management Guidelines generated by SPO team. The guideline is specific to communicate and consult with respect to social and environment aspects and impacts, performance and OSH issues.	Complied
6.2.2 A management official responsible for these issues shall be nominated. - Minor compliance -	Mill and estates manager are responsible to communicate on social, OSH and environmental matters to Head Office, communication to employees on matters pertaining to social, OSH and environmental performance and receive all communication related to social, OSH and environment issues from employees and external stakeholders.	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 -	Mill and estates have generated stakeholder list which included contractors and suppliers, local authorities, transporters, buyers and etc. The date of generation was on January 2016 for mill, 21/10/2016 for Bukit Payung Estate and October 2016 for Tunjuk Laut Estate. Stakeholder meeting was conducted on 19/10/2016 for the whole complex. Contractors, villagers, local authorities and etc were invited to the meeting. Meeting minutes is sighted. No issue was raised during the meeting. Tunjuk Laut Estate has conducted stakeholder meeting with contractors and neighbouring villages on 19/9/2016 and 8/9/2016. No issue was raised during the meeting.	Complied

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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 -	Kulim (M) Berhad has implemented Grievance Procedure Plans dated 4/9/2007. The dispute resolution mechanisms are established through open and consensual agreements with affected parties. For internal stakeholders, the grievances are dealt through Consultative Committees. The management has developed Grievance Policy dated 1/1/2008. The time to process the complaints or grievances is 10 working days.	Complied
6.3.2	Documentation of both the process by which a dispute was resolved and the outcome shall be available. - Major compliance –	Mill has implemented a Complaint Form for Housing. All the complaints were mainly from workers related to housing issues such as broken door, plug point damage and etc. No pending issues were sighted. Through interview with the staff and contractors confirmed that no complaints from external stakeholders. Bukit Payung Estate and Tunjuk Laut Estate has implemented enquiry register book and complaint form for housing repair. All the issues reported were resolved and no pending issue sighted. Awareness training on complaint and grievances was conducted on 13/10/2016 to all the workers. Interview with the stakeholders found that they were aware of complaint procedure.	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. There have been no issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders.	Complied
6.4.2	A procedure for calculating and distributing fair compensation (monetary or otherwise) shall be established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. This procedure shall take into account: gender differences in the power to claim rights, ownership and access to land; differences of transmigrants and long-established communities; and differences in ethnic groups' proof of legal versus communal ownership of land. - Minor compliance -	SOP is as per criteria 6.4.1.	Complied

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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 reported during the time of audit.	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 -	<p>Mill and estate have employed local and foreign workers. All the mill workers are under direct employment and estates consisted of direct and contract employment of workers. The payslip has included basic income, allowance pay, working days, medical leave, deduction of salary and etc. Sampled payslip from July - September 2016 as below:</p> <ul style="list-style-type: none"> a) Employee No.: 640022 b) Employee No.: 640084 c) Employee No.: 640111 d) Employee No.: 640015 e) Employee No.: 624652 f) Employee No.: 624016 g) Passport No.: AS444701 h) Passport No.: AS573423 i) Passport No.: AS036164 j) Employee No.: 626984 k) Employee No.: 626695 l) Employee No.: 626556 m) Passport No.: BF0229064 n) Passport No.: BA0832579 <p>All the sampled workers for direct employment and contract workers were achieved the minimum wage accordance to Minimum Wage Order 2016 which achieved RM 1000/ month or RM 38.46/ day.</p> <p>Mill management has applied to Labour Department for salary deduction on mosque fund, gender committee fund and other religion funds and insurance on 22/9/2016. The management has yet to receive approval from Labour Department.</p> <p>Union members were deducted RM 8 for the union subscription fee since September 2016 for mill and Bukit Payung estate. The management has paid the extra deduction of RM 3 to the members. The payment vouchers (under Job Code 72401- Sundry Shop) has been sighted with the acknowledgement from the members.</p> <p>Deduction permit on electricity (Series No.: JB/11123/120 dated 9/10/1996), school bus fare (Series No.: PP3/29/011/2007 dated 1/3/2007) and Khairat Family scheme (Series No.: JTKSM7/2/35/68 JLD 40 dated 3/10/2006) has been sighted for Bukit Payung Estate.</p>	Complied

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<p>6.5.2</p> <p>Labour laws, union agreements or direct contracts of employment detailing payments and conditions of employment (e.g. working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc.) shall be available in the languages understood by the workers or explained carefully to them by a management official.</p> <p>- Major compliance -</p>	<p>The mill and estates have employed local and foreign workers under direct employment and contract employment. Employment contract are available in language that understood by workers. The contract has detailing the payments and employment conditions such as period of working, working hour, medical assistance, holiday and annual leave, period of notice and etc. The contract was signed by the workers and sampled contracts as below:</p> <ul style="list-style-type: none"> a) Employee No.: 640022 joined on 1/2/2015 b) Employee No.: 640084 joined on 13/8/2015 c) Employee No.: 640111 joined on 22/9/2016 d) Employee No.: 626556 joined on 1/11/2011 <p>Consent form and letter of Extension of employment for PLKS Foreign Workers has been sighted and acknowledged by the workers who have worked more than 2 years. Sampled workers as below:</p> <ul style="list-style-type: none"> a) Passport No.: AE4854076 who joined on 7/9/2014 b) Passport No.: B1572183 who joined on 8/10/2007 c) Employee No.: 626695 who joined on 27/10/2013 d) Employee No.: 626863 who joined on 10/10/2013 <p>All the terms were according to the initial contract of employment signed.</p>	<p>Complied</p>
<p>6.5.3</p> <p>Growers and millers shall provide adequate housing, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible.</p> <p>- Minor compliance –</p>	<p>Mill and estates have provided housing facilities, medical, education and welfare to the workers. Water and electricity was supplied to the workers with subsidize of certain amount. Hospital Assistant has conducted linesite inspection by weekly basis in Bukit Payung Estate. No major issue was raised during the inspection.</p>	<p>Complied</p>
<p>6.5.4</p> <p>Growers and millers shall make demonstrable efforts to monitor and improve workers’ access to adequate, sufficient and affordable food.</p> <p>- Minor compliance –</p>	<p>Sundry shop and food shop was found inside the complex. Owner of the sundry shop has displayed the goods and foods price on each of the item. According to the SIA, the price of goods were expensive. The management has discussed with the owner to readjust and displayed the goods price. Through interview with one of the housewife found that she was satisfied with the price. The food shop owner has injected Typhim 0.5ml vaccination on 13/10/2016 from Clinic Mersing. The expiry of the vaccine was on 12/10/2019.</p>	<p>Complied</p>
<p>Criterion 6.6: The employer respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.</p>		
<p>6.6.1</p> <p>A published statement in local languages recognising freedom of association shall be available.</p> <p>- Major compliance -</p>	<p>Kulim (M) Berhad has implemented Guidelines for General Workers where they respect the rights of the workers to join any association that recognized by the company. The guideline has distributed to each of the workers. Awareness training on freedom of association has been conducted on 19/9/2016 to all the workers.</p>	<p>Complied</p>

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6.6.2 Minutes of meetings with main trade unions or workers representatives shall be documented. - Minor compliance -	<p><u>Pasir Panjang Palm Oil Mill:</u></p> <p>The management has conducted meeting with Union and AMESU representatives on 29/9/2016. Total of 10 participants attended the meeting which consists of management representatives, AMESU representatives and NUPW representatives. Meeting minutes is sighted. The management has developed action plan for the issues raised during the meeting.</p> <p><u>Bukit Payung Estate:</u></p> <p>Meeting with Senior Industrial Relation officer from NUPW Southern, NUPW Field Officer and estate NUPW representative was conducted on 5/10/2016 with total 10 participants. Meeting minutes was sighted and no issue was reported during the meeting. Different nationality of workers were invited to attend the meeting. Attendant list is sighted.</p> <p><u>Tunjuk Laut Estate:</u></p> <p>The management has conducted meeting with the Union representatives and workers on 13/10/2016 to discuss if any issue or complaint. Document reviewed of the meeting minutes found that no issue was reported.</p>	Complied
<p>Criterion 6.7: Children are not employed or exploited.</p>		
6.7.1 There shall be documentary evidence that minimum age requirements are met. - Major compliance -	Kulim (M) Berhad has implemented Guidelines for General Workers where they will not employed child labour according to Children and Young Persons (Employment) Act 1966. The guideline has distributed to each of the workers. Awareness training on child labour has been conducted on 19/9/2016 to all the workers.	Complied
<p>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.</p>		
6.8.1 A publicly available equal opportunities policy including identification of relevant/affected groups in the local environment shall be documented. - Major compliance -	Kulim (M) Berhad has implemented Kulim Sustainability Handbook dated June 2007. People Policy has been developed and the management is committed to support non-discrimination in any form. They respect equal opportunities and maintain an equal gender relationship on the work environment. Awareness training on no discrimination has been conducted on 20/9/2016 to all the workers.	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 -	Migrant workers are recruited with 2 years contract. Local workers are on a long term employment. No any kind of discrimination was noted. Job opportunities and amenities such as free housing, water and electricity supplies, medical care are given to all employees without discrimination. All employees are aware of the grievance procedures through the various Committees such as Gender Committee for women, foreign workers representation and union committee to highlight their concerns and grievances if any. No grievances were highlighted to the audit team by internal and external stakeholders.	Complied

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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 -	Policy Statement on Sexual Harassment has been developed 1/1/2008. Kulim (M) Berhad has maintained a safe and healthy work environment to all workers especially women from any form of harassment, humiliation and intimidation of a sexual nature. Awareness training on sexual harassment has been conducted on 21/9/2016 to all the 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 -	Kulim (M) Berhad has established a SOP for protect the rights of reproductive. However, they did not develop policy to protect the reproductive rights of all. Thus, a major non-conformity was raised. Major nonconformance
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 mill and estates management have established Gender Committee (WoW). The management has adopted the following definition of sexual harassment derived from Code of Practice on Prevention & Eradication of Sexual Harassment in the Workplace. A reporting procedure has been developed and to be utilized if there is any sexual harassment case reported. Last meeting was conducted on 23/2/2016 for the whole complex. The committee has organized activities related to religion and social activities. Bukit Payung Estate management has implemented Complaint Book for Women on Wards (WoW) to record if any sexual harassment or violence case reported. Document reviewed on the complaint book found no case was reported so far. Tunjuk Laut Estate has conducted meeting on 14/4/2016 which involved workers and housewives. No case of sexual harassment has been reported during the meeting. There was a sexual harassment case reported on 26/2/2016 sighted in the enquiry register book. The management has taken action by sent the suspect back to his home country. 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 -	No FFB purchased from out-growers or smallholders as Pasir Panjang POM only processed FFB from company owned estate only. Complied

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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 -	No FFB purchased from out-growers or smallholders as Pasir Panjang POM only processed FFB from company owned estate only.	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 -	The contractors have signed on letter of acceptance with the management. Below are the sampled letter of acceptance: <ul style="list-style-type: none"> a) Reference No.: CQ/14/2016 for overhaul FFB conveyor No.2 with date of commencement on 1/10/2016 to date of completion on 14/10/2016. b) Contract No.: MPSB/LBP 3/2015 for supplying workers and transport to load and transport FFB to mill. The commencement date was on 1/2/2015 and valid until 31/12/2017. c) Contract No.: MPSB/LBP 3/2016 for supplying workers to harvest FFB. The commencement date was on 15/9/2016 and valid until 14/9/2019. d) Contract No.: MPSB/LTL 8/2016 for supplying workers for replanting work. The commencement date was on 1/7/2016 and valid until 31/12/2016. e) Contract No.: MPSB/LTL 5/2016 for supplying workers to harvest FFB. The commencement date was on 1/4/2016 and valid until 31/3/2019. The contractors have signed on the agreement.	Complied
6.10.4	Agreed payments shall be made in a timely manner. - Minor compliance -	According to Contract Administration Guidelines & Procedures revised on June 2014, the payment will be made to the contractors in instalment or progress payment. The operating unit advised the contractors within 15 working days from receipt of their invoices of any disputed of the amount date. Interview with contractors confirmed that they were satisfied with the payment made.	Complied
Criterion 6.11: Growers and millers contribute to local sustainable development where appropriate.			
6.11.1	Contributions to local development that are based on the results of consultation with local communities shall be demonstrated. - Minor compliance –	Mill and estates management have made contribution to the internal and external stakeholders. For example: The management has organized activities and seminar related to religion to the workers, fishing competition, seminar related to safety, donation to school for competition, donation of school uniform to all the students and etc.	Complied
6.11.2	Where there are scheme smallholders, there shall be evidence that efforts and/or resources have been allocated to improve smallholder productivity. - Minor compliance –	No scheme smallholders involved in Pasir Panjang certification unit.	Not applicable
Criterion 6.12: No forms of forced or trafficked labour are used.			

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Criterion / Indicator		Assessment Findings	Compliance
6.12.1	There shall be evidence that no forms of forced or trafficked labour are used. - Major compliance -	Kulim (M) Berhad has implemented Kulim Sustainability Handbook dated June 2007. People Policy has been developed and the management is prohibited to engage or support the use of forced labour in all of their operations and administrations. All the local and foreign workers were hold a valid identification card and passports prior to work.	Complied
6.12.2	Where applicable, it shall be demonstrated that no contract substitution has occurred. - Minor compliance –	No contract of substitution was noted.	Complied
6.12.3	Where temporary or migrant workers are employed, a special labour policy and procedures shall be established and implemented. - Major compliance -	Equal opportunity and non-discriminatory policy is implemented. No temporary workers. Migrant workers are treated equally as per the locals.	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 -	Kulim (M) Berhad has implemented Human Right Policy dated 1/1/2008. The management is treated the workers with respect and fair. Awareness training on human rights has been conducted on 22/9/2016 to all the workers.	Complied
6.13.2	As long as children of foreign workers in Sabah and Sarawak are ineligible to attend government school, the plantation companies should engage in a process to secure these children access to education as a moral obligation.	Not applicable.	Complied
Principle 7: Responsible development of new plantings Pasir Panjang Certification Unit and supply base did not carry out any new plantings after November 2005. Therefore, the requirement of Principle 7 is not applicable during this initial assessment. It was verified through land title, mapping and also planting cycle.			
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</p> <p>The action plan for continual improvement shall be implemented, based on a consideration of the main social and environmental impacts and opportunities of the grower/mill, and shall include a range of Indicators covered by these Principles and Criteria.</p> <p>As a minimum, these shall include, but are not necessarily be limited to:</p> <ul style="list-style-type: none"> • Reduction in use of pesticides(Criterion 4.6); • Environmental impacts (Criteria 4.3, 5.1 and 5.2); • Waste reduction (Criterion 5.3); • Pollution and greenhouse gas (GHG) emissions (Criteria 5.6 and 7.8); • Social impacts (Criterion 6.1); <ul style="list-style-type: none"> • Optimising the yield of the supply base. <p>- Major compliance -</p>	<p>CIP initiated by Pasir Panjang Palm Oil Mill as below:</p> <ol style="list-style-type: none"> a) EFB management - EFB composting plant b) POME management – Land application of POME c) Methane captured – In progress of handling over d) Prevent land and water pollution – BOD for the final discharge below 5000 ppm by desludging of sedimentation pond and construction of new anaerobic pond no. 4. <p><u>Bukit Payung Estate:</u> The estate has developed a Continual Improvement Plan for Y2017. The CIP as below:</p> <ol style="list-style-type: none"> a) Construct 2 quarters for security guard – Targeted to be accomplish by end June 2017. b) Utilization of mechanical buffalo for harvesting at P16 – Targeted to be purchase on April 2017. <p><u>Tunjuk Laut Estate:</u> CIP initiated by the estate as below:</p> <ol style="list-style-type: none"> a) Erosion control – Guatamela planting, vertivar planting, road maintenance, culvert and road side drain maintenance programme. Targeted date to complete on 31/1/2017. b) Painting Workers Quarter by 31/12/2016. 	<p>Complied</p>

Appendix B: Approved Time Bound Plan

Project	Estate	Plan
Indonesia	PT RAJ	2019
	PT TPR	
Trader	Eng Lee Heng	2018

List of Estate Manage by KULIM			
Mill Base	Kulim/ Jcorp Estate	Estate	Status
Tereh Mill	Kulim Estate	TEREH UTARA	Certified RSPO
		TEREH SELATAN	
		SELAJ	
		ENGGANG	
		MUTIARA	
		SG. SEMBRONG	
		SG. TAWING	
Sedenak Mill		SEDENAK	
		RENGAM	
		BASIR ISMAIL	
		ULU TIRAM	
		KUALA KABONG	
Sindora Mill		REM / PASAK	
		SINDORA	
		SUNGAI PAPAN	
Palong Mill		SEPANG LOI	
		UMAC	
		LABIS BAHRU	
		MUNGKA	
		KEMEDAK	
	PALONG		
		PASIR PANJANG	

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Pasir Panjang Mill	Kulim Estate	SIANG	In progress
	Jcorp Estate	BUKIT KELOMPOK	
		TUNJUK LAUT	
		PASIR LOGOK	
		BUKIT PAYUNG	

Appendix C: Certification Unit RSPO Certificate Details

Kulim (Malaysia) Berhad
Pasir Panjang Palm Oil Mill
K.B. 527
81909 Kota Tinggi
Johor, Malaysia
RSPO membership number: 1-0006-04-000-00

BSI RSPO Certificate No. : RSPO 657192
Date of Initial Certificate Issued: 09/03/2017
Date of Expiry: 08/03/2022
Applicable Standards: RSPO P&C MYNI 2014; RSPO Certification System June 2007 (revised March 2011); RSPO P&C MY-NIWG 2010; RSPO Supply Chain Certification Standard 21 November 2014 Module D - CPO Mills: Identity Preserved)

Pasir Panjang Palm Oil Mill and supply base					
Location Address	Pasir Panjang Palm Oil Mill K.B. 527 81909 Kota Tinggi, Johor, Malaysia				
GPS Location	103° 56' 54.8736" E ; 2° 1' 4.8504" N				
CPO Tonnage Total	49,989.80 mt				
PK Tonnage Total	11,465.55 mt				
CPO Claimed for Certification*	49,989.80 mt				
PK Claimed for Certification *	11,465.55 mt				
Own estates FFB Tonnage	229,311.00 mt				
Scheme Smallholder FFB Tonnage	N.A				
Estates	Production Area		Other use (ha)	Certified Area / Total land lease (ha)	Annual FFB Production (mt)
	Mature (ha)	Immature (ha)			
Pasir Panjang Estate	1,028.11	420.3	257.59	1,706.00	14,950.00
Tunjuk Laut Estate	1,900.88	771.67	195.25	2,867.80	29,208.00
Bukit Payung Estate	1,194.35	726.06	387.22	2,307.63	18,879.00
Siang Estate	3,205.92	-	237.18	3,443.10	74,297.00
Bukit Kelompok Estate	1,832.85	604.91	139.77	2,577.53	42,454.00
Pasir Logok Estate	1,993.51	-	90.94	2,084.45	49,523.00
Total	11,155.62	2,522.94	1,307.95	14,986.51	229,311.00

Appendix D: Assessment Plan

Date	Time	Subjects	Boon Han	Ning Shing	Hafiz
Monday 24/10/2016	AM	Audit Team travelling to site	√	√	√
	PM	Stakeholder Consultation	√	√	√
Tuesday 25/10/2016 Pasir Panjang Palm Oil Mill	0830 - 0900	Opening meeting: <ul style="list-style-type: none"> Opening presentation by Team Leader Confirmation of assessment scope and finalize audit plan 	√	√	√
	0900 - 1200	Pasir Panjang Palm Oil Mill Inspection: FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment, staff, workers and contractor interview, housing and facility inspection, clinic, meeting stakeholders etc.	√	√	√
	1100-1200	Supply chain for CPO mill, weighbridge officer, production record and etc	√	-	-
	1200 - 1300	Lunch	√	√	√
	1300 - 1630	Document review P1 – P8: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/ workers representatives, new planting, TBP, CIP and implementation etc.)	√	√	√
	1630-1700	Interim closing briefing	√	√	√
Wednesday 26/10/2016 Bukit Payung Estate	0900-1100	Bukit Payung Estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill, etc.	√	√	√
	1100-1200	Meeting with stakeholders (Government, village rep, smallholders, Workers Leader, contractor etc.)	√	√	√
	1200-1300	Lunch	√	√	√

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Date	Time	Subjects	Boon Han	Ning Shing	Hafiz
	1300-1630	Bukit Payung 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).	√	√	√
	1630-1700	Interim Closing Meeting	√	√	√
Thursday 27/10/2016	0900-1100	Tunjuk Laut 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.	√	√	√
Tunjuk Laut Estate	1100-1200	Meeting with stakeholders (Government, village rep, smallholders, Workers Leader, contractor etc.)	√	√	√
	1200-1300	Lunch	√	√	√
	1300-1530	Tunjuk Laut 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).	√	√	√
	1530-1630	Verify any outstanding issues & Preparation for closing meeting	√	√	√
	1630-1730	Closing Meeting	√	√	√
Friday 28/10/2016	AM	Audit Team traveling back to KL	√	√	√

Appendix E: Stakeholders Contacted

<p>Internal Stakeholders</p> <p>Weighbridge Operator Staff and Executives WoW Secretary</p>	<p>Union/Contractors/Local Communities</p> <p>Contractor and Supplier Village representative</p>
<p>Government Departments</p> <p>Labour Departments DOSH Department of Wildlife</p>	

Appendix F : Pasir Panjang Palm Oil Mill Supply Chain Assessment (Module D – CPO Mills: Identity Preserved)

Requirements	Compliance
D.1 Definition	
<p>D.1.1 A mill is deemed to be Identity Preserved (IP) if the FFB used by the mill are sourced from its own supply base certified to the RSPO Principles and Criteria (RSPO P&C). Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own certified land base. If a mill processes certified and uncertified FFB without physically separating the material then only Module E is applicable.</p>	<p>The Pasir Panjang mill only receives certified FFB. Therefore qualifies for the Identity Preserved supply chain system and module. During the P&C assessment, the audit team verified the volumes and sources of certified FFB entering the mill, the implementation of processing controls and volume sales of RSPO certified products</p>
D.2 Explanation	
<p>D.2.1 The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill must be recorded by the certification body (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 shall 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>D.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>As this is the main assessment, the management has taken action to register and meet the reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization.</p>
D.3 Documented procedures	
<p>D.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 role 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’s procedures for the implementation of this standard.</p>	<p>Latest written documented procedures (SM/WI/2) for the chain of custody is with Identity Preserved (IP) model covering all the RSPO Supply Chain Certification Standard and Traceability for handling certified and non-certified FFB. This developed based on the RSPO SCCS 21 November 2014. The mill manager has the responsibility to ensure implementation assisted by the on-site compliance executive. The IP model is applied because only certified FFB from own supply base is received and processed at Pasir Panjang Palm Oil Mill.</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. RSPO Supply Chain training has been conducted on 28/7/2015 by Sustainability Department, Kulim (M) Berhad. Assistant Manager and weighbridge operator have attended the training and attendant list is sighted. Besides, the management has conducted an internal training on weighbridge station to other weighbridge operators on 6/10/2016.</p>
<p>D.3.2 The site shall have documented procedures for receiving and processing certified and non-certified FFBs.</p>	<p>Pasir Panjang Palm Oil mill has documented procedures SM/WI/2 for the incoming FFB, processing and outgoing palm products (CPO and PK). The procedure covers receiving and processing certified and non-certified FFBs.</p>

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D.4 Purchasing and goods in	
D.4.1 The site shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.	Daily records are prepared at the entry point at the weighbridge. Daily summary and monthly summary documented for all the certified FFB. Records verified by internal and external audit. Pasir Panjang mill have system to verify at the weighbridge.
D.4.2 The site shall inform the CB immediately if there is a projected overproduction of certified tonnage.	The facilities aware of this procedure.
D.5 Record keeping	
D.5.1 The site shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a three-monthly basis.	All the inventory records are maintained and updated on daily basis and monthly report shows monthly inventory. Computerized system in place. No PKO and Palm kernel meal at Pasir Panjang Palm Oil mill. PK is sold to 3 rd party KCP. Daily records are prepared at the entry point at the weighbridge. Daily summary and monthly summary documented for all the FFB received. Records of certified FFB received verified during annual surveillance. Records verified by internal and external audit.
D.6 Processing	
D.6.1 The site shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept segregated from noncertified material including during transport and storage.	During this assessment it was confirmed that only own supply bases of FFB is processed and no receive of outsider crops. This ensures that there is no possibility of mixing during processing.
D.6.2 The objective is for 100 % segregated material to be reached.	Processing and storage records can trace back to only certified segregated FFB and finish product (CPO and PK) through traceability records such as weighbridge records. This ensures that 100% segregated materials are reached.

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Actual Tonnage Certified Palm Production - 01 Jan 2016 – 31 December 2016

Mill	Capacity	CPO	PK
Pasir Panjang Palm Oil Mill	45 mt/hr	N.A	N.A

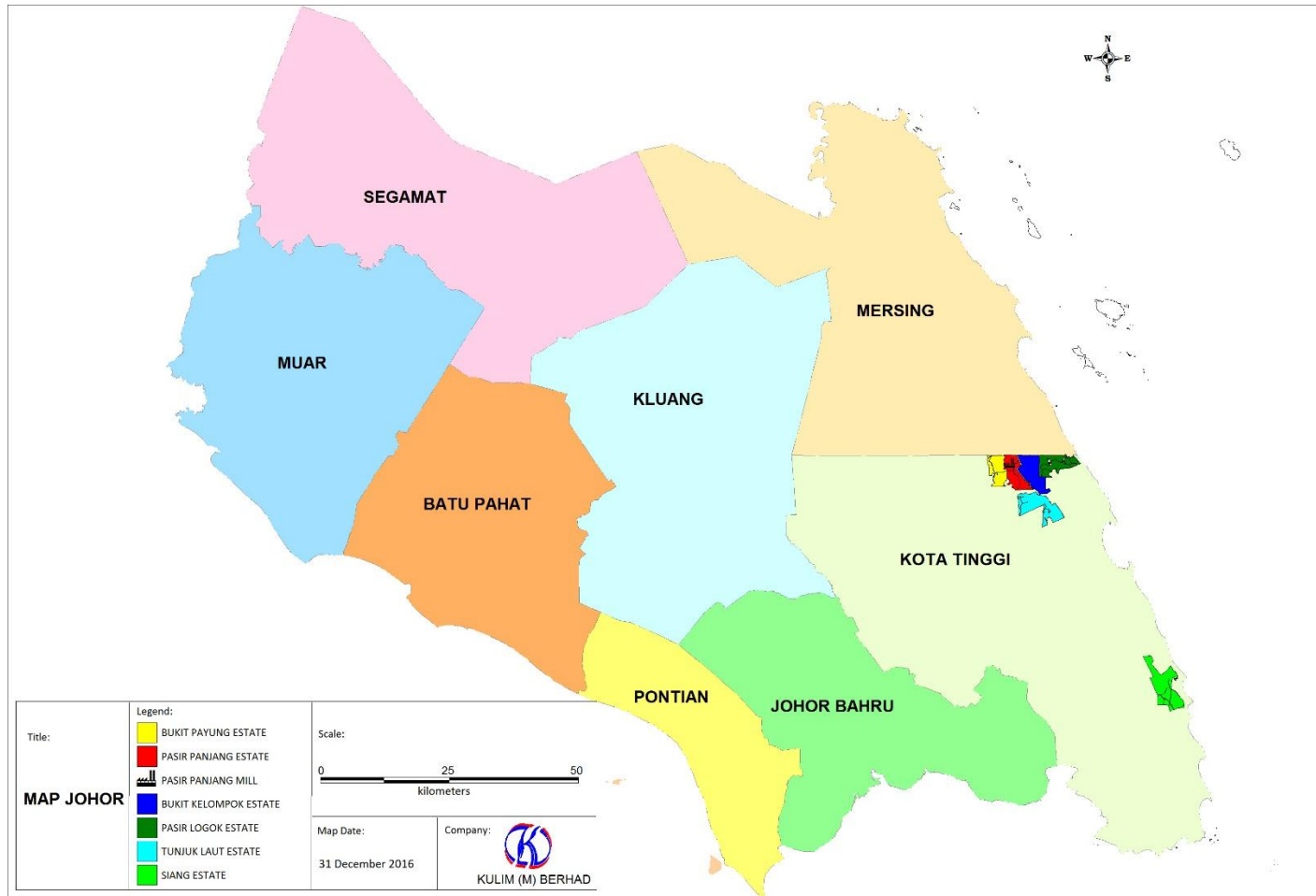
Actual Tonnage Sales of Certified Palm Products – 01 Jan 2016 – 31 December 2016

Mill	Certified CPO Sales	Certified PK Sales	Remarks
Pasir Panjang Palm Oil Mill	N.A	N.A	N.A

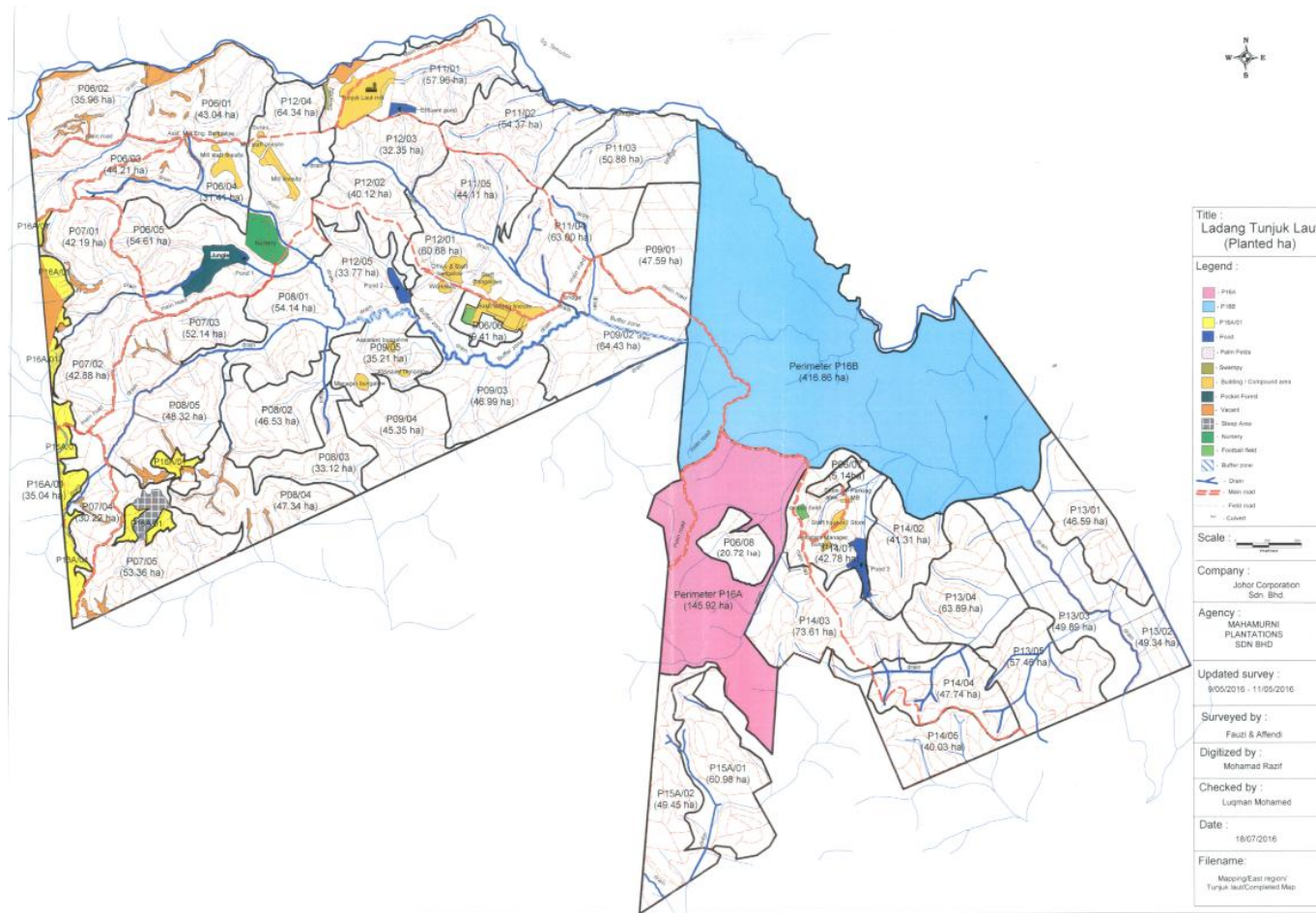
Actual Tonnage Certified FFB Received Monthly - 01 Jan 2016 – 31 December 2016

Month	Certified Supply Base (from own certificate scope) (mt)						Total FFB/Month (mt)
	Tunjuk Laut Estate	Pasir Panjang Estate	Bukit Payung Estate	Bukit Kelompok Estate	Pasir Logok Estate	Siang Estate	
N.A							
Total							

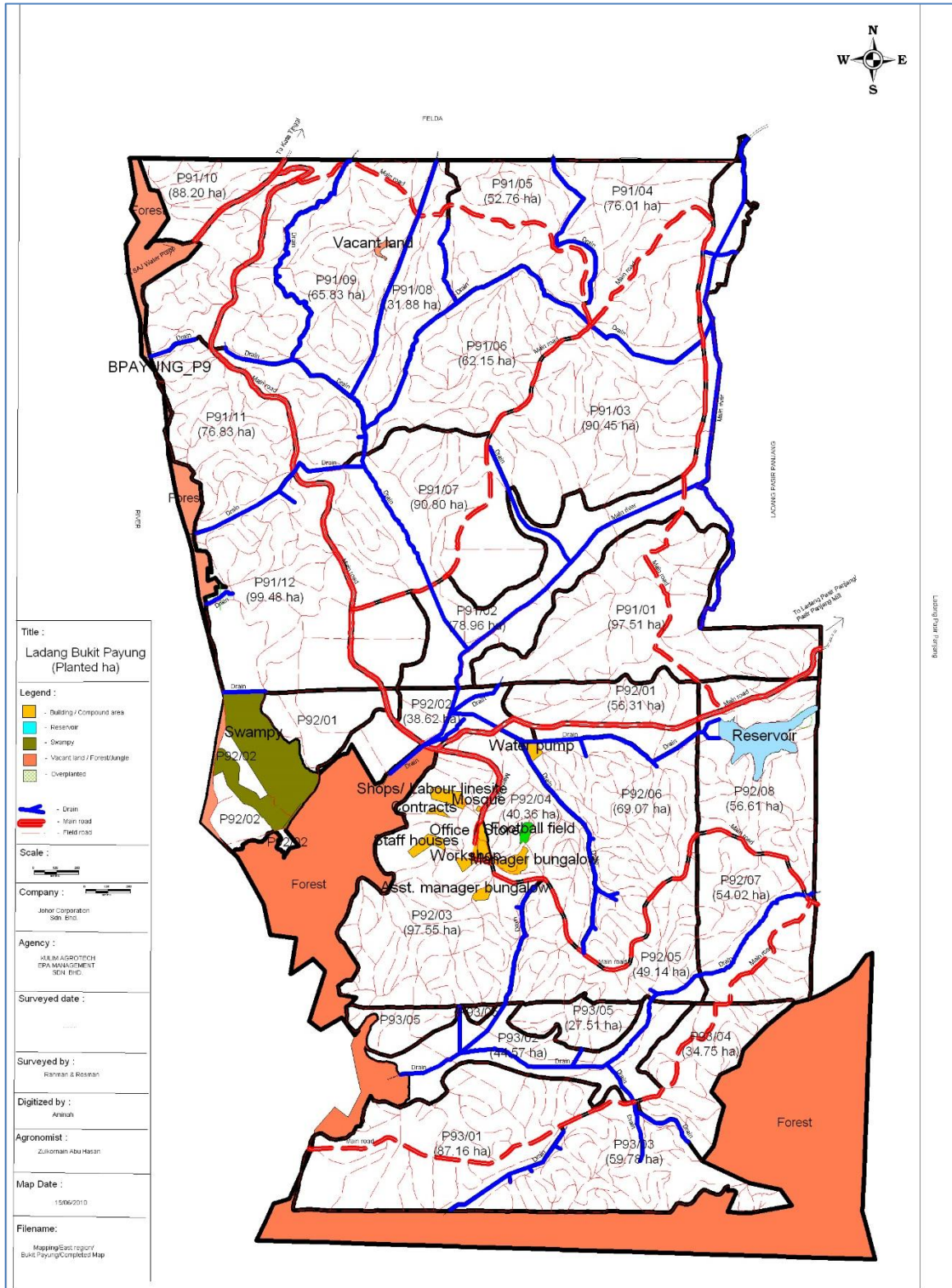
Appendix G: Location Map of Pasir Panjang Palm Oil Mill Certification Unit and Supply bases



Appendix H: Location Map of Tunjuk Laut Estate



Appendix I: Location Map of Bukit Payung Estate



Appendix J: List of Abbreviations Used

AMESU	All Malayan Estates Staff Union
ASA	Annual Surveillance Assessment
BOD	Biological Oxygen Demand
BPE	Bukit Payung Estate
CHRA	Chemical Health Risk Assessment
CIP	Continual Improvement Plan
CPO	Crude Palm Oil
DOE	Department of Environment
DOSH	Department of Occupational Safety & Health
EFB	Empty Fruit Bunch
EIA	Environmental Impact Assessment
EMS	Environmental Management System
ERP	Emergency Response Plan
FFB	Fresh Fruit Bunch
HCV	High Conservation Value
IPM	Integrated Pest Management
ISCC	International Sustainable Carbon Certification
JUPEM	Juukur dan Pemetaan Malaysia
MPOA	Malaysian Palm Oil Association
MSDS	Material Safety Data Sheet
MPOB	Malaysian Palm Oil Board
MSPO	Malaysian Sustainable Palm Oil
MY-NI	Malaysian National Interpretation
NGO	Non Governmental Organisation
NUPW	National Union of Plantation Workers
OSH	Occupational Safety & Health
PK	Palm Kernel
PKO	Palm Kernel Oil
POM	Palm Oil Mill
PPE	Personal Protective Equipment
PPPOM	Pasir Panjang Palm Oil Mill
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
TLE	Tunjuk Laut Estate