

**MALAYSIAN SUSTAINABLE PALM OIL  
– ANNUAL SURVEILLANCE ASSESSMENT  
Public Summary Report**

<b>Sime Darby Plantation Berhad</b>
Head Office: Level 3A, Main Block Plantation Tower, No. 2, Jalan P.J.U 1A/7 47301 Ara Damansara Selangor, Malaysia
Certification Unit: <b>Flemington Palm Oil Mill</b> & Plantations including Flemington Estate, Bagan Datoh Estate, Sungai Samak Estate and Sabak Bernam Estate
Location of Certification Unit: Strategic Operating Unit (SOU 4) – Flemington Palm Oil Mill, Sungai Sumun 36369 Teluk Intan, Perak, Malaysia

**Report prepared by:**  
**Mohamed Hidhir Zainal Abidin** (Lead Auditor)

**Report Number: 8852160**

**Assessment Conducted by:**  
BSI Services Malaysia Sdn Bhd,  
Unit 3, Level 10, Tower A  
The Vertical Business Suites, Bangsar South  
No. 8, Jalan Kerinchi  
59200 Kuala Lumpur  
Tel +603 2242 4211 Fax +603 2242 4218  
[www.bsigroup.com](http://www.bsigroup.com)

<b>TABLE of CONTENTS</b>	<b>Page No</b>
Section 1: Executive Summary .....	3
1.1 Organizational Information and Contact Person .....	3
1.2 Certification Information .....	3
1.3 Location of Certification Unit .....	4
1.4 Plantings & Cycle .....	4
1.5 FFB Production (Actual) and Projected (tonnage).....	4
1.6 Certified CPO / PK Tonnage .....	5
1.7 Details of Certification Assessment Scope and Certification Recommendation:.....	5
Section 2: Assessment Process .....	6
1. Assessment Program .....	7
Section 3: Assessment Findings .....	8
3.1 Details of audit results .....	8
3.2 Details of Nonconformities and Opportunity for improvement.....	8
3.3 Status of Nonconformities Previously Identified and OFI .....	11
3.4 Issues Raised by Stakeholders .....	11
3.5 Summary of the Nonconformities and Status.....	13
3.6 Summary of the findings by Principles and Criteria .....	14
4.0 Assessment Conclusion and Recommendation: .....	103
Appendix A: Assessment Plan .....	104
Appendix B: List of Stakeholders Contacted .....	106
Appendix C: Smallholder Member Details.....	107
Appendix D: Location and Field Map .....	108
Appendix E: List of Abbreviations Used.....	110

## Section 1: Executive Summary

1.1 Organizational Information and Contact Person			
MPOB License	Flemington POM – MPOB License; no: 529874004000 Sungai Samak Estate – MPOB License; no: 526340002000 Sabak Bernam – MPOB License; no: 545859002000 Bagan Datoh Estate – MPOB license no:: 525521002000 Flemington Estate – MPOB license no: 525193002000		
Company Name	Sime Darby Plantation Berhad (Flemington Palm Oil Mill SOU 4)		
Address	Level 3A, Main Block Plantation Tower, No. 2, Jalan P.J.U 1A/7 47301 Ara Damansara Selangor, Malaysia		
Group name if applicable:	Sime Darby Plantation Berhad		
Subsidiary of (if applicable)	N/A		
Contact Person Name	Mdm. Shylaja Devi Vasudevan Nair (Head, Sustainability Unit PSQM)		
Website	www.simedarby.com	E-mail	<a href="mailto:Shylaja.vasudevan@simedarby.com">Shylaja.vasudevan@simedarby.com</a> <a href="mailto:kks.flemington@simedarby.com">kks.flemington@simedarby.com</a>
Telephone	+603-78484379 (Head Office) +605-648 9153 (Mill)	Facsimile	+603-78484356 (Head Office) +605-648 9153 (Mill)

1.2 Certification Information			
Certificate Number	Mill: MSPO 682042 Plantations: MSPO 682042		
Issue Date	09/02/2018	Expiry date	08/02/2023
Scope of Certification	Mill: Production of Sustainable Palm Oil and Palm Oil Products Estate: Production of Sustainable Oil Palm Fruits		
Stage 1 Date	N/A (The certification unit is RSPO certified)		
Stage 2 / Initial Assessment Visit Date (IAV)	1,2 & 4 November 2017		
Continuous Assessment Visit Date (CAV) 1	15-17 August 2018		
Continuous Assessment Visit Date (CAV) 2	N/A		
Continuous Assessment Visit Date (CAV) 3	N/A		
Continuous Assessment Visit Date (CAV) 4	N/A		

**MSPO Public Summary Report**  
**Revision 0 (Aug 2017)**

<b>Other Certifications</b>			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
RSPO 590802	RSPO	BSI Services (M) Sdn Bhd	4/10/2021

<b>1.3 Location of Certification Unit</b>			
Name of the Certification Unit (Palm Oil Mill/ Estate/ Smallholder/ Independent Smallholder)	Site Address	GPS Reference of the site office	
		Longitude	Latitude
Flemington Palm Oil Mill (60 mt/hr)	36369 Sungai Sumun, Teluk Itan, Perak, Malaysia	100° 51' 26" E	3° 55' 41" N
Flemington Estate	36369 Sungai Sumun, Teluk Itan, Perak, Malaysia	100° 52' 84" E	3° 53' 46" N
Bagan Datoh Estate	Bagan Datoh 36100 Perak, Malaysia	100° 47' 24" E	3° 59' 33" N
Sungai Samak Estate	Ulu Bernam 36500 Perak, Malaysia	101° 08' 87" E	3° 44' 49" N
Sabak Bernam Estate	Sabak Bernam	101° 00' 24" E	3° 45' 33" N

<b>1.4 Plantings &amp; Cycle</b>					
Estate	Age (Years) - ha				
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30
Flemington Estate	749.06	503.68	214.85	325.33	0.00
Bagan Datoh Estate	1415.71	1239.61	331.95	669.30	4.44
Sungai Samak Estate	574.02	618.41	1574	0	0
Sabak Bernam Estate	1059.78	610.74	126	559.47	-

<b>1.5 FFB Production (Actual) and Projected (tonnage)</b>		
Producer Group	Actual (previous 12 month) July 17 – July 2018	Forecast (next 12 month) October 18 – Septembers 19
Flemington Estate	29,164.42	26,200.00
Bagan Datoh Estate	68,714.32	61,322.00
Sungai Samak Estate	68,545.75	71,131.66

**MSP0 Public Summary Report**  
**Revision 0 (Aug 2017)**

Sabak Bernam Estate	30,677.45	21,844.00
<b>Total</b>	197,101.98	180,497.66

<b>1.6 Certified CPO / PK Tonnage</b>						
<b>Mill</b>	<b>Estimated (July 17 – June 18)</b>		<b>Actual (previous 12 month) July 17 – July 2018</b>		<b>Forecast (next 12 month) October 18 – Septembers 19</b>	
	<b>CPO</b>	<b>PK</b>	<b>CPO</b>	<b>PK</b>	<b>CPO</b>	<b>PK</b>
Flemington Palm Oil Mill	36,463.11 mt	9,284.59 mt	41,756.33 mt	11,044.15 mt	37,002.02 mt	9,927.37 Mt

\*Forecast OER: 20.50%, KER: 5.50%

<b>1.7 Details of Certification Assessment Scope and Certification Recommendation:</b>
<p>BSI Services Malaysia Sdn Bhd has conducted the Initial Certification Assessment of Strategic Operating Unit (SOU 4) – Flemington Palm Oil Mill, Sungai Sumun 36369 Teluk Intan, Perak, Malaysia comprising 1 mill; 4 estates and infrastructures.</p> <p>The onsite assessment was conducted to assess the compliance of the certification unit against the MS 2530-3:2013 Malaysian Sustainable Palm Oil (MSPO) Part 3: General principles for Plantations and Organized Smallholders and MS 2530-4:2013 Malaysian Sustainable Palm Oil (MSPO) Part 4: General principles for Palm Oil Mill.</p> <p>The assessment is a combined assessment for the mill and the group of estates that is supplying to the mill. However the assessment criteria for the mill and the estates were separated following to the required standards. The certification assessment scope is Flemington Palm Oil Mill SOU 4 and Flemington SOU 4 Estates which acts as the group manager for Flemington Estate, Bagan Datoh Estate, Sabak Bernam Estate and Sungai Samak Estate. This report is the combine report for Flemington Palm Oil Mill SOU 4 and Flemington SOU 4 Estates.</p> <p>The onsite assessment was conducted on 15-17 August 2018.</p> <p>Based on the assessment result, Sime Darby Flemington SOU4 complies with the MS 2530-3:2013 Malaysian Sustainable Palm Oil (MSPO) Part 3: General principles for Plantations and Organized Smallholders and MS 2530-4:2013 Malaysian Sustainable Palm Oil (MSPO) Part 4: General principles for Palm Oil Mill and recommended for certification.</p>

## Section 2: Assessment Process

### Certification Body:

BSI Services Malaysia Sdn Bhd,  
Unit 3, Level 10, Tower A  
The Vertical Business Suites, Bangsar South  
No. 8, Jalan Kerinchi  
59200 Kuala Lumpur  
Tel +603 2242 4211 Fax +603 2242 4218  
Nicholas Cheong: [Nicholas.Cheong@bsigroup.com](mailto:Nicholas.Cheong@bsigroup.com)  
[www.bsigroup.com](http://www.bsigroup.com)

BSI is a leading global provider of management systems assessment and certification, with more than 60,000 certified locations and clients in over 100 countries. BSI Standards is the UK's National Standards Body. BSI provides independent, third-party certification of management systems.

### Assessment Methodology, Programme, Site Visits

This on-site assessment was conducted from 15-17 August 2018. The audit programme is included as Appendix A. The approach to the audit was to treat the mill or plantations as a MSP0 Certification Unit. 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. MS 2530-3:2013 and MS 2530-4:2013 were used to guide the collection of information to assess compliance. The comments made by external stakeholders were also taken into account in the assessment.

The estates or smallholders sample were determined based on formula  $N = 1.0\sqrt{y}$  where  $y$  is the number of estates while when applicable, the smallholders sample were determined following the MSP0 Certification Requirement. The sampling of smallholders were based on the formula  $(1.0\sqrt{y}) \times (z)$ ; where 1.0 is the risk factor (may defer to 1.2 and 1.4 depending on risk), where  $y$  is total number of group members and where  $z$  is the multiplier defined by the risk assessment. The sampled smallholder listed in Appendix C.

Meetings were held with stakeholders to seek their views on the performance of the company with respect to the MSP0 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 B.

**MSPO Public Summary Report**  
**Revision 0 (Aug 2017)**

All the previous nonconformities are remains closed. The assessment findings for the initial assessment are detailed in Section 4.2.

This report is structured to provide a summary of assessment finding as attached in the Section 3. The assessment was based on random samples and therefore nonconformities may exist that have not been identified.

This report was externally reviewed by MSPO approved 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**

<b>1. Assessment Program</b>					
<b>Name (Mill / Plantation / Group smallholders)</b>	<b>Year 1 (Certification)</b>	<b>Year 2 (ASA 1)</b>	<b>Year 3 (ASA 2)</b>	<b>Year 4 (ASA 3)</b>	<b>Year 5 (ASA 4)</b>
Flemington Palm Oil Mill	√	√	√	√	√
Flemington Estate	√	-	√	-	√
Bagan Datoh Estate	√	-	√	-	√
Sabak Bernam Estate	-	√	-	√	-
Sungai Samak Estate	-	√	-	√	-

**Tentative Date of Next Visit:** November 5, 2019 - November 7, 2019

**Total No. of Mandays:** 6

**BSI Assessment Team:**

**Mohamed Hidhir Zainal Abidin – Lead Auditor**

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

**Amir Bahari - Team Member**

He obtained qualification in B.Sc. (Hons) Chemistry USM 1985 & Diploma in Palm Oil Milling Tech/Management MPOB 1996. He has been in the plantations industry for 30 years, among others managing rubber factories, palm oil mills and estates. During the tenure of employment he has been trained as an auditor in ISO 9001, ISO 14001, OHSAS 18001 & also RSPO. He has accumulated 38 man-days in the auditing profession after ending career in the plantation industry

### Section 3: Assessment Findings

#### 3.1 Details of audit results

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

- MSPO MS 2530-2:2013 – General Principles for Independent Smallholders
- MSPO MS 2530-3:2013 – General Principles for Oil Palm Plantations and Organized Smallholders
- MSPO MS 2530-4:2013 – General Principles for Palm Oil Mills

#### 3.2 Details of Nonconformities and Opportunity for improvement

The nonconformity is listed below.

During this assessment, 1 (one) Major nonconformity and one (1) opportunity for improvement raised. Flemington POM certification unit has submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted. The implementation of the Corrective Actions for the Major Nonconformity(ies) has been verified for its effectiveness and closed accordingly.

Major Nonconformities:		
Ref	Area/Process	Clause
1672920-201808-M1	Flemington POM and supply base	4.3.1.1
Requirements:	i) All operations are in compliance with the applicable local, state, national and ratified international laws and regulations. ii) Employment Act 1955, Clause 60, Section 3 subsection (d) "In the case of an employee employed on piece rates who works on a rest day, he shall be paid twice his ordinary rate per piece."	
Statement of Nonconformity:	Compliance with the Employment Act 1955 was not effectively implemented.	
Objective Evidence:	In Sungai Samak Estate, Yew Lian Division, sampled of the loose fruit collectors found that they worked on rest day without paying double of the normal rate per piece. For the month of March 2018; employee no. 107855, 126839, 134366 has worked 1 day on their rest day. Employee no. 107855 has worked for 3 days on rest day, 126839 has worked for 3 days on rest day and 134366 has workers on 1 day on rest day in the month of April 2018. Employee no. 107855, 126839 and 134366 has worked for 3 days on rest day in the month of July 2018.	
Corrections:	1. Training on Employment Act 1955, particularly on work on rest day provisions will be organized to Sungai Samak Estate Management by HQ.  2. To cease the existing practice of paying loose fruit collectors on rest day for workers with in-complete task. If work is offered on rest day, workers will be	



**MSP0 Public Summary Report**  
**Revision 0 (Aug 2017)**

	<p>paid twice of normal rate. Estate Management will prepare the necessary documentation for Employee ID No. 107855, 126839 and 134366 for March, April and July 2018 (the months the NCR was raised)</p>
<p>Root cause analysis:</p>	<ol style="list-style-type: none"> <li>1. Sungai Samak Estate Management, particularly at Yew Lian Division, does not understand the legal requirement pertaining to Employment Act 1955, work on rest day provisions.</li> <li>2. From our understanding,   Section 60 (1) states that ... no employee shall be compelled to work on a rest day unless he is engaged in work which by reason of its nature requires to be carried on continuously or continually by two or more shifts etc...   This section essentially implies that both employer and employee must consent for work to be carried out on a rest day   Based on our further investigations, the Estate Management is of the view that Section 60 (3) is not applicable because: <ol style="list-style-type: none"> <li>1. These employees were not required/instructed by the estate manager / their supervisors to work on their rest day. Therefore, the estate did not consent for them to work on a rest day;</li> <li>2. They had on their own accord decided to work on their rest day to complete tasks that were assigned to them on their normal working days during the week;</li> <li>3. Full payment of their wages were made at the time they were assigned their tasks on normal working days during the week and therefore is subject to the normal rate of pay and not the rate for rest day.</li> </ol> However, there are opportunities for improvements in the implementation / mechanism to document the productivity, work offered and not offered as well as consent for work to be carried out on rest day to ensure consistency in the manner that the estate manages this issue.</li> </ol>
<p>Corrective Actions:</p>	<ol style="list-style-type: none"> <li>i) Training on Employment Act 1955, particularly on work on rest day provisions will be organized to all Operating Units in SOU 4 Flemington by HQ.</li> <li>ii) Estate Management together with the relevant department e.g. HR, IR and Upstream Malaysia will work together on the definition of the work offered by developing proper mechanisms to document important elements e.g. monitoring of productivity and consent to work by both parties on rest day of the loose fruit pickers to ensure compliance with Section 60 (3) of the Employment Act 1955.</li> <li>iii) To disseminate and communicate the mechanism to all relevant parties by HR IR and Upstream Malaysia.</li> </ol>

**MSP0 Public Summary Report**  
**Revision 0 (Aug 2017)**

Assessment Conclusion:	<p>1. Based on the productivity record, the loose fruit picker that worked on rest day were paid twice. The productivity record and piece rated input for loose fruit picker (Yew Lian Division) was sighted.</p> <p>September 2018</p> <p>a. 107855 ( 2/9/18: 454kg, 16/9/18:366kg, 23/9/18: 513kg)  b. 108053 (2/9/18: 198kg, 16/9/18: 380kg, 23/9/18: 218kg)  c. 134366 (2/9/18: 238kg, 16/9/18: 303kg, 23/9/18: 418kg)</p> <p>October 2018</p> <p>a. 107855 (7/10/18:451kg,14/10/18:476kg, 28/10/18: 432kg)  b. 108053 (14/10/18: 356kg, 28/10/18: 324kg)  c. 134366 (7/10/18: 377kg, 14/10/18: 398kg,28/10/18:397kg)</p> <p>2. Sample payslip workers;</p> <p>a. 107855 (Sept 18 – 3 days work on rest day, Oct 18 – 3 days work on rest days),  b. 108053 (Sep 18 – 3 days work on rest day, Oct 18 – 2 days work on rest day)  c. 134366 (Sep 18 – 3 days work on rest day, Oct 18 – 3 days work on rest day)</p> <p>3. Training on employment act was done on 31/10/2018 by Group IR, Sime Darby Plantation Berhad (HQ), Mr Mohd Akmal Md Zainal. The management of Sg Samak Estate (Manager, Assistant, Chief Clerk and other staff) was attended the training.</p> <p>Corrective action is found to be effective, thus the major NC was closed on 09/11/18 supported with sufficient documented evidence. Continuous implementation will be further verified in the assessment.</p>
------------------------	---

Opportunity For Improvement		
Ref	Area/Process	Clause
1672920-201808-11	Flemington POM and supply base	4.4.5.11 (part 3)
Requirements:	In cases where on-site living quarters are provided, these quarters shall be habitable and have basic amenities and facilities.	
Objective Evidence:	<p>Observed at Yew Lian Division line site, a few site conditions need to be improved further related to:</p> <p>i) Clogged and stagnant water at parameter and house drain.  ii) Water container to be kept closed and consistently check to avoid breeding of larvae.  iii) Avoidance of poultry and availability of signage for any prohibited activities at line site.</p> <p>Monitoring of drug and medicine - Currently stock check carried out on fortnightly basis to check incoming and issuance of medicine. The process can be improved further to include monitoring of expiry of medicine to ensure readiness at point of use.</p>	

Noteworthy Positive Comments	
1	Good cooperation and commitment from the management and staff
2	Management, staff and workers were able to demonstrate good understanding on sustainability
3	-

### 3.3 Status of Nonconformities Previously Identified and OFI

Not applicable.

Major Nonconformities:		
Ref	Area/Process	Clause
<i>NC ID from eReport</i>	N/A	N/A
Requirements:	N/A	
Statement of Nonconformity:	N/A	
Objective Evidence:	N/A	
Corrections:	N/A	
Root cause analysis:	N/A	
Corrective Actions:	N/A	
Assessment Conclusion:	N/A	
Stage II Status:	N/A	
Assessment Conclusion:	N/A	

### 3.4 Issues Raised by Stakeholders

IS #	Description
1	<p>Issues:            Local Communities (Kg. Kebun Sayur) – The villager informed that they are allowed to access estate’s road in order to enter to their village. So far, they have good relationship with the management and they will cooperate with the management to maintain the good security in the area. There was no land dispute reported.</p> <p>Management Responses:            The management will properly demarcate the boundary and maintain good relationship with the local communities.</p>

	<p>Audit Team Findings: No further issue.</p>
2	<p>Issues: Gender Committee Representatives – The female workers informed that they were treated equally without discrimination against gender. Meeting was conducted and monitoring of sexual harassment and violence was carried out. So far, there was no any sexual harassment and violence case reported.</p> <p>Management Responses: The management will ensure monitoring of sexual harassment and violence case will be conducted.</p> <p>Audit Team Findings: No other issue.</p>
3	<p>Issues: NUPW Representatives – They have meeting with the management at least once a year or whenever necessary. So far, they do not receive any complaints from the workers regarding wages, working condition and housing.</p> <p>Management Responses: The management will response to any complaints from NUPW if there is any.</p> <p>Audit Team Findings: No other issue.</p>
4	<p>Issues: Workers’ Representative (Indonesia, Bangladesh, India and Nepal) – They were treated equally without discrimination. They informed that their wages had achieved the Minimum Wage Order 2016. Free housing was provided to them. They are aware of the freedom of association and understood all the policies in the company.</p> <p>Management Responses: The management will continue to treat all the workers equally.</p> <p>Audit Team Findings: No other issue.</p>
5	<p>Issues: Contractors – They informed that they had signed on the agreement prior to work. Payment details were clearly stated in the agreement and the payment was made promptly.</p> <p>Management Responses: The management will ensure payment makes promptly.</p> <p>Audit Team Findings: No further issue.</p>

**3.5 Summary of the Nonconformities and Status**

<b>CAR Ref.</b>	<b>CLASS</b>	<b>ISSUED</b>	<b>STATUS</b>
1672920-201808-M1- 4.3.1.1	Major	17/8/18	Closed out on 9/11/2018.

**3.6 Summary of the findings by Principles and Criteria**

**MS 2530-3:2013 Malaysian Sustainable Palm Oil (MSPO) Part 3: General principles for Plantations and Organized Smallholders**

Criterion / Indicator		Assessment Findings	Compliance
<b>4.1 Principle 1: Management commitment &amp; responsibility</b>			
<b>Criterion 4.1.1 – Malaysian Sustainable Palm Oil (MSPO) Policy</b>			
<b>4.1.1.1</b>	A policy for the implementation of MSPO shall be established. <b>- Major compliance -</b>	The internal memo from Mr Tan Men Kon, Head of Plantation Sustainability & Quality Management documented the commitment Sime Darby towards MSPO implementation. The internal memo dated 8 <sup>th</sup> September 2017 was issued to all Estates and Mills. The commitment is to implement and certified with MSPO by December 2017.	Compliance
<b>4.1.1.2</b>	The policy shall also emphasize commitment to continual improvement. <b>- Major compliance -</b>	The continual improvement commitment is documented in the following Management & Operation Policies: Quality Management Policy dated January 2015 Lean Six Sigma Policy dated January 2015 Quality Policy dated January 2015  The commitments are made by Datuk Franki Anthony Dass the Managing Director of Sime Darby Plantations Berhad.	Compliance
<b>Criterion 4.1.2 – Internal Audit</b>			

**MSPO Public Summary Report**  
**Revision 0 (Aug 2017)**

<p><b>4.1.2.1</b></p>	<p>Internal audit shall be planned and conducted regularly to determine the strong and weak points and potential area for further improvement.</p> <p><b>- Major compliance -</b></p>	<p>Records showed that an RSPO &amp; MSPO Internal audit was carried out SQM department. The Internal Consultative Assessment Report dated 3/7/2018 for Sungai Samak Estate was verified. The strong and weak points and potential area for further improvement were identified in the report. Total of 6 major and 4 minor non-conformities raised during audit. All findings were reviewed during management review meeting and nessesary action has been determined for improvement.</p>	<p>Compliance</p>
<p><b>4.1.2.2</b></p>	<p>The internal audit procedures and audit results shall be documented and evaluated, followed by the identification of strengths and root causes of nonconformities, in order to implement the necessary corrective action.</p> <p><b>- Major compliance -</b></p>	<p>An internal audit procedure (SD/SDP/PSQM/IAP dated 1/11/2017) had been established and documented.</p> <p>The results of the audit conducted on 9/7/2018 on Bagan Datoh Estate had also been documented. The identification of strengths and root causes of nonconformities, in order to implement the necessary corrective action had been carried at the Management meeting held on 9/7/2018.</p>	<p>Compliance</p>
<p><b>4.1.2.3</b></p>	<p>Reports shall be made available to the management for their review.</p> <p><b>- Major compliance -</b></p>	<p>The minutes of the Management meeting held on 9/7/18 on the documented results of the audit conducted on 3/7/2018 on Sungai Samak was verified. The identification of strengths and root causes of nonconformities, in order to implement the necessary corrective action had been discussed and the PIC was identified and time frame established.</p>	<p>Compliance</p>
<p><b>Criterion 4.1.3 – Management Review</b></p>			

<p><b>4.1.3.1</b></p>	<p>The management shall periodically review the continuous suitability, adequacy and effectiveness of the requirements for effective implementation of MSPO and decide on any changes, improvement and modification.</p> <p><b>- Major compliance -</b></p>	<p>Sime Darby is RSPO certified company. On annual basis management review is conducted on Regional level. The last management review was conducted on 9/7/2018. All pertinent agenda has been discussed for the effective implementation of MSPO.</p>	<p>Compliance</p>
<p><b>Criterion 4.1.4 – Continual Improvement</b></p>			
<p><b>4.1.4.1</b></p>	<p>The action plan for continual improvement shall be based on consideration of the main social and environmental impact and opportunities of the company.</p> <p><b>- Major compliance -</b></p>	<p>Sungai Samak Estate had a documented continual improvement plan for 2017/2018. The plan was on:</p> <ul style="list-style-type: none"> <li>▪ Communication &amp; whistle blower (Social):               <ol style="list-style-type: none"> <li>1. To communicate it at Stakeholders meetings.</li> <li>2. To communicate it to workers.</li> <li>3. To display the procedure.</li> </ol> </li> <li>▪ Removal of schedule waste at tenant shop (Kedai Motor Sg Dua) (Environmental):               <ol style="list-style-type: none"> <li>1. To collect and keep the SW at estate store.</li> <li>2. Disposing SW weekly</li> <li>3. Inspection by HA every week concurrent with linesite inspection.</li> </ol> </li> <li>▪ To increase awareness on Safety &amp; Health (OSH):               <ol style="list-style-type: none"> <li>1. To conduct safety campaigns.</li> <li>2. To conduct safety trainings.</li> </ol> </li> </ul>	<p>Compliance</p>



**MSPO Public Summary Report  
Revision 0 (Aug 2017)**

<p><b>4.1.4.2</b></p>	<p>The company shall establish a system to improve practices in line with new information and techniques or new industry standards and technology (where applicable) that are available and feasible for adoption.</p> <p><b>- Major compliance -</b></p>	<p>SDPB Research &amp; Development department was responsible for improving practices in line with new information and techniques or new industry standards and technology. The improvements were then included as procedures into their best practices manuals like Agriculture Reference Manual (ARM), EQMS, etc.</p> <p>SD3 system using MTG (Mini Tractor Grabber) has been used widely in the estate due 100% flat area. Other mechanized operation such as circle blower to replace manual circle raking and motorized siever unit has been introduced to increase efficiency rate and productivity.</p>	<p>Compliance</p>
<p><b>4.1.4.3</b></p>	<p>An action plan to provide the necessary resources including training, to implement the new techniques or new industry standard or technology (where applicable) shall be established.</p> <p><b>- Major compliance -</b></p>	<p>Provisions were made in the annual and forecast business plans / budgets for the necessary resources including training, to implement the new techniques. The latest in best practices introduced and implemented towards mechanized operation. Budget for the new mechanical buffalo (MB) L100 and Kubota L3200DT and tractor complete with grabber and 1.0 ton scissor lift trailer was sighted to replace old depreciated unit for improvement.</p>	<p>Compliance</p>
<p><b>4.2 Principle 2: Transparency</b></p>			
<p>Criterion 4.2.1 – Transparency of information and documents relevant to MSPO requirements</p>			
<p><b>4.2.1.1</b></p>	<p>The management shall communicate the information requested by the relevant stakeholders in the appropriate languages and forms, except those limited by commercial confidentiality or disclosure that could result in negative environmental or social outcomes.</p> <p><b>- Major compliance -</b></p>	<p>The estate implemented the procedure for responding to all communications as outlined in their Estate Quality Management System documents. The system required response to all communication within a certain time frame. Requests from workers and management’s responses were recorded and maintained. Action may then be taken to fulfil the request or for decision to be made by relevant person-in-charge. All communications were logged and registered in a log book. The record</p>	<p>Compliance</p>

**MSPO Public Summary Report**  
**Revision 0 (Aug 2017)**

		included types of complaints and the dates when they were made and attended to and remarks. Most records were mainly for request for repairs of the workers quarters. Correspondence with stakeholders such as DOSH and local communities were maintained.	
<b>4.2.1.2</b>	Management documents shall be publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes.  - <b>Major compliance</b> -	Management documents were publicly available, except those which was prevented by commercial confidentiality and those which when disclosed would result in negative environmental and social outcomes. Information was published in SDPB annual reports - latest sighted was Dec 2016. Information relating to land titles and relating to safety and health plans were available at the SDPB website at <a href="http://plantation.simedarby.com">http://plantation.simedarby.com</a>	Compliance
<b>Criterion 4.2.2 – Transparent method of communication and consultation</b>			
<b>4.2.2.1</b>	Procedures shall be established for consultation and communication with the relevant stakeholders.  - <b>Major compliance</b> -	The estate used the procedure for responding to all communications as outlined in their Estate Quality Management System documents. The system required response to all communication within a certain time frame. The procedures were in the EQMS manual Appendix 5.5.3 for Internal communication and Sub section 5.5.3.2 for external communications.	Compliance
<b>4.2.2.2</b>	A management official should be nominated to be responsible for issues related to Indicator 1 at each operating unit.  - <b>Minor compliance</b> -	The management official nominated to be responsible for issues related consultation and communication with the relevant stakeholders on Sungai Samak Estate was the Senior Assistant manager. The appointment letter dated 1 July 2017 was verified.	Compliance
<b>4.2.2.3</b>	List of stakeholders, records of all consultation and communication and records of action taken in response to input from stakeholders should be properly maintained.  - <b>Major compliance</b> -	Bagan Datoh Estate had established and documented the list of stakeholders. The list had details like name of party, address, contact person and telephones numbers of contractors, vendors/suppliers, local community heads, government agencies, schools, hospitals, etc.  Records of communication were maintained. For internal & external communication buku aduan were maintained; however, there were no	Compliance

**MSPO Public Summary Report**  
**Revision 0 (Aug 2017)**

		request of complaints received. For worker a separate “repair book” was maintained with the latest complaint recorded was 28/7/17. All complaints have been satisfactorily addressed by the estate.	
<b>Criterion 4.2.3 – Traceability</b>			
<b>4.2.3.1</b>	The management shall establish, implement and maintain a standard operating procedure to comply with the requirements for traceability of the relevant product(s). <b>- Major compliance -</b>	Bagan Datoh Estate used the SOP in the QMM manual Section 7 Product Realisation Sub section 7.5.3 Identification and traceability – Level 3 Reference SOP, Section C6 – FFB Identification & Traceability to comply with the requirements for traceability of its product which is FFB.	Compliance
<b>4.2.3.2</b>	The management shall conduct regular inspections on compliance with the established traceability system. <b>- Major compliance -</b>	The management conducted regular inspections on compliance with the established traceability system. FFB despatch detail report summarized on daily basis. Total of 199.65 mt of FFB despatched to Flemington POM on 15/8/18. SIME Semua 2.0 (CRS system) for traceability.	Compliance
<b>4.2.3.3</b>	The management should identify and assign suitable employees to implement and maintain the traceability system. <b>- Minor compliance -</b>	The management of Bagan Datoh Estate had identified and assigned suitable employees to implement and maintain its traceability system.  SIME Semua 2.0 (CRS system) for traceability. Electronic tag/chip is used for each and every load/consignment. Chip is linked to Semua apps and scanned and before weigh and despatch. All information were recorded in the system which traceable to identify [field, crop type, harvesting date, number of bunches, weight etc]. Person in charge for the each load/consignment is harvesting mandore and bunch counter.	Compliance
<b>4.2.3.4</b>	Records of sales, delivery or transportation of FFB shall be maintained. <b>- Major compliance -</b>	The were no sale of product (FFB) done by Sungai Samak Estate as all its FFB was sent SDPB own mill. Records of FFB delivery to the mill were maintained and records verified were:	Compliance

		i) Despatch date: 15/8/2018 : FFB from field 2015B, WB ticket number: 27448, lorry: WDM4857, weight: 9,830 Kg.																
<b>4.3 Principle 3: Compliance to legal requirements</b>																		
<b>Criterion 4.3.1 – Regulatory requirements</b>																		
<b>4.3.1.1</b>	<p>All operations are in compliance with the applicable local, state, national and ratified international laws and regulations.</p> <p><b>- Major compliance -</b></p>	<p>A mechanism to ensure compliance to legal and other requirement has been documented in EQMS &amp; MQMS (Estate &amp; Mill Quality Management System) under Standard Operation Manual distributed to all operating units under SOU4. PSQM Department and respective operating units will undertake the responsibility of identifying, managing, updating and tracking the legal requirement as well as monitoring the status of legal compliance. Refer to Estate/Mill Quality Management System, Level 2: Standard Operating Manual, Appendix 5.2.4: Procedure for Legal and Other Requirements dated 10 December 2008.</p> <p>Licenses/permit viewed among others are:</p> <table border="1"> <thead> <tr> <th></th> <th>Licence/permit</th> <th>Validity Period</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>MPOB sell and transport FFB license: 545-859-00-000</td> <td>1/2/18–31/1/19</td> </tr> <tr> <td>2</td> <td>Weighbridge License: B1230015</td> <td>1 year from 04/5/17</td> </tr> <tr> <td>3</td> <td>Diesel Storage license: SL/KSL(01)13/SK</td> <td>1 year from 22/1/18</td> </tr> <tr> <td>4</td> <td>Air compressor license PMT-4704</td> <td>Valid as per DOSH certificate</td> </tr> </tbody> </table>		Licence/permit	Validity Period	1	MPOB sell and transport FFB license: 545-859-00-000	1/2/18–31/1/19	2	Weighbridge License: B1230015	1 year from 04/5/17	3	Diesel Storage license: SL/KSL(01)13/SK	1 year from 22/1/18	4	Air compressor license PMT-4704	Valid as per DOSH certificate	Compliance
	Licence/permit	Validity Period																
1	MPOB sell and transport FFB license: 545-859-00-000	1/2/18–31/1/19																
2	Weighbridge License: B1230015	1 year from 04/5/17																
3	Diesel Storage license: SL/KSL(01)13/SK	1 year from 22/1/18																
4	Air compressor license PMT-4704	Valid as per DOSH certificate																

**MSPO Public Summary Report**  
**Revision 0 (Aug 2017)**

<p><b>4.3.1.2</b></p>	<p>The management shall list all laws applicable to their operations in a legal requirements register.</p> <p><b>- Major compliance -</b></p>	<p>List of applicable legal and other requirements was made available during the assessment and compiled in the QSHE/04/5.2.4 folders.</p> <p>a) Documented procedure has been established and implemented refer to Estate/Mill Quality Management System, Level 2: Standard Operating Manual, Appendix 5.2.4: Procedure for Legal and Other Requirements dated 10 December 2008.</p> <p>b) The Legal &amp; Other Requirements Register (LORR) covers all the necessary regulatory requirements.</p>	<p>Compliance</p>
<p><b>4.3.1.3</b></p>	<p>The legal requirements register shall be updated as and when there are any new amendments or any new regulations coming into force.</p> <p><b>- Major compliance -</b></p>	<p>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. The latest change in regulation applicable to the POM operation is the Labour Law. The Legal &amp; Other Requirements Register (LORR) covers all the necessary regulatory requirements. The LORR for both the estates was reviewed on 1/1/18 to include the Employment Insurance System EIS for compliance.</p>	<p>Compliance</p>
<p><b>4.3.1.4</b></p>	<p>The management should assign a person responsible to monitor compliance and to track and update the changes in regulatory requirements.</p> <p><b>- Minor compliance -</b></p>	<p>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.</p>	<p>Compliance</p>
<p><b>Criterion 4.3.2 – Lands use rights</b></p>			
<p><b>4.3.2.1</b></p>	<p>The management shall ensure that their oil palm cultivation activities do not diminish the land use rights of other users.</p> <p><b>- Major compliance -</b></p>	<p>The was no evidence to show that Oil Palm cultivation activities of Sg Samak and Sabak Bernam Estate had diminished the land use rights of others. The management had documents to show legal ownership of its land.</p>	<p>Compliance</p>
<p><b>4.3.2.2</b></p>	<p>The management shall provide documents showing legal ownership or lease, history of land tenure and the actual use of</p>	<p>Documents showing legal ownership or lease, history of land tenure and the actual legal use (agriculture) of the land were made available at all visited sites. Sample of land title based on the latest quit rent for 2018 are:</p>	<p>Compliance</p>

	<p>the land.</p> <p><b>- Major compliance -</b></p>	<p><u>Sungai Samak Estate</u>            i) Grant#47177, Lot #4189, area: 1137.1067 ha, District: Mukim Hutan Melintang, legal ownership: freehold            ii) Grant#57689, Lot #5161, area: 712.2456 ha, District: Mukim Hutan Melintang, legal ownership: freehold</p> <p><u>Sabak Bernam Estate</u>            i) Grant#29597, Lot #1, area:2023.425 ha, District: Mukim Sabak, legal ownership: freehold            ii) Grant#55208, Lot #2095, area:504.0364 ha, District: Mukim Sungai Panjang</p>	
<b>4.3.2.3</b>	<p>Legal perimeter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable.</p> <p><b>- Major compliance -</b></p>	<p>During the field visit it was noted that legal boundaries are clearly demarcated and visibly maintained at Sungai Samak Estate. Field P15A is adjacent to smallholder farm and boundary marker is visibly maintained and separated with physical boundary (trenches).</p> <p><u>Sabak Bernam Estate</u>            Boundary marker is clearly demarcated and visibility maintained near to the boundary along P02B which adjacent to village separated with physical boundary (trenches).</p>	Compliance
<b>4.3.2.4</b>	<p>Where there are, or have been, disputes, documented proof of legal acquisition of land title and fair compensation that have been or are being made to previous owners and occupants; shall be made available and that these should have been accepted with free prior informed consent (FPIC).</p> <p><b>- Minor compliance -</b></p>	<p>At time of visit, there was no evidence to show of any land disputes in Sg Samak and Sabak Bernam Estate.</p>	Compliance
<p>Criterion 4.3.3 – Customary rights</p>			

<p><b>4.3.3.1</b></p>	<p>Where lands are encumbered by customary rights, the company shall demonstrate that these rights are understood and are not being threatened or reduced.  - Major compliance -</p>	<p>At time of visit, there was no evidence to show that any land was encumbered by customary rights in Sg Samak and Sabak Bernam Estate.</p>	<p>Compliance</p>
<p><b>4.3.3.2</b></p>	<p>Maps of an appropriate scale showing extent of recognized customary rights land, if any, should be made available.  - <b>Minor compliance</b> -</p>	<p>NA- as at time of visit, there was no evidence to show that any land was encumbered by customary rights.</p>	<p>Compliance</p>
<p><b>4.3.3.3</b></p>	<p>Negotiation and FPIC shall be recorded and copies of negotiated agreements should be made available.  - <b>Major compliance</b> -</p>	<p>NA as at time of visit, there was no evidence to show that any land was encumbered by customary rights or land disputes.</p>	<p>Compliance</p>
<p><b>4.4 Principle 4: Social responsibility, health, safety and employment condition</b></p>			
<p><b>Criterion 4.4.1: Social Impact Assessment (SIA)</b></p>			
<p><b>4.4.1.1</b></p>	<p>Social impact should be identified and plans are implemented to mitigate the negative impacts and promote the positive ones.  - <b>Minor compliance</b> -</p>	<p>A Social Impact Assessment (SIA) was prepared for the whole SOU 4 Flemington CU. The Social Impact Assessment (SIA) was conducted on 27th June to 1st July 2016 including consideration of feedbacks from the stakeholder engagement meeting Besides providing socio-economic baseline data, the report highlighted various issues (complaints, requests and comments) raised by the stakeholders of the respective estates and mill (in SOU4), action plans for handling the identified issues were also presented in the report.</p>	<p>Compliance</p>
<p><b>Criterion 4.4.2: Complaints and grievances</b></p>			
<p><b>4.4.2.1</b></p>	<p>A system for dealing with complaints and grievances shall be established and documented.  - <b>Major compliance</b> -</p>	<p>The estate used the same procedure for responding to all communications inclusive of complaints and grievances as outlined in their Estate Quality Management System documents. The system required response to all communication within a certain time frame. The procedures were in the EQMS manual Appendix 5.5.3 for Internal</p>	<p>Compliance</p>

**MSPO Public Summary Report**  
**Revision 0 (Aug 2017)**

		communication and Sub section 5.5.3.2 for external communications. The “Flowchart and procedure on handling social issues” in PQMS, SQMS appendix 5 was available and exhibited on notice boards. The Senior Assistant Manager was appointed the PIC.	
<b>4.4.2.2</b>	The system shall be able to resolve disputes in an effective, timely and appropriate manner that is accepted by all parties.  - <b>Major compliance</b> -	The estate implemented the same procedure for responding to all communications as outlined in their Estate/Mill Quality Management System documents. The system required response to all communication within a certain time frame. Requests from workers and management’s responses were recorded and maintained. The record included types of complaints and the dates when they were made and attended to and remarks. Most records were mainly for request for repairs of the workers quarters. Correspondence with stakeholders such as DOSH and local communities were maintained.	Compliance
<b>4.4.2.3</b>	A complaint form should be made available at the premises, where employees and affected stakeholders can make a complaint.  - <b>Minor compliance</b> -	A complain form ‘Borang Aduan’ was available and a flow chart “Flowchart and procedure on handling social issues” were exhibited on the notice boards.	Compliance
<b>4.4.2.4</b>	Employees and the surrounding communities should be made aware that complaints or suggestions can be made any time.  - <b>Minor compliance</b> -	Employees and the surrounding communities were made aware that complaints or suggestions can be made any time through stakeholder meetings, union meetings and briefing conducted at muster grounds. Employees are not fully aware on the possible complaints and grievance channels. During interview with the workers, there were complaints on house maintenance and dispute on overtime. The workers complained to the mandor. However there were actions has not been taken by the mandor. The workers were aware that they can make the complaints to the higher authority of the mandor. This is verified during interview with field workers and union representative.	Compliance
<b>4.4.2.5</b>	Complaints and resolutions for the last 24 months shall be documented and made available to affected stakeholders upon	Records of complaints were maintained. For internal & external communication buku aduan were maintained; however, there were no	Compliance



	request. <b>- Major compliance -</b>	request of complaints received. For worker a separate repair book was maintained with the latest complain recorded. No latest request recorded for 2018 and the last report was recorded in June 2018.	
<b>Criterion 4.4.3:</b> Commitment to contribute to local sustainable development			
<b>4.4.3.1</b>	Growers should contribute to local development in consultation with the local communities. <b>- Minor compliance -</b>	Sungai Samak Estate did contribute to local development in consultation with the local communities. Records of requests from local communities and surrounding schools were sighted. Some of activities recorded were: i) School donation ii) Donations to temple iii) Voucher for workers iv) Maintenance/trouble shooting of school wiring electricity	Compliance
<b>Criterion 4.4.4:</b> Employees safety and health			
<b>4.4.4.1</b>	An occupational safety and health policy and plan shall be documented, effectively communicated and implemented. <b>- Major compliance -</b>	The Group Occupational Safety & Health Management Policy had been established and implemented for all mills and estates. a) The policy was signed by the Managing Director of Sime Darby Plantation on January 2015 and displayed prominently on notice boards in English and local language Bahasa Malaysia. b) The Policy is implemented through the OSH activities by the on-site Safety Officers and monitored by OSH Manager from Head Office. c) Included in the policy is the commitment of the Company to provide and maintain a safe and healthy working environment of its employees & contractors & visitors.  In interviews with the workers and staff during the site visit (Sg Samak Estate Field no 2015 C, workshop, SW store, general store) revealed that the employees had been briefed and had understood the policy.	Compliance

<p><b>4.4.4.2</b></p>	<p>The occupational safety and health plan shall cover the following:</p> <ul style="list-style-type: none"> <li>a) A safety and health policy, which is communicated and implemented.</li> <li>b) The risks of all operations shall be assessed and documented.</li> <li>c) An awareness and training programme which includes the following requirements for employees exposed to pesticides:             <ul style="list-style-type: none"> <li>i. all employees involved shall be adequately trained on safe working practices</li> <li>ii. all precautions attached to products shall be properly observed and applied</li> </ul> </li> <li>d) The management shall provide the appropriate PPE at the place of work to cover all potentially hazardous operations as identified in the risk assessment and control such as Hazard Identification, Risk Assessment and Risk Control (HIRARC).</li> <li>e) The management shall establish Standard Operating Procedure for handling of chemicals to ensure proper and safe handling and storage in accordance to Occupational Safety Health (Classification Packaging and Labeling) Regulation 1997 and Occupational Safety Health (Use and Standard of Exposure of Chemical Hazardous to Health) Regulation 2000.</li> <li>f) The management shall appoint responsible person(s) for workers' safety and health. The appointed person(s) of trust</li> </ul>	<p>Briefings to employees are made through town hall session. Sighted records of the Town Hall program held at both the estates</p> <p>During the town hall session, subjects on safety policies, road safety, zero harm, accident history and precautionary measures, dialogue and 'ikrar pekerja' were briefed and shown in slides presentation to the employees. The 'ikrar pekerja' was sighted. Content includes among others to prioritise safety, execute work safely, adhere all safety rules and regulations and to target zero accident.</p> <p>Apart from specific session, safety policy and targets were available on display board printed in both English &amp; Bahasa Malaysia</p> <p>HIRARC for both estates are available and formalised in 2013. All the main activities were covered. HIRARC for Sg Samak Estate was reviewed on 04/10/17 for the formalisation of the 2018/19 assessment.</p> <p>HIRARC for both the estates were sighted having details as follows of common activities.</p> <table border="1" data-bbox="1061 962 1709 1361"> <thead> <tr> <th>No</th> <th>Activity</th> <th>No</th> <th>Activity</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Office</td> <td>9</td> <td>Pruning &amp; harvesting</td> </tr> <tr> <td>2</td> <td>Security</td> <td>10</td> <td>Manuring</td> </tr> <tr> <td>3</td> <td>Weeding</td> <td>11</td> <td>Replanting</td> </tr> <tr> <td>4</td> <td>P&amp;D</td> <td>12</td> <td>Waste</td> </tr> <tr> <td>5</td> <td>Boundary &amp; census</td> <td>13</td> <td>Workshop</td> </tr> <tr> <td>6</td> <td>Road bridges</td> <td>14</td> <td>Nursery</td> </tr> </tbody> </table>	No	Activity	No	Activity	1	Office	9	Pruning & harvesting	2	Security	10	Manuring	3	Weeding	11	Replanting	4	P&D	12	Waste	5	Boundary & census	13	Workshop	6	Road bridges	14	Nursery	<p>Compliance</p>
No	Activity	No	Activity																												
1	Office	9	Pruning & harvesting																												
2	Security	10	Manuring																												
3	Weeding	11	Replanting																												
4	P&D	12	Waste																												
5	Boundary & census	13	Workshop																												
6	Road bridges	14	Nursery																												

**MSPO Public Summary Report  
Revision 0 (Aug 2017)**

<p>must have knowledge and access to latest national regulations and collective agreements.</p> <p>g) The management shall conduct regular two-way communication with their employees where issues affecting their business such as employee's health, safety and welfare are discussed openly. Records from such meeting are kept and the concerns of the employees and any remedial actions taken are recorded.</p> <p>h) Accident and emergency procedures shall exist and instructions shall be clearly understood by all employees.</p> <p>i) Employees trained in First Aid should be present at all field operations. A First Aid Kit equipped with approved contents should be available at each worksite.</p> <p>j) Records shall be kept of all accidents and be reviewed periodically at quarterly intervals.</p> <p><b>- Major compliance -</b></p>	<table border="1"> <tr> <td>7</td> <td>Drainage culverts</td> <td>&amp;</td> <td>15</td> <td>Break time</td> </tr> <tr> <td>8</td> <td>transportation</td> <td></td> <td>16</td> <td>Weighbridge</td> </tr> </table>	7	Drainage culverts	&	15	Break time	8	transportation		16	Weighbridge	<p>All HIRARC were verified and approved accordingly.</p> <p>Both estates provide training to the workers and staff exposed to pesticides and chemicals. The following training sessions were recorded.</p> <table border="1"> <thead> <tr> <th colspan="2">Sg Samak Estate</th> <th colspan="2">Sabak Bernam Estate</th> </tr> <tr> <th>Date</th> <th>Training</th> <th>Date</th> <th>Training</th> </tr> </thead> <tbody> <tr> <td>16/7/18</td> <td>IPM -RB Spraying in immature fields</td> <td>9/7/18</td> <td>Circle spraying</td> </tr> <tr> <td>6/7/18</td> <td>Handling of spraying pump</td> <td>11/7/18</td> <td>Manuring – safety briefing</td> </tr> <tr> <td>3/7/18</td> <td>IPM – Census of ganoderma</td> <td>3/7/18</td> <td>P&amp;D spraying</td> </tr> <tr> <td>22/6/18</td> <td>Circle spraying in mature fields</td> <td>17/1/18</td> <td>Sprayers safety</td> </tr> <tr> <td>16/7/18</td> <td>IPM -RB Spraying in immature fields</td> <td>26/2/18</td> <td>Induction program for FW</td> </tr> <tr> <td>2/8/17</td> <td>Inter pump briefing</td> <td>-</td> <td>-</td> </tr> </tbody> </table>	Sg Samak Estate		Sabak Bernam Estate		Date	Training	Date	Training	16/7/18	IPM -RB Spraying in immature fields	9/7/18	Circle spraying	6/7/18	Handling of spraying pump	11/7/18	Manuring – safety briefing	3/7/18	IPM – Census of ganoderma	3/7/18	P&D spraying	22/6/18	Circle spraying in mature fields	17/1/18	Sprayers safety	16/7/18	IPM -RB Spraying in immature fields	26/2/18	Induction program for FW	2/8/17	Inter pump briefing	-	-
	7	Drainage culverts	&	15	Break time																																							
8	transportation		16	Weighbridge																																								
Sg Samak Estate		Sabak Bernam Estate																																										
Date	Training	Date	Training																																									
16/7/18	IPM -RB Spraying in immature fields	9/7/18	Circle spraying																																									
6/7/18	Handling of spraying pump	11/7/18	Manuring – safety briefing																																									
3/7/18	IPM – Census of ganoderma	3/7/18	P&D spraying																																									
22/6/18	Circle spraying in mature fields	17/1/18	Sprayers safety																																									
16/7/18	IPM -RB Spraying in immature fields	26/2/18	Induction program for FW																																									
2/8/17	Inter pump briefing	-	-																																									

**MSPO Public Summary Report  
Revision 0 (Aug 2017)**

		<p>25/7/1 7</p>	<p>Chemical mixing &amp; SDS</p>	<p>-</p>	<p>-</p>	<p>Details of other training are available 4.4.6.1 (training and competency). OSH programs are also included. Common programs are initiated from HQ level e.g. OSH meeting, workplace inspection, inspection on PPE, training on MSPO/RSPO etc.</p> <p>The estates provide PPE to the employees such as apron, safety helmets, safety shoes relevant to the work handled by the workers. Records of PPE issuance on 14/8/18 for Sg Samak Estate was sighted. During the site visit workers were observed to be in PPE. PPE items includes the following;</p> <ul style="list-style-type: none"> <li>a) Mask 3M -9313</li> <li>b) Nitrile gloves</li> <li>c) Dupont apron</li> <li>d) Goggles</li> <li>e) Vest</li> <li>f) Safety helmets</li> </ul> <p>Both estates had established SOP for chemical handling. This is available in PSQM – Operational Control Procedure under subject Chemical Safety Management. This includes compliance related to</p> <ul style="list-style-type: none"> <li>a) Conduct/reassess CHRA (conducted on 15&amp;29/7 2015. A revised CHRA was added on 25/4/17 to include new chemical ACEPHATE for the bagworm treatment.</li> <li>b) Review of chemical register</li> <li>c) Chemical management assessment review</li> </ul>
--	--	---------------------	--------------------------------------	----------	----------	---

		<p>d) Conduct health surveillance. The document was sighted.</p> <p>Both the Estate Managers were appointed as the Chairman of the ESH committee, letters of appointment signed by the Regional CEO were sighted (Sg Samak – 12/9/17). The Senior Assistant/Assistants in turn were assigned as the OSH coordinator and responsible for all safety and environmental issues. All appointments are valid for a 2-year term. Both estates management conduct regular two-way communication with their employees through the quarterly ESH meeting. The dates of meeting held by both estates are recorded below.</p> <table border="1" data-bbox="1050 703 1541 946"> <thead> <tr> <th></th> <th>Sg Samak</th> <th>Sabak Bernam</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>30/7/18</td> <td>6/6/18</td> </tr> <tr> <td>2</td> <td>27/4/18</td> <td>19/3/18</td> </tr> <tr> <td>3</td> <td>29/1/18</td> <td>9/1/18</td> </tr> <tr> <td>4</td> <td>27/10/17</td> <td>26/9/17</td> </tr> </tbody> </table> <p>The minutes of meeting for Sg Samak and Sabak Bernam Estates on 30/7/18 and 19/3/18 respectively were sighted and verified. Workers during the meeting participated in the discussion mainly on line site and safety. The agenda discussed during the ESH meeting among other includes the following;</p> <p>Accident incidences/SIME CARD report/HIRARC /visit from PQSM-OSH/GCAD report/safety report for Contractors/OSH program/medical surveillance.</p> <p>Accident and emergency procedures are available. There was formation of ERP Team &amp; ERP for all the identified incidences. The organisation chart for the ERP team was established and displayed for information of the employees. The important telephone contact</p>		Sg Samak	Sabak Bernam	1	30/7/18	6/6/18	2	27/4/18	19/3/18	3	29/1/18	9/1/18	4	27/10/17	26/9/17	
	Sg Samak	Sabak Bernam																
1	30/7/18	6/6/18																
2	27/4/18	19/3/18																
3	29/1/18	9/1/18																
4	27/10/17	26/9/17																

**MSPO Public Summary Report  
Revision 0 (Aug 2017)**

		<p>numbers were also provided therein. ERT are initiated for fire &amp; flood, chemical spillage &amp; motor vehicle, wild &amp; poisonous animal attack, first aid team. Procedures guidelines were produced by PSQM and amended to tailor to the situation differences in the estates and mills. Sighted drills conducted by the estates</p> <ul style="list-style-type: none"> <li>i) Sg Samak – fire drill on 29/8/17 &amp; 10/8/17</li> <li>ii) Sabak Bernam – Fire drill on 26/10/17 &amp; 12/5/17</li> </ul> <p>All records were sighted and verified.</p> <p>Both estates trained their nominated employees for First Aid mainly those involved in the field operations. A First Aid Kit equipped with approved 16 items are available and replenished on a weekly basis. Distribution of the 1st Aid Kit for both the estates are made at the following places/personnel;</p> <p>Office / AP Post / Chemical Store / Fertiliser Store / Workshop / Field staff / Mandores. The boxes kept by the mandore were sighted during the field visit. Both Estates had regular monthly briefing to the 1st Aid Kit holders on the management of the content and usage.</p> <p>Records of all accidents are kept in both estates for a min of 10 years. Accident incidences if any are reviewed during safety meetings. Sg Samak Estate IN 2017 had 37 cases 6 with LTI and remaining without having any LTI. Sabak Bernam Estate recorded 13 cases with LTI for the same year. HIRARC accordingly was reviewed on 17/4/17 for a case on 26/3/17 involving an AP having injury while riding in field 2015 DOSH submission was complied under the legislative requirement.</p>	
<p><b>Criterion 4.4.5: Employment conditions</b></p>			

**MSPO Public Summary Report**  
**Revision 0 (Aug 2017)**

<p><b>4.4.5.1</b></p>	<p>The management shall establish policy on good social practices regarding human rights in respect of industrial harmony. The policy shall be signed by the top management and effectively communicated to the employees.</p> <p><b>- Major compliance -</b></p>	<p>The top management of SDPB was committed to implement good social practices regarding human rights in respect of industrial harmony. Their commitment is clearly described with the statement indicated in the “Social Policy” and “Social &amp; Humanity Management Policy” both dated January 2015 and signed by the Managing Director.</p>	<p>Compliance</p>						
<p><b>4.4.5.2</b></p>	<p>The management shall not engage in or support discriminatory practices and shall provide equal opportunity and treatment regardless of race, colour, sex, religion, political opinion, nationality, social origin or any other distinguishing characteristics.</p> <p><b>- Major compliance -</b></p>	<p>The top management of SDPB was committed not to engage in or support discriminatory practices and would provide equal opportunity and treatment regardless of race, colour, sex, religion, political opinion, nationality, social origin or any other distinguishing characteristics. Their commitment was clearly described with the statement indicated in the “Social Policy” dated January 2015 and signed by the Managing Director</p> <p>There were no evidences of any form of discrimination based on race, national origin, religion, gender, union and political affiliation.</p> <p>Interview with workers confirmed that there was no such discrimination in Bagan Datoh Estate.</p>	<p>Compliance</p>						
<p><b>4.4.5.3</b></p>	<p>Management shall ensure that employees’ pay and conditions meet legal or industry minimum standards and as per agreed Collective Agreements. The living wage should be sufficient to meet basic needs and provide some discretionary income based on minimum wage.</p> <p><b>- Major compliance -</b></p>	<p>The pay and conditions of employees in Bagan Datoh Estate met legal and industry minimum standards and as per agreed Collective Agreements. The Employees were mainly paid on piece rates and daily wages. The daily wage was as per the Minimum Wage Order 2016 which was MR38.46 /day. Harvesters were paid as per MAPA NUPW agreements. Payslips reviewed confirmed that the basic wages met minimum standards. Some of those wage slips reviewed (September 2017):</p> <table border="1" data-bbox="1048 1313 1890 1374"> <thead> <tr> <th data-bbox="1048 1313 1330 1374">Name</th> <th data-bbox="1330 1313 1610 1374">Job Description</th> <th data-bbox="1610 1313 1890 1374">NRIC/Passport No</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>	Name	Job Description	NRIC/Passport No				<p>Compliance</p>
Name	Job Description	NRIC/Passport No							

**MSPO Public Summary Report**  
**Revision 0 (Aug 2017)**

		<table border="1"> <tr> <td>Kumaran Subramaniam</td> <td>Tractor Driver</td> <td>760421-08-5041</td> </tr> <tr> <td>Ram Shankar</td> <td>Sprayer</td> <td>N2231303</td> </tr> <tr> <td>Hairul Andri</td> <td>Loose Fruit Picker</td> <td>AT111564</td> </tr> <tr> <td>Muhamad Zohri</td> <td>Harvester - Cutter</td> <td>A4221493</td> </tr> </table>	Kumaran Subramaniam	Tractor Driver	760421-08-5041	Ram Shankar	Sprayer	N2231303	Hairul Andri	Loose Fruit Picker	AT111564	Muhamad Zohri	Harvester - Cutter	A4221493	
Kumaran Subramaniam	Tractor Driver	760421-08-5041													
Ram Shankar	Sprayer	N2231303													
Hairul Andri	Loose Fruit Picker	AT111564													
Muhamad Zohri	Harvester - Cutter	A4221493													
<b>4.4.5.4</b>	<p>Management should ensure employees of contractors are paid based on legal or industry minimum standards according to the employment contract agreed between the contractor and his employee.</p> <p><b>- Minor compliance -</b></p>	<p>The driver of the Rajan Enterprise for Backhoe rental interviewed confirmed that he was paid RM1,500.00 per month. This confirmed by the contractor when interviewed.</p>	Compliance												
<b>4.4.5.5</b>	<p>The management shall establish records that provide an accurate account of all employees (including seasonal workers and subcontracted workers on the premises). The records should contain full names, gender, date of birth, date of entry, a job description, wage and the period of employment.</p> <p><b>- Major compliance -</b></p>	<p>Bagan Datoh Estate maintained a record of all employees, SEMUA – Employee Master Listing – Ref ZCKRLM04 as at 16/8/18 for total of 274 workers, under the following categories:</p> <ol style="list-style-type: none"> <li>1) Monthly paid</li> <li>2) Daily rated or General Worker</li> <li>3) Staff</li> </ol> <p>The list had the following information details for each employee:</p> <ul style="list-style-type: none"> <li>- Division</li> <li>- Employee Number</li> <li>- Employee Name</li> <li>- New NRIC/Passport Number</li> <li>- Date of Birth</li> <li>- Date joined</li> </ul>	Compliance												



		<p>In addition each employee had details in individual registration forms and another for foreign workers with details of passport and work permits.</p>																						
<p><b>4.4.5.6</b></p>	<p>All employees shall be provided with fair contracts that have been signed by both employee and employer. A copy of employment contract is available for each and every employee indicated in the employment records.</p> <p><b>- Major compliance -</b></p>	<p>All employees on Sungai Samak Estate had been provided with fair contracts which were signed by both employee and employer.</p> <p>Employment Contract Form for local and foreign workers were available. Information indicated in the form showed that all employees were provided with fair contracts in term of salary, accommodation and other benefits.</p> <p>Copies of Employment Contract for each local and foreign worker indicated in the employment records were available. Sample of employment contract checked:</p> <p>i) Local workers</p> <table border="1" data-bbox="1050 842 1888 1019"> <thead> <tr> <th>Name</th> <th>Position</th> <th>Contract date</th> </tr> </thead> <tbody> <tr> <td>Suraya Binti Hamid</td> <td>General Worker</td> <td>9/8/18</td> </tr> <tr> <td>Musrifah Binti Hashim</td> <td>General Worker</td> <td>9/8/18</td> </tr> </tbody> </table> <p>Foreign worker contract was valid for 2-3 years depending on nationality. 1 year contract extension will be offered and renewed on annual basis subject to the mutual agreement between workers and employer. Sample of employment contract checked:</p> <table border="1" data-bbox="1050 1206 1888 1394"> <thead> <tr> <th>Name</th> <th>Position</th> <th>Contract date</th> </tr> </thead> <tbody> <tr> <td>Ram Gopal</td> <td>General workers</td> <td>12/7/18</td> </tr> <tr> <td>Amarjeet Suhani</td> <td>General workers</td> <td>22/6/17</td> </tr> <tr> <td>Ibrahim</td> <td>General workers</td> <td>6/10/17</td> </tr> </tbody> </table>	Name	Position	Contract date	Suraya Binti Hamid	General Worker	9/8/18	Musrifah Binti Hashim	General Worker	9/8/18	Name	Position	Contract date	Ram Gopal	General workers	12/7/18	Amarjeet Suhani	General workers	22/6/17	Ibrahim	General workers	6/10/17	<p>Compliance</p>
Name	Position	Contract date																						
Suraya Binti Hamid	General Worker	9/8/18																						
Musrifah Binti Hashim	General Worker	9/8/18																						
Name	Position	Contract date																						
Ram Gopal	General workers	12/7/18																						
Amarjeet Suhani	General workers	22/6/17																						
Ibrahim	General workers	6/10/17																						

<p><b>4.4.5.7</b></p>	<p>The management shall establish a time recording system that makes working hours and overtime transparent for both employees and employer.</p> <p><b>- Major compliance -</b></p>	<p>Sungai Samak Estate had established a time recording system for all employees</p> <p>Time recording system has been carried out manually on daily basis for field and office staff &amp; executives.</p> <p>For office staff &amp; executives, the working hours are recorded in the Executives &amp; Staff Attendance List.</p> <p>For field workers, they record the working hours in the Daily Time Record. The overtime working hours always mutually agreed and approved by the assistant manager.</p> <p>The documented working hours available in the daily check roll records</p>	
<p><b>4.4.5.8</b></p>	<p>The working hours and breaks of each individual employee as indicated in the time records shall comply with legal regulations and collective agreements. Overtime shall be mutually agreed and shall always be compensated at the rate applicable and shall meet the applicable legal requirement.</p> <p><b>- Major compliance -</b></p>	<p>The working hours and breaks of each individual employee as indicated in the time records and contract of employment met with legal regulations and collective agreements. Overtime was mutually agreed and was always paid at the applicable rate that met the applicable legal requirement.</p>	<p>Compliance</p>
<p><b>4.4.5.9</b></p>	<p>Wages and overtime payment documented on the pay slips shall be in line with legal regulations and collective agreements.</p> <p><b>- Major compliance -</b></p>	<p>Wages and overtime payment documented on the pay slips on Sungai Samak Estate was in line with legal regulations and collective agreements.</p> <p>Pay slips of all employees are available as evidence of salary payment.</p> <p>The pay slip contain the following information :</p> <ul style="list-style-type: none"> <li>a. Jenis Pendapatan Termasuk Dalam Gaji Purata</li> <li>b. Jenis Pendapatan Tidak Termasuk Dalam Gaji Purata</li> <li>c. Tanggungan Perbelanjaan</li> </ul>	<p>Compliance</p>

**MSPO Public Summary Report**  
**Revision 0 (Aug 2017)**

		<p>d. Potongan</p> <p>Some pay slips verified were:</p> <table border="1" data-bbox="1050 440 1888 853"> <thead> <tr> <th>Name</th> <th>Job Description</th> <th>NRIC/Passport No</th> </tr> </thead> <tbody> <tr> <td>Suraya Binti Hamid</td> <td>General Worker</td> <td>690513-08-6040</td> </tr> <tr> <td>Musrifah Binti Hashim</td> <td>General Worker</td> <td>650202-08-6418</td> </tr> <tr> <td>Ram Gopal</td> <td>General Worker</td> <td>G5450704</td> </tr> <tr> <td>Amarjeet Suhani</td> <td>General Worker</td> <td>P1697504</td> </tr> <tr> <td>Ibrahim</td> <td>General Worker</td> <td>AU085281</td> </tr> </tbody> </table>	Name	Job Description	NRIC/Passport No	Suraya Binti Hamid	General Worker	690513-08-6040	Musrifah Binti Hashim	General Worker	650202-08-6418	Ram Gopal	General Worker	G5450704	Amarjeet Suhani	General Worker	P1697504	Ibrahim	General Worker	AU085281	
Name	Job Description	NRIC/Passport No																			
Suraya Binti Hamid	General Worker	690513-08-6040																			
Musrifah Binti Hashim	General Worker	650202-08-6418																			
Ram Gopal	General Worker	G5450704																			
Amarjeet Suhani	General Worker	P1697504																			
Ibrahim	General Worker	AU085281																			
<p><b>4.4.5.10</b></p>	<p>Other forms of social benefits should be offered by the employer to employees, their families or the community such as incentives for good work performance, bonus payment, professional development, medical care and health provisions.</p> <p><b>- Minor compliance -</b></p>	<p>On Bagan Datoh Estate other benefits like free housing, free water, telephone reimbursement of RM5.00, festive expenses RM100.00, insurance of RM13.00, school bus subsidy of RM34.40 paid to the transporter and rice &amp; cooking oil were provided.</p>	<p>Compliance</p>																		
<p><b>4.4.5.11</b></p>	<p>In cases where on-site living quarters are provided, these quarters shall be habitable and have basic amenities and facilities in compliance with the Workers' Minimum Standards Housing and Amenities Act 1990 (Act 446) or any other applicable legislation.</p> <p><b>- Major compliance -</b></p>	<p>In Sungai Samak Estate on-site living quarters were provided to all employees. At time of visit these quarters were observed to be habitable with basic amenities and facilities in compliance with the Workers' Minimum Standards Housing and Amenities Act 1990 (Act 446).</p> <p>Line site inspections were carried weekly by the HA and biweekly inspections carried out by VMO. Line site inspection guided under operational control procedure, SD/SDP/PSQM(ESH)/204-OD6, rev:0 dated 26/2/15.</p>	<p>Compliance</p>																		

		<p><u>Opportunity for improvement</u></p> <p>Observed at Yew Lian Division line site, a few site conditions need to be improved further related to:</p> <ul style="list-style-type: none"> <li>i) Clogged and stagnant water at parameter and house drain.</li> <li>ii) Water container to be kept closed and consistently check to avoid breeding of larvae.</li> <li>iii) Avoidance of poultry and availability of signage for any prohibited activities at line site.</li> </ul> <p>Monitoring of drug and medicine - Currently stock check carried out on fortnightly basis to check incoming and issuance of medicine. The process can be improved further to include monitoring of expiry of medicine to ensure readiness at point of use.</p>	
<b>4.4.5.12</b>	<p>The management shall establish a policy and provide guidelines to prevent all forms of sexual harassment and violence at the workplace.</p> <p><b>- Major compliance -</b></p>	<p>SDPB had established “Gender Policy” dated January 2015 and signed by the Managing Director which provided guidelines to prevent all forms of sexual harassment and violence at the workplace.</p> <p>Sungai Samak Estate had established a Gender Committee with the Manager as Patron, a chairwoman, a vice chairman, a secretary, and 8 committee members. All were women except for the patron.</p> <p>Records showed that a training on Human Rights, Introduction to productive rights and refresher gender committee training was conducted on 19/6/18</p> <p>At time of visit there was no case reported on any form of sexual harassment or violence at the workplace.</p>	Compliance
<b>4.4.5.13</b>	<p>The management shall respect the right of all employees to form or join trade union and allow workers own representative(s) to facilitate collective bargaining in</p>	<p>The management of Sungai Samak Estate respected the right of all employees to join a trade union relevant to the industry. This was evident from deductions made for union subscription and insurance in</p>	

**MSPO Public Summary Report  
Revision 0 (Aug 2017)**

	<p>accordance with applicable laws and regulations. Employees shall be given the freedom to join a trade union relevant to the industry or to organize themselves for collective bargaining. Employees shall have the right to organize and negotiate their work conditions. Employees exercising this right should not be discriminated against or suffer repercussions.</p> <p><b>- Major compliance -</b></p>	<p>the pay slips of employees. This was further confirmed by workers during interviews. On both divisions on Sungai Samak Estate there were a NUPW chairman and secretary and records on meeting held with management were sighted.</p>	<p>Compliance</p>						
<p><b>4.4.5.14</b></p>	<p>Children and young persons shall not be employed or exploited. The minimum age shall comply with local, state and national legislation. Work by children is acceptable on family farms, under adult supervision, and when not interfering with their education programmes. Children shall not exposed to hazardous working conditions.</p> <p><b>- Major compliance –</b></p>	<p>SDPB had a “Child protection policy” which advocated compliance to all relevant local and internal laws. From the employments records and SEMUA – Employee Master Listing – Ref ZCKRLM04,</p> <p>On Bagan Datoh Estate, children and young persons were not employed or exploited. The minimum age complied with local, state and national legislation. A perusal of the employee master list found no employee below the national minimum age legislation. Consultations with estate employees confirmed that there was no employee under the minimum age.</p>	<p>Compliance</p>						
<p><b>Criterion 4.4.6: Training and competency</b></p>									
<p><b>4.4.6.1</b></p>	<p>All employees, contractors and relevant smallholders are appropriately trained. A training programme (appropriate to the scale of the organization) that includes regular assessment of training needs and documentation, including records of training shall be kept.</p> <p><b>- Major compliance -</b></p>	<p>Both Estates have organised trainings for their employees. There were also sessions held with presence of contractors and neighbouring community.</p> <p>a) Sg Samak Estate held the following sessions during the period of review</p> <table border="1" data-bbox="1048 1310 1850 1388"> <thead> <tr> <th data-bbox="1048 1310 1193 1345">Date</th> <th data-bbox="1193 1310 1709 1345">Training Subject</th> <th data-bbox="1709 1310 1850 1345">Attendees</th> </tr> </thead> <tbody> <tr> <td data-bbox="1048 1345 1193 1388"></td> <td data-bbox="1193 1345 1709 1388"></td> <td data-bbox="1709 1345 1850 1388"></td> </tr> </tbody> </table>	Date	Training Subject	Attendees				<p>Compliance</p>
Date	Training Subject	Attendees							

**MSPO Public Summary Report  
Revision 0 (Aug 2017)**

		12/9/18	Policy briefing	Entire	
		18/7/18	Penjagaan Alam Sekitar/HCV & Biodiversity	Entire	
		16/7/18	IPM -RB Spraying in immature fields	12	
		13/7/18	Induction program for new FW	11	
		6/7/18	Handling of spraying pump	17	
		3/7/18	IPM – Census of ganoderma	4	
		22/6/18	Circle spraying in mature fields	5	
		22/6/18	RISE awareness	41	
		18/5/18	First Aid	13	
		27/4/18	Accident statistics awareness	entire	
		25/3/18	5S implementation	7	
		14/2/18	Manuring	16	
		25/3/18	CLASS Awareness	5	
		20/11/17	Water saving	entire	
		20/11/17	Safety while stacking fronds	20	
		25/10/17	MSPO awareness	entire	
		12/10/17	Induction program FW	7	
		15/9/17	FFB transporter – ESH & RSPO/MSPO	10	
		29/8/17	Fire Drill	entire	
		10/8/17	PMV & Fire prevention	12	

**MSPO Public Summary Report  
Revision 0 (Aug 2017)**

		9/8/17	manuring	16
		2/8/17	Inter pump briefing	20
		25/7/17	Chemical mixing & SDS	7
		25/7/17	Line site upkeep	entire
		21/7/17	First Aid	9
		11/7/17	Bagworm census	10
		b) Sabak Bernam Estate organised similar training as follows;		
		<b>Date</b>	<b>Training Subject</b>	<b>attendees</b>
		31/7/18	IPM	7
		24/7/18	SOP- Replanting & safety	17
		3/7/18	HCV/Policies/COBC briefing	entire
		9/7/18	Circle spraying	20
		11/7/18	Manuring – safety briefing	20
		3/7/18	P&D spraying	11
		5/7/18	IPM – BOB management	8
		18/4/18	Drivers competency	18
		19/3/17	Harvesting safety awareness	30
		11/3/18	Safety briefing & first aid	entire

**MSPO Public Summary Report  
Revision 0 (Aug 2017)**

		<table border="1"> <tr> <td>17/1/18</td> <td>Sprayers safety</td> <td>27</td> </tr> <tr> <td>26/2/18</td> <td>Induction program for FW</td> <td>10</td> </tr> <tr> <td>19/1/18</td> <td>Waste management</td> <td>entire</td> </tr> <tr> <td>26/10/17</td> <td>First Aid &amp; ERP</td> <td>Entire</td> </tr> <tr> <td>25/10/17</td> <td>MSPO RSPO Awareness for contractors</td> <td>10</td> </tr> <tr> <td>22/7/17</td> <td>First Aid</td> <td>18</td> </tr> <tr> <td>8/7/17</td> <td>Safety during replanting</td> <td>entire</td> </tr> <tr> <td>12/5/17</td> <td>Fire dill - ERP</td> <td>entire</td> </tr> </table> <p>Training for the SOU both estates and the mill is an on-going activity and held along with the annual program.</p>	17/1/18	Sprayers safety	27	26/2/18	Induction program for FW	10	19/1/18	Waste management	entire	26/10/17	First Aid & ERP	Entire	25/10/17	MSPO RSPO Awareness for contractors	10	22/7/17	First Aid	18	8/7/17	Safety during replanting	entire	12/5/17	Fire dill - ERP	entire	
17/1/18	Sprayers safety	27																									
26/2/18	Induction program for FW	10																									
19/1/18	Waste management	entire																									
26/10/17	First Aid & ERP	Entire																									
25/10/17	MSPO RSPO Awareness for contractors	10																									
22/7/17	First Aid	18																									
8/7/17	Safety during replanting	entire																									
12/5/17	Fire dill - ERP	entire																									
<p><b>4.4.6.2</b></p>	<p>Training needs of individual employees shall be identified prior to the planning and implementation of the training programmes in order to provide the specific skill and competency required to all employees based on their job description.</p> <p><b>- Major compliance -</b></p>	<p>Similar method for identifying the training needs are used in this SOU 4 operating units for the both estates and mill. The training needs for both Sg Samak &amp; Sabak Bernam Estates for the FY 2018/19 training program has been established. The details of the training needs include categories of job descriptions, sections, and employees group. Included in this program are subjects among others are;</p> <ul style="list-style-type: none"> <li>a) Environment e.g. environmental,</li> <li>b) safety &amp; health policy,</li> <li>c) effective work place inspection</li> <li>d) PPE training and demonstration</li> <li>e) scheduled waste management,</li> <li>f) environmental responsibility, HCV &amp; Biodiversity training,</li> <li>g) field activities,</li> <li>h) equipment handling,</li> <li>i) vehicles maintenance/safe driving etc.</li> </ul>	<p>Compliance</p>																								



<b>4.4.6.3</b>	<p>A continuous training programme should be planned and implemented to ensure that all employees are well trained in their job function and responsibility, in accordance to the documented training procedure.</p> <p><b>- Minor compliance -</b></p>	<p>Training details are planned and summarised in the OSH program. This is in compliance and detailed in 4.4.6.1 above. Training program are made on annual basis. In addition, it is subject for a review during the financial year should need arises.</p>	Compliance
<b>4.5 Principle 5: Environment, natural resources, biodiversity and ecosystem services</b>			
<b>Criterion 4.5.1: Environmental Management Plan</b>			
<b>4.5.1.1</b>	<p>An environmental policy and management plan in compliance with the relevant country and state environmental laws shall be developed, effectively communicated and implemented.</p> <p><b>- Major compliance -</b></p>	<p>There is an environmental management policy issued on Group level signed by the Managing Director in Jan 2015.</p> <ul style="list-style-type: none"> <li>a) Communications to the employees were through training session and briefing at muster grounds. The environmental subjects are emphasised during training related to MSPO/RSPO, scheduled waste, and spillages. Refer training records for both estates in 4.4.6.1 above.</li> <li>b) Subjects on environmental are included the annual training program titled “environmental responsibility &amp; biodiversity-environmental aspect impact assessment”.</li> </ul>	Compliance
<b>4.5.1.2</b>	<p>The environmental management plan shall cover the following:</p> <ul style="list-style-type: none"> <li>a) An environmental policy and objectives;</li> <li>b) The aspects and impacts analysis of all operations.</li> </ul> <p><b>- Major compliance -</b></p>	<p>The EMP policy is available as specified in 4.5.1.1 above.</p> <p>Objectives, target and duration are shown in the Environmental Management program (EMP) incorporating the action plan to be initiated by the estates. The EMP for both estates were sighted and verified. Details of the objectives were also mentioned in 4.5.4.1.</p>	Compliance

**MSPO Public Summary Report  
Revision 0 (Aug 2017)**

		<p>The estates identified the aspects and impacts analysis of its operations. Many of which are common. Areas/activities identified at;</p> <ul style="list-style-type: none"> <li>a) Nursery (beneficial plant)</li> <li>b) Main entrance/compound</li> <li>c) Road/office/store/</li> <li>d) Workshop/power station/</li> <li>e) Petrol/diesoline/scheduled waste store</li> <li>f) Water treatment plant /</li> <li>g) FFB transportation</li> <li>h) P&amp;D /weeding/spraying/harvesting &amp; collection/manuring</li> <li>i) Replanting</li> </ul> <p>Findings were discussed in OSH/ meetings. The last update of the EAI list is dated 2/7/2018 and 28/12/2017 for Sg Samak and Sabak Bernam Estates (to include workshop) respectively.</p>									
<p><b>4.5.1.3</b></p>	<p>An environmental improvement plan to mitigate the negative impacts and to promote the positive ones, shall be developed, effectively implemented and monitored.</p> <p><b>- Major compliance -</b></p>	<p>This is available in the EIA Plan and Pollution Prevention Plan dated 02/7/2018 compiled for FY 2018/19. Details as elaborated below;</p> <table border="1" data-bbox="1048 997 1870 1289"> <thead> <tr> <th data-bbox="1048 997 1099 1061"></th> <th data-bbox="1099 997 1397 1061">Environmental Issues</th> <th data-bbox="1397 997 1720 1061">Mitigating measures</th> <th data-bbox="1720 997 1870 1061">Time frame</th> </tr> </thead> <tbody> <tr> <td data-bbox="1048 1061 1099 1289">1</td> <td data-bbox="1099 1061 1397 1289">Leakage of pesticides during mixing &amp; washing into outside land</td> <td data-bbox="1397 1061 1720 1289">To recollect water used at mixing area to be recycled during mixing To clean &amp; maintain containment sump at chemical mixing area to contain leakages.</td> <td data-bbox="1720 1061 1870 1289">On-going</td> </tr> </tbody> </table>		Environmental Issues	Mitigating measures	Time frame	1	Leakage of pesticides during mixing & washing into outside land	To recollect water used at mixing area to be recycled during mixing To clean & maintain containment sump at chemical mixing area to contain leakages.	On-going	<p>Compliance</p>
	Environmental Issues	Mitigating measures	Time frame								
1	Leakage of pesticides during mixing & washing into outside land	To recollect water used at mixing area to be recycled during mixing To clean & maintain containment sump at chemical mixing area to contain leakages.	On-going								

**MSPO Public Summary Report  
Revision 0 (Aug 2017)**

				To place all chemicals containers on metal trays		
		2	Open burning at line site	To provide rubbish bin To record rubbish collection  To update line site inspection  Rubbish disposed at MDTI	On-going	
		3	High usage of pesticide chemicals	To increase planting of BP To increase barn owl ratio 1:5 ha  Perform pest census prior treatment.	On-going	
		4	Oil spillage at workshop	To place metal tray during services. To clean/maintain oil trap.	On-going	
		5	Replanting	Implement zero burning policy Ensure no soil erosion	On-going	
		6	Scheduled waste	To ensure all scheduled waste disposed safely & update record.	On-going	

**MSPO Public Summary Report**  
**Revision 0 (Aug 2017)**

		Monitoring is made through data analysis and the daily field and site supervision.	
<b>4.5.1.4</b>	A programme to promote the positive impacts should be included in the continual improvement plan.  - <b>Minor compliance</b> -	This is available in the EIA Plan and Pollution Prevention Plan dated 02/7/2018 compiled for FY 2018/19. Details as incorporated therein detailed in 4.5.1.3	Compliance
<b>4.5.1.5</b>	An awareness and training programme shall be established and implemented to ensure that all employees understand the policy and objectives of the environmental management and improvement plans and are working towards achieving the objectives.  - <b>Major compliance</b> -	A training program is available in the SOU Training Program updated on a yearly basis or revised as per the management requirement. Included in this programme are subjects related to environment e.g. environmental, safety & health policy, scheduled waste management, environmental responsibility, HCV & Biodiversity training. Both estates also emulated similar program for in house training.	Compliance
<b>4.5.1.6</b>	Management shall organize regular meetings with employees where their concerns about environmental quality are discussed.  - <b>Major compliance</b> -	Similar forums are used by the mill and the estates in discussing concerns on environmental quality A management review meeting is held annually to discuss issues on water management plan, electricity use, diesel consumption, waste management, SIA plan, renewable energy, aspect/impact, HIRARC. In addition, environmental issues are tabled during the quarterly ESH meeting and also EPMC	Compliance
<b>Criterion 4.5.2: Efficiency of energy use and use of renewable energy</b>			
<b>4.5.2.1</b>	Consumption of non-renewable energy shall be optimized and closely monitored by establishing baseline values and trends shall be observed within an appropriate timeframe. There should be a plan to assess the usage of non-renewable energy including fossil fuel, electricity and energy efficiency in the operations over the base period.	Monthly record on energy consumption for both renewable and non-renewable sources were kept and documented in both estates. It is monitored to optimize use of renewable energy. Data is being compiled for comparison and control for future improvement. Monitoring is made using diesel/mt FFB, commentary on variance on irregularities variances.	Compliance

	<b>- Major compliance -</b>	<p>a) Sg Samak performance recorded from July 2017-June 2018 from lowest 0.95 to highest 2.99</p> <p>b) Sabak Bernam Estate from lowest 2.66 to 6.35</p> <p>Reason provided e.g. rainy season, crop pattern and vehicle breakdown, age of vehicle/machinery, contour of estate</p> <p>Data with graph recorded were sighted and verified.</p>										
<b>4.5.2.2</b>	<p>The oil palm premises shall estimate the direct usage of non-renewable energy for their operations, including fossil fuel, and electricity to determine energy efficiency of their operations. This shall include fuel use by contractors, including all transport and machinery operations.</p> <p><b>- Major compliance -</b></p>	<p>The estimate for the direct usage of non-renewable energy for their operations, including fossil fuel, and electricity to determine energy efficiency of their operations inclusive of fuel use by contractors, including all transport and machinery operations was available in the respective estate yearly budgets.</p>	Compliance									
<b>4.5.2.3</b>	<p>The use of renewable energy should be applied where possible.</p> <p><b>- Minor compliance -</b></p>	<p>There was no opportunity to use renewable energy in both Estates at current technology. Mainly such practices are made in the mills whereby fibres and shell are used as fuel in the boiler for steam production thereafter for power generation</p>	Compliance									
<b>Criterion 4.5.3: Waste management and disposal</b>												
<b>4.5.3.1</b>	<p>All waste products and sources of pollution shall be identified and documented.</p> <p><b>- Major compliance -</b></p>	<p>All waste and pollution are identified and documented in the Waste Management Action Plan. The compilation for Financial Year 2018/19 was made at SOU4 level. Details of waste generated from the estates and mill operations among others are shown below;</p> <table border="1" data-bbox="1048 1150 1868 1399"> <thead> <tr> <th>Type of waste</th> <th>Location</th> <th>Action to be taken</th> </tr> </thead> <tbody> <tr> <td>Domestic waste rubbish</td> <td>Linesites, office, workshop, store,</td> <td>Collection/disposal 2x/week Estate for onwards collection by Majlis Daerah T Intan</td> </tr> <tr> <td>Industrial waste-fertiliser bags</td> <td>Empty bags store</td> <td>Inventory of bags, reuse for LF collection, sell to appointed contractor</td> </tr> </tbody> </table>	Type of waste	Location	Action to be taken	Domestic waste rubbish	Linesites, office, workshop, store,	Collection/disposal 2x/week Estate for onwards collection by Majlis Daerah T Intan	Industrial waste-fertiliser bags	Empty bags store	Inventory of bags, reuse for LF collection, sell to appointed contractor	Compliance
Type of waste	Location	Action to be taken										
Domestic waste rubbish	Linesites, office, workshop, store,	Collection/disposal 2x/week Estate for onwards collection by Majlis Daerah T Intan										
Industrial waste-fertiliser bags	Empty bags store	Inventory of bags, reuse for LF collection, sell to appointed contractor										

**MSPO Public Summary Report  
Revision 0 (Aug 2017)**

		Scrap metal	workshop	Inventory maintained, tender at zone level for sale to licensed contractor.	
		SW 404 Clinical waste	clinic	Inventory maintained. Storage in sharp bin in clinic. Disposal through VMO	
		SW rags, plastics, filters	workshop	Inventory maintained. Storage in scheduled waste store. Disposal through licensed contractor.	
		Spent lubricant & hydraulic oil	workshop	Inventory maintained. Storage in scheduled waste store. Disposal through licensed contractor	
		Disposed containers, bags, equipment contaminated with chemicals, pesticides, SW,	Scheduled waste store	Inventory maintained. Storage in SW store. All containers are labeled. Empty containers collected by authorized vendor.	
<b>4.5.3.2</b>	A waste management plan to avoid or reduce pollution shall be developed and implemented. The waste management plan should include measures for:  a) Identifying and monitoring sources of waste and pollution  b) Improving the efficiency of resource utilization and recycling of potential wastes as nutrients or converting them into value-added by-products	Details of the types and management plan are shown in 4.5.3.1 above.			Compliance

**MSPO Public Summary Report**  
**Revision 0 (Aug 2017)**

	<b>- Major compliance -</b>		
<b>4.5.3.3</b>	<p>The management shall establish Standard Operating Procedure for handling of used chemicals that are classified under Environment Quality Regulations (Scheduled Waste) 2005, Environmental Quality Act, 1974 to ensure proper and safe handling, storage and disposal.</p> <p><b>- Major compliance -</b></p>	<p>The procedures for handling used chemicals classified under Environment Quality Regulations (Scheduled Waste) 2005, Environmental Quality Act, 1974 are available prepared on Group level by PSQM and implemented in all estates and mills for all the applicable practices. The operational control procedures for the scheduled wastes management provides guidelines as follows;</p> <ul style="list-style-type: none"> <li>a) Management of class 1 chemical containers</li> <li>b) Management of class 2 (and higher) chemical containers.</li> <li>c) Management of fertiliser bags</li> </ul> <p>These documents were established on 28/2/2015 issued throughout the Group Estates and remain effective for practice in all operating units.</p>	Compliance
<b>4.5.3.4</b>	<p>Empty pesticide containers shall be punctured and disposed in an environmentally and socially responsible way, such that there is no risk of contamination of water sources or to human health. The disposal instructions on manufacturer's labels should be adhered to. Reference should be made to the national programme on recycling of used HDPE pesticide containers.</p> <p><b>- Major compliance -</b></p>	<p>Under the operational control procedure established as given in 4.5.3.3 above the guideline and practice for handling empty pesticides are as follows;</p> <ul style="list-style-type: none"> <li>a) All class 2 and above containers are tripled rinsed and hole punctured at the bottom only if the waste generator is to dispose as non-scheduled waste.</li> <li>b) Containers to be disposed as scheduled waste need not go the triple rinsing and hole punctured process.</li> </ul> <p>These guidelines are based on Department Of Agriculture ref 91/120/038/014 dated 7/11/2002. During the site visit this has been adhered mainly containers are tripled rinsed and hole punctured at the container base.</p>	Compliance
<b>4.5.3.5</b>	<p>Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourses.</p> <p><b>- Minor compliance -</b></p>	<p>Under the action plan of the waste management plan, collection is 2 to 3x/week. Monitoring is made by an Executive/staff. D Jubilee Estate and mill disposed their domestic waste through the local city council.</p>	Compliance

<b>Criterion 4.5.4: Reduction of pollution and emission</b>			
<b>4.5.4.1</b>	An assessment of all polluting activities shall be conducted, including greenhouse gas emissions, scheduled wastes, solid wastes and effluent.  - <b>Major compliance</b> -	Both estates assessed their polluting activities. This has been incorporated in the Environmental Improvement Plan/Pollution Prevention Plan 2018/19. Details as provided in 4.5.1.3 and 4.5.1.4. Therein is given potential sources of pollutants, objective & targets and action to be taken.	Compliance
<b>4.5.4.2</b>	An action plan to reduce identified significant pollutants and emissions shall be established and implemented.  - <b>Major compliance</b> -	Details of action plan for identified pollutants are shown in 4.5.1.3	Compliance
<b>Criterion 4.5.5: Natural water resources</b>			
<b>4.5.5.1</b>	The management shall establish a water management plan to maintain the quality and availability of natural water resources (surface and ground water). The water management plan may include:  a. Assessment of water usage and sources of supply.  b. Monitoring of outgoing water which may have negative impacts into the natural waterways at a frequency that reflects the estate's current activities.	The Water Management Plan for the estates has been established. This is compiled on Group basis and amended to meet demands of specific issue in operating units. There was no major change since introduction on 11/7/2016 and has remained effective and continued implementation for the current 2018/19 Plan. Included therein are inspection of water catchment, rain water monitoring, water leakages/overflow, run-off. Both estates management has provided contingency plans in event of water crisis for financial year 2018/19. Water usage is recorded on monthly basis for both estates. Steps/options to be adopted taken are; - to ensure consistency of water supply SYABAS/LAP - to train/educate staff/workers to conserve water - to revise demand and supply volume / conditions In event of a severe water pollution situation: - to address the source of pollution and eradication. - to reusing/recycling/rationing - apply rain harvest collection	Compliance



	<p>c. Ways to optimize water and nutrient usage to reduce wastage (e.g. having in place systems for re-use, night application, maintenance of equipment to reduce leakage, collection of rainwater, etc.).</p> <p>d. Protection of water courses and wetlands, including maintaining and restoring appropriate riparian buffer zones at or before planting or replanting, along all natural waterways within the estate.</p> <p>e. Where natural vegetation in riparian areas has been removed, a plan with a timetable for restoration shall be established and implemented.</p> <p>f. Where bore well is being use for water supply, the level of</p>	<p>Water courses and wetlands are protected including maintaining and restoring appropriate riparian buffer zones. The guidelines are detailed in the River Reserve Management (Management of River Reserve in Sime Darby Plantation dated April 2014). The buffer zones established are as following:</p> <table border="1" data-bbox="1050 550 1870 1034"> <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 - 40 meters</td> <td>40 meters</td> </tr> <tr> <td>10 - 20 meters</td> <td>20 meters</td> </tr> <tr> <td>5 - 10 meters</td> <td>10 meters</td> </tr> <tr> <td>&lt; 5 meters</td> <td>5 meters</td> </tr> </tbody> </table> <p>There was no major river crossing for both the estates. However, the policy for the protection of watercourse are made known to all employees for an effective implementation when the need arises. Both estates received supply from SYABAS/LAP hence does not require an internal water treatment for the domestic consumption.</p>	River width	Buffer zone	➤ 40 meters	50 meters	20 - 40 meters	40 meters	10 - 20 meters	20 meters	5 - 10 meters	10 meters	< 5 meters	5 meters	
River width	Buffer zone														
➤ 40 meters	50 meters														
20 - 40 meters	40 meters														
10 - 20 meters	20 meters														
5 - 10 meters	10 meters														
< 5 meters	5 meters														

	<p>the ground water table should be measured at least annually.</p> <p><b>- Major compliance -</b></p>		
<b>4.5.5.2</b>	<p>No construction of bunds, weirs and dams across main rivers or waterways passing through an estate.</p> <p><b>- Minor compliance -</b></p>	<p>This is in compliance by the estates. This requirement is also audited internally by the PQSM personnel. During the field visit no construction of such was observed. This was further supported through facts obtained from interviews among the employees.</p>	Compliance
<b>4.5.5.3</b>	<p>Water harvesting practices should be implemented (e.g. water from road-side drains can be directed and stored in conservation terraces and various natural receptacles).</p> <p><b>- Minor compliance -</b></p>	<p>During the site visit practices of water harvesting are noted mainly in both the estates however not on entirety as the estates are also categorised as coastal. Construction of MCP = Moisture Conservation Pit are made at interval of every 40 feet &amp; every 2 palms should the management decides the necessity of such. Road side pits were also available at every 3 palm rows, to divert in event of water overflowing and also to benefit the nearest palm at the pit end to obtain additional moisture.</p>	Compliance
<p><b>Criterion 4.5.6: Status of rare, threatened, or endangered species and high biodiversity value</b></p>			
<b>4.5.6.1</b>	<p>Information shall be collated that includes both the planted area itself and relevant wider landscape-level considerations (such as wildlife corridors). This information should cover:</p> <ul style="list-style-type: none"> <li>a) Identification of high biodiversity value habitats, such as rare and threatened ecosystems, that could be significantly affected by the grower(s) activities.</li> <li>b) Conservation status (e.g. The International Union on Conservation of Nature and Natural Resources (IUCN) status on legal protection, population status and habitat requirements of rare, threatened, or endangered species),</li> </ul>	<p>There was no HCV area and RTE species identified by Sg Samak and Sabak Bernam Estate. Based site review, auditor also has verified and confirmed this. So, there was no need to conduct any monitoring on HCV and RTE species.</p>	Compliance

**MSPO Public Summary Report**  
**Revision 0 (Aug 2017)**

	that could be significantly affected by the grower(s) activities. <b>- Major compliance -</b>		
<b>4.5.6.2</b>	If rare, threatened or endangered species, or high biodiversity value, are present, appropriate measures for management planning and operations should include: g) Ensuring that any legal requirements relating to the protection of the species are met. h) Discouraging any illegal or inappropriate hunting, fishing or collecting activities; and developing responsible measures to resolve human-wildlife conflicts. <b>- Major compliance -</b>	There was no HCV area and RTE species identified by Sg Samak and Sabak Bernam Estate . Based site review, auditor also has verified and confirmed. So, there was no need to conduct any monitoring on HCV and RTE species.	Compliance
<b>4.5.6.3</b>	A management plan to comply with Indicator 1 shall be established and effectively implemented, if required. <b>- Major compliance -</b>	NA as There was no HCV area and RTE species identified Sg Samak and Sabak Bernam Estate . Based site review, auditor also has verified and confirmed. So, there was no need to conduct any monitoring on HCV and RTE species.	Compliance
<b>Criterion 4.5.7: Zero burning practices</b>			
<b>4.5.7.1</b>	Use of fire for waste disposal and for preparing land for oil palm cultivation or replanting shall be avoided except in specific situations, as identified in regional best practice. <b>- Major compliance -</b>	The Group policy of “Zero open burning” is enforced since July 2008. The operating units adhered to the policy of “Zero open burning” for any replanting. From field visits and interviews with the workers there is no open burning being practiced in the estates. Both estates had replanting program spanned over the forthcoming years. Refer details in 4.6.2.2. In addition, Sime Darby Plantation assigned 1 person based in HQ being in charge to detect any open fire in the Company’s fields using the Global Spot Watch.	Compliance

<p><b>4.5.7.2</b></p>	<p>A special approval from the relevant authorities shall be sought in areas where the previous crop is highly diseased and where there is a significant risk of disease spread or continuation into the next crop.</p> <p><b>- Major compliance -</b></p>	<p>N/A. Details in 4.5.7.1 above</p>	<p>N/A</p>
<p><b>4.5.7.3</b></p>	<p>Where controlled burning is allowed, it shall be carried out as prescribed by the Environmental Quality (Declared Activities) (Open Burning) Order 2003 or other applicable laws.</p> <p><b>- Major compliance -</b></p>	<p>N/A. Details in 4.5.7.1 above</p>	<p>N/A</p>
<p><b>4.5.7.4</b></p>	<p>Previous crops should be felled or mowed down, chipped and shredded, windrowed or pulverized or ploughed and mulched.</p> <p><b>- Minor compliance -</b></p>	<p>This is included in the specification of work orders in event of land preparation during a replanting. It is a standard practice in Sime Darby Plantation.</p>	<p>Compliance</p>
<p><b>4.6 Principle 6: Best Practices</b></p>			
<p><b>Criterion 4.6.1: Site Management</b></p>			
<p><b>4.6.1.1</b></p>	<p>Standard operating procedures shall be appropriately documented and consistently implemented and monitored.</p> <p><b>- Major compliance -</b></p>	<p>The SOP for the estates and mill operations are available which is prepared on Group basis. There are levels of the documentation identified as follows;</p> <ul style="list-style-type: none"> <li>a) Level 1 Estate quality management system std operation manual</li> <li>b) Level 2 EQMS quality management manual</li> <li>c) Level 3 standard operating procedure</li> <li>d) Level 4 work instruction</li> <li>e) Level 5 records.</li> </ul>	<p>Compliance</p>

**MSPO Public Summary Report**  
**Revision 0 (Aug 2017)**

<p><b>4.6.1.2</b></p>	<p>Where oil palm is grown within permitted levels on sloping land, appropriate soil conservation measures shall be implemented to prevent both soil erosion as well as siltation of drains and waterways. Measures shall be put in place to prevent contamination of surface and groundwater through runoff of either soil, nutrients or chemicals.</p> <p><b>- Major compliance -</b></p>	<p>The estates construct terraces at slope area of more than 6 degrees. Planting of cover crop are made to retain the soil structure and conservation.</p> <p>a) Road side pit are made to divert water at slope areas to prevent road erosion and surface damage.</p> <p>Terraces are constructed inclined towards the terrace wall.</p>	<p>Compliance</p>
<p><b>4.6.1.3</b></p>	<p>A visual identification or reference system shall be established for each field.</p> <p><b>- Major compliance -</b></p>	<p>All fields are marked and identified. Information like year planting (field no) and the total hectare is shown in all markers. There are both stencilled at the palm trees and also displayed in signages at the boundary/corners of every fields. This is observed during the field visit in both estates.</p>	<p>Compliance</p>
<p><b>Criterion 4.6.2: Economic and financial viability plan</b></p>			
<p><b>4.6.2.1</b></p>	<p>A documented business or management plan shall be established to demonstrate attention to economic and financial viability through long-term management planning.</p> <p><b>- Major compliance -</b></p>	<p>The annual business plan is available as per the Group Financial Procedure. &amp; Guidelines.</p> <p>Both estates and the mill had a similar format i.e. in the form of annual budget with a 5 year projection. (Budget year, PY2, PY3, PY4, PY5) This business plan is prepared as guidance for future planning. The budget contains palm year of planting, age categories, and FFB production.</p> <p>Component of operating expenditure includes</p> <p>a) Administration,  b) harvesting &amp; collection,  c) field upkeep, transportation,  d) road and bridges,  e) labour overhead,  f) EVIT (running accounts for engines, vehicles, implements &amp; tractors.</p>	<p>Compliance</p>

		Inclusive in the business plan is also Capital Expenditure (CAPEX) among others replacement / upgrading of building, vehicles replacement, workers' amenities etc. the budget for 2017/18 for both the estates was sighted and verified.																			
<b>4.6.2.2</b>	Where applicable, an annual replanting programme shall be established. Long term replanting programme should be established and review annually, where applicable every 3-5 years.  <b>- Major compliance –</b>	Both estates established a replanting program spanned over a 5-year period till 2023/24. All programs were sighted. All replanting program and planning in all the Group Estates are monitored by the Replanting Unit. Assistance and audit are performed as and when required and necessary.  <table border="1"> <thead> <tr> <th>Estate</th> <th>2019/20</th> <th>2020/21</th> <th>2021/22</th> <th>2022/23</th> <th>2023/24</th> </tr> </thead> <tbody> <tr> <td>Sg Samak</td> <td>-</td> <td>-</td> <td>-</td> <td>148.85</td> <td>218.04</td> </tr> <tr> <td>Sabak Bernam</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> </tr> </tbody> </table>	Estate	2019/20	2020/21	2021/22	2022/23	2023/24	Sg Samak	-	-	-	148.85	218.04	Sabak Bernam	-	-	-	-	-	Compliance
Estate	2019/20	2020/21	2021/22	2022/23	2023/24																
Sg Samak	-	-	-	148.85	218.04																
Sabak Bernam	-	-	-	-	-																
<b>4.6.2.3</b>	The business or management plan may contain: a) Attention to quality of planting materials and FFB b) Crop projection: site yield potential, age profile, FFB yield trends c) Cost of production : cost per tonne of FFB d) Price forecast e) e) Financial indicators : cost benefit, discounted cash flow, return on investment  <b>- Major compliance –</b>	This requirement i.e. crop material, crop projection, yield, production cost is available. It is provided in the business management plan shown in item 4.6.2.1 above.  The estates had a format and guideline to calculate the returns on the field operations i.e. Income=sale of FFB (with award of CPO/CPK from the mill) less the expenditure (fixed and direct cost). This format is sighted.	Compliance																		
<b>4.6.2.4</b>	The management plan shall be effectively implemented and the achievement of the goals and objectives shall be regularly monitored, periodically reviewed and documented.	The estates performance is recorded in the monthly progress report. a) Details on the actual vs budget i.e. crop production, fixed and direct cost are shown therein.	Compliance																		

**MSPO Public Summary Report**  
**Revision 0 (Aug 2017)**

	- Major compliance -	<ul style="list-style-type: none"> <li>b) The management also provides variance report on the performance and reviewed on a monthly basis.</li> <li>c) The supervisory personnel maintained a daily cost for the field operations.</li> </ul> <p>The SOU meeting involving the Managers sits monthly with the Regional CEO for the performance review.</p>	
<b>Criterion 4.6.3: Transparent and fair price dealing</b>			
<b>4.6.3.1</b>	<p>Pricing mechanisms for the products and other services shall be documented and effectively implemented.</p> <p>- Major compliance –</p>	<p>This is available in the guidelines LOA (limit of authority) and revised sourcing method for plantation upstream Malaysia dated 11/7/2017.</p> <ul style="list-style-type: none"> <li>a) All tender and pricing exercises are handled by the HQ management. Projects are tendered from the approved vendors registered with HQ.</li> <li>b) Payments are processed and made by HQ through system named MEX. This is made upon job verification by the operating units personnel and also representatives from HQ for major projects handled upstairs.</li> </ul>	Compliance
<b>4.6.3.2</b>	<p>All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner.</p> <p>- Major compliance -</p>	<p>This requirement is in compliance. All contracts and purchases are documented i.e. in the form of purchase orders, invoices, contracts for the larger transaction. All documents are signed by both vendor and estates. Few samples kept at AAO/Chief Clerk' s office were sighted.</p>	Compliance
<b>Criterion 4.6.4: Contractor</b>			
<b>4.6.4.1</b>	<p>Where contractors are engaged, they shall understand the MSPO requirements and shall provide the required documentation and information.</p> <p>- Major compliance -</p>	<p>This requirement has been specified in a letter dated 01/7/2017 on RSPO/ISCC/MSPO awareness on to all the contractors, vendors of the estates. This letter was sighted and has stated that all Contractors need to follow RSPO/ISCC/MSPO guideline in accordance with the Sime</p>	Compliance

**MSPO Public Summary Report**  
**Revision 0 (Aug 2017)**

		Darby Plantation of Estate Quality Management System. Annual training are also provided to ensure awareness among the contractors/vendors.							
<b>4.6.4.2</b>	The management shall provide evidence of agreed contracts with the contractor. <b>- Major compliance -</b>	This is in compliance. All estates maintain contract with the vendors as specified in the financial procedure. Samples extracted are shown below:  <b>Sg Samak Estate:</b>	Compliance						
		<table border="1"> <thead> <tr> <th>Contractor</th> <th>Type of work</th> <th>Date of Contract</th> </tr> </thead> <tbody> <tr> <td>M/s Fame Transport Sdn Bhd</td> <td>FFB Transportation from Estate to the Mill</td> <td>Revised annually</td> </tr> </tbody> </table>	Contractor	Type of work	Date of Contract	M/s Fame Transport Sdn Bhd	FFB Transportation from Estate to the Mill	Revised annually	
Contractor	Type of work	Date of Contract							
M/s Fame Transport Sdn Bhd	FFB Transportation from Estate to the Mill	Revised annually							
<b>4.6.4.3</b>	The management shall accept MSPO approved auditors to verify assessments through a physical inspection if required. <b>- Minor compliance -</b>	This is specified in the letter dated 01/7/2017 as shown in item 4.6.4.1 above.	Compliance						
<b>4.6.4.4</b>	The management shall be responsible for the observance of the control points applicable to the tasks performed by the contractor, by checking and signing the assessment of the contractor for each task and season contracted. <b>- Major compliance -</b>	All works performed at the estates are checked and verified by the estates personnel. Projects where tenders are issued by HQ are checked by representatives from HQ usually from the Engineering Dept.	Compliance						
<b>4.7 Principle 7: Development of new planting</b> – Bagan Datoh and Flemington did not carry out any new plantings since January 2015. Therefore, Principle 7 is not applicable during this main assessment. The immature areas are replanted area.									



**MS 2530-4:2013 Malaysian Sustainable Palm Oil (MSPO) Part 4: General principles for Palm Oil Mill.**

Criterion / Indicator		Assessment Findings	Compliance
<b>4.1 Principle 1: Management commitment &amp; responsibility</b>			
<b>Criterion 4.1.1 – Malaysian Sustainable Palm Oil (MSPO) Policy</b>			
<b>4.1.1.1</b>	Policy for the implementation of MSPO shall be established. <b>- Major compliance -</b>	The internal memo from Mr Tan Men Kon, Head of Plantation Sustainability & Quality Management documented the commitment Sime Darby towards MSPO implementation. The internal memo dated 8 <sup>th</sup> September 2017 was issued to all Estates and Mills. The commitment is to implement and certified with MSPO by December 2017.	Complied
<b>4.1.1.2</b>	The policy shall also emphasize on the commitment to continual improvement with the objective of improving the milling operation. <b>- Major compliance -</b>	The continual improvement commitment is documented in the following Management & Operation Policies: Quality Management Policy dated January 2015 Lean Six Sigma Policy dated January 2015 Quality Policy dated January 2015 The commitments are made by Datuk Franki Anthony Dass the Managing Director of Sime Darby Plantations Berhad.	Complied
<b>Criterion 4.1.2 – Internal Audit</b>			
<b>4.1.2.1</b>	Internal audit shall be planned and conducted regularly to determine the strong and weak points and potential area for further improvement.	Internal audit was carried by RSPO & Certifications Unit, PSQM on 6/7/18 for Flemington Palm Oil Mill. Audit covered both documentation and field operation for the mill.	Complied

**MSPO Public Summary Report**  
**Revision 0 (Aug 2017)**

Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -		
4.1.2.2	The internal audit procedures and audit results shall be documented and evaluated, followed by the identification of strengths and root causes of nonconformities, in order to implement the necessary corrective action.  - Major compliance -	Internal audit process is defined under Internal audit procedure, SD/SDP/PSQM/IAP, rev:2 dated 1/11/2017. Audit was carried out by PSQM team from HQ. Total of 3 major, 2 minor and 2 OFI raised as result of audit. Some of the NC is still in the process of closure.	Complied
4.1.2.3	Reports shall be made available to the management for their review.  - Major compliance -	The internal audit report has distributed to the POM management and Sime Darby Plantation HQ management. There is a month SQM meeting at HQ level to review the treading of findings raised in both internal and external audit.	Complied
<b>Criterion 4.1.3 – Management Review</b>			
4.1.3.1	The management shall periodically review the continuous suitability, adequacy and effectiveness of the requirements for effective implementation of MSPO and decide on any changes, improvement and modification.  - Major compliance -	The latest management review was carried out on 16/7/18. The combined MSPO/RSPo meeting was chaired by mill manager and attended by assistant manager and head of department. All pertinent elements in the standard has been discussed for effective implementation of MSPO towards continual improvement.	Compliance
<b>Criterion 4.1.4 – Continual Improvement</b>			
4.1.4.1	The action plan for continual improvement shall be based on a consideration of the main social and environmental impact and opportunities for the company.	Continual improvement plan for POM FY2018/2019. It cover the mostly on the mill operation and sfety related budget. For example:	Complied

Criterion / Indicator		Assessment Findings	Compliance
	- <b>Major compliance</b> -	i) Plant & machinery : Turbine wheel, reversing segment and main oil pump replacement ii) Fire Fighting/Safety and Health : Fire fighting pump set @ hydrant system upgrade iii) Plant & machinery : Cake breaker conveyor upgrade c/w separating column and cyclone unit.	
<b>4.1.4.2</b>	The company should establish a system to improve practices in line with new information and techniques; and for disseminating this information throughout the workforce. - <b>Major compliance</b> -	Continual improvement is demonstrated based on project initiated by mill management through KAIZEN/Lean Six Sigma project. The project focus mainly on cost saving and process losses minimization for each financial year. Sample of completed project for FY 2018/2019: i) To recover palm kernel after empty bunch press – Target recovery/ benefit RM 209,937 ( based on 2 <sup>nd</sup> half of 2017 price) ii) To reduce kernel loss/FFB at Flemington POM for fibre cyclone median 0.11% to 0.095% - Target kernel loss/FFB 0.0950 (improvement 0.02 - 0.03 kernel loss per FFB resulting saving of RM 17574.55)	Complied
<b>4.2 Principle 2: Transparency</b>			
Criterion 4.2.1 – Transparency of information and documents relevant to MSPO requirements			
<b>4.2.1.1</b>	The management shall communicate adequate information to other stakeholder on environmental, social and legal issues relevant to sustainable practices in the relevant languages and forms.	The Standard Operation Manual dated 01/11/2008 documented the process for Procedure for External Communication (sub-section 5.5, Appendix 5.5.3.2). The time frame to provide feedback to the stakeholder is documented to be 2 weeks of the	Complied

**MSPO Public Summary Report**  
**Revision 0 (Aug 2017)**

Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -	date receiving the queries. The Mill Manager is responsible to address all communication and request for documentations that could be made available to public/stakeholders.	
4.2.1.2	<p>The management documents shall be publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes.</p> <p>- Major compliance -</p>	<p>Sime Darby Plantations Bhd continued to use the group website for disseminating public information. The Sustainability Report and Group Annual report is available in website.</p> <p>Information relating to land titles, safety and health plans, pollution prevention plans, and annual report are available at the estate.</p> <p>In addition to the website, the policies were also displayed at various locations including the main notice boards of the estates and muster ground notice boards for employees and visitors to view.</p> <p>Procedure for complaints and grievances were available through Sime Darby Plantations Bhd website at <a href="http://www.simedarbyplantation.com/Sustainability.aspx">http://www.simedarbyplantation.com/Sustainability.aspx</a></p>	Complied
<b>Criterion 4.2.2 – Transparent method of communication and consultation</b>			
4.2.2.1	<p>Procedures shall be established for consultation and communication with the relevant stakeholders.</p> <p>- Major compliance -</p>	<p>The Standard Operation Manual dated 01/11/2008 documented the process for Procedure for External Communication (sub-section 5.5, Appendix 5.5.3.2).</p> <p>The Sustainable Plantation Management System Appendix 5 (Flowchart and Procedures on handling Social Issues) dated 01/11/2008 documented the process for handling communication regarding social issues</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
4.2.2.2	The management shall nominate management officials at the operating unit responsible for issues related to <i>indicator 1</i> . <b>- Minor compliance -</b>	The Mill Manager is responsible to deal with the external communication.	Complied
4.2.2.3	A list of stakeholders, records of all consultation and communication and records of action taken in response to input from stakeholders shall be properly maintained. <b>- Major compliance -</b>	The latest stakeholders list was updated. Document dated July 2018 was sighted.  The external stakeholder consultation is conducted once a year. The last stakeholder meeting was conducted on 26/6/2018 for Flemington POM and estate. External stakeholder invited ( Land Department, Panel Clinic, School (SJK (T) Ladang New Coconut, SOCSO and Government Clinic Sungai Sumen). There were no negative feedback with regards to the estate and mill activities in the stakeholder consultation.	Complied
<b>Criterion 4.2.3 – Traceability</b>			
4.2.3.1	The management shall commit itself to implement and maintain the requirements for the traceability and shall establish a standard operation procedure for traceability. <b>- Major compliance -</b>	Bagan Datoh, Flemington, Sungai Samak and Sabak Bernam Estate is sending the FFB to Flemington POM.  The weighbridge ticket provided the following details:  Product (FFB or Loose fruit)  Delivery note from estates stating the weight and fruit grade (A or B).  D.O Number  Date of the shipment	Complied

Criterion / Indicator		Assessment Findings	Compliance
		<p>The Sustainable Plantation Management System Appendix 15 dated February 2018 documented the procedure for traceability. The procedure requires validation of certificate of supplying estate.</p> <p>The procedure had identified critical control points to prevent contamination of non-certified FFB.</p> <p>The current traceability system is Sime Weigh System.</p> <p>The responsible personal for the traceability is the Mill Manager.</p>	
<b>4.2.3.2</b>	<p>The management shall conduct regular inspections on compliance with the established traceability system.</p> <p><b>- Major compliance -</b></p>	<p>The Sustainable Plantation Management System Appendix 15 dated February 2018 documented the procedure for traceability. The procedure requires validation of certificate of supplying estate.</p> <p>The procedure had identified critical control points to prevent contamination of non-certified FFB.</p> <p>The current traceability system is Sime Weigh System.</p> <p>The responsible personal for the traceability is the Mill Manager.</p>	Complied
<b>4.2.3.3</b>	<p>The management shall identified and assign suitable employees to implement and maintain traceability system.</p> <p><b>- Minor compliance -</b></p>	<p>The overall personal in charge for the traceability is the Mill Manager. The responsibility is stated in the job description. Hence there is no required to have a formal letter of appointment.</p>	Complied
<b>4.2.3.4</b>	<p>Records of storage, sales, delivery or transportation of crude palm oil and palm kernel shall be maintained.</p>	<p>The records of CPO sales has been verified. The dispatch of the CPO are determine by HQ Sales &amp; Marketing and will be entered</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance						
	- Major compliance -	<p>into the Sime Weigh System. The weigh bridge operator will check the system before releasing the dispatch.</p> <p>The sample dispatch documentation sighted was date: 23/6/18, WB ticket#0104993, weight; 39.54 mt to SD Nuri</p>							
<b>4.3 Principle 3: Compliance to legal requirements</b>									
<b>Criterion 4.3.1 – Regulatory requirements</b>									
<b>4.3.1.1</b>	<p>All operations shall be in compliance with applicable local, state, national and ratified international laws and regulations.</p> <p>- Major compliance -</p>	<p>A mechanism to ensure compliance to legal and other requirement has been documented in EQMS &amp; MQMS (Estate &amp; Mill Quality Management System) under Standard Operation Manual distributed to all operating units under SOU4.</p> <p>a) PSQM Department and respective operating units will undertake the responsibility of identifying, managing, updating and tracking the legal requirement as well as monitoring the status of legal compliance.</p> <p>b) Reference: Estate/Mill Quality Management System, Level 2: Standard Operating Manual, Appendix 5.2.4: Procedure for Legal and Other Requirements dated 10 December 2008.</p> <p>Licenses/permit viewed as complied by the estates for the legislative requirement among others viewed were:</p> <table border="1"> <thead> <tr> <th></th> <th>License /permit</th> <th>Validity period</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>MPOB no 52987-400-4000 purchase, storage, processing of FFB max</td> <td>1/6/18-31/5/19</td> </tr> </tbody> </table>		License /permit	Validity period	1	MPOB no 52987-400-4000 purchase, storage, processing of FFB max	1/6/18-31/5/19	Complied
	License /permit	Validity period							
1	MPOB no 52987-400-4000 purchase, storage, processing of FFB max	1/6/18-31/5/19							

**MSPO Public Summary Report**  
**Revision 0 (Aug 2017)**

Criterion / Indicator		Assessment Findings		Compliance
			288000mt/year. Total processed 2017=219760mt	
		2	DOE-no 004234 Schedule Of Compliance AS (B) A 91/110/61/081	1/7/18-30/6/19
		3	AESP confined space attended and qualified for 3 personnel	8-9/11/17 & 11-12/7/17
		4	AGTES – Confined space	23/2/17
		5	JTK-Had kerja lebih masa sect 60A Employment Act 1955	Effective 2/12/13
		6	JTK-Minimum Housing Standard Act 1990	Dated 30/10/12
		7	peraturan 38(1) (9)	
		8	Suruhanjaya Tenaga-Perakuan Perlesenan Semua Pepasangan Elektrik	30/10/17-29/10/18
		9	Steam Engineer Grade 1 possessed by Mill Manager ref no 128/2004	23/12/2004
		1	Engine driver grade 1 ref no PK 117/2006	01/12/2006
		0	Mr Chandran Anamalai	
		1	Engine driver grade 1 ref no PK 11/EIS/02/34 En Mohd Sharizal	28/7/2011
		List of certificated machinery registered with DOSH sighted among others as listed below;		
			Machinery/registration no	validity
		1	Boiler no 1 - PMD 8703	22/7/2019
		2	Boiler no 2 – PMD 8704	21/4/2019
		3	Thermal Deareator PMT 147302	21/4/2019
		4	Sterilizer no 1 PMT 147319	21/4/2019



**MSPO Public Summary Report**  
**Revision 0 (Aug 2017)**

Criterion / Indicator		Assessment Findings		Compliance	
		5	Sterilizer no 4 PMT 147316	28/82018	
		6	Vertical Air Receiver no 1PK PMT 940	21/4/2019	
		7	Compressor Air Receiver PK PMT 6679	22/7/2019	
		8	Electrical Chain Hoist PK PMA 6499	21/4/2019	
<b>4.3.1.2</b>	The management shall list all relevant laws related to their operations in a legal requirements register.  <b>- Major compliance -</b>	<p>The Legal &amp; Other Requirements Register (LORR) covers all the necessary regulatory requirements. The LORR for was reviewed on 25/10/2017.</p> <ul style="list-style-type: none"> <li>a) List of applicable legal and other requirements was made available during the assessment and complied in the QSHE/04/5.2.4 folder.</li> <li>b) Documented procedure has been established and implemented refer to Estate/Mill Quality Management System, Level 2: Standard Operating Manual, Appendix 5.2.4: Procedure for Legal and Other Requirements dated 10 December 2008</li> </ul>		Complied	
<b>4.3.1.3</b>	The legal requirements register shall be updated as and when there are any new amendments or any new regulations coming into force.  <b>- Major compliance -</b>	<p>The Legal &amp; Other Requirements Register (LORR) covers all the necessary regulatory requirements.</p> <ul style="list-style-type: none"> <li>a) The LORR for was reviewed on 25/10/2017.</li> <li>b) 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.</li> <li>c) The latest change in regulation applicable to the POM operation is the Labour Law.               <ul style="list-style-type: none"> <li>- WMHSA Act 1990</li> <li>- Minimum wage 2016</li> </ul> </li> </ul>		Complied	

**MSPO Public Summary Report**  
**Revision 0 (Aug 2017)**

Criterion / Indicator		Assessment Findings	Compliance
<b>4.3.1.4</b>	The management should assign a person responsible to monitor compliance and to track update the changes in regulatory requirements.  - <b>Minor compliance</b> -	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. This correspondence was sighted via an email issued from Head Office for the operating units to update and comply where applicable	Complied
<b>Criterion 4.3.2 – Lands use rights</b>			
<b>4.3.2.1</b>	The management shall ensure that their oil palm milling activities do not diminish the land use rights of other users.  - <b>Major compliance</b> -	The Estates and Mill are on government lease land and they hold copies of Land Titles. The oil palm operations are consistent with the land title for agricultural purposes. For POM, the land title sharing with Flemington Estate. Sighted the copy of the land title onsite and the original keep at the headquarters.	Complied
<b>4.3.2.2</b>	The management shall provide documents showing legal ownership or lease, history of land tenure and the actual legal use of the land.  - <b>Major compliance</b> -	For POM, the land title sharing with Flemington Estate. Sighted the copy of the land title onsite and the original keep at the headquarters. There is no issue on land use claims evidence during the audit.	Complied
<b>4.3.2.3</b>	Legal parameter boundary markers should be clearly demarcated and visibly maintained on the ground where practicable.  - <b>Major compliance</b> -	POM located within the compound of the Flemington estate. It was noted that legal boundaries are clearly demarcated and visibly maintained	Complied
<b>4.3.2.4</b>	Where there are, or haven been disputes, documented proof of legal acquisition of land and fair compensation that have been or are being made to previous owners and occupants; shall made available and that these should have been accepted with free prior	There is no land dispute in the Flemington POM operating units at the time of audit. The land belongs to Sime Darby Plantation Berhad and land ownership documents verified	Complied

Criterion / Indicator		Assessment Findings	Compliance
	informed consent (FPIC). <b>- Minor compliance -</b>		
<b>Criterion 4.3.3 – Customary rights</b>			
<b>4.3.3.1</b>	Where lands are encumbered by customary rights, the company shall demonstrate that these rights are understood and are not being threatened or reduced. <b>- Major compliance -</b>	There is no land dispute or customary rights issues in the mill.	Complied
<b>4.3.3.2</b>	Maps of an appropriate scale showing extent of recognized customary rights shall be made available. <b>- Minor compliance -</b>	There is no land dispute or customary rights issues in the mill.	Complied
<b>4.3.3.3</b>	Negotiation and FPIC shall be recorded and copies of the relevant agreements should be made available. <b>- Major compliance -</b>	There is no land dispute or customary rights issues in the mill.	Complied
<b>4.4 Principle 4: Social responsibility, health, safety and employment condition</b>			
<b>Criterion 4.4.1: Social Impact Assessment (SIA)</b>			
<b>4.4.1.1</b>	Social impacts should be identified and plans should be implemented to mitigate the negative impacts and promote the positive ones. <b>- Minor compliance -</b>	Sustainability Strategy Unit, PSQM Department has conducted Social Impact Assessment (SIA) for the whole SOU 4 – Flemington which consisted of Flemington POM, Flemington Estate, Bagan Datoh Estate, Sungai Samak Estate and Sabak Bernam Estate on 27/6-1/7/2016. The assessment was carried out through interviewed with stakeholders, document reviewed and site visit. The assessment was involved the participation of	Complied

Criterion / Indicator		Assessment Findings	Compliance
		internal and external stakeholders such as local authorities, local communities, contractors and workers. Seen the attendance list of the stakeholders that involved in the assessment.	
<b>Criterion 4.4.2: Complaints and grievances</b>			
<b>4.4.2.1</b>	A system for dealing with complaints and grievances shall be established and documented. <b>- Major compliance -</b>	Under the sustainable plantation management system Appendix 5, procedure on handling social issue (version 1; year 2008) has been implemented.  Under Group policies and authorities GPA No 85 Whistleblowing provide an internal mechanism for reporting, investigating and remedying any wrongdoing.	Complied
<b>4.4.2.2</b>	The system shall be able to resolve dispute in an effective, timely and appropriate manner, which is accepted by all parties. <b>- Major compliance -</b>	The complaint and grievances is open to effected parties including internal and external stakeholders. The time to process the complaints or grievances is 2 weeks.	Complied
<b>4.4.2.3</b>	A complaint form should be made available at the premises, where employees and affected stakeholders can make complaints. <b>- Minor compliance -</b>	The complaint form is made available in the mill office. In case the complainant would want to make an anonymity complaint it can be made through electronic Complaint form or email to Senior Director or Whistleblowing committee or toll free number or fax or by mail. This information is available in notice boards in the mill.	Complied
<b>4.4.2.4</b>	Employees and surrounding communities should be made aware of its existence and that complaints or suggestions may be made at any time. <b>- Minor compliance -</b>	Interview conducted with workers to confirm their understanding of the complaint and grievance process. There is no grievance recorded since the last audit. Only request for maintenance housing are made by workers. Refer to the latest house maintenance request dated 27/7/18; house# 135A, problem:	Complied

**MSPO Public Summary Report**  
**Revision 0 (Aug 2017)**

Criterion / Indicator		Assessment Findings	Compliance
		leakage (sink, roofing and water tap). Repair work done and verified by mill manager.	
<b>4.4.2.5</b>	Complaints and solutions within the past 24 months shall be documented and be made available to affected stakeholders upon request.  - <b>Major compliance</b> -	The complaint record for request for maintenance are available and kept for 10 years according to the Standard Operation Manual Section 4; Sub-section 4.2.3 Control of Documents..	Complied
<b>Criterion 4.4.3:</b> Commitment to contribute to local sustainable development			
<b>4.4.3.1</b>	Palm oil miller should contribute to local development in consultation with the local communities. Where the mill is an integral part of plantation, such contribution to local community development may be regarded as a joint effort by the mill and the plantation.  - <b>Minor compliance</b> -	The mill and estates management have made contribution to the local communities and stakeholders such as donation to MPOA sport day, school, safety townhall (safety programme, motivational and religious talk) for the benefit of local communities and also workers.	Complied
<b>Criterion 4.4.4:</b> Employees safety and health			
<b>4.4.4.1</b>	An occupational safety and health policy and plan which is in line with Occupational Safety and Health Act 1994 and Factories and Machinery Act 1967 (Act 139) shall be documented, effectively communicated and implemented.  - <b>Major compliance</b> -	The Group Occupational Safety & Health Management Policy had been established and implemented. <ul style="list-style-type: none"> <li>a) The policy was signed by the Managing Director of Sime Darby Plantation on January 2015 and displayed prominently on notice boards in English and local language Bahasa Malaysia.</li> <li>b) The Policy is implemented through the OSH activities by the on-site Safety Officers and monitored by OSH Manager from Head Office.</li> <li>c) Included in the policy is the commitment of the Company</li> </ul>	Complied

Criterion / Indicator		Assessment Findings	Compliance																												
		<p>to provide and maintain a safe and healthy working environment of its employees &amp; contractors &amp; visitors.                      In Interviews with the workers and staff during the site visit revealed that the employees had been briefed and had understood the fundamental of the policy.</p>																													
<b>4.4.4.2</b>	<p>The occupational safety and health plan should cover the following:</p> <ul style="list-style-type: none"> <li>a) A safety and health policy, which is communicated and implemented.</li> <li>b) The risk of all operations shall be assessed and documented.</li> <li>c) An awareness and training programme which includes the following requirements for employees exposed to chemicals used at the palm oil mill:                             <ul style="list-style-type: none"> <li>i. All employees involved are adequately trained on safe working practices;</li> <li>ii. All precautions attached to products should be properly observed and applied;</li> </ul> </li> <li>d) The management shall provide the appropriate PPE at the place of work to cover all potentially hazardous operations as identified in the risk assessment and control such as Hazard Identification, Risk Assessment and Risk Control (HIRARC).</li> <li>e) The management shall establish Standard Operating Procedure for handling of chemicals to ensure proper and safe handling and storage in accordance to Occupational Safety Health (Classification Packaging and Labeling) Regulation 1997 Occupational Safety Health (Use and Standard of Exposure of Chemical Hazardous to Health) Regulation 2000.</li> </ul>	<p>The policy has been established with details elaborated in 4.4.4.1 above.</p> <p>The risk of all operations were assessed and documented under HIRARC. The HIRARC for the mill operations was last reviewed on 29/11/2017. HIRARC for the following stations/operations/activities among others were sighted;</p> <table border="1"> <thead> <tr> <th></th> <th>Areas/Activities</th> <th></th> <th>Areas /Activities</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Reception Station– Weighbridge/Ramp</td> <td>7</td> <td>Engine Room</td> </tr> <tr> <td>2</td> <td>Fruit Handling</td> <td>8</td> <td>Product storage /Dispatch</td> </tr> <tr> <td>3</td> <td>Sterilizer</td> <td>9</td> <td>Laboratory</td> </tr> <tr> <td>4</td> <td>Threshing</td> <td>10</td> <td>Water treatment</td> </tr> <tr> <td>5</td> <td>Clarification / Oil Room</td> <td>11</td> <td>Effluent Treatment Pond</td> </tr> <tr> <td>6</td> <td>Boiler House</td> <td>12</td> <td>Biogas Plant</td> </tr> </tbody> </table> <p>Training for employees are provided. The training includes for the employees handling chemicals and other safe working procedures. Details of the trainings organised by the mil management is shown in 4.4.6.1.</p>		Areas/Activities		Areas /Activities	1	Reception Station– Weighbridge/Ramp	7	Engine Room	2	Fruit Handling	8	Product storage /Dispatch	3	Sterilizer	9	Laboratory	4	Threshing	10	Water treatment	5	Clarification / Oil Room	11	Effluent Treatment Pond	6	Boiler House	12	Biogas Plant	Complied
	Areas/Activities		Areas /Activities																												
1	Reception Station– Weighbridge/Ramp	7	Engine Room																												
2	Fruit Handling	8	Product storage /Dispatch																												
3	Sterilizer	9	Laboratory																												
4	Threshing	10	Water treatment																												
5	Clarification / Oil Room	11	Effluent Treatment Pond																												
6	Boiler House	12	Biogas Plant																												

**MSPO Public Summary Report**  
**Revision 0 (Aug 2017)**

Criterion / Indicator	Assessment Findings	Compliance
<p>f) The management shall appoint responsible person(s) for workers' safety and health. The appointed person(s) of trust shall have knowledge and access to latest national regulations and collective agreements.</p> <p>g) The management shall conduct regular two-way communication with their employees where issues that affect their business such as those related to employees' safety, health and welfare are discussed openly. Records from such meeting shall be kept ant the concerns of employees and any remedial actions taken shall be recorded.</p> <p>h) Accident and emergency procedures shall exist and instructions shall be clearly understood by all employees.</p> <p>i) Employees trained in First Aid shall be present at all mill operations. First Aid equipment should be available at each worksite.</p> <p>j) Records shall be kept of all accidents and be reviewed periodically at quarterly intervals.</p> <p><b>- Major compliance -</b></p>	<p>The mill issued PPE to all its employees. The common PPE provided are safety boots and safety helmets and cotton gloves. Other specified PPE i.e. are issued for designated type of work such as harness (working at height), leather gloves for the cage handlers and workshop personnel, ear plug for employees working at high noise density etc. Record for the issuance dated 19/3/18 was sighted and verified,</p> <p>SOP of handling of chemicals is available. The document was dated 26/02/17 titled "chemical safety management" 17 pages. Therein is shown requirement &amp; selection of chemicals, assessment of chemicals hazards, selection of supplier and transportation of chemicals storage and handling.</p> <p>The management appointed the ill Manager as the Chairman for the ESH committee. The appointment was signed by the Regional General Manager via a letter dated 18/7/2017. The Manager in turn elects the Engineers to further execute and monitor all the ESH practices in the day-to-day running of the mill,</p> <p>Communications on safety are made through safety meeting /site supervision/dialogue/briefing during the weekly muster. The safety meeting was held 3 monthly having a total of 4 meeting in a year. The dates of meeting held in 2017/18 were checked and recorded below;</p>	

**MSPO Public Summary Report  
Revision 0 (Aug 2017)**

Criterion / Indicator		Assessment Findings			Compliance
			Date	No of attendees	
		1	14/6/18	23	
		2	14/3/18	21	
		3	20/12/17	19	
		4	20/9/17	23	
		5	21/6/17	19	
		<p>There were standard agenda discussed as provided by PSQM. Additional issue where deemed important by the committee will be included in the discussion. Minutes of 2 meetings 14/6/18 &amp; 20/9/17 were sighted. Among others the agenda discussed are:</p> <ol style="list-style-type: none"> <li>1. Workplace inspection</li> <li>2. Line site visit report</li> <li>3. Accident statistics/report/Unsafe act</li> <li>4. Legislative requirement /update</li> <li>5. Hose reel &amp; hydrant /street light report</li> <li>6. Scheduled Waste</li> <li>7. GCAD/PSQM Audit highlight</li> </ol> <p>Accident and emergency procedures are available. There is a formation of ERP Team &amp; ERP for all the identified incidences. The organisation chart for the ERP team was appointed and displayed for information of the employees. Drill for fire ERP was latest organised on 27/4/18. Other ERP were briefed during the weekly gathering and explained during the ad-hoc briefing at</p>			



Criterion / Indicator		Assessment Findings	Compliance																				
		<p>individual stations. These trainings are recorded in the log book maintained at the operations site.</p> <p>A basic in-house 1st aid training was conducted on 27/4/18 for all the employees. In addition, the management has trained the following representative on 12/9-13/9/17 at St John Ambulans Malaysia having the certificate of competency (1<sup>st</sup> Aid at workplace)</p> <ul style="list-style-type: none"> <li>a) En Muhamad Syamil Mat Salleh</li> <li>b) En Muniandy A/L Kuppusamy</li> <li>c) En Mustafa Rahman Abdullah</li> </ul> <p>Records of all accidents are kept. Accident incidences are reviewed during safety meetings. Accidents incidences for 2017 were recorded below</p> <table border="1"> <thead> <tr> <th></th> <th>Date</th> <th>Location</th> <th>LTI</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>23/1/17</td> <td>Boiler house</td> <td>2</td> </tr> <tr> <td>2</td> <td>4/7/17</td> <td>Oil room</td> <td>7</td> </tr> <tr> <td>3</td> <td>7/10/17</td> <td>Electrical workshop</td> <td>27</td> </tr> <tr> <td colspan="3" style="text-align: right;">Total</td> <td>36</td> </tr> </tbody> </table>		Date	Location	LTI	1	23/1/17	Boiler house	2	2	4/7/17	Oil room	7	3	7/10/17	Electrical workshop	27	Total			36	
	Date	Location	LTI																				
1	23/1/17	Boiler house	2																				
2	4/7/17	Oil room	7																				
3	7/10/17	Electrical workshop	27																				
Total			36																				

Criterion / Indicator		Assessment Findings	Compliance
		HIRARC was reviewed accordingly and investigation was also held by the committee.	
<b>Criterion 4.4.5: Employment conditions</b>			
<b>4.4.5.1</b>	The management shall establish a policy on good social practice regarding human rights in respect of industrial harmony. The policy shall be signed by the top management and communicated to the employees.  <b>- Major compliance -</b>	Sime Darby Plantation Berhad is committed to implement the equal opportunity within their organization. Their commitment is clearly described with the statement indicated in the Social and Humanity Management Policy signed by Managing Director in January 2015.	Complied
<b>4.4.5.2</b>	The management shall not engage in or support discriminatory practices and shall provide equal opportunity and treatment regardless of race, colour, sex, religion, political opinion, nationality, social origin or any other distinguishing characteristics.  <b>- Major compliance -</b>	The top management of Sime Darby Plantation Berhad is committed to implement the equal opportunity within their organization. Their commitment is clearly described with the statement indicated in the Social and Humanity Management Policy signed by Managing Director in January 2015. There were no evidences of any form of discrimination based on race, national origin, religion, gender, union and political affiliation and is covered in the policy as well.  Interview with workers indicates that there is no such discrimination occurs in the workplace	Complied
<b>4.4.5.3</b>	Management shall ensure that employees' pay and conditions meet legal or industry minimum standards as per Collective Agreements. The living wage should be sufficient to meet basic needs and provide some discretionary income based on minimum wage.	The payroll and pay slip records of employees showed that all employees are paid with the monthly salary are compliance with the local minimum wages requirements.  Sample of pay slips for local workers for July 2018:	Complied

Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -	i) Employee# 0000102576 ii) Employee# 0000024837 iii)Employee# 0000024858  Sample of pay slips for foreign workers for July 2018: i) Employee# 0000117504  Review the pay slip and mill attendance report (including OT hours) confirmed that their basic salary wages complied with minimum wages (RM 38.46/day) for daily rated and RM 1000/month for monthly rated workers	
4.4.5.4	Management should ensure employees of contractors are paid based on legal or industry minimum standards according to the employment contract agreed between the contractor and his employee.  - Minor compliance -	There were contract workers under Lotus two Enterprise for non production workers (workshop). Total of 3 contract workers [BT0067917, BK 0851510, BL 0282273] payment vouchers and contract of employment checked and verified. Based on the payment voucher checked, daily rate for contract workers is around (RM 52 - 55) which more than minimum wages of RM 38.46/day. Employment contract dated 1/1/2017 signed by the said workers were checked and found to be valid.	Complied
4.4.5.5	The management shall establish records that provide an accurate overview of all employees (including seasonal workers and subcontracted workers on the premises). The records should contain full names, gender, date of birth, date of entry, a job description, wage and the period of employment.  - Major compliance -	Flemington POM maintain an accurate record of all employees (local and foreign) under Employee Master Listing report, ZCKRLM04. Total of 106 employees (as at 13/8/18) listed under mill's check roll with additional 3 contract workers under Lotus Two Enterprise.  Records updated and verified during the audit were found contains the following details of information for every employees. Employee Name	Complied

Criterion / Indicator		Assessment Findings	Compliance
		Activity Nationality Gang details Date of Birth Occupation Religion Employment Date Sex Passport No. and Expiry Date ( for foreigner) Work Permit Expiry Date Identification Card no. Socso. No. EPF no.	
<b>4.4.5.6</b>	All employees shall be provided with fair contracts that have been signed by both employee and employer. A copy of employment contract shall be made available for each and every employee indicated in the employment records.  <b>- Major compliance -</b>	Employment Contract for local and foreign workers are available. Information indicated in the form showed that all employees are provided with fair contracts in term of salary, accommodation and other benefits.  Copies of Employment Contract for each local and foreign workers indicated in the employment records are available. Foreign worker contract is valid for 3 year plus yearly contract extension for those who intent to continue working with the company.  Sample of employment contract available for the local workers: i) Employee# 0000102576 ii) Employee# 0000024837 iii)Employee# 0000024858	Complied

**MSPO Public Summary Report**  
**Revision 0 (Aug 2017)**

Criterion / Indicator		Assessment Findings	Compliance
		<p>Sample of employment contract available for the foreign workers:</p> <ul style="list-style-type: none"> <li>i) Employee# 117504</li> <li>ii) Employee# 96139</li> <li>iii) Employee# 117509</li> </ul> <p>Employment contract for contractor workers under Lotus Two Enterprise (LTE), LTE/2017 dated 1/1/17</p> <ul style="list-style-type: none"> <li>- BT0067917, BK 0851510, BL 0282273 signed date 6/1/17.</li> </ul>	
<b>4.4.5.7</b>	<p>The management shall establish a time recording system that makes working hours and overtime transparent for both the employees and employers.</p> <p><b>- Major compliance -</b></p>	<p>Flemington POM has established a time recording system using punch card for all employees. Time recording system has been implemented by punch card system for all mill employees.</p> <p>The working hours for all employees has been clearly documented in the Employment Contract and displayed in the office to ensure transparent for both employees and employer</p>	Complied
<b>4.4.5.8</b>	<p>The working hours and breaks of the individual worker indicated in the time records shall comply with legal regulations and collective agreements. Overtime shall be mutually agreed upon and shall meet the legal requirements applicable.</p> <p><b>- Major compliance -</b></p>	<p>The working hours and breaks of the individual worker indicated in the time records were in compliance with legal regulations and collective agreements. Based on the Mill Daily Attendance Report (CKRRD005) and punch card records, overtime and breaks were recorded and consistent with the payslip for sample months in September 2017, February 2018 and July 2018. No evidence of overtime exceeded 104 hours as per Employment (Limitation of Overtime Work) Regulations 1980.</p>	Complied
<b>4.4.5.9</b>	<p>Wages and overtime payment documented on the pay slips shall be in line with legal regulations and collective agreements.</p>	<p>Pay slips of all employees (check roll) are available as evidence of salary payment.</p> <p>The pay slip contain the following information :</p> <ul style="list-style-type: none"> <li>a) Earnings</li> </ul>	Complied

Criterion / Indicator		Assessment Findings	Compliance
	- <b>Major compliance</b> -	<ul style="list-style-type: none"> <li>- Basic Salary ( Daily Rated Work, Work on Rest Day and Work on Holiday)</li> <li>- Overtime (Week days, Rest days and Holiday)</li> <li>b) Deduction</li> <li>- Union fee (NUPW &amp; AMESU),SOCSO, EPF , electricity deduction and others</li> </ul> <p>Observed that the wages and overtime payment documented on the pay slips are in line with legal requirement and as stated in the employment contract</p>	
<b>4.4.5.10</b>	<p>Other forms of social benefits should be offered by the employer to employees, their families or community such as incentives for good work performance, bonus payment, support of professional development, medical care provisions and improvement of social surroundings.</p> <p>- <b>Minor compliance</b> -</p>	<p>The company provides:</p> <p>5kg rice and 5kg cooking oil to all workers once every 2 months</p> <p>RM5 mobile subsidy to all workers.</p> <p>Free medical benefit to workers dependent at the estates clinics.</p> <p>Renewal for driving license for local workers</p> <p>Sending worker’s children to schools</p> <p>Once a year festival token to all workers</p> <p>Yearly schooling assistance</p> <p>Sime Darby scholarship</p> <p>The field workers are paid with Productivity Incentive. The more they work the higher the incentive.</p>	Complied
<b>4.4.5.11</b>	In cases where on-site living quarters are provided, these quarters shall be habitable and have basic amenities and facilities.	The basic amenities and facilities at the quarters provided by the company to it workers includes electricity, water and domestic waste disposal. Electricity and water is connected with the	Complied

Criterion / Indicator		Assessment Findings	Compliance
	- <b>Major compliance</b> -	<p>national infrastructure facilities. The usage of electricity and water is bared by the workers themselves.</p> <p>During the field assessment, it was observed that the housing are in good conditions. For local workers with family, each will be given a house while for foreign workers for single workers, it will be given shared house of 2-3 each people per house.</p> <p>Linesite inspection is conducted on weekly basis as per the Workers' Minimum Standards Housing and Amenities Act 1990. The results of the inspection is being discussed with the estate manager for actions.</p> <p>For foreign workers, all foreign workers will be given a starter kit which includes basis amenities (e.g. mattress, cooking utilises).</p>	
<b>4.4.5.12</b>	<p>The management shall establish a policy to prevent all forms of sexual harassmt and violence at the workplace.</p> <p>- <b>Major compliance</b> -</p>	<p>The Gender Policy was established since January 2015. The Policy covers the commitment to prevent sexual harassment and all forms of violence against women, workers and community. The signatory of the Policy is by Datuk Franki Anthony Dass the Managing Director of Sime Darby Plantation.</p>	Complied
<b>4.4.5.13</b>	<p>The management shall respect the right of all employees to form and join trade union and allow workers' own representative(s) to facilitate collective bargain in accordance with applicable laws and regulations. Employees shall be given freedom to join trade unions relevant to the industry or organize themselves for collective bargaining. Employees shall have the right to organize and negotiate their work conditions. Employees exercising this right should not be discriminated against or suffer repercussions.</p>	<p>During the interview with workers, there are no evidence received that there are restriction from the company to allow workers to join trade union. The workers have their freedom to join the NUPW/MAPA union.</p> <p>The Social Policy established since 2015 covers the commitment of the company towards respecting the rights of all personnel to form and join trade unions of their choice to bargain collectively.</p>	Complied

**MSPO Public Summary Report**  
**Revision 0 (Aug 2017)**

Criterion / Indicator		Assessment Findings	Compliance
	- Major compliance -	The appointed union leader is Mr Gopal Krishnan A/L Muniandy. Latest union meeting with mill management dated 14/3/18 is referred to. No concern highlighted by the union representative based on the meeting minute.	
<b>4.4.5.14</b>	Children and young persons shall not be employed or exploited. The minimum age shall comply with local, state and national legislation.  - Major compliance -	The Social Policy and Social & Humanity Management Policy was established since January 2015. The Policy covers the commitment to not condone forced labour or child labour. The signatory of the Policy is by Datuk Franki Anthony Dass the Managing Director of Sime Darby Plantation.  Field observation, interviewing with workers and verification of workers master list confirmed that there is no child labor.	Complied
<b>Criterion 4.4.6: Training and competency</b>			
<b>4.4.6.1</b>	All employees and contractors shall be appropriately trained. A training programme shall include regular assessment of training needs and documentation, including records of training.  - Major compliance -	The annual training program has been established and significantly covers all aspects of the RSPO Principles and Criteria. Additional subjects include mill operating procedures, parameters of mill produce, machinery maintenance etc. The training program also specified the target group of employees to be trained under the allocated subjects.  The program mainly covers both requirement of the estates and mill in the SOU 4. The subject for the training are issued and assisted by the SQM personnel. The following topics included in the annual training program 2018/19 among others are extracted below; <ul style="list-style-type: none"> <li>a) OSH Act 7 regulations 1994.</li> <li>b) Environmental Quality Act 1974</li> </ul>	Complied



**MSPO Public Summary Report**  
**Revision 0 (Aug 2017)**

Criterion / Indicator		Assessment Findings	Compliance																								
		<ul style="list-style-type: none"> <li>c) USECHH 2000</li> <li>d) OSH Committee and function.</li> <li>e) Workplace inspection</li> <li>f) First Aid Training/fire fighting</li> <li>g) Scheduled waste training</li> <li>h) RSPO/MSPO/SCCS training</li> <li>i) Water treatment /Environmental Management</li> <li>j) HCV &amp; Biodiversity training.</li> <li>k) NADOPOD/HIRARC</li> <li>l) Personnel hygiene</li> <li>m) 5S /LOTO/Working at height/working in confined space</li> <li>n) ERP chemical &amp; oil spill</li> </ul> <p>Records of training for Flemington Mill sighted during this audit is since the last audit is shown below.</p> <table border="1"> <thead> <tr> <th>Date</th> <th>Subject</th> <th>Attendees</th> </tr> </thead> <tbody> <tr> <td>16/7/18</td> <td>Workshop-Oxy cutter handlings</td> <td>7</td> </tr> <tr> <td>12/7/18</td> <td>Chemical handling and labelling</td> <td>16</td> </tr> <tr> <td>6/8/18</td> <td>Morning safety briefing</td> <td>Entire shift</td> </tr> <tr> <td>9/7/18</td> <td>Morning safety briefing</td> <td>Entire shift</td> </tr> <tr> <td>14/7/18</td> <td>Good housekeeping &amp; zero dumping</td> <td>11</td> </tr> <tr> <td>9/7/18</td> <td>Briefing on Company's Policies</td> <td>Entire shift</td> </tr> <tr> <td>27/6/18</td> <td>SCCS – Mass Balance for transporters</td> <td>6</td> </tr> </tbody> </table>	Date	Subject	Attendees	16/7/18	Workshop-Oxy cutter handlings	7	12/7/18	Chemical handling and labelling	16	6/8/18	Morning safety briefing	Entire shift	9/7/18	Morning safety briefing	Entire shift	14/7/18	Good housekeeping & zero dumping	11	9/7/18	Briefing on Company's Policies	Entire shift	27/6/18	SCCS – Mass Balance for transporters	6	
Date	Subject	Attendees																									
16/7/18	Workshop-Oxy cutter handlings	7																									
12/7/18	Chemical handling and labelling	16																									
6/8/18	Morning safety briefing	Entire shift																									
9/7/18	Morning safety briefing	Entire shift																									
14/7/18	Good housekeeping & zero dumping	11																									
9/7/18	Briefing on Company's Policies	Entire shift																									
27/6/18	SCCS – Mass Balance for transporters	6																									

**MSPO Public Summary Report**  
**Revision 0 (Aug 2017)**

Criterion / Indicator		Assessment Findings			Compliance
		11/6/18	RISE and work training	17	
		6/6/18	SCCS reclassification IP to MB	8	
		24/4/18	SCCS training & whistleblowing	Entire shift	
		2/6/18	RSPO/COBC/MSPO briefing	Entire shift	
		5/7/18	OCP-receiving and handling	3	
		8/6/18	Sludge pit operations	5	
		16/4/18	RSPO SCC New updates	11	
		27/4/18	Fire drill / First Aid Briefing	22	
		11/7/18	Mill operations - Moving tippler	2	
		11/7/18	Operations-Oil room/ramp/sterilizer/lab	10	
		26/7/18	Operations-EFB/USB/tipler	10	
		26/6/18	Operations -Kernel plant/boiler	10	
<b>4.4.6.2</b>	<p>Training needs of individual employees shall be identified prior to the planning and implementation of the training programmes in order to provide the specific skill and competency required to all employees based on their job description.</p> <p><b>- Major compliance -</b></p>	<p>The training needs for the mill 2018/19 training program has been established. The details of the training needs include categories of stations, subjects, and employees group.</p> <p>Included in this program are subjects related to environment e.g. environmental, safety &amp; health policy, scheduled waste management, environmental responsibility, HCV &amp; Biodiversity</p>			

Criterion / Indicator		Assessment Findings	Compliance
		training, machine handling, mill stations operations, control of process parameters, workshop management. etc. The compilation from the approved training needs is later transferred to the formation of the training program.	
<b>4.4.6.3</b>	A continuous training programme shall be planned and implemented to ensure that all employees are well trained in their job function and responsibility in accordance to the documented training procedure.  - <b>Minor compliance</b> -	This is in compliance and detailed in 4.4.6.1 above. Training program are made on annual basis. In addition, it is subject for a review during the financial year should need arises.	Complied
<b>4.5 Principle 5: Environment, natural resources, biodiversity and ecosystem services</b>			
<b>Criterion 4.5.1: Environmental Management Plan</b>			
<b>4.5.1.1</b>	An environmental policy and management plan shall be in line with the relevant country and state environmental laws shall be established, effectively communicated and implemented.  - <b>Major compliance</b> -	There is an Environmental Management Policy for the mill issued and endorsed in Jan 2015 by the Managing Director. Inside the policy among others has stated that the Company is committed to protecting the environment and conserving biodiversity through sustainable development.	Complied
<b>4.5.1.2</b>	The environmental management plan shall cover the following: a) An environmental policy and objectives; b) The aspects and impacts analysis of all operations  - <b>Major compliance</b> -	Policy is available and objectives stated therein.  The environmental impact evaluation for boiler operation, power generation, crude palm oil storage leakage and spillage, ruptured, effluent pond ruptured, anaerobic process pond release of gas to atmosphere.	Complied

Criterion / Indicator		Assessment Findings			Compliance	
4.5.1.3	<p>An environmental improvement plan to mitigate the negative impacts and to promote the positive ones, shall be developed, implemented and monitored.</p> <p><b>- Major compliance -</b></p>	<p>The mill monitors aspects and impacts among others the following activities This 2018/19 plan is available and similar to the reduction of pollution and emission. Mainly the areas relating to significant impact to the environment and the effort implemented are summarised below. The Plan was endorsed on 23/7/18</p>			Complied	
			Environmental Issues	Solution Procedure/Action Plan		Time frame
		1	Erosion of effluent pond bund	<p>Place mangrove wood to contain bund parameter.</p> <p>Place gunny containing ash around the eroded bund within the mangrove wood placement</p> <p>Place used tyre at the eroded bund to maintain bund parameter.</p>		Done & continuous
2	Overflow of POME	<p>To monitor &amp; check pond level on daily basis.</p> <p>To ensure system (POME Discharge) in proper order.</p> <p>To check all pump, drainage &amp; piping in good condition.</p>	Done & continuous			

**MSPO Public Summary Report  
Revision 0 (Aug 2017)**

Criterion / Indicator		Assessment Findings			Compliance
			To check bund and ensure all in functional condition.		
		3	Piping for raw pond to biogas plant leaking (via pump)	Daily checking	Done & continuous
		4	Pipe for mixing anaerobic pond to compost plant leaking (via pump)	Daily checking	Continuous
		5	Pipe leakages (CPO) during processing time	To isolate & stop the related process & close incoming/outgoing valves.  To barricade the spillage, the spillage area to prevent the spilled oil from entering the monsoon drain.  To clear the oil at the floor with fibre then using water to clean up the residue & ensure	continuous

**MSPO Public Summary Report**  
**Revision 0 (Aug 2017)**

Criterion / Indicator		Assessment Findings				Compliance
				all being discharge into process drain.		
		6	Chemical spillage at chemical store & boiler station	To place metal tray to prevent spillage while doing mixing chemical operations	Done & continuous	
		7	Overflow calcium carbonate waste water to monsoon drain.	Daily check & clean clay bath pit and check pump.	continuous	
		Records of periodical reporting of the listed issues were available. These were the evidence which showed that the plans been monitored. The plans were reviewed annually during the EPMC and the monthly operations meetings.				
<b>4.5.1.4</b>	A programme to promote the positive impacts should be included in the continual improvement plan.  <b>- Minor compliance -</b>	This is available as per item 4.5.1.3 above. All programme for improvement are shown in the action plan column				Complied
<b>4.5.1.5</b>	An awareness and training programme shall be established and implemented to ensure that employees understand the policy, objectives and management plans and are working towards	A training program is available in the SOU 4 Training Program updated on a yearly basis or revised as per the management				Complied

**MSPO Public Summary Report**  
**Revision 0 (Aug 2017)**

Criterion / Indicator		Assessment Findings	Compliance
	<p>achieving objectives.</p> <p><b>- Major compliance -</b></p>	<p>requirement. Included in this programme are subjects related to environment among others listed below;</p> <ul style="list-style-type: none"> <li>a) Environmental Quality Act &amp; Regulations 1974</li> <li>b) Environmental, safety &amp; health policy,</li> <li>c) ERP Oil /chemical spill</li> <li>d) scheduled waste management,</li> <li>e) environmental responsibility, HCV &amp; Biodiversity training.</li> </ul>	
<b>4.5.1.6</b>	<p>The management shall organize regular meetings with workers where concerns of workers about the environmental quality are discussed.</p> <p><b>- Major compliance -</b></p>	<p>The environmental issues are discussed in a meeting by the EPMC (Environmental Performance Monitoring Committee). The agenda discussed among others as follows;</p> <ul style="list-style-type: none"> <li>a) matters arising</li> <li>b) workplace inspection</li> <li>c) biogas and compost operation report</li> <li>d) scheduled waste report</li> <li>e) effluent management and performance.</li> </ul> <p>In addition, environmental issues were also touched during the quarterly ESH meetings and also briefed during the weekly muster.</p>	Complied
<b>Criterion 4.5.2: Efficiency of energy use and use of renewable energy</b>			
<b>4.5.2.1</b>	<p>Consumption of non-renewable energy shall be optimized and closely monitored by establishing baseline values and trends shall be observed within appropriate timeframe. There should be a plan to assess the usage of non-renewable energy including fossil fuel, electricity in the operations over the base period</p>	<p>The monitoring is recorded in environment performance indicator-electricity generated by steam turbine tabulated for the financial year July – June. It is calculated as electricity generated</p>	Complied

**MSPO Public Summary Report**  
**Revision 0 (Aug 2017)**

Criterion / Indicator	Assessment Findings	Compliance																																																																																				
<p><b>- Major compliance -</b></p>	<p>from turbine that produces power for the mill entire complex operation unit in either kwh/mt FFB or kwh/mt CPO.            A monthly record on energy consumption for both renewable and non-renewable sources were also maintained documented. It is monitored to optimize use of renewable energy. The data is compiled for comparison and control for future improvement with aim of gradual reduction particularly diesel.            The following data 2017/18 was compiled by the mill to fulfill the requirement and monitoring.</p> <table border="1" data-bbox="1088 762 1845 1034"> <thead> <tr> <th>Month</th> <th>Jul 17</th> <th>Aug 17</th> <th>Sept17</th> <th>Oct 17</th> <th>Nov17</th> <th>Dec 17</th> </tr> </thead> <tbody> <tr> <td>FFB processed mt</td> <td>21641</td> <td>17207</td> <td>17108</td> <td>14444</td> <td>14997</td> <td>14263</td> </tr> <tr> <td>CPO processed</td> <td>4507</td> <td>3472</td> <td>3541</td> <td>3023</td> <td>2956</td> <td>2855</td> </tr> <tr> <td>Fibre usage/mt</td> <td>2597</td> <td>2064</td> <td>2053</td> <td>1733</td> <td>1799</td> <td>1711</td> </tr> <tr> <td>Shell usage/mt</td> <td>1082</td> <td>860</td> <td>855</td> <td>722</td> <td>749</td> <td>713</td> </tr> <tr> <td>Renewable energy usage mt/CPO mt</td> <td>0.82</td> <td>0.84</td> <td>0.82</td> <td>0.81</td> <td>0.86</td> <td>0.85</td> </tr> </tbody> </table> <table border="1" data-bbox="1088 1082 1845 1353"> <thead> <tr> <th>Month</th> <th>Jan 18</th> <th>Feb 18</th> <th>Mac 18</th> <th>Apr 18</th> <th>May 18</th> <th>Jun 18</th> </tr> </thead> <tbody> <tr> <td>FFB processed mt</td> <td>13829</td> <td>17300</td> <td>17304</td> <td>14902</td> <td>15504</td> <td>14661</td> </tr> <tr> <td>CPO processed</td> <td>2751</td> <td>3644</td> <td>3522</td> <td>3160</td> <td>3185</td> <td>2972</td> </tr> <tr> <td>Fibre usage/mt</td> <td>1659</td> <td>2076</td> <td>2076</td> <td>1788</td> <td>1860</td> <td>1759</td> </tr> <tr> <td>Shell usage/mt</td> <td>691</td> <td>865</td> <td>865</td> <td>745</td> <td>775</td> <td>733</td> </tr> <tr> <td>Renewable energy usage mt/CPO mt</td> <td>0.85</td> <td>0.81</td> <td>0.84</td> <td>0.80</td> <td>0.83</td> <td>0.84</td> </tr> </tbody> </table>	Month	Jul 17	Aug 17	Sept17	Oct 17	Nov17	Dec 17	FFB processed mt	21641	17207	17108	14444	14997	14263	CPO processed	4507	3472	3541	3023	2956	2855	Fibre usage/mt	2597	2064	2053	1733	1799	1711	Shell usage/mt	1082	860	855	722	749	713	Renewable energy usage mt/CPO mt	0.82	0.84	0.82	0.81	0.86	0.85	Month	Jan 18	Feb 18	Mac 18	Apr 18	May 18	Jun 18	FFB processed mt	13829	17300	17304	14902	15504	14661	CPO processed	2751	3644	3522	3160	3185	2972	Fibre usage/mt	1659	2076	2076	1788	1860	1759	Shell usage/mt	691	865	865	745	775	733	Renewable energy usage mt/CPO mt	0.85	0.81	0.84	0.80	0.83	0.84	
Month	Jul 17	Aug 17	Sept17	Oct 17	Nov17	Dec 17																																																																																
FFB processed mt	21641	17207	17108	14444	14997	14263																																																																																
CPO processed	4507	3472	3541	3023	2956	2855																																																																																
Fibre usage/mt	2597	2064	2053	1733	1799	1711																																																																																
Shell usage/mt	1082	860	855	722	749	713																																																																																
Renewable energy usage mt/CPO mt	0.82	0.84	0.82	0.81	0.86	0.85																																																																																
Month	Jan 18	Feb 18	Mac 18	Apr 18	May 18	Jun 18																																																																																
FFB processed mt	13829	17300	17304	14902	15504	14661																																																																																
CPO processed	2751	3644	3522	3160	3185	2972																																																																																
Fibre usage/mt	1659	2076	2076	1788	1860	1759																																																																																
Shell usage/mt	691	865	865	745	775	733																																																																																
Renewable energy usage mt/CPO mt	0.85	0.81	0.84	0.80	0.83	0.84																																																																																



Criterion / Indicator		Assessment Findings	Compliance																		
		<p>A target as set by the mill was sighted as provided below vs the actual year achieved;</p> <table border="1"> <thead> <tr> <th>Month</th> <th>TOTAL</th> <th>TARGET</th> </tr> </thead> <tbody> <tr> <td>FFB processed mt</td> <td>193165</td> <td>169433</td> </tr> <tr> <td>CPO processed</td> <td>39595</td> <td>37122</td> </tr> <tr> <td>Fibre usage/mt</td> <td>23179</td> <td>20332</td> </tr> <tr> <td>Shell usage/mt</td> <td>9658</td> <td>8471</td> </tr> <tr> <td>Renewable energy usage mt/CPO mt</td> <td><b>0.83</b></td> <td><b>0.78</b></td> </tr> </tbody> </table> <p>Under the annual energy management plan 2017/18 and 2018/19 the mill aimed for reduction plan among others;</p> <ul style="list-style-type: none"> <li>a) educate workers on fuel saving practice</li> <li>avoid leakages during vehicles maintenance.</li> </ul>	Month	TOTAL	TARGET	FFB processed mt	193165	169433	CPO processed	39595	37122	Fibre usage/mt	23179	20332	Shell usage/mt	9658	8471	Renewable energy usage mt/CPO mt	<b>0.83</b>	<b>0.78</b>	
Month	TOTAL	TARGET																			
FFB processed mt	193165	169433																			
CPO processed	39595	37122																			
Fibre usage/mt	23179	20332																			
Shell usage/mt	9658	8471																			
Renewable energy usage mt/CPO mt	<b>0.83</b>	<b>0.78</b>																			
<b>4.5.2.2</b>	<p>The oil palm premises shall estimate the direct usage of non-renewable energy for their operations, including fossil fuel, and electricity to determine energy efficiency of their operations. This shall include fuel use by contractors, including all transport and machinery operations.</p> <p><b>- Major compliance -</b></p>	<p>The mill records the following data and tabulated the ratio against the FFB processed and CPO produced to determine the efficiency of their operations;</p> <ul style="list-style-type: none"> <li>a) all the diesel used (non-renewable) for the mill operations</li> <li>b) fibre/shell used (renewable)</li> </ul> <p>In this relation the following data were sighted and verified</p> <ul style="list-style-type: none"> <li>a) Non-renewable energy usage for 2017/18 for month of July – June. Ratio mt diesel/mt CPO produced ranges from 0.00017 to 0.00077.</li> <li>b) Renewable energy usage for 2017/18 July-June. ratio shell/fibre mt /mt CPO varies from 0.80 – 0.86.</li> </ul>	Complied																		
<b>4.5.2.3</b>	<p>The use of renewable energy should be applied where possible.</p>	<p>The fibre and shell are used in the boiler for fuel recycled in the process system. Surplus quantity of shell/fibre are delivered to</p>	Complied																		

Criterion / Indicator		Assessment Findings	Compliance																
	- <b>Minor compliance</b> -	estates for multi purposes or sold to outside buyers. EFB is used in the estates for mulching and compost production. Details of renewable energy fibre/shell used in the mill is shown in 4.5.2.1 above.																	
<b>Criterion 4.5.3: Waste management and disposal</b>																			
<b>4.5.3.1</b>	All waste products and sources of pollution shall be identified and documented.  - <b>Major compliance</b> -	<p>All waste and pollution are identified and documented in the Waste Management Plan for Financial Year 2018/19. The waste generated from the mill operations as shown below;</p> <table border="1"> <thead> <tr> <th></th> <th>Type of waste</th> <th>Waste description</th> <th>location</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Scheduled waste</td> <td>Spent IPA, hexane, filter, lubricants, hydraulic oil, grease, used batteries, fluorescent lamp.</td> <td>Scheduled waste store</td> </tr> <tr> <td>2</td> <td>Domestic waste</td> <td>rubbish from the mill complex and employees' quarters used paper, plastic &amp; glass bottles, food waste.</td> <td>Linesite, office, workshop, store, shop</td> </tr> <tr> <td>3</td> <td>Production waste</td> <td>Fibre, palm kernel shell, boiler ash, scrap iron, EFB, POME, decanter solids.</td> <td>Mill &amp; compost plant</td> </tr> </tbody> </table> <p>The source of mill pollution generated from the mill is the smoke from the boiler are monitored from the stack emission during the</p>		Type of waste	Waste description	location	1	Scheduled waste	Spent IPA, hexane, filter, lubricants, hydraulic oil, grease, used batteries, fluorescent lamp.	Scheduled waste store	2	Domestic waste	rubbish from the mill complex and employees' quarters used paper, plastic & glass bottles, food waste.	Linesite, office, workshop, store, shop	3	Production waste	Fibre, palm kernel shell, boiler ash, scrap iron, EFB, POME, decanter solids.	Mill & compost plant	Complied
	Type of waste	Waste description	location																
1	Scheduled waste	Spent IPA, hexane, filter, lubricants, hydraulic oil, grease, used batteries, fluorescent lamp.	Scheduled waste store																
2	Domestic waste	rubbish from the mill complex and employees' quarters used paper, plastic & glass bottles, food waste.	Linesite, office, workshop, store, shop																
3	Production waste	Fibre, palm kernel shell, boiler ash, scrap iron, EFB, POME, decanter solids.	Mill & compost plant																

**MSPO Public Summary Report**  
**Revision 0 (Aug 2017)**

Criterion / Indicator		Assessment Findings			Compliance								
		entire operations. These reports are reviewed by the mill and submitted to DOE. There was no major issue since the last audit.											
<b>4.5.3.2</b>	<p>A waste management plan shall be developed and implemented, to avoid or reduce pollution. The waste management plan should include measure for:</p> <p>a) Identifying and monitoring sources of waste and pollution.</p> <p>b) Improving the efficiency and recycling potential of mill by-products by converting them into value-added products.</p> <p><b>- Major compliance -</b></p>	<p>The Waste Management Plan for Financial Year 2018/19 is available and sighted. The plan listed the waste generated from the mill operations as shown below;</p> <table border="1"> <thead> <tr> <th></th> <th>Waste description</th> <th>Action to be taken</th> <th>PIC</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Spent IPA, hexane, filter, lubricants, hydraulic oil, grease, used batteries, fluorescent lamp.</td> <td> <p>Collect &amp; record inventory</p> <p>Store items under lock &amp; keys</p> <p>Dispose to registered vendor</p> <p>Abide sale procedure as stipulated by DOE.</p> <p>Comply to procedure stipulated MQMS SOP Handling of scheduled waste.</p> <p>Comply to Environmental Quality Regulations 2005</p> <p>Establish list of SW/Notify DOE for all SW generated/appropriate SW labelling</p> </td> <td>MS Ibrahim/Mohana/Sinniah</td> </tr> </tbody> </table>				Waste description	Action to be taken	PIC	1	Spent IPA, hexane, filter, lubricants, hydraulic oil, grease, used batteries, fluorescent lamp.	<p>Collect &amp; record inventory</p> <p>Store items under lock &amp; keys</p> <p>Dispose to registered vendor</p> <p>Abide sale procedure as stipulated by DOE.</p> <p>Comply to procedure stipulated MQMS SOP Handling of scheduled waste.</p> <p>Comply to Environmental Quality Regulations 2005</p> <p>Establish list of SW/Notify DOE for all SW generated/appropriate SW labelling</p>	MS Ibrahim/Mohana/Sinniah	Complied
	Waste description	Action to be taken	PIC										
1	Spent IPA, hexane, filter, lubricants, hydraulic oil, grease, used batteries, fluorescent lamp.	<p>Collect &amp; record inventory</p> <p>Store items under lock &amp; keys</p> <p>Dispose to registered vendor</p> <p>Abide sale procedure as stipulated by DOE.</p> <p>Comply to procedure stipulated MQMS SOP Handling of scheduled waste.</p> <p>Comply to Environmental Quality Regulations 2005</p> <p>Establish list of SW/Notify DOE for all SW generated/appropriate SW labelling</p>	MS Ibrahim/Mohana/Sinniah										

**MSPO Public Summary Report**  
**Revision 0 (Aug 2017)**

Criterion / Indicator		Assessment Findings			Compliance	
		2	<p>rubbish from the mill complex and employees' quarters used paper, plastic &amp; glass bottles, food waste.</p>	<p>Abide collection SOP            Establish collection schedule &amp; PIC            Create awareness on hygiene            Monitoring of line site</p>	<p>MS            HA/            Ariff/            Sinniah</p>	
		3	<p>Fibre, palm kernel shell, boiler ash, scrap iron, EFB, POME, decanter solids.</p>	<p>Monitoring of collection &amp; application.            Monitoring of field application record.            Monitoring of usage &amp; application            Monitoring discharge &amp; sales records.</p>	<p>MS Ariff            Makhzum i</p>	
<b>4.5.3.3</b>	<p>The palm oil mill management shall establish Standard Operating Procedure for handling of used chemicals that are classified under Environmental Quality Regulations (Scheduled Waste) 2005, Environmental Quality Act, 1974 to ensure proper and safe handling, storage and disposal. Scheduled waste shall be disposed as per Environmental Quality Act 1974 (Scheduled Waste) Regulations, 2005</p> <p><b>- Major compliance -</b></p>	<p>The SOP for handling the used chemicals under this classification are documented under operational control procedure dated 26/2/2015 of 53 pages. The document is titled as Document title scheduled waste (hazardous waste) management document ID SD/SDP/PSQM (ESH)/203-EN1. The document is sighted and details of the handling is given for the all the identified SW and used chemicals.</p>			Complied	

**MSPO Public Summary Report**  
**Revision 0 (Aug 2017)**

Criterion / Indicator		Assessment Findings	Compliance								
4.5.3.4	Domestic waste should be disposed as such to minimize the risk of contamination of the environment and watercourse. <b>- Minor compliance -</b>	The scheduled waste store was assessed. The pesticide containers are disposed as scheduled waste. The scheduled waste collection consignment notes are reviewed to confirm the disposal of the pesticide containers are according to the best practice. Pesticide containers are also reused as pre-mix containers. Any of the pesticide containers that are to be disposed are triple rinsed and punctured. Sighted a consignment of SW with details below; Date: 26/7/2018 Consignment no: 2018-07610-L1N73G Type: SW 410 -Rags, plastic, papers, SW contaminated filters Quantity: 0.2950 mt Contractor : Kualiti Alam Sdn Bhd.	Complied								
<b>Criterion 4.5.4:</b> Reduction of pollution and emission											
4.5.4.1	An assessment of all polluting activities shall be conducted, including greenhouse gas emissions, particulate and soot emissions, scheduled wastes, solid wastes and effluent. <b>- Major compliance -</b>	The polluting activities are identified and documented in the Environmental Aspect & Impact Identification. From the EAI, it will be evaluated for the impact and any impact will be included in the management plan. The evaluation is documented in the Environmental Impact Evaluation	Complied								
4.5.4.2	An action plan to reduce identified significant pollutants and emissions shall be established and implemented. <b>- Major compliance -</b>	<table border="1"> <thead> <tr> <th>Environmenta l Issues</th> <th>Solution Plan</th> <th>Procedure/Action</th> <th>Time frame</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>	Environmenta l Issues	Solution Plan	Procedure/Action	Time frame					Complied
Environmenta l Issues	Solution Plan	Procedure/Action	Time frame								

**MSPO Public Summary Report**  
**Revision 0 (Aug 2017)**

Criterion / Indicator		Assessment Findings		Compliance
		1	<p>Erosion of effluent pond bund</p> <p>Place mangrove wood to contain bund parameter.</p> <p>Place gunny containing ash around the eroded bund within the mangrove wood placement</p> <p>Place used tyre at the eroded bund to maintain bund parameter.</p>	Done & continuous
		2	<p>Overflow of POME</p> <p>To monitor &amp; check pond level on daily basis.</p> <p>To ensure system (POME Discharge) in proper order.</p> <p>To check all pump, drainage &amp; piping in good condition.</p> <p>To check bund and ensure all in functional condition.</p>	Done & continuous
		3	<p>Piping for raw pond to biogas plant leaking (via pump)</p> <p>Daily checking</p>	Done & continuous
		4	<p>Pipe for mixing anaerobic</p> <p>Daily checking</p>	Continuous

Criterion / Indicator		Assessment Findings			Compliance
		pond to compost plant leaking (via pump)			
		5 Pipe leakages (CPO) during processing time	To isolate & stop the related process & close incoming/outgoing valves.  To barricade the spillage, the spillage area to prevent the spilled oil from entering the monsoon drain.  To clear the oil at the floor with fibre then using water to clean up the residue & ensure all being discharge into process drain.	continuous	
		6 Chemical spillage at chemical store & boiler station	To place metal tray to prevent spillage while doing mixing chemical operations	Done & continuous	
		7 Overflow calcium carbonate waste water	Daily check & clean clay bath pit and check pump.	continuous	

**MSPO Public Summary Report**  
**Revision 0 (Aug 2017)**

Criterion / Indicator		Assessment Findings				Compliance																																			
		to monsoon drain.																																							
<b>4.5.4.3</b>	<p>Palm oil mill effluent (POME) shall be treated to ensure compliance with standards as stipulated in the relevant Environmental Quality (Prescribed Premises) (Crude Palm Oil) Regulations 1977. POME discharge limits and method should be in accordance with the respective state and national policies and regulations.</p> <p><b>- Major compliance -</b></p>	<p>The treated mill effluent discharge is regularly monitored as prescribed in the "Jadual Pematuhan" license issued to the mill. The limit for the Biochemical Oxygen Demand (BOD) discharge is 100 mg/l for water course. Regular monitoring is made on monthly basis and quarterly. In addition, daily site checking on the effluent ponds are made by the supervisory personnel and effluent attendants. Reports for the effluent parameters are submitted using "Borang Penyata Suku Tahun" to DOE for compliance. Sighted the effluent results below submitted to DOE. All parameters are in compliance to the DOE requirement. (Units in mg/l except for PH)</p> <table border="1"> <thead> <tr> <th>Parameters</th> <th>Standard</th> <th>10/4/18</th> <th>18/5/18</th> <th>29/6/18</th> </tr> </thead> <tbody> <tr> <td>PH</td> <td>5-9</td> <td>9.1</td> <td>8.3</td> <td>8.9</td> </tr> <tr> <td>BOD</td> <td>100</td> <td>41</td> <td>57</td> <td>60</td> </tr> <tr> <td>Suspended solids</td> <td>400</td> <td>399</td> <td>370</td> <td>297</td> </tr> <tr> <td>Oil &amp; grease</td> <td>50</td> <td>4</td> <td>4</td> <td>6</td> </tr> <tr> <td>Ammoniacal N</td> <td>150</td> <td>1</td> <td>1</td> <td>1</td> </tr> <tr> <td>Total N</td> <td>200</td> <td>109</td> <td>85</td> <td>51</td> </tr> </tbody> </table>				Parameters	Standard	10/4/18	18/5/18	29/6/18	PH	5-9	9.1	8.3	8.9	BOD	100	41	57	60	Suspended solids	400	399	370	297	Oil & grease	50	4	4	6	Ammoniacal N	150	1	1	1	Total N	200	109	85	51	Complied
Parameters	Standard	10/4/18	18/5/18	29/6/18																																					
PH	5-9	9.1	8.3	8.9																																					
BOD	100	41	57	60																																					
Suspended solids	400	399	370	297																																					
Oil & grease	50	4	4	6																																					
Ammoniacal N	150	1	1	1																																					
Total N	200	109	85	51																																					
<b>Criterion 4.5.5:</b> Natural water resources																																									



Criterion / Indicator	Assessment Findings	Compliance																								
<p><b>4.5.5.1</b> The management shall establish water management plans to maintain the quality and availability of natural water resources (surface and ground water). The water management plan may include:</p> <ul style="list-style-type: none"> <li>a) Assessment of water usage and sources.</li> <li>b) Monitoring of outgoing water which may have negative impacts into the natural waterways at a frequency that reflects the mill's current activities.</li> <li>c) Ways to optimize water and nutrient usage and reduce wastage (<i>e.g.</i> having in place systems for re-use, night application, maintenance of equipment to reduce leakage, collection of rainwater, etc.).</li> </ul> <p><b>- Major compliance -</b></p>	<p>The Water Management Plan for the mill has been established. It was last reviewed on 16/7/18 for the 2018/19 plan. Included therein are the following documents which were sighted and verified;</p> <ul style="list-style-type: none"> <li>a) Contingency plan during water shortage</li> </ul> <table border="1" data-bbox="1088 675 1854 1034"> <thead> <tr> <th></th> <th>Area/incident</th> <th>Action steps</th> <th>PIC</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Water shortage/prolonged dry season</td> <td>to purchase water from LAP to train/educate staff/workers to conserve water - to obtain treated water supply from mill's WTP</td> <td>MS AAO Ariff Mohana</td> </tr> <tr> <td>2</td> <td>Severe water pollution/contamination</td> <td>to purchase water from LAP to perform treatment of polluted water to check monsoon drain water pollution level.</td> <td>MS AAO Nadzri Mohana</td> </tr> </tbody> </table> <ul style="list-style-type: none"> <li>b) Water reduction plan</li> </ul> <table border="1" data-bbox="1088 1129 1854 1361"> <thead> <tr> <th></th> <th>Issues/Areas</th> <th>Action Steps</th> <th>Status</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Hot water usage as dilution at press station</td> <td>To use sterilizer condensate water as dilution</td> <td>Done &amp; continuous</td> </tr> <tr> <td>2</td> <td>Turbine cooling water at engine room</td> <td>To recycle water as hot water</td> <td>Done</td> </tr> </tbody> </table>		Area/incident	Action steps	PIC	1	Water shortage/prolonged dry season	to purchase water from LAP to train/educate staff/workers to conserve water - to obtain treated water supply from mill's WTP	MS AAO Ariff Mohana	2	Severe water pollution/contamination	to purchase water from LAP to perform treatment of polluted water to check monsoon drain water pollution level.	MS AAO Nadzri Mohana		Issues/Areas	Action Steps	Status	1	Hot water usage as dilution at press station	To use sterilizer condensate water as dilution	Done & continuous	2	Turbine cooling water at engine room	To recycle water as hot water	Done	<p>Complied</p>
	Area/incident	Action steps	PIC																							
1	Water shortage/prolonged dry season	to purchase water from LAP to train/educate staff/workers to conserve water - to obtain treated water supply from mill's WTP	MS AAO Ariff Mohana																							
2	Severe water pollution/contamination	to purchase water from LAP to perform treatment of polluted water to check monsoon drain water pollution level.	MS AAO Nadzri Mohana																							
	Issues/Areas	Action Steps	Status																							
1	Hot water usage as dilution at press station	To use sterilizer condensate water as dilution	Done & continuous																							
2	Turbine cooling water at engine room	To recycle water as hot water	Done																							

Criterion / Indicator		Assessment Findings				Compliance	
		3	All process stations	Prioritize dry cleaning on daily basis	continuous		
		4	Water overflow from vacuum drier tank	Used for only cleaning with pressure pump.	Done & continuous		
		5	Hot water usage for oil recovery at clarifier	Only using deoiling tank supernatant & oil recovery underground tank water	Done & continuous		
		6	Hot water usage for decanter flushing	Minimize usage of 2 decanters running simultaneously & reduce frequency of flushing.	Done & continuous		
		c) Identification & management of waste water					
			location	Wastewater produced	Treatment/containment		
		1	Processing stations	Decanter heavy phase, condensate, clay bath solution	Decanter pit/ETP		
		2	Boiler	Blowdown, cleaning water	Sludge pit, ETP		
		3	Engine room	Steam condensate, turbine cooling water	Monsoon drain, recycled tank		
		4	Laboratory	Cleaning water	Process drain		

Criterion / Indicator		Assessment Findings				Compliance
		5	Workshop	Cleaning water	Monsoon drain	
		6	washroom	Toilet water, cleaning water	Septic tank	
<b>4.5.5.2</b>	Where open discharge of POME into water course is practiced, mills should undertake to gradually phase it out in accordance to the applicable state or national regulations.  - <b>Major compliance</b> -	<p>Details of effluent treatment and report as per item 4.5.4.3 above.</p> <p>Similar to others mills within the organization the mill management is looking into having a zero discharge system or establishing a biogas plant to initiate eliminating the watercourse application practiced at current.</p>				Complied
<b>4.6 Principle 6: Best Practices</b>						
<b>Criterion 4.6.1: Mill Management</b>						
<b>4.6.1.1</b>	Standard operating procedures shall be appropriately documented and consistently implemented and monitored.  - <b>Major compliance</b> -	<p>The mill processing system is documented in the Sustainability Plantation Management System MQMS/SQM/08 v 1 dated 01/11/2008 which includes the mill SOP, and Mill Quality Management Manual v.1 2008/MQMS/QMM/08. These documents provide guidelines and standards in the mill operations. The Standard Operating procedure (SOP) described details from the reception, sterilisation, threshing, pressing, clarification, depericarping (nut polishing) station, effluent, laboratory, workshop, despatches etc. In addition, there are also manuals available within the industry and MPOB that are used as guidelines.</p>				Complied

Criterion / Indicator		Assessment Findings	Compliance
4.6.1.2	All palm oil mills shall implement best practices. <b>- Major compliance -</b>	The monitoring of the mill process is made through the shift supervision headed by an Assistant Engineer and the Mill Assistant. All process parameters are documented and summarized in a daily report. The external monitoring is made through visits by the CEO/General Manager and also technical personnel from the Head Office. DOSH performed the annual UPV machinery inspection In addition, there are audits by PSQM and GCAD. This is to ensure compliance to Policies, procedures in relation mill operations, financial, OSH, welfare among others.	Complied
<b>Criterion 4.6.2: Economic and financial viability plan</b>			
4.6.2.1	A documented business or management plan shall be established to demonstrate attention to economic and financial viability through long-term management planning. <b>- Major compliance -</b>	The annual business plan is available. The document is in the form of annual budget and the projection for 5 years (Budget year, PY2, PY3, PY4, PY5) prepared as guidance for future planning. The business plan contains FFB processed, production of CPO & CPK. The Component of operating expenditure among others includes; <ul style="list-style-type: none"> <li>a) process labour,</li> <li>b) maintenance external, maintenance parts,</li> <li>c) consumable, EVIT,</li> <li>d) admin cost,</li> <li>e) labour overhead.</li> </ul> Inclusive in the business plan is also Capital Expenditure (CAPEX) among others showing expenditure on;	Complied

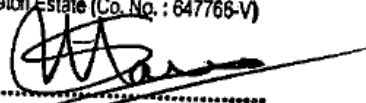

**MSPO Public Summary Report**  
**Revision 0 (Aug 2017)**

Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> <li>a) replacement / upgrading of building/</li> <li>b) machinery,</li> <li>c) workers' amenities and staff</li> </ul> <p>The profit and loss statement was made available prepared by the Regional office.</p>	
<b>Criterion 4.6.3: Transparent and fair price dealing</b>			
<b>4.6.3.1</b>	<p>Pricing mechanisms for the products and other services shall be documented and effectively implemented.</p> <p><b>- Major compliance -</b></p>	<p>Flemington palm oil mill process FFB from company owned estates only. No FFB purchased from out-growers or smallholders.</p> <p>Contract agreement/ Letter of Award (LOA) for the contractors were verified during the audit and sampled contracts were as below:</p> <ul style="list-style-type: none"> <li>a. Contractor: Lotus Two Enterprise provides labour dated 15/6/2017 which commenced on 1/7/2017 and valid for one year. Extension of contract is still in progress by HQ and interim approval granted for 3 month starting from 1/7/18 by Regional General Manager.</li> </ul> <p>The terms and conditions were stated in the agreement have acknowledged on each page of the contract.</p>	Complied
<b>4.6.3.2</b>	<p>All contracts shall be fair, legal and transparent and agreed payments shall be made in timely manner.</p> <p><b>- Major compliance -</b></p>	<p>According to the agreement made, the payment to contractors shall be made 30 days after the invoice date that submitted to the company by 1st week of the month. Interview with the contractors confirmed that the payment was made promptly according to the agreement.</p>	Complied

**MSPO Public Summary Report**  
**Revision 0 (Aug 2017)**

Criterion / Indicator		Assessment Findings	Compliance
<b>Criterion 4.6.4: Contractor</b>			
<b>4.6.4.1</b>	In case of the engagement of contractors, they shall be made to understand the MSPO requirements and shall provide the required documentation and information.  - <b>Major compliance</b> -	A contract was sighted. The evaluation and tender process was handled by the Procurement Department at Head Office. Transaction between M/S JASA KORPORAT and the mill dated 19/12/17 letter of award LOA on the CPO transportation. Inclusive in the contract is a clause 6.2 requiring compliance on safety factors and PPE; a) Comply with any applicable laws, regulations, terms and conditions. b) PPE issued to the employees c) Ensure safety of employees	Complied
<b>4.6.4.2</b>	The management shall provide evidence of agreed contracts with the contractor.  - <b>Major compliance</b> -	The contracts transacted by the mill among others as listed below; SDP (Flemington Palm Oil Mill) vs a) National Land Finance Cooperative Society Limited b) Peniagaan Sinaran Mewah c) Jasa Korporat d) Arrima Tec Sdn Bhd.	Complied
<b>4.6.4.3</b>	The management shall accept MSPO approved auditors to verify the assessments through a physical inspection, if required.  - <b>Minor compliance</b> -	This requirement has been specified during a briefing by the mill to CPO transporter on 27/6/18. In addition, there was a letter dated 01/7/2017 on RSPO/ISCC/MSPO awareness issued to all the contractors, vendors of the mill. This letter was sighted and has stated that all Contractors need to follow RSPO/ISCC/MSPO guideline in accordance with the Sime Darby Plantation of Estate Quality Management System	Complied

**4.0 Assessment Conclusion and Recommendation:**

<b>Acknowledgement of Internal Responsibility and Formal Sign-off of Assessment Findings</b>	
Based on the findings during the assessment Flemington Palm Oil Mill and Flemington SOU4 Estates Certification Unit complies with the MS 2530-3:2013 or MS 2530-4:2013. It is recommended that the certification of Flemington Palm Oil Mill and Flemington SOU4 Estates Certification Unit is approved.	
<b>Acknowledgement of Assessment Findings</b>	<b>Report Prepared by</b>
<b>Name:</b> Manokaram A/c Subramanian	<b>Name:</b> Mohamed Hidhir Zainal Abidin
<b>Company name:</b> Sime Darby Plantation Berhad	<b>Company name:</b> BSI Services Malaysia Sdn Bhd
<b>Title:</b> SOU 4 Chairman	<b>Title:</b> Lead Auditor
<b>Signature:</b> Sime Darby Plantation Berhad Bagan Datoh Estate (Co. No. : 647766-V)  ..... Manokaram A/c Subramanian Senior Manager	<b>Signature:</b> 
<b>Date:</b>	<b>Date:</b> 5/2/2019

**Appendix A: Assessment Plan**

<b>PRELIMINARY AGENDA</b>				
<b>Date</b>	<b>Time</b>	<b>Subjects</b>	<b>Hidhir</b>	<b>Amir</b>
Tuesday 14/8/18	AM	Audit team travelling to Teluk Intan. Overnight at Grand Court Hotel	-	√
Wednesday 15/8/18  <b>Flemington POM</b>	0730 am	Audit team travelling to Flemington POM	√	√
	08.30 – 09.00	Opening Meeting: <ul style="list-style-type: none"> <li>• Opening Presentation by Audit team leader.</li> <li>• Confirmation of assessment scope and finalize Audit plan</li> </ul>		
	09.00 – 12.30	<b>Flemington POM</b> Inspection: FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment. Laboratory, weighbridge and palm product storage area, staff, workers and contractor interview, housing and facility inspection, clinic, etc.	√	√
	10.30 – 12.30	Stakeholder interviews (combined with estate's Stakeholders)	√	-
	12.30 – 13.30	Lunch	√	√
	13.30 – 16.30	Continue with document review (MSPO part 4), P1: Management commitment and responsibility, P2: Transparency P3: Compliance to legal requirement P4: Social responsibility, health safety and employment condition  P5: Environment, natural resources, biodiversity and ecosystem services P4: Social responsibility, health safety and employment condition, P6 : Best practices	√	√
	16.30 - 17.00	Interim Closing briefing.	√	√
Thursday 16/8/2018  <b>Sg Samak Estate</b>	09.00 – 12.30	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.	√	√
	10.30 – 12.30	Stakeholder interviews (combined with estate's Stakeholders)	√	-
	12.30 – 13.30	Lunch	√	√
	13.30 – 16.30	Document review P1 – P6 (MSPO part 3), P1: Management commitment and responsibility, P2: Transparency, P3: Compliance to legal requirement P4: Social responsibility, health safety and employment condition, P5: Environment, natural resources, biodiversity and ecosystem services and P6 : Best practices, P7: Development of New Planting (if any )	√	√



**MSPO Public Summary Report**  
**Revision 0 (Aug 2017)**

	16.30 - 17.00	Interim Closing briefing.	√	√
Friday 17/8/2018  <b>Sabah            Bernam            Estate</b>	09.00 – 12.30	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.	√	√
	10.30 – 12.30	Stakeholder interviews (combined with estate's Stakeholders)	√	-
	12.30 – 14.30	Lunch and Friday Prayer	√	√
	14.30 – 15.30	Document review P1 – P6 (MSPO part 3), P1: Management commitment and responsibility, P2: Transparency, P3: Compliance to legal requirement P4: Social responsibility, health safety and employment condition, P5: Environment, natural resources, biodiversity and ecosystem services and P6 : Best practices, P7: Development of New Planting (if any )	√	√
	15.30 – 16.30	Preparation of audit report and presentation of findings	√	√
	17.00	End of audit	√	√

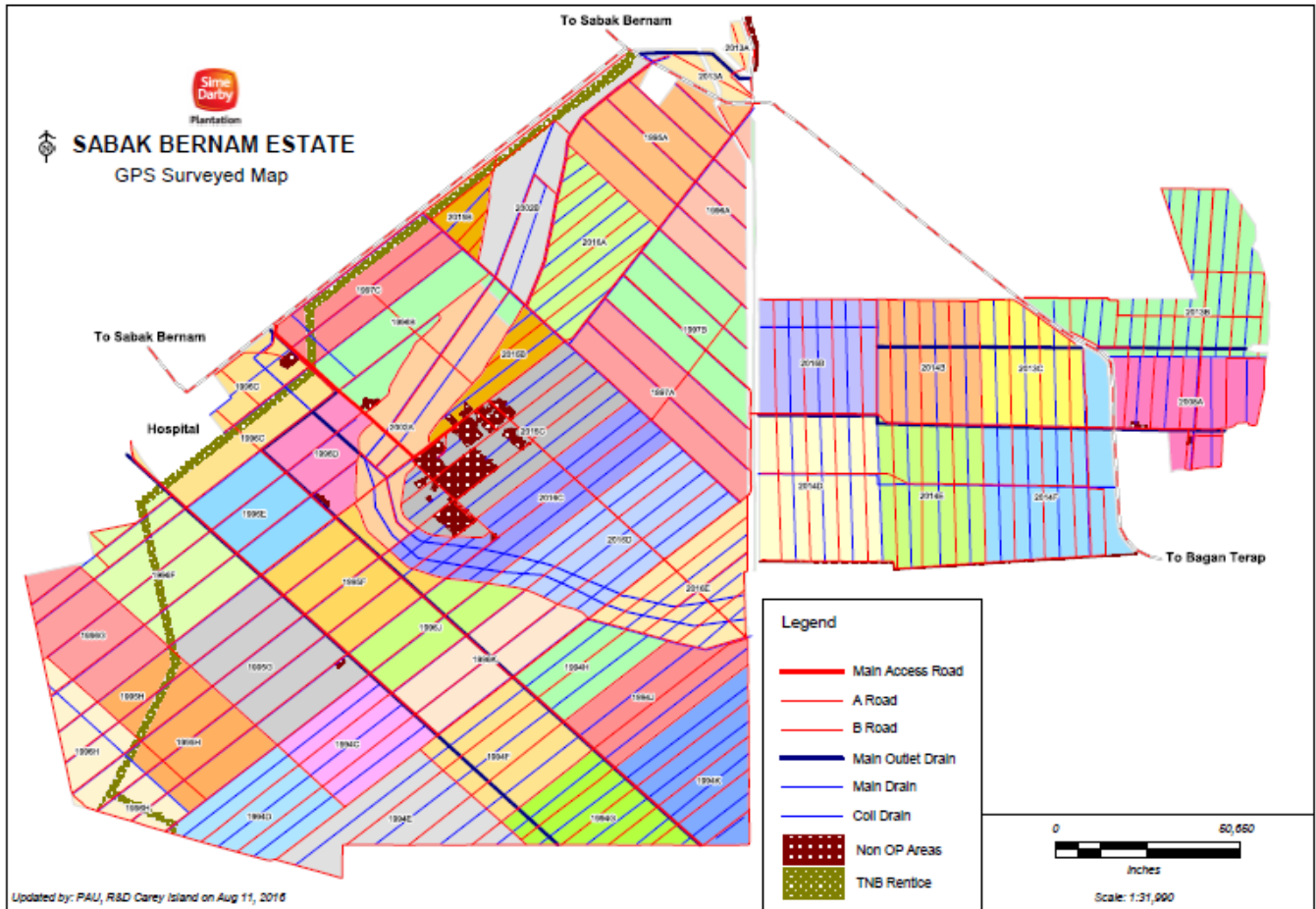
**Appendix B: List of Stakeholders Contacted**

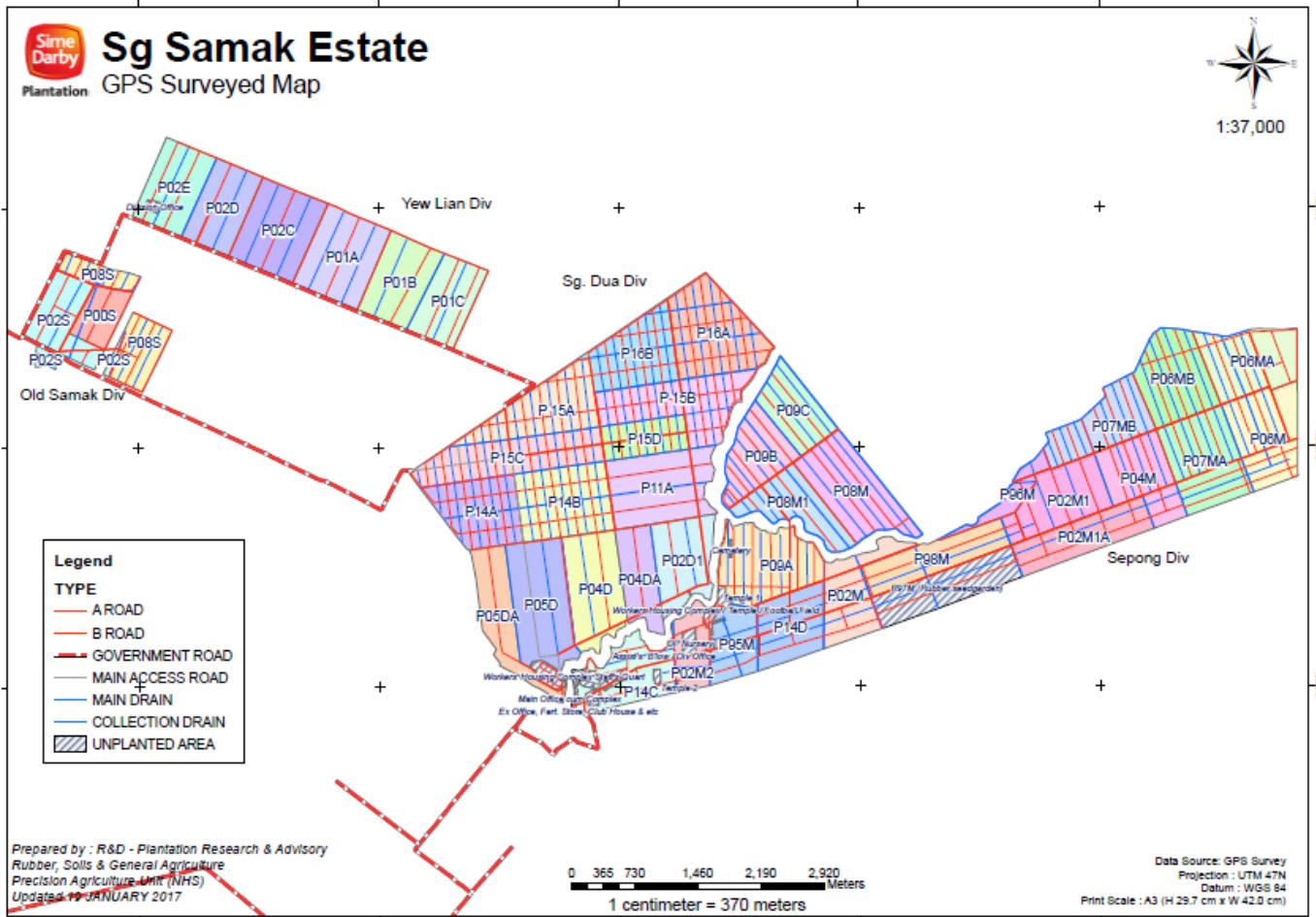
<p>Internal Stakeholders</p> <p>Sprayers Harvesters Manurers Mill Operators Gender Committee Representatives Workers Union Representatives NUPW Representatives Workers Representative</p>	<p>Union/Contractors/Local Communities</p> <p>Contractors Head of Village, Kg. Kebun Sayur</p>
<p>Government Departments</p>	<p>NGO</p> <p>No complaint by NGO for Flemington CU. Therefore, NGO was not contacted.</p>

**Appendix C: Smallholder Member Details**

No	Name of smallholder	Year Planted	Land Area (ha)	Forecast FFB (Mt/ha/year)
1	Not applicable			
2				
3				
4				
5				
6				
7				
8				
9				
10				
11				
12				
13				
14				
15				
16				
17				
18				
19				
20				
21				
22				
23				
<b>TOTAL</b>				

**Appendix D: Location and Field Map**





**Appendix E: List of Abbreviations Used**

AN	Ammoniacal Nitrogen
BOD	Biological Oxygen Demand
CHRA	Chemical Health Risk Assessment
CPO	Crude Palm Oil
DGEPN	Environmental Protection Agency Gabon
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
MSDS	Material Safety Data Sheet
MSP0	Malaysian Sustainable Palm Oil
O&G	Oil and Grease
PK	Palm Kernel
PPE	Personal Protective Equipment
PSQM	Plantation Sustainability and Quality Management
PQR	Performance Quality Rating
RC	Re-Certification
RED	Renewable Energy Directive
SEIA	Social & Environmental Impact Assessment
SIA	Social Impact Assessment
SOP	Standard Operating Procedure
SOU	Strategic Operating Unit
SS	Suspended Solids
TN	Total Nitrogen
TS	Total Solids
VFA	Volatile Fatty Acids