

RSPO – RECERTIFICATION ASSESSMENT

Keresia Plantations Sdn. Bhd.
Head Office: P.O Box 2607, 97008 Bintulu, Sarawak, MALAYSIA
Certification Unit: Keresia Palm Oil Mill Bintulu, Malaysia.

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Section 1 Scope of the Recertification Assessment

1. Company Details			
RSPO Membership Number	1-0077-09-000-00	Membership Approval Date	3 June 2009
Company Name	Keresia Plantations Sdn Bhd / Keresia Mill Sdn Bhd		
Address	Head Office: Level 6, Tun Jugah Tower, 18, Jalan Tunku Abdul Rahman, 93100 Kuching, Sarawak, Certification Unit: (Postal Address): P.O Box 2607, 97008 Bintulu, Sarawak, Malaysia. (Location Address): Lot 1, Block 17, Lavang Land District, 97000 Bintulu, Sarawak, Malaysia.		
Subsidiary of (if applicable)	N/A		
Contact Name	Abdul Aziz Bin Zainal Abidin (Assistant General Manager)		
Website	www.keresia.com.my	E-mail	aziz@keresia.com.my
Telephone	+6086-981105	Facsimile	+6086-981106

2. RSPO Certification Information					
Certificate Number	SPO 559278	Certification Start Date	21/10/2010	Re-Certification End Date	20/10/2020
Scope of Certification	Palm Oil and Palm Kernel Production from Keresia Palm Oil Mill and Supply Base (Jiba Estate, Sujan Estate, Keresia Smallholder Group Scheme)				
Other Certifications					
Certificate Number	Standard(s)	Certificate Issued by		Expiry Date	
EU-ISCC-Cert-DE104-11421401	ISCC	Gut Cert		8 September 2015	

3. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base)	Location [Map Reference #]	GPS	
		Easting	Northing
Keresia Palm Oil Mill (Capacity: 30mt/hr.)	Lot 1, Block 17, Lavang Land District, 97000 Bintulu, Sarawak, Malaysia.	113° 35' 59.1"	03° 09' 49.6"
Sujan Estate	Lot 1, Block 17, Lavang Land District, 97000 Bintulu, Sarawak, Malaysia.	113° 36' 09.0"	03° 10' 34.3"
Jiba Estate	Lot 1, Block 17, Lavang Land District, 97000 Bintulu, Sarawak, Malaysia.	113° 33' 36.4"	03° 09' 10.5"
Keresia Smallholder Group Scheme (KSGS)	Lot 1, Block 17, Lavang Land District, 97000 Bintulu, Sarawak, Malaysia.	113° 33' 27.9"	03° 12' 05.3"

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4. Description of Own Certificate Supply Base						
Estate	Mature (ha)	Immature (ha)	Total Planted (ha)	Infrastructure & Other (ha)	Total Hectareage	% of Planted
Sujan Estate	3,078.08	0	3,078.08	464.62	3,542.70	86.88%
Jiba Estate	2,268.82	0	2,268.82	211.48	2,480.30	91.47%
KSGS	357.00	0	357.00	0	357.00	100.00%
TOTAL	5,703.09	0	5,703.09	676.10	6,380.00	

Note: KSGS: Keresas Smallholder Group Scheme

5. Plantings & Cycle								
Estate	Age (Years) & %					Certified Tonnage / Year		
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30	Estimated (Aug. 2014 – July 2015)	Actual (Aug. 2014 – July 2015)	Forecast (Aug. 2015 – July 2016)
Sujan Estate	0	0	100	0	0	82,570	77,521	79,611
Jiba Estate	0	0	100	0	0	64,199	56,603	54,452
KSGS	0	0	100	0	0	9,260	9,102	8,889
TOTAL						156,029	143,226	142,952

6. Certified Tonnage									
Mill	Estimated (Previous Year Aug. 2014 – July 2015)			Actual (This Year Aug. 2014 – July 2015)			Forecast (Next Year Aug. 2015 – July 2016)		
	FFB	CPO	PK	FFB	CPO	PK	FFB	CPO	PK
Keresas Palm Oil Mill	156,029	32,766	7,021	143,226	28,745	5,206	142,952	28,690	6,276
Total	156,029	32,766	7,021	143,226	28,745	5,206	142,952	28,690	6,276

7. Non-Certified Tonnage									
Supplier	Estimated (Previous Year Aug. 2014 – July 2015)			Actual (This Year Aug. 2014 – July 2015)			Forecast (Next Year Aug. 2015 – July 2016)		
	FFB	CPO	PK	FFB	CPO	PK	FFB	CPO	PK
Independent Estates	67,509	14,170	3,159	71,221	14,294	2,585	75,740	15,201	3,325
Total	67,509	14,170	3,159	71,221	14,294	2,585	75,740	15,201	3,325

Section 2 Assessment Process

Certification Body:

BSI Services Malaysia Sdn Bhd
(ASI Accreditation Number: RSPO-ACC-19)
B-08-01 (East), Level 8, Block B, PJ8,
No. 23, Jalan Barat, Seksyen 8,
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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) since 31/10/2014 with accredited office located at Kuala Lumpur, Malaysia and an office at Jakarta, Indonesia, Singapore, Bangkok and Australia which involve in RSPO Certification Program.

Assessment Methodology, Programme, Site Visits

The on-site recertification assessment was conducted from 22 - 25 July 2015. 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 June 2015, 30 days prior to the recertification assessment. No written 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 Keresia 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 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 D.

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BSI examined in detail the smallholder survey database and concluded that the information showed the majority of smallholders met conformance with the RSPO P&C. The validity of the smallholder survey results was tested by selecting a sample of 6 smallholders (Total of 54 smallholders) that were representative of a range of conditions and subjecting these to field audits. This figure is well in excess of the RSPO sampling guidelines of smallholders. BSI concluded that the survey results for the included smallholders plus the physical audits and the interviews of the smallholder representatives provided substantive evidence of conformance with the RSPO P&C.

The minor nonconformities that were assigned during the ASA4 were followed up to ensure it remains closed. All the previous nonconformities remains closed (details are in section 3.3.1). The assessment findings for the recertification 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 internally reviewed by Mr. Mohamed Hidhir and externally by independent peer 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)	Year 1 (Recertification)	Year 2 (ASA1-1)	Year 3 (ASA1-2)	Year 4 (ASA1-3)	Year 5 (ASA1-4)
Keresa Palm Oil Mill	√	√	√	√	√
Sujan Estate	√	√	√	√	√
Jiba Estate	√	√	√	√	√
KSGS Smallholders	√	√	√	√	√

Tentative Date of Next Visit: 25 July 2016

Total No. of Mandays: 10.5

BSI Assessment Team:

Muhammad Haris B. Abdullah – Lead Assessor

He holds Master in Business Administration from the University Utara Malaysia and Bachelor of Business Administration (Hons) Majored in Human Resource Development from the Open University Malaysia. He has more than 3 years working experience in oil palm plantation and conducting social impact assessments of agriculture, agriculture best practices, and environmental impact assessment and workers welfare. He completed the RSPO Lead Auditor Training in April 2013 and passed the course. He is also passed the ISO 14001, ISO 9001, OHSAS 18001 Lead Auditor Training Courses and qualified as EICC auditor. He has completed International Sustainable and Carbon Certification (ISCC) Lead Auditor Training Courses. Recently he has attended the RSPO P&C Social and Labour Standards and the Mechanics of Social Auditing Workshop on 17 – 19 September in Bangkok, Thailand. He had assisted with conducting audits of oil palm plantation for more than 7 companies against the RSPO P&C in

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Indonesia and in Malaysia for the past 4 years. During this assessment, he assessed on the aspect of environment, Safety and Health, Legal, Social and community engagements, Stakeholders consultation, and workers welfare. He is able to speak and understand Bahasa Malaysia, English, Tamil and Bahasa Indonesia.

Hafriazhar Mohd Mohktar – Team member

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

Senniah Appalasamy – Team member

He holds degree in Resource Economics from Agriculture University, Malaysia. He has vast experience in Plantation crop management covering oil palm plantation, rubber, cocoa and pepper for more than 10 years. He is also experience in manufacturing sector as a quality controller and production management. He is involved in RSPO implementation and assessment since 2008 as a team member and subsequently as a lead auditor with RSPO approved certification body covering assessment with RSPO P&C, RSPO SCCS, RSPO NPP and RSPO Group Certification in Malaysia, Indonesia and Thailand. He has completed ISO 9001:2008, Social Auditing Training by RSPO at Yogyakarta, RSPO SCCS awareness training, RSPO Lead Auditor Training Course, RSPO SCCS Lead Auditor Training Course, RSPO – RED Lead Auditor Training Course, International Sustainable Carbon Certification (ISCC) Lead Auditor training, Sustainability Report Assurance (SRA) Assessor Training, ISO 14001 Lead Auditor Training Course and OHSAS 18001 Lead Auditor Training Course. Besides RSPO, he is also qualified as ISCC lead auditor and SRA Lead Assessor. He have experience in other standards i.e. Global Gap Option 1 and 2 (Fruit, vegetable and aquaculture) and GMP B+ as team member. He has participated and presented paper regarding smallholder RSPO certification during RT 10 in Singapore and RT 11 in Medan, Indonesia in the experience sharing session. For this assessment he assess Mill and Estate best practices, supply chain, OSH, HCV, Legal, Environment, Social issues, stakeholder interview etc. He is able to speak and understand Bahasa Malaysia, English, Tamil and Bahasa Indonesia.

Accompanying Persons: Not Applicable.

Section 3 Assessment Findings

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

- RSPO P&C MYNI-2014 Summary of the Assessment – Appendix A
- RSPO Supply Chain Certification Assessment – Appendix E

3.2 Progress against Time Bound Plan

Keresia Plantations Sdn Bhd operates one palm oil mill and three estates. Palm Oil Mill, two estates and associated smallholder are certified since 2010. Kubud estate was planted in 2012 without prior HCV assessment. This issue was brought to RSPO voluntarily by the company to RSPO Technical Director on 17 September 2013. This area is under compensation mechanism and not certified. The timeline to certify Kubud Estate is depends on the approval of the Keresia Plantations Sdn Bhd’s compensation proposal by RSPO.

BSI has considered that Keresia Plantation Sdn Bhd still comply with the RSPO requirement for partial certification and has justified the delay in certifying the Kubud Estate due to waiting for the approval from RSPO. As it is:

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

BSI has continued involvement with assessments of Keresia Plantations Sdn Bhd during the 2014/2015 period. During this recertification assessment, BSI has contacted stakeholders. BSI did not receive any information or feedback that need to further verify. Keresia Plantations Sdn Bhd consistently has kept BSI informed of any emerging issues. Other than the Kubud Estate, at the time of preparation of this Report, BSI is not aware of any new issues involving:

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

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 re-certification assessment there was a minor nonconformity raised at Jiba Estate. The Estates submitted Corrective Action Plans for the nonconformity. Correction was immediately carried out. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted. The implementation of the corrective action plans to address the minor nonconformity will be followed up during the next surveillance assessment.

Non-Conformity		
NCR #	Description	Category (Major/Minor)
1213818N1	Requirements 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
	Evidence of Nonconformity Jiba estate: During the document audit, it was found that contract agreement for EFB application contractor (Smart Hub) was not available at the estate.	
	Statement of Nonconformity No evidence that EFB application contractor understand the contractual agreements they enter into, and that contracts are fair, legal and transparent.	

Observation	
OBS #	Description
-	Nil

Positive Findings	
PF #	Description
1	Safety signs are continuously maintained well and clearly marked with walkways.
2	The estates have implemented weevil pollinating hatchery to increase the population.
3	The company has good asphalt road at the housing site and road leading to the palm oil to facilitate and ensure the palm product transported efficiently.

Issues raised by Stakeholders

Stakeholder consultation involved internal and external stakeholders. External stakeholders were contacted by telephone to arrange meetings at a location convenient to them to discuss Keresia Certification Unit's environmental and social performance, legal and any known dispute issues. Public Stakeholder Notification was made on 15 June 2015, 30 days prior to the recertification assessment. No written feedback received at the end of the 30 days period.

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

Structured worker interviews with male and female workers and staff were held in private at the workplace in the mill and the estates. Fieldworkers were interviewed informally in small groups in the field. In addition, the wives of workers and staff were interviewed in informal group meetings at their housing. Separate visits were made to each of the local communities to meet with the village head and residents. Company officials were not present at any of the internal or external stakeholder interviews. A list of Stakeholders contacted is included as Appendix E.

IS #	Description
1	Issues Representative from Labour Department: Informed that there is no issue on legal compliance. Labour requirements are implemented in all estates and mill.
	Management Responses The management took note of the comment for continuous improvement.
	Audit Team Findings Positive feedback.
2	Issues Foreign workers representative: No issue regarding pay and condition of work. The representative highlighted that they are treated equally. All foreign workers have access to all facilities similar to local workers.
	Management Responses The management treat all employees equally and no discrimination.
	Audit Team Findings No disputes were highlighted by foreign workers interviewed during field visit.
3	Issues Contractors: Contractors confirm payment is prompt as per agreed contract.
	Management Responses Payment is made as per the agreed terms.
	Audit Team Findings No other issues.
4	Issues: DOSH: No non-compliance issue against occupational health and safety regulations by Keresia mill and estates.
	Management Responses: Acknowledged.
	Audit Team Findings: Good positive feedback.

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5	Issues: DOE: No non-compliance issue against environmental regulations by Keres a mill and estates.
	Management Responses: Acknowledged.
	Audit Team Findings: Good positive feedback.
6	Issues: Panel clinic doctor: The estate following the recommendation to conduct medical check-up, medical surveillance and health inspection for chemical handling workers according to occupational health requirements.
	Management Responses: Acknowledge
	Audit Team Findings: Good positive feedback.
7	Issues: MPOB: Keres a mill and estate complying with its licensing requirement well.
	Management Responses: Acknowledged.
	Audit Team Findings: Good positive feedback.

3.3.1 Status of Nonconformities Previously Identified and Observations

Non-Conformity		
NCR #	Description	Category (Major / Minor)
1097198N1	Requirements: Indicator 5.3.2: Having identified wastes and pollutants, an operational plan should be developed and implemented, to avoid or reduce pollution.	Minor
	Evidence of Nonconformity: At Keres a Mill, during the visit to the diesel storage at the gen-set room noted that diesel second containment was broken. Also, at the ramp area shovel was parked without the oil tray (PCD) although hydraulic oil leakages noted.	
	Statement of Nonconformity: Diesel containment broken and at the ramp area shovel was parked without the oil tray (PCD) although hydraulic oil leakages noted.	
	Action: To monitor pollution prevention plan and ensure all parked machinery to be provided with drip tray.	
	Status: New diesel containment wall has been built on 4/11/2014. Drip tray (PCD) has been provided to all machineries parked on 7/11/2014. During this Recertification visit, the new containment wall and drip trays were verified to be in place and maintained. The NC closed on 22/7/2015.	

Non-Conformity		
NCR #	Description	Category (Major / Minor)
1097198N2	<p>Requirements: Indicator 6.5.2: Labour laws, union agreements or direct contracts of employment detailing payments and conditions of employment (e.g. working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc) are available in the language understood by the workers or explained carefully to them by a plantation management official in the operating unit.</p> <p>Evidence of Nonconformity: Renewed Contract for those workers extended the services of work was not available.</p> <p>Statement of Nonconformity: Renewed Contract for those workers extended the services of work was not available.</p> <p>Action: All workers contract will be renewed after the initial contract has been expired and if they extended the services.</p> <p>Status: Renewed contracts were issued to all workers who have extended their service on 4/11/2015. During this Recertification visit, the renewed contract of workers were verified to be in place and maintained. The NC closed on 22/7/2015.</p>	Minor

Observation	
OBS #	Description
	-Nil-

3.3.2 Summary of the Nonconformities and Status

NC Ref.	CLASS	ISSUED	STATUS
CR01	Minor	18/6/2010	Closed on 13/10/2011
CR02	Minor	18/6/2010	Closed on 13/10/2011
CR03	Minor	18/6/2010	Closed on 13/10/2011
CR04	Minor	18/6/2010	Closed on 13/10/2011
CR05	Minor	18/6/2010	Closed on 13/10/2011
CR06	Minor	18/6/2010	Closed on 13/10/2011
CR07	Minor	18/6/2010	Closed on 13/10/2011
CR01-1	Minor	13/10/2011	Closed on 06/09/2012
CR02-1	Minor	13/10/2011	Closed on 06/09/2012

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CR03-1	Minor	13/10/2011	Closed on 06/09/2012
CR04-1	Minor	13/10/2011	Closed on 06/09/2012
CR05-1	Minor	13/10/2011	Closed on 06/09/2012
CR01-2	Minor	6/9/2012	Closed on 29/08/2013
CR01-3	Major	29/8/2013	Closed on 24/10/2013
CR02-3	Major	29/8/2013	Closed on 24/10/2013
CR03-3	Minor	29/8/2013	Closed on 23/09/2014
CR04-3	Minor	29/8/2013	Closed on 23/09/2014
CR05-3	Minor	29/8/2013	Closed on 23/09/2014
1097198M1	Major	26/9/2014	Closed on 25/11/2014
1097198M2	Major	26/9/2014	Closed on 25/11/2014
1097198N1	Minor	26/9/2014	Closed on 22/07/2015
1097198N2	Minor	26/9/2014	Closed on 22/07/2015
1213818N1	Minor	25/7/2015	"open"

Assessment Conclusion and Recommendation:	
Based on the findings during the recertification assessment of Keresia Palm Oil Mill Certification Unit and supply base complies with the RSPO P&C 2013, Malaysian National Interpretation (MYNI-2014) and the RSPO Supply Chain Certification Standard (Nov 2014) for CPO Mill. It is recommended that the certification of Keresia Palm Oil Mill Certification Unit is approved and continued.	
Acknowledgement of Assessment Findings	Report Prepared by
Name: Mr. A.K. Kumaran	Name: Muhammad Haris Bin Abdullah
Company name: Keresia Plantation Sdn. Bhd	Company name: BSI Services (M) Sdn. Bhd
Title: General Manager	Title: RSPO Lead Auditor
Signature: 	Signature: 
Date: 13/08/2015	Date: 11/8/2015

Appendix A: Summary of Findings

Criterion / Indicator	Assessment Findings	Compliance	
Principle 1: Commitment to Transparency			
Criterion 1.1: Growers and millers provide adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.			
1.1.1	There shall be evidence that growers and millers provide adequate information on (environmental, social and/or legal) issues relevant to RSPO Criteria to relevant stakeholders for effective participation in decision making. - Minor compliance -	Adequate information covering on environmental, social and legal issues which are relevant to RSPO Criteria and relevant to stakeholders is shared for effective participation and decision making. Requests for information from the Regulatory Department such as DOE quarterly reports were attended and no noncompliance or complaints were noted. Information on environmental, social and legal issues relevant to RSPO Criteria was made available to relevant stakeholders for effective participation in decision making. Publicly available documents such as land title, OSH plan, HGV documents, negotiation procedure, complaint records, RSPO public summary reports, EIA, Management Plans & Continuous Improvement Plans and company policies are available. 1/7/2015 visited by DOSH for Mill inspection and approved machinery permits. Required information was submitted by the mill. 20/10/2014 visited by DOE and compliance was recorded.	Complied
1.1.2	Records of requests for information and responses shall be maintained. -Major compliance	Records of request for information maintained in file No.: KM 6-7 Action Request. Records of stakeholder requesting information recorded in the visitor's book. Most of the requests are internal i.e. housing repair request by the workers.	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>Publicly available management documents covers Land titles, OHS plans, EIA, SIA, HCV documentation, Pollution prevention and reduction plans, records of complaints and grievances, negotiation procedures, RSPO Public Summary Report, company policies and Continual improvement plans. All operating units have individual documents and records to demonstrate compliance to this indicator.</p> <p>RSPO Public summary reports are publicly available on request at each certification unit.</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>Committing to a code of ethical conduct and integrity in all operations and transactions documented and communicated to all levels of the workforce and operations. The code of business conduct available since December 2009 includes elements of human right as well.</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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2.1.1 Evidence of compliance with relevant legal requirements shall be available. - Major compliance -	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 TQM sustainability team. Sample permits and license checked: <ul style="list-style-type: none"> - Labour Department license to recruit foreign workers dated 26/6/2015 (No.: 86-PTK-MG-BKN-31152-1(A) JLD.2 - MPOB license # 520557004000; validity period 01-Apr-2015 to 31-Mar-2016 for 275,000MT per year - Mill DOE license and compliance schedule # JPKKS 000709A; validity 1-Jul-2015 to 30-Jun-2016 for 60 MT FFB/hr and method of POME discharge on waterways. (BOD below 50ppm). - Weighbridge license No.: B733540 valid till 1/2/2016. - Estate: MPOB 516060011000 (Expiry 31/10/15) - OSH (USECHH) Regulation 2000 requirements – Sighted CHRA report dated July 2012. Covered on personnel working in the Laboratory, Effluent Treatment Plant, Schedule waste, workshop and water treatment plant. Report prepared by Registered DOSH person Reg. No. JKPP IH 127/171-2(71) - Petrol License - Bintulu Development Authority (BDA) SLP000174 (31/12/15) Diesel/petrol KPDNKK (BTU.P.02/10 (D, Serial number Q007439) valid until 3/4/16. Quantity (28,135 litres). - Competent person: <ul style="list-style-type: none"> i) Steam engineer – Ahmad Fauzi Bin Ismail (150/2004) ii) Engine driver – Suring Anak Laroh SW/12/EIP/02/108 Grade 2, James Tapui (SW/06//EIP/02/10) Grade 2. iii) Safety Officer – Raymond Anak Elah (JKPP IS 127/438/2/7007) iv) ICE driver – SW/12/EI/02/109 (Grade 2). 	Complied
2.1.2 A documented system, which includes written information on legal requirements, shall be maintained. - Minor compliance -	A Legal Compliance procedure has been established (KP 1-6 Mechanism for ensuring legal compliance dated 15 Mar 2010). All operating units have Legal & Other Requirements Register (LORR) covering all the necessary regulatory requirements. TQM sustainability department have reviewed and updated the LORR at both mil and estates on 30/6/2015.	Complied
2.1.3 A mechanism for ensuring compliance shall be implemented. - Minor compliance -	Evaluation of compliance done on yearly basis. Sighted record dated 30/6/2015 (mill and estates). No non-compliance during the evaluation period.	Complied

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2.1.4 A system for tracking any changes in the law shall be implemented. - Minor compliance -	Tracking system available to identify changes in the relevant regulations through head office, website information and the information are communicated from the Group Head Office. On the site verification, interviews with office personnel and records indicate that the system is appropriate to the operations. Tracking system on any changes in the law been well implemented. E.g. regular notification by Head Office and regular updates from the DOE/DOSH websites as well as from MAPA seculars.	Complied
Criterion 2.2: The right to use the land is demonstrated, and is not legitimately contested by local people who can demonstrate that they have legal, customary or user rights.		
2.2.1 Documents showing legal ownership or lease, history of land tenure and the actual legal use of the land shall be available. - Major compliance -	Keresa Estate operation is on lease land. There are documents in place showing legal ownership or lease and a history of land tenure. As reported during the last assessment, estate was developed on State Lease Land, issued by Department of Land and Survey; Bintulu Division dated 28 December 1996 for 99 years (between 01 January 1981 and 01 January 2080) over an area of 6,023 ha in Lot No. 1 Block 17 Lavang Land District, Bintulu Sarawak.	Complied
2.2.2 Legal boundaries shall be clearly demarcated and visibly maintained. - Minor compliance -	Field visit to J9701 (pack No. 91) at Sujan estate and field No.: 06K2 (pack No.: 719) noted that boundary with state land is visibly maintained and verified during the visit. Legal boundaries are clearly demarcated and visibly maintained throughout the estate. Mill is located inside Sujan Estate and sharing the estate boundary. All the boundaries are visibly maintained as per company SOP.	Complied
2.2.3 Where there are or have been disputes, additional proof of legal acquisition of title and evidence that fair compensation has been made to previous owners and occupants shall be available, and that these have been accepted with free, prior and informed consent (FPIC). - Minor compliance -	There is no land dispute in the certification unit and supply base at the time of audit. The land leased by Keresa and land ownership documents verified.	Complied
2.2.4 There shall be an absence of significant land conflict, unless requirements for acceptable conflict resolution processes (see Criteria 6.3 and 6.4) are implemented and accepted by the parties involved. -Major compliance	There is no land dispute in the certification unit and supply base at the time of audit. The land leased by Keresa and land ownership documents verified.	Complied
2.2.5 For any conflict or dispute over the land, the extent of the disputed area shall be mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable). -Minor compliance	There is no land dispute in the certification unit and supply base at the time of audit. The land leased by Keresa and land ownership documents verified.	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	There is no land dispute in the certification unit and supply base at the time of audit. The land leased by Keresa and land ownership documents verified.	Complied

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Criterion / Indicator		Assessment Findings	Compliance
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 -	The estate lands are legally owned and leased by the company. The existing estates are not encumbered by any customary land rights. Interview with the surrounding communities and stakeholders confirm no disputes.	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 -	The estate lands are legally owned by the company and no other users were identified within the land area.	Complied
2.3.3	All relevant information shall be available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements. -Minor compliance	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.			

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Criterion / Indicator	Assessment Findings	Compliance	
3.1.1	A business or management plan (minimum three years) shall be documented that includes, where appropriate, a business case for scheme smallholders. - Major compliance -	Annual business plan in the form of annual budget and the projection for 5 years prepared as guidance for future planning. The business plan contains FFB yield, CPO, OER, and KER, costs of production, etc. It also includes environment, social (workers and staffs welfare), and health and safety component and associated capital expenditure for improvement of smallholder schemes.	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 -	As reported during last assessment, there is no requirement for an annual replanting programme at this stage as the earliest plantings were in 1997 so there will no replanting programme until at least 2023.	Complied
<p>Principle 4: Use of appropriate best practices by growers and millers</p>			
<p>Criterion 4.1: Operating procedures are appropriately documented, consistently implemented and monitored.</p>			
4.1.1	Standard Operating Procedures (SOPs) for estates and mills are documented - Major compliance -	Keresa has prepared Standard Operating Procedures (SOPs) for mill and estates covering all the relevant operations dated 21/8/2011. Inspection to the field and mill confirm that the SOPs are implemented. Assistant Managers and staff monitor the implementation.	Complied
4.1.2	A mechanism to check consistent implementation of procedures shall be in place. - Minor compliance -	<p>External Mill Advisor and TQM department inspect and report on the operations on annual basis. The on-site managers develop Action Plans from the Advisory Reports for improvement of the operations. Review of Advisory Reports, Action Plans and site inspections confirmed consistent records of implementation of SOPs. During mill visit it was noted that that operating parameters were consistently recorded by the operators.</p> <p>Mill: Last DOSH visit for year 2015 was on 1/7/15. No summons/major comments noted.</p> <p>Last DOE visit for year 2015 was on 20/10/14. No summons/major comments noted.</p> <p>Action plan has been implemented & closed accordingly for the minor comments highlighted by DOE/DOSH during the above visits.</p> <p>Estates: As to date there were no DOE / DOSH visit at Jiba or Sujana Estates since 2013.</p>	Complied
4.1.3	Records of monitoring and any actions taken shall be maintained and available, as appropriate. - Minor compliance -	<p>The records of monitoring and the actions taken maintained for more than 12 months. Records were verified during the document review found compliance.</p> <p>Mill Advisor visited the Mill on 8/12/2014. Report includes monitoring of all activities in the mill. It was noted the mill OER slightly drop to 20.42% compared with the budget of 21.5%.</p> <p>1/7/2015 visited by DOSH – Mill inspection.</p> <p>Internal RSPO audit was conducted from 31/3 – 8/4/2015 9/12/2014 by the TQM Sustainability Unit.</p> <p>TQM unit visit: 13-14/5/2015</p> <p>Agronomist visit: 16-17 October 2014</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
4.1.4	The mill shall record the origins of all third-party sourced Fresh Fruit Bunches (FFB). - Major compliance -	Keresia mill maintains a daily record of all FFB received. The records show the origin, weight, transporters details and etc of the FFB received.	Complied
Criterion 4.2: Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.			
4.2.1	There shall be evidence that good agriculture practices, as contained in Standard Operating Procedures (SOPs), are followed to manage soil fertility to a level that ensures optimal and sustained yield, where possible. - Minor compliance -	Good agriculture practices which follows the Keresia manual contains Standard Operating Procedures to ensure soil fertility is managed to a level that ensures optimal and sustained yield. Similar to ASA4, the Smallholders Coordinator (TQM) has carried out training on Best Practice including safe use of chemical, MPOB training, soil training, best management practice on agronomic (harvesting, fertilizer application, and pesticide application); block maintenance, and social related training. Regular field to every member block visit was carried out to monitor the best practice implementation at least once every two years. Audit finding was presented in the longhouse. During the past years, all smallholders' blocks have been visited.	Complied
4.2.2	Records of fertiliser inputs shall be maintained. - Minor compliance -	Fertilizer application follows the recommendation from the agronomist. Application records are documented in the daily costing book. Sample checked at Sujana estate found that for field number 07K3, MOP was applied as per recommendation with 1.25kg/palm. Record shows the application date, field number, dosage applied per palm, type of fertilizer and number of applicators. Small Holders demonstrated that they understand the requirements and techniques to maintain soil fertility and this were explained to them by company representatives.	Complied
4.2.3	There shall be evidence of periodic tissue and soil sampling to monitor changes in nutrient status. - Minor compliance -	Agronomist prepares the annual fertilizer recommendation. Leaf analysis result which shows the nutrient level was used as guidance for the fertilizer recommendation. Leaf sampling carried out on 26/8/2014 by Sarawak Oil palms Berhad Laboratory (Ref. No.: 007/KRS/FOL/14). Periodic soil sampling is carried out at 5 years interval. Last was done in June 2012.	Complied
4.2.4	A nutrient recycling strategy shall be in place, and may include use of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), and palm residues after replanting. - Minor compliance -	EFB application only applied to selected fields at the estates. Average about 45mt/ha EFB applied.	Complied
Criterion 4.3: Practices minimise and control erosion and degradation of soils.			
4.3.1	Maps of any fragile soils shall be available. - Major compliance -	All the estates hold copies of soil map. Soil maps and field visit confirm that there is no fragile soil on the estates.	Complied
4.3.2	A management strategy shall be in place for plantings on slopes above a certain limit (this needs to be soil and climate specific). - Minor compliance -	Slope map available. Slope area constructed with terrace and side drainage. Planting terraces had been constructed where slope >10°. Fields are established with cover crops such as muccuna and soft grasses and ferns.	Complied

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Criterion / Indicator	Assessment Findings	Compliance
4.3.3 A road maintenance programme shall be in place. - Minor compliance -	Estates visited have implemented annual Road Maintenance Programme. Roads inspected during field audit are generally in a good condition due to the lateritic soil. Road maintenance carried out internally with grader and compactor. Road maintenance includes road grading, laterite re-surfacing wherever necessary, road side drain upkeep, culvert upkeep, road side silt pits construction etc. Monthly progress records are prepared and sent to head office.	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.	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.	Complied
4.3.6 A management strategy shall be in place for other fragile and problem soils (e.g. sandy, low organic matter, acid sulphate soils). - Minor compliance -	There is no soil categorised as problematic or fragile soil at all estates visited.	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 (KP 2-201 dated June 2010) involved water consumption management and quality monitoring which inclusive of drinking water monitoring and discharge water monitoring. Drinking water monitoring was done as per National Water Quality Standard Malaysia (NWQSM) by Kementerian Kesihatan Malaysia through its Pejabat Kesihatan Bahagian Bintulu. Monitoring was done on annual basis where the latest sample analysis done on 25 June 2015 still not received its results. Previous analysis done on 25 June 2014 shown the treated water quality comply with the NWIQS requirements.	Complied

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4.4.2 Protection of water courses and wetlands, including maintaining and restoring appropriate riparian and other buffer zones (refer to national best practice and national guidelines) shall be demonstrated. - Major compliance -	Documented as a guideline entitled Riparian Zone Establishment (Ref. # E 4.5.3; Chapter 4; Issue date Jan 2010; Version 1.0). Buffer zones established as following: <table border="1" data-bbox="660 477 1294 658"> <thead> <tr> <th>River width</th> <th>Buffer zone</th> </tr> </thead> <tbody> <tr> <td>> 40 meters</td> <td>50 meters</td> </tr> <tr> <td>20 to 40 meters</td> <td>40 meters</td> </tr> <tr> <td>10 to 20 meters</td> <td>20 meters</td> </tr> <tr> <td>5 to 10 meters</td> <td>10 meters</td> </tr> <tr> <td>< 5 meters</td> <td>5 meters</td> </tr> </tbody> </table> Jiba Estate implemented the river water monitoring by taking water samples from 7 sampling points of river and streams running through Jiba Estate including Sg. Jiba, Sg. Semerah, Sg. Jampang and Sg. Besal. Sample analyses were done every 3 months by Chemsain Konsultant Sdn. Bhd. Sampled analysis report (Report No. 62; period of Nov 2014 – Jan 2015; Ref. # CK/MO102-210/4/14; dated 26 Jan 2015) shown that analysis were done against Class IIB of NWQSM and the results were in-compliance with the standard.	River width	Buffer zone	> 40 meters	50 meters	20 to 40 meters	40 meters	10 to 20 meters	20 meters	5 to 10 meters	10 meters	< 5 meters	5 meters	Complied
River width	Buffer zone													
> 40 meters	50 meters													
20 to 40 meters	40 meters													
10 to 20 meters	20 meters													
5 to 10 meters	10 meters													
< 5 meters	5 meters													
4.4.3 Appropriate treatment of mill effluent to required levels and regular monitoring of discharge quality, especially Biochemical Oxygen Demand (BOD), shall be in compliance with national regulations (Criteria 2.1 and 5.6). - Minor compliance -	Palm Oil Mill Effluent (POME) treated through anaerobic pond treatment system where the licensed limit for final discharge BOD was increased by DOE from 20mg/l to 50mg/l for latest issued licensed. Regular monitoring was conducted by the mill by taking the sample of waste water in final discharge point and water at the upstream and downstream of the river. Latest sample analyses results for the month of April, May and June 2015 shown that the mill has consistently met the requirement for BOD limit (Sample: ESI Laboratory Sdn. Bhd. Certificate of analysis ref. # KMSB/12-06/207 dated 12 June 2015) Result: BOD ₃ final discharge = 14mg/l BOD ₃ river (Sungai Sujan) upstream = <2mg/l BOD ₃ river (Sungai Sujan) downstream = <2mg/l	Complied												
4.4.4 Mill water use per tonne of Fresh Fruit Bunches (FFB) (see Criterion 5.6) shall be monitored. - Minor compliance -	Water consumption (KM 4-13) were monitored and measured individually for mill processing, boiler, firefighting and housing. Consumption for the month of June 2015 = 0.95 m ³ /FFB processed. Consumption for 2014 = 1.92 m ³ /FFB processed - due to overflowing of water for domestic use which has been rectified accordingly.	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 -	The implementation on biological method of controlling pest in the plantation through IPM such as Beneficial plants <i>Cassia coganensis</i> , <i>Turnera subulata</i> and <i>Antigonon leptopus</i> as a preventive measure to control leaf eating pest were planted in all the estates. Also included is the use of pheromones to control Rhinoceros beetles although there has been no outbreak for some time. There is also a policy of not killing snakes in Keresa and this has led to a substantial reduction in the number of rats in the plantation. This is further evidenced by the fact that rat bait has not been purchased for more than 3 years.	Complied												

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4.5.2 Training of those involved in IPM implementation shall be demonstrated. - Minor compliance -	IPM training is given by the TQM executives and plantation executives with qualification in agriculture. Interview with the census team confirm their understanding of the Keres SOP on census. IPM training covers census, planting of beneficial plants etc. Interview of smallholders indicated that they have better understanding of IPM and several of them have planted beneficial plants on their plots.	Complied
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 -	The agrochemical used are those registered under the Pesticides Act 1974 and there is a register which records product use; when required; amounts to be used and frequency of use. This is documented within the field operations' SOP specific for pesticide usage, which ensures that the most effective and least harmful chemicals are always the first choice and there is avoidance of prophylactic and indiscriminate spraying.	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 -	Pesticide use is recorded in the field costing book. Information includes date, area treated, quantity of a.i applied per ha and number of application annually such as selective spraying carried out in the month of June 2015 at field 1997A covering 47.25ha. 0.077L a.i/ha applied.	Complied
4.6.3 Any use of pesticides shall be minimised as part of a plan, and in accordance with Integrated Pest Management (IPM) plans. There shall be no prophylactic use of pesticides, except in specific situations identified in national Best Practice guidelines. - Major compliance -	The quantity of agrochemicals required for various field conditions are documented and justified in Keres SOP. The implementation in the field is consistent with the SOP.	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 -	Paraquat was eliminated. At the time of assessment there were no class 1a or 1b pesticides. Alternatives such as Glyphosate were used with the elimination of Paraquat.	Complied
4.6.5 Pesticides shall only be handled, used or applied by persons who have completed the necessary training and shall always be applied in accordance with the product label. Appropriate safety and application equipment shall be provided and used. All precautions attached to the products shall be properly observed, applied, and understood by workers (see Criterion 4.7). - Major compliance -	Pesticide operators given training on the safe handling and application of the pesticides. Suitable personal protective equipment's and application equipment provided to the operators. All precautions attached to the products explained to operators and understood by them. This was noted during the interview with workers.	Complied

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4.6.6	Storage of all pesticides shall be according to recognised best practices. All pesticide containers shall be properly disposed of and not used for other purposes (see Criterion 5.3). - Major compliance -	Complied
4.6.7	Application of pesticides shall be by proven methods that minimise risk and impacts. - Minor compliance -	Complied
4.6.8	Pesticides shall be applied aerially only where there is documented justification. Communities shall be informed of impending aerial pesticide applications with all relevant information within reasonable time prior to application. - Major compliance -	Complied
4.6.9	Maintenance of employee and associated smallholder knowledge and skills on pesticide handling shall be demonstrated, including provision of appropriate information materials (see Criterion 4.8). - Minor compliance -	Complied
4.6.10	Proper disposal of waste material, according to procedures that are fully understood by workers and managers shall be demonstrated (see Criterion 5.3). - Minor compliance -	Complied
4.6.11	Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, shall be demonstrated. - Major compliance -	Complied
4.6.12	No work with pesticides shall be undertaken by pregnant or breast-feeding women. - Major compliance -	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:

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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 -	Keresas's OHS Policy dated 29 January 2010 signed by the top management provides guidance for all OSH related matters. This policy communicated to all employees onsite during safety meeting and morning briefing. Mill: Annual Occupational Medical Surveillance program has been conducted accordingly. Last medical surveillance done on 12/4/15 by Occupational Health Doctor DOSH Reg. No. JKPP HQ/08/DOC/00(206). Result of the Medical Examinations found to be Normal in acceptable limits. Baseline & subsequent monitoring (RETEST) (ref: PUA-Keresas/2014/02), dated March 2015 (JKPP HQ/08/DOC/00/427) 15 numbers of employees sent for audiometric testing.	Complied
4.7.2 All operations where health and safety is an issue shall be risk assessed, and procedures and actions shall be documented and implemented to address the identified issues. All precautions attached to products shall be properly observed and applied to the workers. - Major compliance -	Mill: Risk assessment sampled department Reception, Sterilizer and Threshing Station. Noted activities, Hazard, risk analysis been adequately covered. Last review was done on 1/6/15 during the management review meeting and the management agreed to maintain the existing risk assessment. Control measures been adequately monitored for the identified risks. Estates: Risk assessment sampled department Pest & Diseases, Workshop and Harvesting. Noted activities, Hazard, risk analysis been adequately covered. Last review was done on 17/12/14 and the management agreed to maintain the existing risk assessment. Control measures been adequately monitored for the identified risks.	Complied
4.7.3 All workers involved in the operation shall be adequately trained in safe working practices (see Criterion 4.8). Adequate and appropriate protective equipment shall be available to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, and land preparation, harvesting and, if it is used, burning. - Minor compliance -	Mill: All workers involved in the operation have been adequately trained in safe working practices and PPE issuance had been adequately provided for the workers. Sampled for workers at workshop and store. Found that the PPE issuance record was available for the sampled workers. ERP training 12/3/2015 attended by all employees at mill. Estates: All workers involved in the operation has been adequately trained in safe working practices and PPE issuance been adequately provided for the workers. Sighted PPE training record for Chemical spraying workers dated 28/3/15. Found that the PPE issuance record was available for the sampled workers.	Complied
4.7.4 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 -	Assistant manager at each of the operating units are appointed as OSH Coordinators. Mill: Members of OSH committee were clearly identified from employer and employee representatives. Periodical OSH committee meeting been conducted on quarterly basis. Sighted minutes OSH Committee meeting dated 15/6/15 & 26/3/15. Estates: Members of OSH committee been clearly identified from employer and employee representatives. Periodical OSH committee meeting been conducted on quarterly basis. Sighted minutes OSH Committee meeting dated 20/6/15 & 13/3/15.	Complied

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4.7.5 Accident and emergency procedures shall exist and instructions shall be clearly understood by all workers. Accident procedures shall be available in the appropriate language of the workforce. Assigned operatives trained in First Aid should be present in both field and other operations, and first aid equipment shall be available at worksites. Records of all accidents shall be kept and periodically reviewed. - Minor compliance -	<p>Mill: Emergency Preparedness and Response procedure with effective date 1/6/12 has been clearly established and communicated to all workers. Fire drill been conducted on yearly basis. Last done on 15/1/15. Drill report available and overall result of the drill was successful. ERP organization chart, assembly area and location of fire extinguishers and contact numbers available and displayed at relevant locations. First aiders competency certificate available e.g. for office operator. First aid equipment available at worksites e.g. at Laboratory and Store.</p> <p>So far no incident occurred as to date since February 2014. JKPP 8 for year end 2014 has been send to DOSH Putrajaya on 10/1/15.</p> <p>Estates: Emergency Preparedness and Response procedure has been clearly established and communicated to all workers. Fire drill been conducted on yearly basis. Last done on 15/1/15. Drill report available and overall result of the drill was successful.</p> <p>ERP organization chart, assembly area and location of fire extinguishers and contact numbers available and displayed at relevant locations. First aiders competency certificate available e.g. for storekeeper. First aid equipment available at worksites e.g. at Workshop and Store.</p>	Complied
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 by SOCSO, whereas foreign workers are covered by Foreign Workers Compensation Scheme with Allianz Insurance Berhad. All workers working in the mill are adequately covered with medical care and accident insurance e.g. via SOCSO and 15WKU700135 Foreign worker Compensation Scheme by Allianz that valid from 10/6/15 to 9/6/17.</p>	Complied
4.7.7 Occupational injuries shall be recorded using Lost Time Accident (LTA) metrics - Minor compliance -	<p>Records on Lost Time Accident (LTA) metrics displayed at the operating units and reported to head office. Zero fatal accident was recorded. Common minor injury such as thorn prick records at clinic verified. Mill: Last LTI occurred on 8/2/14. Total man-hours without LTI as at July 2015 are 297024 hours (476) days. As for Sujan estate, total hours without LTI are 675840 and 608256 hours for Jiba estate.</p>	Complied
Criterion 4.8: All staff, workers, smallholders and contract workers are appropriately trained.		
4.8.1 A formal training programme shall be in place that covers all aspects of the RSPO Principles and Criteria, and that includes regular assessments of training needs and documentation of the programme. - Major compliance -	<p>A formal training programme on all aspects of RSPO Principles and Criteria has been established and implemented. Training for various categories of operators, including all field and office staff, with regards to individual duties and training needs had been reviewed and found to be complied.</p> <p>KSGS coordinator has prepared a training plan for smallholders for 2015.</p>	Complied

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Criterion / Indicator	Assessment Findings	Compliance
4.8.2 Records of training for each employee shall be maintained. - Minor compliance -	<p>Records of training for employees available and maintained. Records verified on a sampling basis at the Mill and estates visited covers all aspect of training and RSPO P&C.</p> <p>Mill:</p> <ol style="list-style-type: none"> 1. Chemical handling training: 1/4/2015 2. Schedule waste awareness training: 28/1/2015 3. SOP training: 26/3/2015 4. Firefighting 15/1/2015. 5. First Aid Training: 4/4/2015 <p>Estates:</p> <ol style="list-style-type: none"> 1. Safe Agrochemical Handling Training 8/7/2015 2. Harvesting Training 12/6/2015 3. Fertilizer application training 16/4/2015 <p>Trainings conducted by TQM executives for KSGS smallholders:</p> <ol style="list-style-type: none"> 1. Safe use of pesticide: 10/5/2015 2. Soil fertility and Erosion training: 24/4/2015 3. IPM training: 20/3/2015 4. Waste management training: 17/2/2015 	Complied
<p>Principle 5: Environmental responsibility and conservation of natural resources and biodiversity</p>		
<p>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.</p>		
5.1.1 An environmental impact assessment (EIA) shall be documented. - Major compliance -	<p>Based on Keresa Plantations & Mill – TQM Management System entitled Environmental Management System (Chapter 4; Ref. # E4.2; issue date Nov 2009; version1.0), an environmental impact assessment (KM 4-1 Baseline EIA 2009) was documented as following:</p> <ul style="list-style-type: none"> • Mill Environmental Significant Aspect (E 4.3.3 .1 Env. Aspect Register V2; dated May 2010) – amended Sep 2011 – latest reviewed on Sep 2014 • Mill Environmental Significant Aspect (E 4.3.3 .2 Env. Aspect Register V4; dated May 2010) – amended Sep 2011 – latest reviewed on Sep 2014 	Complied
5.1.2 Where the identification of impacts requires changes in current practices, in order to mitigate negative effects, a timetable for change shall be developed and implemented within a comprehensive management plan. The management plan shall identify the responsible person/persons. - Minor compliance -	<p>There are no any changes required in current practices based on the environmental aspects and impacts identified. The management has already identified and appointed the responsible persons consist of central office and unit office management staff including Assistant General Manager, Estate Managers, Safety Officer and Estate Executives. The team was supported by administrative and clerical staff in unit offices.</p>	Complied

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Criterion / Indicator	Assessment Findings	Compliance
5.1.3	This plan shall incorporate a monitoring protocol, adaptive to operational changes, which shall be implemented to monitor the effectiveness of the mitigation measures. The plan shall be reviewed as a minimum every two years to reflect the results of monitoring and where there are operational changes that may have positive and negative environmental impacts. - Minor compliance -	The continuous monitoring as per initial implementation was implemented on timely basis where for each operating unit the planned programs were included in annual budgeting. Results of the programs that were monitored will determine operational changes whether have positive or negative environmental impacts. The visit confirmed that programs gave continuous improvement accordingly to the company. Complied
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.		
5.2.1	Information shall be collated in a High Conservation Value (HCV) assessment that includes both the planted area itself and relevant wider landscape-level considerations (such as wildlife corridors). - Major compliance -	The initial HCV report dated 2011 by Wild Asia conclude that there is no HCV in the areas apart from the identified riparian areas around the various rivers running through the estate. A number of riparian areas have been identified as HCV areas and these have been signposted. Small Holders are aware of any restrictions and appear to abide by signs in place. There is no identified HCV in small holder blocks. No hunting was observed during this audit. Communities recognize the company's policy on no hunting in the property. Complied
5.2.2	Where rare, threatened or endangered (RTE) species, or HCVs, are present or are affected by plantation or mill operations, appropriate measures that are expected to maintain and/or enhance them shall be implemented through a management plan. - Major compliance -	As reported during ASA4, there were no protected, rare or threatened species identified in the Keresa area and adjacent state land. Complied
5.2.3	There shall be a programme to regularly educate the workforce about the status of these RTE species, and appropriate disciplinary measures shall be instigated in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect or kill these species. - Minor compliance -	Enhancement of the river buffer zones are being carried out. Habitat protection includes prevention of disturbance by workers through awareness campaigns and regular patrols of the area. Inspection of housing areas and interview of residents confirmed workers are aware of the company policy that prohibits illegal hunting. Complied
5.2.4	Where a management plan has been created there shall be ongoing monitoring: • The status of HCV and RTE species that are affected by plantation or mill operations shall be documented and reported; • Outcomes of monitoring shall be fed back into the management plan. - Minor compliance -	The biodiversity management plan for year 2015 has been prepared on the 14/12/14 by TQM department. The plan includes monitoring of buffer zone area in the estate and surrounding area. Complied

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Criterion / Indicator	Assessment Findings	Compliance
5.2.5 Where HCV set-asides with existing rights of local communities have been identified, there shall be evidence of a negotiated agreement that optimally safeguards both the HCVs and these rights. - Minor compliance -	There was no HCV set-aside that needs any negotiation process with the local communities.	Complied
Criterion 5.3: Waste is reduced, recycled, re-used and disposed of in an environmentally and socially responsible manner.		
5.3.1 All waste products and sources of pollution shall be identified and documented. - Major compliance -	<p>Based on documented pollution prevention plan (KM 4-1 Waste Register), among the waste products identified and documented including general waste and scheduled waste. Sources of waste were from the mill, estates and housing area.</p> <p>Common waste identified including domestic waste and scheduled waste. Other specific type of waste generated by the mill is organic (biomass) waste which is also a source of renewable energy consists of fibres, shells, empty fruit bunches, boiler ashes and decanter solids.</p> <p>For estates, its reusable and recyclable wastes identified included empty fertilizer bags and triple rinsed empty chemical containers. Organic biomass waste generated by estates including fronds and chipped fell palms.</p> <p>Other specific activities such as mill maintenance and estate vehicle workshop generate few categories of scheduled waste such as SW 305, SW 306, SW 409 and SW 410. Clinic operation generated clinical waste.</p>	Complied
5.3.2 All chemicals and their containers shall be disposed of responsibly. - Major compliance -	<p>Mill – stored and disposed as scheduled waste.</p> <p>Estate- triple rinsing and spot painted in red before return back to supplier. Visit and records confirmed that no empty chemical containers being disposed other than returned back to supplier.</p>	Complied
5.3.3 A waste management and disposal plan to avoid or reduce pollution shall be documented and implemented. - Minor compliance -	<p>Documented pollution prevention plan (KM 4-1) was emphasized in the pollution prevention plan where the site visit confirmed that the practice of reduce, reuse and recycle of materials has been implemented throughout the company mill and estates.</p> <p>Method of handling the domestic/general wastes are segregation at the collection point from offices and housing area before being disposed through landfill.</p> <p>For scheduled wastes, the handling was done according to the legal requirement where a scheduled waste store was constructed in each operating unit for storage. A company registered with DOE, Wasteway (M) Sdn. Bhd. was appointed to collect the scheduled waste from all the scheduled waste storage facilities within the company.</p> <p>Clinical waste from the clinic was collected by Medan Central Clinic as the authorised clinical waste collection and disposal contractor appointed by the company.</p>	Complied
Criterion 5.4: Efficiency of fossil fuel use and the use of renewable energy is optimised.		

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Criterion / Indicator	Assessment Findings	Compliance
5.4.1	<p>A plan for improving efficiency of the use of fossil fuels and to optimise renewable energy shall be in place and monitored.</p> <p>- Minor compliance -</p>	<p>Utilization of fossil fuels (diesel for genset) was monitored and control through stores stocks and materials checking reported on monthly basis. Effective maintenance plan and productive operation plan for genset including regular servicing of gensets as well as efficient operation of FFB process to fully utilize the free source of fuel i.e. biomass (fiber and shell) were implemented. The quantity of biomass also monitored to achieve the expected percentage of fiber (60 – 70%) and shell (3%) quantities being consumed.</p> <p>Complied</p>
<p>Criterion 5.5: Use of fire for preparing land or replanting is avoided, except in specific situations as identified in the ASEAN guidelines or other regional best practice.</p>		
5.5.1	<p>There shall be no land preparation by burning, other than in specific situations as identified in the 'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003, or comparable guidelines in other regions.</p> <p>- Major compliance -</p>	<p>Keresa Plantations has established and implemented Best Management Practice (KP 2) approach through its standard operations and procedures (KP2-4 SOPs – Field Policy Manual).</p> <p>Under its conservation measures chapter entitled Environment Conservation (SOP # 7.iii; version 2 dated 1 Jan 2009), all mitigations measures for plantation activities including land preparation or replanting shall be in compliance with the approved Environment Impact Assessment (EIA) by Natural Resource and Environmental Board of Sarawak.</p> <p>This is including Zero Open Burning practices where the visit to the field and facilities confirm that the company are in compliance of its Zero Open Burning policy.</p> <p>Complied</p>
5.5.2	<p>Where fire has been used for preparing land for replanting, there shall be evidence of prior approval of the controlled burning as specified in 'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003, or comparable guidelines in other regions.</p> <p>- Minor compliance -</p>	<p>There's no any evidence of fire has been used for preparing land for replanting during the visit.</p> <p>Complied</p>
<p>Criterion 5.6: Plans to reduce pollution and emissions, including greenhouse gases, are developed, implemented and monitored.</p>		
5.6.1	<p>An assessment of all polluting activities shall be conducted, including gaseous emissions, particulate/soot emissions and effluent (see Criterion 4.4).</p> <p>- Major compliance -</p>	<p>Based on the assessment of all polluting activities as of the Environment Aspect and Impact assessment (KM 4-1 Baseline Waste ID), identified source was boiler chimney. Current monitoring was through online boiler smoke density and alarm and six-monthly boiler stack monitoring of dust particulate. Sampled monitoring report done on 5 May 2015 by ESI Sampling Sdn. Bhd. (Report ref. # KMSB/ST-B2/2015/1; dated 18 May 2015) for boiler chimney no. 2. Result shown the stack emissions are within limit at 0.386 g/Nm³.</p> <p>Complied</p>

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Criterion / Indicator	Assessment Findings	Compliance
5.6.2 Significant pollutants and greenhouse gas (GHG) emissions shall be identified, and plans to reduce or minimise them implemented. - Major compliance	Based on KM 4-1 Baseline Waste ID, main source of significant pollutants and greenhouse gas (GHG) identified was methane (CH ₄) emission through POME treatment. The company are in process of obtaining proposals to construct methane capture facilities in POME treatment pond. Received one proposal from Konpro Consultant. Expected to complete the construction of the biogas plant by 2017. 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 its licensed GHG calculator, where annual quantification of all GHG sources was input into the calculator. Default values of emissions factor Calculation of the GHG emissions were derived from the RES-directive Annex V, table D as estimated by BioGrace project. These calculations were then checked against the calculations through ENZO. The GHG calculations were done separately between the mill and estates. Keresa has submitted the GHG report to RSPO during its NPP submission in June 2014. For 2015, the report will be submitted by end of the year.	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 -	The Social Impact Assessment was carried out on 31 July 2014 with the participation of affected parties i.e stakeholders, estate management & staff, field workers, government agencies, neighbouring villagers and being internally reviewed on yearly basis as per recommendation. The TQM department is responsible to perform the SIA assessment. The social action plan contains a time table with person responsible to manage and monitor each issue. The Mill Social Action Plan for 2015 financial year prepared on 02 August 2014 has included new issues raised by stakeholders with timeframe for action. Completed issues have been removed from the plan to address the previous observation raised. The estate social action plan for 2015 was updated on the 2/8/14 after the stakeholder meeting.	Complied
6.1.2 There shall be evidence that the assessment has been done with the participation of affected parties. - Major compliance -	Assessment also covered social amenities, environment, road users, employee changes, safety and health issues, surrounding communities, government official, police, labour department, health department, contractors and suppliers.	Complied

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Criterion / Indicator	Assessment Findings	Compliance	
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 -	Based on the SIA findings and recommendation from the TQM personnel's, a timetable with responsibilities for mitigation and monitoring of the social impacts were developed and reviewed as necessary. The assistant manager is responsible for the social issues and communication with the stakeholders. Social action plan FY 2015 has been prepared on the 2/8/14. The issues from the external and internal stakeholder such as government agency, contractor, village representative, Worker representative has been included in the plan and with the action plan.	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 -	Annual SIA improvement plans reviewed in August 2014. The assessment was through meeting with the effected parties and stakeholders.	Complied
6.1.5	Particular attention shall be paid to the impacts of smallholder schemes (where the plantation includes such a scheme). - Minor compliance -	TQM department executives are the responsible persons to identify and assist the smallholder scheme. Keresa management team meets the KSGS smallholders twice a year to update and obtain feedbacks. Latest meeting was done on 13/2/2015 attended by 22 members.	Complied
Criterion 6.2: There are open and transparent methods for communication and consultation between growers and/or millers, local communities and other affected or interested parties.			
6.2.1	Consultation and communication procedures shall be documented. - Major compliance -	The Mill and Estate engage in communication with local communities and interested parties. The communication procedure is as per Keresa communication policy which shows flow chart of the communication procedure. This was confirmed during interview with the local community representative and village representatives.	Complied
6.2.2	A management official responsible for these issues shall be nominated. - Minor compliance -	The responsibility to ensure effective implementation of the SOP is the respective Mill and Estate Managers assisted by social officers. The Social Officer of the respective operating unit handles social issues of the mill and estates.	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 -	List of stakeholders updated and maintained. The previous observation was addressed effectively. Records of meetings were maintained. The records are available in the Social Management Plan files at the respective operating units.	Complied
Criterion 6.3: There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all effected parties.			

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Criterion / Indicator	Assessment Findings	Compliance	
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 -	A documented dispute resolution procedure is available in Mill and Estate Total Quality Management System Manual which is effective, timely, and appropriate and open to any affected parties. The complaint and grievances is open to effected parties including internal and external stakeholders.	Complied
6.3.2	Documentation of both the process by which a dispute was resolved and the outcome shall be available. - Major compliance -	SOP to resolve social disputes "Handling Social Issues" SOP dated 1 Nov 2012 has been established. Stakeholder meetings are held regularly to identify and give opportunity to stakeholders to complaint or raise disputes. Issues are discussed and consensual agreements reached during stakeholder meetings. Follow-up actions had timelines, responsibilities, and details of actions and monitored by managers for satisfactory conclusion. Minutes of meetings are maintained and reviewed.	Complied
Criterion 6.4: Any negotiations concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.			
6.4.1	A procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, shall be in place. - Major compliance -	SOP to identify legal and customary rights as well as people entitled to compensation has been established- titled "Handling Land Disputes" SOP dated 1 Nov 2012. 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 in 6.4.1 above.	Complied
6.4.3	The process and outcome of any negotiated agreements and compensation claims shall be documented, with evidence of the participation of affected parties, and made publicly available. - Major compliance -	No issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders to date.	Complied
Criterion 6.5: Pay and conditions for employees and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages.			
6.5.1	Documentation of pay and conditions shall be available. - Major compliance -	Documentation of pay and conditions such as pay slips shows gross pay, net pay, leave, medical leave pay etc are maintained by the company.	Complied

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Criterion / Indicator	Assessment Findings	Compliance
6.5.2	Labour laws, union agreements or direct contracts of employment detailing payments and conditions of employment (e.g. working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc.) shall be available in the languages understood by the workers or explained carefully to them by a management official. - Major compliance -	Employment contract are available in languages understood by workers. Pay and conditions explained to workers by the operating units. Basic daily pay was verified to be in accordance with the Minimum Wage Order 2012. Sample checked at both mill and estates found workers contracts are available. Complied
6.5.3	Growers and millers shall provide adequate housing, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. - Minor compliance -	Keresa Mill and estates provide adequate housing, water supplies, medical, educational and welfare amenities in accordance with Workers' Minimum Standard of Housing and Amenities Act 1990 (Act 446). There is on-going upgrading of housing. Water is supplied to workers housing through piping. The water tanks are provided for storage purpose. Complied
6.5.4	Growers and millers shall make demonstrable efforts to monitor and improve workers' access to adequate, sufficient and affordable food. - Minor compliance -	Accesses to food for the workers are considered adequate and sufficient. Each operating units have groceries shops within the estates which rented and operated by local communities. Complied
Criterion 6.6: The employer respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.		
6.6.1	A published statement in local languages recognising freedom of association shall be available. - Major compliance -	Workers have freedom to join the workers union. Policy on Freedom of Association dated August 2010. Complied
6.6.2	Minutes of meetings with main trade unions or workers representatives shall be documented. - Minor compliance -	Although there were no Labour Unions, workers and staff are represented in Joint Consultative Committee (JCC) which was established since September 2010. Members are elected from representatives of every division including foreign workers. Regular meetings are held every three months. Latest meeting was held on 11/7/2015. Complied
Criterion 6.7: Children are not employed or exploited.		
6.7.1	There shall be documentary evidence that minimum age requirements are met. - Major compliance -	Inspection to employee contract agreement and list of registration confirmed that those employed are as per company policy on minimum age. The minimum working age is 18 and above. During field visit and consultation with stakeholders confirm that there is no child labour at any of the operations. Complied
Criterion 6.8: Any form of discrimination based on race, caste, national origin, religion, disability, gender, sexual orientation, union membership, political affiliation, or age, is prohibited.		
6.8.1	A publicly available equal opportunities policy including identification of relevant/affected groups in the local environment shall be documented. - Major compliance -	A policy on equal opportunity available and displayed at the offices along with the other policies. Complied

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Criterion / Indicator	Assessment Findings	Compliance
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 3 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 JCC committee to highlight their concerns and grievances if any. No grievances were highlighted to the audit team by internal and external stakeholders.	Complied
6.8.3 It shall be demonstrated that recruitment selection, hiring and promotion are based on skills, capabilities, qualities, and medical fitness necessary for the jobs available. - Minor compliance -	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 on protection against Sexual Harassment and other forms of harassment available and implemented. There is no any reported case of harassment in the operating units.	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 -	Reproductive rights of the female workers are protected. Female employees are aware that they are entitled for two months paid maternity leave.	Complied
6.9.3 A specific grievance mechanism which respects anonymity and protects complainants where requested shall be established, implemented, and communicated to all levels of the workforce. - Minor compliance -	Existing grievance procedure to handle grievances from internal and external stakeholders contains flow chart and available in the local language. Grievances and complaints are treated as confidential and not discussed in public.	Complied
Criterion 6.10: Growers and mills deal fairly and transparently with smallholders and other local businesses.		
6.10.1 Current and past prices paid for Fresh Fruit Bunches (FFB) shall be publicly available. - Minor compliance -	Current and past prices paid for FFB was displayed at the mill entrance gate. The prices are as per daily MPOB pricing guidelines.	Complied
6.10.2 Evidence shall be available that growers/millers have explained FFB pricing, and pricing mechanisms for FFB and inputs/services shall be documented (where these are under the control of the mill or plantation). - Major compliance -	FFB pricing is based on MPOB pricing. Interview confirmed that contractors and suppliers understand contractual agreement and stated that the contract is transparent and fair. The company has standard term and condition of contract agreement which is explained prior to signing. Latest meeting minutes with smallholders dated 26/6/2015 found the FFB pricing has been explained again to the smallholders by the TQM executives.	Complied

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Criterion / Indicator	Assessment Findings	Compliance	
6.10.3	Evidence shall be available that all parties understand the contractual agreements they enter into, and that contracts are fair, legal and transparent. - Minor compliance -	The company has standard term and condition of contract agreement. However, document audit at Jiba estate found that contract agreement for EFB application contractor (Smart Hub) was not available. Minor nonconformity was raised.	Minor nonconformity
6.10.4	Agreed payments shall be made in a timely manner. - Minor compliance -	Interview of contractors and workers confirmed payment is made promptly. Inspection to the "Grievance Book" indicated no complaint was raised in relation to processing of the payment.	Complied
Criterion 6.11: Growers and millers contribute to local sustainable development where appropriate.			
6.11.1	Contributions to local development that are based on the results of consultation with local communities shall be demonstrated. - Minor compliance -	Contributions are regularly made to local community activities. This was confirmed by local community during interview. Company also allow access to local community to access through the estate roads. Consultations with the local communities are held to encourage them to highlight and suggest any activities for local community development.	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 -	TQM department executives are the responsible persons to identify and assist the smallholder scheme. Regular meetings and trainings were conducted to create awareness among the small holders and get feedback from them.	Complied
Criterion 6.12: No forms of forced or trafficked labour are used.			
6.12.1	There shall be evidence that no forms of forced or trafficked labour are used. - Major compliance -	All employees are legal with local identification card for local employees and foreign employees are with valid passports and working permits. No evident of trafficked workers were found during the audit.	Complied
6.12.2	Where applicable, it shall be demonstrated that no contract substitution has occurred. - Minor compliance -	No contract 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 -	The existing policy covers the necessary aspects of human rights. Employees are aware of their rights and workers and staff representatives monitor to ensure no violations.	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.	There were no foreign workers children reside at the Keresa operating units.	Complied

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Criterion / Indicator	Assessment Findings	Compliance	
Principle 7: Responsible development of new plantings			
As reported during ASA4, Keresa is in the progress of developing new area. However, this new area is excluded from the Keresa Certification Scope. This area is put under RSPO compensation procedure. Keresa had few discussions with RSPO and going through the process.			
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.			
8.1.1	<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>Similar to last assessment all estate are not using paraquat. This is one of the major commitments by all the operating units to stop using paraquat. Environmental impacts of the operations were identified. Environmental Impact Management details the impact mitigation measures and actions required to improve environmental performance for the identified significant impacts. Yield is optimised.</p>	Complied

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Appendix B: Keresia Plantations Sdn Bhd – Keresia Certification Unit RSPO Certificate Details

Keresia Plantations Sdn. Bhd.
 PO Box 2607,
 97008 BINTULU
 SARAWAK MALAYSIA
www.keresia.com.my

BSI RSPO Certificate No: SPO 559278

Date of Initial Certificate Issued: 21 October 2010

Date of Re-Certification Expiry: 20 October 2020

RSPO membership number: 1-0077-09-000-00

Applicable Standards: RSPO P&C MY-NIWG 2014; RSPO Supply Chain Certification Standard November 2014
 Module E - CPO Mills: Mass Balance

Keresia Palm Oil Mill and Supply Base					
Location Address	Keresia Plantations Sdn Bhd, PO Box 2607, 97008 Bintulu, Sarawak, Malaysia.				
GPS Location	Longitude: 113° 35' 59.1" E Latitude: 03° 09' 49"N				
CPO Tonnage Total	28,690				
PK Tonnage Total	6,276				
CPO Claimed for Certification	28,690				
PK Claimed for Certification	6,276				
Own estates FFB Tonnage	134,063				
Scheme Smallholder FFB Tonnage	8,889				
Company's adjacent Suppliers FFB Tonnage – Other adjacent estates (Certified)	-				
Estates	Production Area		Other use (ha)	Certified Area / Total land lease (ha)	Annual FFB Production (mt)
	Mature (ha)	Immature (ha)			
Sujan	3,078.08	0	464.62	3,542.70	79,611
Jiba	2,268.82	0	211.48	2,480.30	54,452
Estate Total	5,346.90	0	676.10	6,023.00	134,063
KSGS Smallholders	357.00	0	0	357.00	8,889
GRAND TOTAL	5,703.90	0	676.10	6,380.00	142,952

Remarks: KSGS: Keresia Smallholder Group Scheme

Appendix C: Assessment Plan

PRELIMINARY AGENDA					
Date	Time	Subjects	Muhd Haris	Senniah	Hafri
Tuesday 21/7/2015	AM	Audit Team travelling to the site.	√	√	√
	PM	Meeting external stakeholders	√	√	-
Wednesday 22/7/2015	08.30 – 09.00	Opening Meeting: <ul style="list-style-type: none"> • Opening Presentation by Audit team leader. • Confirmation of assessment scope and finalize Audit plan (including stakeholder’s consultation). 	√	√	√
	09.00 – 12.30	Keresia Palm Oil Mill Inspection: FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment, staff, workers and contractor interview, housing and facility inspection, clinic, etc.	-	√	√
	10.00 – 12.30	Meeting with stakeholders (Government, village rep, smallholders, Workers Leader, contractor etc.)	√	-	-
	12.30 – 13.30	Lunch	√	√	√
	13.30 – 16.30	Keresia Palm Oil Mill: Visit to laboratory, weighbridge and palm product storage area. Document Review P1 – P8: SOPs, Supply chain for CPO mill, SCCS, Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation etc. Verify previous nonconformities.	√	√	√
	16.30 - 17.00	Interim Closing briefing.	√	√	√
Thursday 23/7/2015	08.30 – 12.30	Jiba Estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill, , etc.	√	√	√
	12.30 – 13.30	Lunch	√	√	√
	13.30 – 16.30	Jiba Estate Document review P1 – P8: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc).	√	√	√
	16.30 - 17.00	Interim Closing Briefing	√	√	√
Friday 24/7/2015	8.30 – 12.00	Sujan Estate & KSGS Smallholders Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill, , etc.	√	√	√
	12.00 – 13.30	Lunch/Rest/Prayers	√	√	√

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PRELIMINARY AGENDA					
Date	Time	Subjects	Muhd Haris	Senniah	Hafri
	13.30 – 16.30	Sujan Estate & KSGS Smallholders Document review P1 – P8: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc).	√	√	√
	16.30 - 17.00	Interim Closing Briefing	√	√	√
Saturday 25/7/2015	8.00 - 10.00	KSGS Smallholders Document audit continues for KSGS Smallholders	√	√	√
	10.00 - 11.30	Verify any outstanding issues & Preparation for closing meeting	√	√	√
	10.30 - 11.30	Closing Meeting	√	√	√
	PM	Audit Team travelling back to KL.	√	√	√

Appendix D: Stakeholders Contacted

<p><i>Internal Stakeholders</i></p> <p>Keresia Certification Unit Management team and Staff</p> <p>Assistant General Manager</p> <p>Representatives from TQM Department</p> <p>On site compliance executives</p> <p>Mill Manager and Assistants</p> <p>Estate Managers and Assistants</p> <p>Facility Administrators</p> <p>Gender Committee Representatives</p> <p>Hospital / Medical Assistants</p> <p>Clinic Assistants</p> <p>Male and Female workers</p> <p>Workers Representatives</p> <p>Foreign Workers Representatives</p>	<p><i>Local Communities / Smallholders</i></p> <p>Rumah Ballrully</p> <ul style="list-style-type: none"> - Ballrully Ak Kenai (Tuai Rumah) - Ayu Ak Hanjan - Nancy Ak Uli - Uding Ak Atan <p>Rumah Ambak (Nuga)</p> <ul style="list-style-type: none"> - Ambak Ak Usah (Tuai Rumah) - Bermas Ak Ringgit
<p><i>Government Departments</i></p> <p>Government School</p> <p>Department of Safety and Health</p> <p>Department of Environment</p> <p>Labour Department</p> <p>Malaysian Palm Oil Board</p>	<p><i>Contractors</i></p> <p>General Contractor</p> <p>FFB Supplier</p> <p>FFB Transport contractor</p> <p><i>External Stakeholders</i></p> <p>GreenPalm</p> <p>Social NGO</p> <p>UTZ</p> <p>Panel Clinic (OHD Doctor)</p>

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Appendix E: Keresia Palm Oil Mill Supply Chain Assessment (Module E – CPO Mills: Mass Balance)

Requirements	Compliance
E.1 Definition	
<p>E.1.1 Certification for CPO mills is necessary to verify the volumes of certified and uncertified FFB entering the mill and volume sales of RSPO certified producers. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own certified land base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.</p>	<p>The Keresia Palm Oil Mill receives and process both certified and non-certified FFB. Therefore, it uses the Mass Balance supply chain system and module. During the P&C assessment, the audit team verified the volumes and sources of certified and non-certified FFB entering the mill, the implementation of processing controls and volume sales of RSPO certified Products.</p>
E.2 Explanation	
<p>E.2.1 The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill must be recorded by the CB in the public summary of the P&C certification report. This figure represents the total volume of certified palm oil product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced should then be recorded in each subsequent annual surveillance report.</p>	<p>The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill is recorded in this public summary report.</p>
<p>E.2.2 The mill must also meet all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization (RSPO IT platform or book and claim).</p>	<p>The mill has met all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization (RSPO IT platform or book and claim).</p>
E.3 Documented procedures	
<p>E.3.1 The site shall have written procedures and/or work instructions to ensure the implementation of all the elements specified in these requirements. This shall include at minimum the following:</p> <p>a) Complete and up to date procedures covering the implementation of all the elements in these requirements;</p> <p>b) The name of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the site procedures for the implementation of this standard.</p>	<p>Keresia mill has documented procedures for the incoming FFB, processing and outgoing palm products (CPO and PK). System available to verify the receiving documents to differentiate the certified and non-certified FFB received. The person in charge is the mill manager assisted by assistant mill manager and weighbridge clerk. The manager and Assistant attended RSPO SCCS Training conducted by TQM executives on 20/6/2015. Both demonstrate awareness.</p>
<p>E.3.2 The site shall have documented procedures for receiving and processing certified and non-certified FFBs.</p>	<p>Keresia Palm Oil Mill has documented procedures for the incoming FFB, processing and outgoing palm products (CPO and PK). System available to make marking on the receiving documents to differentiate the certified and non-certified FFB received.</p>
E.4 Purchasing and goods in	
<p>E.4.1 The site shall verify and document the volumes of certified and non-certified FFBs received.</p>	<p>Daily records are prepared at the entry point at the weighbridge. Daily summary and monthly summary documented for all the certified and non-certified FFB. Records verified by internal and external audit.</p>

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

Actual Certified Palm Production – Aug. 2014 – July 2015 (ASA4)

MILL	CAPACITY & Supply Chain Model	CPO	PK
Keresas Palm Oil Mill	30mt/hr Mass Balance (MB)	28,745	5,206

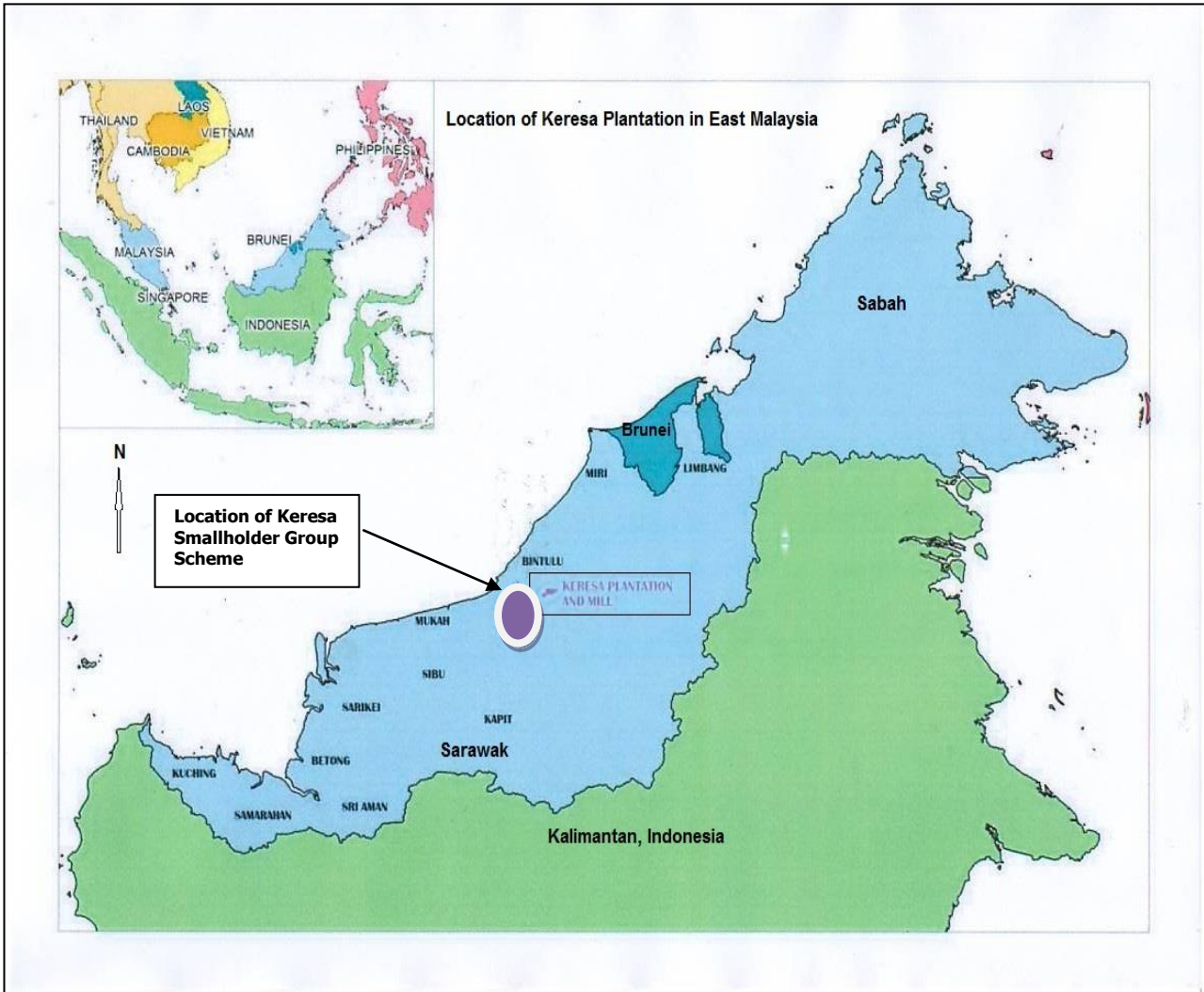
Actual Sales of Certified Palm Products – Aug. 2014 – July 2015 (ASA4)

MILL	Certified CPO Sales	Certified PK Sales	Remarks
Keresas Palm Oil Mill	-nil-	-nil-	-nil-

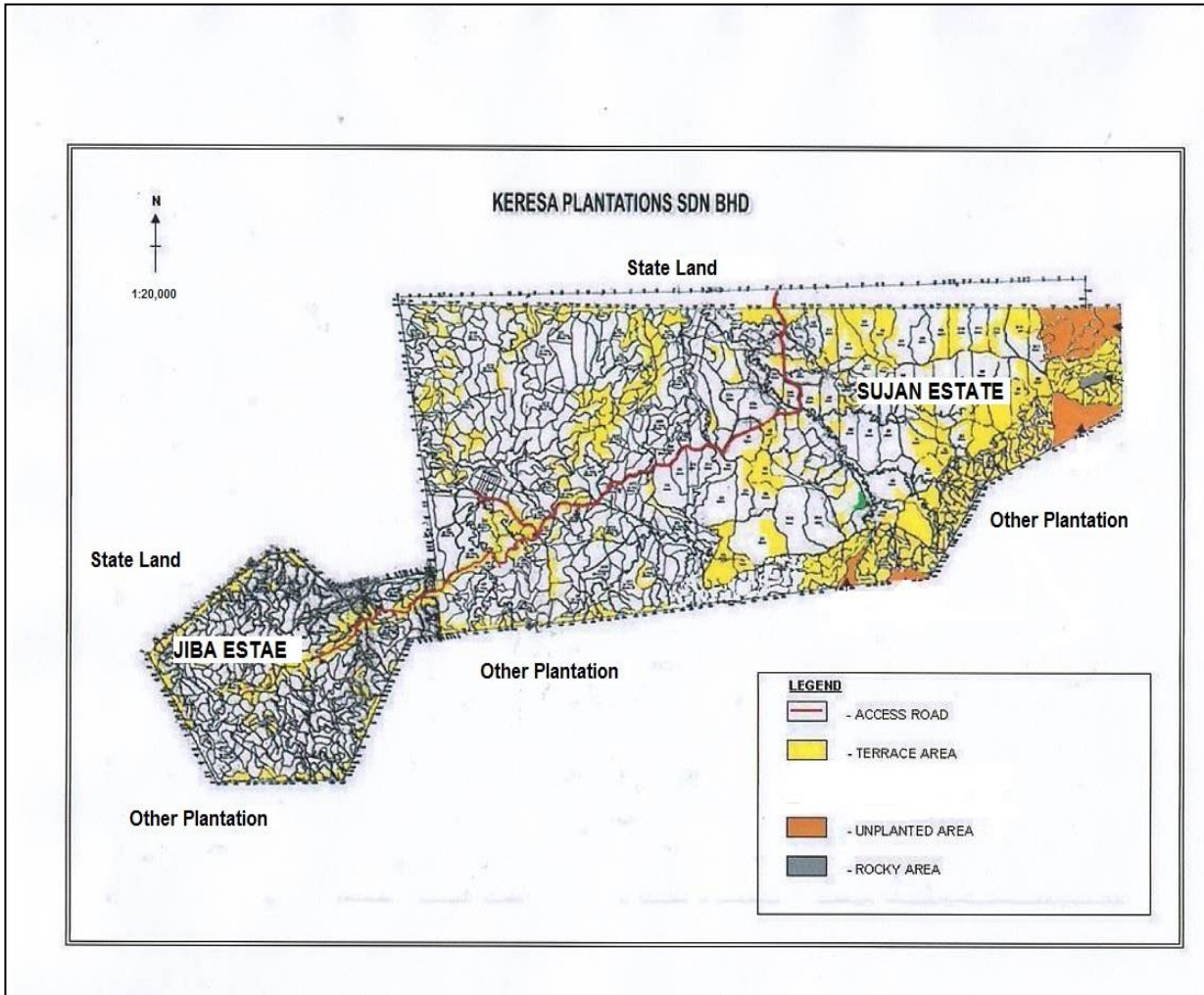
Actual Certified FFB Received Monthly – Aug. 2014 – July 2015 (ASA4)

Month	Sujan	Jiba	KSGS	Total FFB/Month
August 2014	8571	5,563	785	14,919
September 2014	6543	4,688	779	12,010
October 2014	7316	4,512	847	12,675
November 2014	8570	4,074	696	13,340
December 2014	6577	4,746	671	11,994
January 2015	4582	3,971	751	9,304
February 2015	5273	4,310	738	10,321
March 2015	5689	4,510	723	10,922
April 2015	5815	4,819	784	11,418
May 2015	6748	4,893	714	12,355
June 2015	5424	4,549	802	10,775
July 2015	6413	5,968	812	13,193
Total	77,521	56,603	9,102	143,226

Appendix F: Location of Keresia Palm Oil Mill and Supply Bases in Bintulu, Sarawak, Malaysia.



Appendix G: Jiba and Sujan Estates location map



Appendix H: List of Abbreviations Used

AMESU	All Malaysian Estate Staff Union
ASA4	Annual Surveillance Assessment 4
BOD	Biological Oxygen Demand
CHRA	Chemical Health Risk Assessment
CPO	Crude Palm Oil
DOE	Department of Environment
DOSH	Department of Occupational Safety & Health
EFB	Empty Fruit Bunch
EMS	Environmental Management System
FFB	Fresh Fruit Bunch
GMP	Good Manufacturing Practice
HCV	High Conservation Value
IAV	Initial Assessment Visit
IPM	Integrated Pest Management
ISCC	International Sustainable Carbon Certification
KSGS	Keresas Smallholder Group Scheme
MAPA	Malaysian Agriculture Producers Association
MPOA	Malaysian Palm Oil Association
MSDS	Material Safety Data Sheet
MSPO	Malaysian Sustainable Palm Oil
MY-NI	Malaysian National Interpretation
PK	Palm Kernel
PPE	Personal Protective Equipment
RC	Re-Certification
RED	Renewable Energy Directive
RSPO P&C	Roundtable on Sustainable Palm Oil Principle & Criteria
SCCS	Supply Chain Certification Standard
SEIA	Social & Environmental Impact Assessment
SIA	Social Impact Assessment
SOP	Standard Operating Procedure
TQM	Total Quality Management