

**RSPO PRINCIPLE AND CRITERIA –  
3<sup>rd</sup> ANNUAL SURVEILLANCE ASSESSMENT  
Public Summary Report**

<b>Client Company name (Parent Company): PT RIGUNAS AGRI UTAMA (PT Inti Indosawit Subur)</b>
Client company Address: <b><u>Jl. M.H Thamrin No.31 Jakarta 10230 Indonesia</u></b>
Certification Unit: Bungo Tebo Palm Oil Mill  Location of Certification Unit: Village of Tuo Sumay (sub-District of Sumay) and Pinang Belai (sub-District of Serai Serumpun), Tebo Regency, Jambi Province, Indonesia

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## Section 1: Scope of the Certification Assessment

1. Company Details			
<b>RSPO Membership Number</b>	1-0022-06-000-00	<b>Membership Approval Date</b>	6 February 2006
<b>Parent Company Name</b>	PT Inti Indosawit Subur		
<b>Address</b>	Jl. M.H. Thamrin No.31 Jakarta 10230 Indonesia		
<b>Subsidiary (Certification Unit Name)</b>	PT Rigunas Agri Utama – Bungo Tebo Palm Oil Mill		
<b>Address</b>	Village of Tuo Sumay (sub-District of Sumay) and Pinang Belai (sub-District of Serai Serumpun), Tebo Regency, Jambi Province, Indonesia.		
<b>Contact Name</b>	Mr. Putu Grhyate Yonata Aksa		
<b>Website</b>	www.asianagri.com	<b>E-mail</b>	<a href="mailto:Putu_Aksa@asianagri.com">Putu_Aksa@asianagri.com</a>
<b>Telephone</b>	+62 21 23201119	<b>Facsimile</b>	+62 21 2301120

2. Certification Information			
<b>Certificate Number</b>	<b>RSPO 620917</b>	<b>Date of First Certification</b>	3 December 2015
		<b>Certificate Start Date</b>	3 December 2015
		<b>Certificate Expiry Date</b>	2 December 2020
<b>Scope of Certification</b>	Production of CPO and PK at Bungo Tebo Palm Oil Mill and FFB supplied from one (1) company owned estate namely Bungo Tebo Estate and eighteen (18) smallholder cooperatives. Palm oil mill capacity 60 tons FFB/hour		
<b>Applicable Standards</b>	RSPO P&C INA NI 2016; RSPO Supply Chain Certification Standard 2017 (CPO Mill – Module E)		

3. Other Certifications			
<b>Certificate Number</b>	<b>Standard(s)</b>	<b>Certificate Issued by</b>	<b>Expiry Date</b>
ID05/65250	ISO 14001:2015	SGS	10 June 2020
EU-ISCC-Cert-DE100-27302018	ISCC EU	SGS	07 July 2019
BSI-ISPO 619412	ISPO	BSI Group Indonesia 5 Desember 2021	5 December 2021

<b>4. Location(s) of Mill &amp; Supply Bases</b>			
<b>Name (Mill / Supply Base)</b>	<b>Location [Map Reference #]</b>	<b>GPS Coordinates</b> (Note for Auditors: Deg °, Minutes ', Seconds "; The format must be two decimal points) (Eg. 3° 51' 14.01" N)	
		<b>Latitude</b>	<b>Longitude</b>
Bungo Tebo Palm Oil Mill	Village of Tuo Sumay (sub-District of Sumay) and Pinang Belai (sub-District of Serai Serumpun), Tebo Regency, Jambi Province.	1° 20' 46.02" S	102°27'17.04" E
Bungo Tebo Estate	Village of Tuo Sumay (sub-District of Sumay) and Pinang Belai (sub-District of Serai Serumpun), Tebo Regency, Jambi Province	01° 15' 13" S - 01° 21' 51" S	102° 21' 39" E - 102° 29' 08" E
Koperasi Tanjung Dani Sakti	Tanjung Dani Hamlet, Tuo Sumay Village, Sumay sub-District, Tebo Regency, Jambi Province	01° 19' 17" S	102° 24' 36" E
Koperasi Sumay Jaya	Tuo Sumay Village, Sumay sub-District, Tebo Regency, Jambi Province	01° 23' 02" S	102° 26' 13" E
Koperasi Sumber Usaha	Tuo Sumay Village, Sumay sub-District, Tebo Regency, Jambi Province	01° 23' 06" S	102° 26' 49" E
Koperasi Sawit Bina Tani	Sungai Rambai Village, Tebo Ulu sub-District, Tebo Regency, Jambi Province	01° 22' 31" S	102° 23' 54" E
Koperasi Belarik Jaya	Jati Belarik Village, Sumay sub-District, Tebo Regency, Jambi Province	01° 27' 36" S	102° 27' 06" E
Koperasi Sawit Tambara Jaya	Tambun Arang Village, Sumay sub-District, Tebo Regency, Jambi Province	01° 26' 16" S	102° 28' 02" E
Koperasi Tunas Harapan	Teluk Langkap Village, Sumay sub-District, Tebo Regency, Jambi Province	01° 26' 02" S	102° 26' 18" E
Koperasi Sejahtera Tani	Punti Kalo Village, Sumay sub-District, Tebo Regency, Jambi Province	01° 25' 29" S	102° 25' 31" E
Koperasi Produksi Tani Mandiri	Kandang Village, Tebo Tengah sub-District, Tebo Regency, Jambi Province	01° 26' 34" S	102° 29' 24" E
Koperasi Tanjung Jaya Bersama	Tuo Sumay Village, Sumay sub-District, Tebo Regency, Jambi Province	01° 19' 40" S	102° 28' 29" E
Koperasi Tanjung Aur Duri	Teriti Village, Sumay sub-District, Tebo Regency, Jambi Province	01° 19' 38" S	102° 28' 03" E
Koperasi Sawit Makmur	Pinang Belai Village, Serai Serumpun sub-District, Tebo Regency, Jambi Province	01° 16' 58" S	102° 21' 50" E
Koperasi Sawit Makmur	Sekutur Jaya Village, Serai Serumpun sub-District, Tebo Regency, Jambi Province	01° 15' 34" S	102° 20' 01" E
Koperasi Barokah	Teluk Kasai Rambahan Village, Tebo Ulu sub-District, Tebo Regency, Jambi Province	01° 18' 00" S	102° 18' 40" E

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Koperasi Sejahtera	Sawit	Keluarga	Bungo Tanjung Village, Tebo Ulu sub-District, Tebo Regency, Jambi Province	01° 12' 46.8" S	102° 18' 57.7" E
Koperasi Bersama	Sawit	Makmur	Bukit Pamuan Village, Serai Serumpun sub-District, Tebo Regency, Jambi Province	01° 12' 15.5" S	102° 18' 33.8" E
Koperasi Sawit Karya Makmur			Napal Putih Village, Serai Serumpun sub-District, Tebo Regency, Jambi Province	01° 11' 02.4" S	102° 17' 01.3" E
Koperasi Perkasa	Sawit	Tanduk	Suko Makmur Village, Serai Serumpun sub-District, Tebo Regency, Jambi Province	01° 09' 05.0" S	102° 13' 55.5" E

<b>5. Description of Supply Base</b>					
<b>Estate</b>	<b>Total Planted (Mature + Immature)* (ha)</b>	<b>HCV (ha)</b>	<b>Infrastructure &amp; Other** (ha)</b>	<b>Total Area (ha)</b>	<b>% of Planted</b>
<b>Bungo Tebo Estate</b>	<b>2,519.38</b>	<b>37</b>	<b>109.26</b>	<b>2,665.64</b>	<b>94.51</b>
<b>Bungo Tebo Smallholder Scheme (2,957 smallholder's)</b>	<b>5,914</b>	<b>0</b>	<b>0</b>	<b>5,914</b>	<b>100</b>
Koperasi Tanjung Dani Sakti (110 smallholder's)	220		0	220	100
Koperasi Sumay Jaya (116 smallholder's)	232		0	232	100
Koperasi Sumber Usaha (92 smallholder's)	184		0	184	100
Koperasi Sawit Bina Tani (119 smallholder's)	238		0	238	100
Koperasi Belarik Jaya (91 smallholder's)	182		0	182	100
Koperasi Sawit Tambara Jaya (109 smallholder's)	218		0	218	100
Koperasi Tunas Harapan (72 smallholder's)	144		0	144	100
Koperasi Sejahtera Tani (44 smallholder's)	88		0	88	100
Koperasi Produksi Tani Mandiri (79 smallholder's)	158		0	158	100
Koperasi Tanjung Jaya Bersama	68		0	68	100

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(34 smallholder's)					
Koperasi Tanjung Aur Duri (34 smallholder's)	68		0	68	100
Koperasi Sawit Sumay Makmur (429 smallholder's)	858		0	858	100
Koperasi Sawit Makmur (336 smallholder's)	672		0	672	100
Koperasi Barokah (186 smallholder's)	372		0	372	100
Koperasi Sawit Keluarga Sejahtera (68 smallholder's)	136		0	136	100
Koperasi Sawit Makmur Bersama (314 smallholder's)	628		0	628	100
Koperasi Sawit Karya Makmur (355 smallholder's)	710		0	710	100
Koperasi Sawit Tanduk Perkasa (369 smallholder's)	738		0	738	100
<b>Grand Total</b>	<b>8,433.38</b>	<b>37</b>	<b>109.26</b>	<b>8,579.64</b>	<b>98.29</b>

\*: planted area are includes Mature, Immature and Replanting

\*\*: infrastructure & others consist of Mill (24.18 Ha), Road & Bridges (45 Ha), Nursery (11.08 Ha), boundary trenches (12 Ha), workers housing (17 Ha). Data collected based on Area Statement August 2018.

HCV area of Bungo Tebo Estate is within the HGU (3,367.28 Ha), whilst HCV for smallholders is outside the certificate of land ownership (SHM). Therefore, no HCV identified within the smallholder certified area.

6. Plantings & Cycle							
Estate	Age (Years)					Mature**	Immature
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		
<b>Bungo Tebo Estate</b>	<b>1,191.38</b>	<b>512.00</b>	<b>0</b>	<b>816.00</b>	<b>0</b>	<b>1,328.00</b>	<b>1,191.38</b>
<b>Bungo Tebo Smallholder Scheme (2,957 smallholder's)</b>	<b>0</b>	<b>0</b>	<b>866.00</b>	<b>5,048.00</b>	<b>0</b>	<b>5,914.00</b>	<b>0</b>
Koperasi Tanjung Dani Sakti (110 smallholder's)	-	-	-	220	-	220	-

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Koperasi Sumay Jaya (116 smallholder's)	-	-	-	232	-	232	-
Koperasi Sumber Usaha (92 smallholder's)	-	-	134	50	-	184	-
Koperasi Sawit Bina Tani (119 smallholder's)	-	-	112	126	-	238	-
Koperasi Belarik Jaya (91 smallholder's)	-	-	64	118	-	182	-
Koperasi Sawit Tambara Jaya (109 smallholder's)	-	-	26	192	-	218	-
Koperasi Tunas Harapan (72 smallholder's)	-	-	12	132	-	144	-
Koperasi Sejahtera Tani (44 smallholder's)	-	-	28	60	-	88	-
Koperasi Produksi Tani Mandiri (79 smallholder's)	-	-	158	-	-	158	-
Koperasi Tanjung Jaya Bersama (34 smallholder's)	-	-	68	-	-	68	-
Koperasi Tanjung Aur Duri (34 smallholder's)	-	-	42	26	-	68	-
Koperasi Sawit Sumay Makmur (429 smallholder's)	-	-	-	858	-	858	-
Koperasi Sawit Makmur (336 smallholder's)	-	-	-	672	-	672	-
Koperasi Barokah (186 smallholder's)	-	-	-	372	-	372	-
Koperasi Sawit Keluarga Sejahtera (68 smallholder's)	-	-	-	136	-	136	-
Koperasi Sawit Makmur Bersama (314 smallholder's)	-	-	-	628	-	628	-
Koperasi Sawit Karya Makmur (355 smallholder's)	-	-	-	710	-	710	-



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Koperasi Sawit Tanduk Perkasa (369 smallholder's)	-	-	222	516	-	738	-
<b>Grand Total (Ha)</b>	<b>1,191.38</b>	<b>512.00</b>	<b>866.00</b>	<b>5,864.00</b>	<b>0</b>	<b>7,242.00</b>	<b>1,191.38</b>

**Note:**

\*Please note whether there is replanting (fill up P3.1 by auditor) or new planting (fill up P7 by auditor)

\*\*Only Mature area is considered as production area

Immature area include replanting area.

<b>7. Certified Tonnage of FFB (Own Certified Scope)</b>			
Estate	Tonnage / year		
	Estimated (Nov 2017 – Aug 2018)	Actual (Nov 2017 – Aug 2018)	Forecast (Sep 2018 – Aug 2019)
<b>Bungo Tebo Estate</b>	<b>37,443.00</b>	<b>29,328.74</b>	<b>26,145.40</b>
<b>Bungo Tebo Smallholder Scheme (2,957 smallholder's)</b>	<b>105,130.00</b>	<b>87,853.82</b>	<b>112,970.08</b>
Koperasi Tanjung Dani Sakti (110 smallholder's)	4,148.00	2,063.02	3,502.57
Koperasi Sumay Jaya (116 smallholder's)	4,374.00	2,176.71	3,699.90
Koperasi Sumber Usaha (92 smallholder's)	2,819.00	2,150.24	2,840.40
Koperasi Sawit Bina Tani (119 smallholder's)	4,205.00	1,615.32	3,254.61
Koperasi Belarik Jaya (91 smallholder's)	3,204.00	2,565.96	3,427.48
Koperasi Sawit Tambara Jaya (109 smallholder's)	3,353.00	3,451.41	4,405.62
Koperasi Tunas Harapan (72 smallholder's)	2,245.00	2,982.27	3,270.89
Koperasi Sejahtera Tani	1,422.00	1,525.50	1,796.58

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(44 smallholder's)			
Koperasi Produksi Tani Mandiri (79 smallholder's)	2,726.00	2,815.92	3,232.29
Koperasi Tanjung Jaya Bersama (34 smallholder's)	1,210.00	630.05	987.96
Koperasi Tanjung Aur Duri (34 smallholder's)	1,159.00	873.29	1,145.65
Koperasi Sawit Sumay Makmur (429 smallholder's)	16,177.00	14,480.13	17,379.68
Koperasi Sawit Makmur (336 smallholder's)	12,210.00	9,361.39	12,785.44
Koperasi Barokah (186 smallholder's)	6,695.00	5,488.01	7,042.09
Koperasi Sawit Keluarga Sejahtera (68 smallholder's)	2,483.00	1,992.99	2,485.82
Koperasi Sawit Makmur Bersama (314 smallholder's)	11,378.00	9,960.45	12,574.99
Koperasi Sawit Karya Makmur (355 smallholder's)	12,377.00	10,333.41	13,546.46
Koperasi Sawit Tanduk Perkasa (369 smallholder's)	12,945.00	13,387.75	15,591.63
<b>Grand Total</b>	<b>142,573.00</b>	<b>117,182.56</b>	<b>139,115.48</b>

**Note:**
**Auditor Notes:**

For **Estimated**, the period shall be as previous assessment **Forecast**

For **Actual**, the period shall be from the last assessment until current period. Example:

- Last assessment date was 10/01/2017 and this year assessment date is 25/11/2017. The period for Actual shall be January 2017 – October 2017 (10 months).
- Last assessment date was 25/11/2017 and this year assessment date is 15/10/2018. The period for Actual shall be November 2017 – September 2018 (11 months).

Depending on the audit period, the actual volume can be more or less than 12 months.

If there is volume extension, please add the extended volume + the last year Forecast with **Estimated** and include a note at the bottom of the table to indicate what is the extended CSPO and CSPK volume.

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8. Certified Tonnage of FFB (from other certified unit(s)) if applicable *			
Estate	Tonnage / year		
	Estimated ( <i>key in period</i> )	Actual ( <i>key in period</i> )	Forecast ( <i>key in period</i> )
N/A	N/A		N/A
<b>Total</b>			

**Note:**  
**Auditor Notes:**  
 1. *Crop diversion from other certified unit(s) within the same management.*  
 2. *For period, please refer to notes in table 7 above.*

9. Non-Certified Tonnage of FFB (outside supplier – excluded from certificate) if applicable			
Independent FFB Supplier	Tonnage / year		
	Estimated (Nov 2017 – Aug 2018)	Actual (Nov 2017 – Aug 2018)	Forecast (Sep 2018 – Aug 2019)
Third party FFB supplier/collector	150,000	104,895.12	153,338.95
<b>Total</b>	<b>150,000</b>	<b>104,895.12</b>	<b>153,338.95</b>

**Note:**  
**Auditor Notes:**  
 For period, please refer to notes in table 7 above.

10. Certified Tonnage			
	Estimated (Nov 2017 – Aug 2018)	Actual (Nov 2017 – Aug 2018)	Forecast (Sep 2018 – Aug 2019)
	<b>Mill Capacity: 60 MT/hr</b>	FFB	FFB
<b>142,573.00</b>		<b>117,182.56</b>	<b>139,115</b>
<b>SCC Model: MB</b>	CPO (OER: 22.04 %)	CPO (OER: 20.72%)	CPO (OER: 20.94 %)
	<b>31,423.09</b>	<b>24,280.23</b>	<b>29,131</b>
	PK (KER: 5.30 %)	PK (KER: 5.43 %)	PK (KER: 5.45 %)
	<b>7,556.37</b>	<b>6,363.01</b>	<b>7,582</b>

**Note:** *for Forecast value is rounded up.*  
**Auditor Notes:**  
 For period, please refer to notes in table 7 above.

<b>11. Actual Sold Volume (CPO)</b>					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSB		
<b>CPO (MT)</b>	492.12	22,412	-	-	22,904.12

*Data collected from PalmTrace Transaction report period 30 Nov 2017 – 31 Aug 2018*

<b>12. Actual Sold Volume (PK)</b>					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSB		
<b>PK (MT)</b>	3,397.89	-	-	-	3,397.89

*Data collected from PalmTrace Transaction report period 30 Nov 2017 – 31 Aug 2018*

<b>13. Actual Group certification Claims</b>		
	Credit	Physical Volume (MT)
<b>IS-CSP0</b>	-	-
<b>IS-CSPKO</b>	-	-
<b>IS-CSPKE</b>	-	-

## Section 2: Assessment Process

### Certification Body:

BSI Services Malaysia Sdn Bhd,  
(ASI Accreditation Number: ASI-ACC-067)  
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)

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### 2.1 Assessment Methodology, Programme, Site Visits

The on-site initial assessment was conducted from **18 – 25 September 2018**. The audit programme is included as Appendix D. The approach to the audit was to treat the mill and its supply base as an RSPO Certification Unit. Mill was audited together with the sample estates. A range of environmental and social factors were covered. This includes consideration of topography, palm age, proximity to areas with HCVs, declared conservation areas and local communities.

The Major NC close out on-site assessment was conducted on **22-23 November 2018**. The audit programmes are included in Section 2.3.

The methodology for collection of objective evidence included physical site inspections, observation of tasks and processes, interviews of staff, workers and their families and external stakeholders, review of documentation and monitoring data. RSPO Principles & Criteria Indonesia National Interpretation, September 2016 and RSPO Supply Chain Certification Standard 2017 were used to guide the collection of information to assess compliance. The comments made by external stakeholders were also taken into account in the assessment.

The approach to the audit was to treat the mill and its supply base as an RSPO Certification Unit. The mill was audited together with the estates (or smallholders) of its supply base.

- The minimum sample size is four estates. Sample size for certification unit with more than four (4) estates were determined based on formula  $N = (0.8\sqrt{y}) \times (z)$  where y is the number of estates and where z is the multiplier defined by risk assessment
- As for the smallholders, the sample were determined following the RSPO Management System Requirements and Guidance for Group Certification of FFB Production (2016). The sampling of smallholders were based on the formula  $(0.8\sqrt{y}) \times (z)$ ; where y is total number of independent group member and where z is the multiplier defined by the risk assessment. The sampled smallholder listed in Appendix I.

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

Structured worker interviews with male and female workers and staff were held in private at the workplace in the mill and the estates. Fieldworkers were interviewed informally in small groups in the field. In addition, the wives of workers and staff were interviewed in informal group meetings at their housing. Separate visits were made to each of the local communities to meet with the village head and residents. Company officials were not present at any of the internal or external stakeholder interviews. A list of Stakeholders contacted is included as Section 3.5.

All the previous nonconformities are remains closed. The assessment findings for the initial assessment/annual surveillance assessment are detailed in Section 3.4.

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

For Initial and Re-certification assessment, the report was externally reviewed by RSPO approved Certification Reviewer prior to certification decision by BSI.

For Annual surveillance assessment, the report was internally reviewed and approved by BSI qualified certification reviewer.

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

<b>Assessment Program</b>					
<b>Name (Mill / Supply Base)</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>
Bungo Tebo POM	X	X	X	X	X
Bungo Tebo Estate	X	X	X	X	X
Koperasi Tanjung Dani Sakti (110 smallholder's)			X		
Koperasi Sumay Jaya (116 smallholder's)		X			
Koperasi Sumber Usaha (92 smallholder's)		X			
Koperasi Sawit Bina Tani (119 smallholder's)			X		
Koperasi Belarik Jaya (91 smallholder's)			X		
Koperasi Sawit Tambara Jaya (109 smallholder's)			X		

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Koperasi Tunas Harapan (72 smallholder's)				X	
Koperasi Sejahtera Tani (44 smallholder's)				X	
Koperasi Produksi Tani Mandiri (79 smallholder's)				X	
Koperasi Tanjung Jaya Bersama (34 smallholder's)				X	
Koperasi Tanjung Aur Duri (34 smallholder's)		X			
Koperasi Sawit Sumay Makmur (429 smallholder's)					X
Koperasi Sawit Makmur (336 smallholder's)		X			
Koperasi Barokah (186 smallholder's)					X
Koperasi Sawit Keluarga Sejahtera (68 smallholder's)					X
Koperasi Sawit Makmur Bersama (314 smallholder's)					X
Koperasi Sawit Karya Makmur (355 smallholder's)				X	
Koperasi Sawit Tanduk Perkasa (369 smallholder's)					X

**Tentative Date of Next Visit: September 23, 2019 - September 30, 2019**

**Total No. of Mandays: 32.5**

**2.2 BSI Assessment Team:**

<b>Team Member</b>	<b>Role</b> <i>(Team Leader or Team member)</i>	<b>Qualifications</b> <i>(Short description of the team members)</i>
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Name		
Yudwi Wisnu Rahmanto <b>(YWR)</b>	Team Leader	Bachelor of Forestry with majoring on Forest Silviculture. He worked at professional independent Certification Body as an Auditor for last 8 years and has involved in auditing activities with various certification schemes. Selected training which have been followed, such as RSPO Endorsed Lead Auditor Training Course, RSPO NEXT, ISPO Auditor/Lead Auditor Course, Quality Management System (QMS) ISO 9001:2008 Auditor/Lead Auditor Course, GIS-Basic Mapping and Spatial Analysis, Timber Legality Assurance System (SVLK), Verification Organization Training C.A.F.E Practices (Starbucks), UTZ Programme and others internal training programs. He has involved in auditing activities, such as Sustainable Forest Management by FSC FM/COC Scheme, Sustainable Palm Oil by RSPO and ISPO Scheme, Coffee And Farmer Equity (C.A.F.E Practices) Starbucks, Organic Standard (EU, NOP, JAS) for Coffee Farmers and Organic Exchange for Textile. During the assessment he assigned to verify legal, land dispute and long term aspect.
Mujinius Jalaraya <b>(MJ)</b>	Team member	He hold Bachelor degree from Faculty of Forestry, Bogor Agricultural University (IPB) in 2008, Majoring in Forest Resources Conservation and Ecotourism. He has working experience in palm oil plantations as SHE Assistant at PT. Astra Agro Lestari Tbk in 2008 - 2012 and as Supervisor Sustainability at Teladan Prima Group in 2012 – 2014. He involved in RSPO certification since 2014 as a team member subsequently as a Lead Auditor. He has completed the training, such as: Lead Auditor ISO 9001: 2008 course, Lead Auditor ISPO course, Lead Auditor RSPO endorsed course, RSPO SCCS Lead Auditor endorsed course, HCV Identification and management, Internal Auditor ISO 14001: 2004 Training, Training for Trainers, OHS Expert Training, etc. He is fluently speaking in English and Bahasa Indonesia. During this assessment, he assessed on the aspects of Environmental and HCV management.
Eko Purwanto <b>(EP)</b>	Team member	He graduated as Bachelor of Forestry from Forest Conservation Department, Faculty of Forestry, Bogor Agricultural University (IPB) in 2001. He owned working experience at Oil Palm Plantation in East Kalimantan since 2003 to 2012, the last position was Estate Manager. He has implemented good agricultural practice including integrated pest management and limited pesticides uses. He has experience in auditing ISO 9001, ISPO, RSPO P&C and RSPO SCC with SAI Global since 2012 to 2017 as Lead Auditor and sometimes as Auditor. He joined BSI Group Indonesia in August 2017 as Auditor/Lead Auditor for ISO, ISPO, RSPO P&C and RSPO SCC (Client Manager/Tutor). He has been trained for lead auditor of RSPO P&C (2013), ISO 9001:2008 (2012), ISO 14001:2004 (2013), ISPO (2012) and RSPO SCC (2012). He has received refreshment training of RSPO P&C in May 2018 and RSPO SCC in March 2018. He has also completed training course of ISO 14001 (2012), Minaut (Oil and Automotive) Indonesia (2011) and Introduction to HCV Toolkit HCV (2011). Since October 2012 he has been involved in quality (ISO 9001) management system audits for very broad industrial and involved in Indonesia Sustainable Palm Oil (ISPO) and RSPO P&C audit for several plantations and mills, also RSPO Supply Chain audit for several KCP, Bulking and Refinery. During the assessment he assigned to verify Best Agriculture and Mill Practices, Long-term Management Plan and Supply



		Chain for Mill.
Imam Fakhrurozi <b>(IF)</b>	Team member	Imam holds degree in Agriculture Technology and graduated from Gadjah Mada University, Yogyakarta in 2011. He had 2 (two) years working experienced related to oil palm industries i.e. as a sustainability and HSE in oil palm Plantation Company in Indonesia. Several relevant Training he has completed include ISO 9001 and 14001 Lead Auditor, Lead Auditor of SMK3, RSPO P&C Lead auditor endorsed courses. Currently he works for BSI Group based in Jakarta office. He is one of the BSI qualified RSPO auditor. He had been involved in RSPO auditing since 2016. During this assessment, he assessed on the Social, Labor aspect and stakeholder consultation.
Pratama A. Sedayu <b>(PS)</b>	Team member	He graduated from University of Jenderal Soedirman on 2008, majoring in Social Economic of Agriculture. He involved in RSPO certification since 2009 as a team member subsequently as a Lead Auditor, covering assessment against RSPO P&C in Indonesia, Malaysia, Thailand, Papua New Guinea, and Liberia. He completed the ISO 9001, ISO 14001, OHSAS 18001 Lead Auditor Course, HCV Identification and Management; ISPO Lead Auditor endorsed Course and RSPO P&C and RSPO SCCS Lead Auditor endorsed Courses. During this assessment, he assessed on OHS, Agrochemical handling and several on social aspect.

**Accompanying Persons: None**

### 2.3 Assessment Plan

The Assessment plan was sent to the client prior to the assessment (attached assessment plan).

Date	Time	Subjects	YWR	MJ	EP	PS	IF
			PRSPOLA	PRSPOLA/PRSPO-OHS/EMS	PRSPO-SCC/OHS/EMS	PRSPO-T OHS/EMS/SA	PRSPO-TOHS/TEMS/TA
Monday, 17/09/2018	08.55 – 10.30	Flight Jakarta – Jambi	√	√	√	√	√
	10.30 – 17.30	Travelling to PT RAU – Bungo Tebo POM	√	√	√	√	√
Tuesday, 18/09/2018	08.00 – 09.00	Opening meeting <ul style="list-style-type: none"> <li>Auditee Speech (Introduction of PIC, Profile of Certified Management Unit)</li> <li>Auditor Team Speech (Introduction, Audit Objective, Audit Scope, Audit Plan Discussion, Determine of Audit Sample, Transparency and Confidentiality Clarification)</li> <li>Verification of Basic Information (Mill and supply bases)</li> <li>Review of previous assessment findings.</li> </ul>	√				

Date	Time	Subjects	YWR	MJ	EP	PS	IF
			PRSPOLA	PRSPOLA/PRSPO-OHS/EMS	PRSPO-SCC/OHS/EMS	PRSPO-T OHS/EMS/SA	PRSPO-TOHS/EMS/TSA
	09.00 – 12.00	Interview with Stakeholders (statutory bodies): <ul style="list-style-type: none"> <li>- Environmental Agency of Bungo Tebo Regency</li> <li>- Labour Agency (Disnakertrans) of Bungo Tebo Regency</li> <li>- National Land Agency (Kantor Pertanahan) of Bungo Tebo Regency</li> <li>- Plantation Agency (Disbun) of Bungo Tebo Regency</li> </ul>					√
	09.00 – 12.00	Field observation to <b>Bungo Tebo Estate</b> : <ul style="list-style-type: none"> <li>• Implementation of Agronomy Aspect (Harvesting &amp; Transportation, Manuring, Pesticides Application, Road Maintenance, Integrated Pest Management, EFB Application)</li> <li>• Implementation of Environmental, Conservation and Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management, HCV Area)</li> <li>• Implementation of Occupational Health &amp; Safety Aspect</li> <li>• Implementation of Legal Aspect (Land Ownership, Legal Boundaries, Land Occupied)</li> <li>• Observation of Workers Facilities (Housing complex, School, Worship Place, etc.).</li> </ul>	√	√	√	√	
	12.00 – 14.00	Lunch Break	√	√	√	√	√
	14.00 – 17.00	<ul style="list-style-type: none"> <li>• Continued Field Observation (if any)</li> <li>• Verification of field visit and completing checklist</li> <li>• Consultation with internal stakeholders (Labour union, gender committee, local contractor and local NGO's)</li> </ul>	√	√	√	√	√

Date	Time	Subjects	YWR	MJ	EP	PS	IF
			PRSPOLA	PRSPOLA/PRSPO-OHS/EMS	PRSPO-SCC/OHS/EMS	PRSPO-T OHS/EMS/SA	PRSPO-TOHS/T EMS/TS A
Wednesday, 19/09/2018	08.00 – 12.00	<p>Field observation to <b>KOPERASI Tani Mandiri (scheme Smallholders)</b>:</p> <ul style="list-style-type: none"> <li>Implementation of Agronomy Aspect (Harvesting &amp; Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application)</li> <li>Implementation of Environmental, Conservation and Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management, HCV Area)</li> <li>Implementation of Occupational Health &amp; Safety Aspect</li> <li>Implementation of Legal Aspect (Land Ownership, Legal Boundaries)</li> <li>Consultation with internal stakeholders (village head, cooperative management, local contractor, local NGO's) – related Transparency and Social aspect.</li> </ul> <p><b>Sample taken: 21 smallholders plot (Hampanan 88, 89, 90 and 105)</b></p>	√	√	√	√	√
	12.00 – 14.00	Lunch Break	√	√	√	√	√
	14.00 – 17.00	• Continued Field Observation (if any)	√	√	√	√	√
		• Verification of field visit and completing checklist at Plasma Office.	√	√	√	√	√

Date	Time	Subjects	YWR	MJ	EP	PS	IF
			PRSPOLA	PRSPOLA/PRSPO-OHS/EMS	PRSPO-SCC/OHS/EMS	PRSPO-T OHS/EMS/SA	PRSPO-TOHS/T EMS/TS A
Thursday, 20/09/2018	08.00 – 12.00	<p>Field observation to <b>KOPERASI Tunas Harapan (scheme Smallholders)</b>:</p> <ul style="list-style-type: none"> <li>Implementation of Agronomy Aspect (Harvesting &amp; Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application)</li> <li>Implementation of Environmental, Conservation and Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management, HCV Area)</li> <li>Implementation of Occupational Health &amp; Safety Aspect</li> <li>Implementation of Legal Aspect (Land Ownership, Legal Boundaries)</li> <li>Consultation with internal stakeholders (village head, cooperative management, local contractor, local NGO's) – related Transparency and Social aspect.</li> </ul> <p><b>Sample taken: 19 smallholders plot (Hampan 48, 49, 50, 107)</b></p>	√	√	√	√	√
	12.00 – 14.00	Lunch Break	√	√	√	√	√
	14.00 – 17.00	• Continued Field Observation (if any)	√	√	√	√	√
		• Verification of field visit and completing checklist	√	√	√	√	√

Date	Time	Subjects	YWR	MJ	EP	PS	IF
			PRSPOLA	PRSPOLA/ PRSPO-OHS/EMS	PRSPO-SCC/OHS/EMS	PRSPO-T OHS/EMS/SA	PRSPO-TOHS/T EMS/TS A
Friday, 21/09/2018	08.00 – 11.30	<p>Field observation to <b>KUD Sejahtera Tani (scheme Smallholders)</b>:</p> <ul style="list-style-type: none"> <li>Implementation of Agronomy Aspect (Harvesting &amp; Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application)</li> <li>Implementation of Environmental, Conservation and Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management, HCV Area)</li> <li>Implementation of Occupational Health &amp; Safety Aspect</li> <li>Implementation of Legal Aspect (Land Ownership, Legal Boundaries)</li> <li>Consultation with internal stakeholders (village head, cooperative management, local contractor, local NGO's) – related Transparency and Social aspect.</li> </ul> <p><b>Sample taken: 12 smallholders plot (Hampan 51 and 108)</b></p>	√	√	√	√	√
	11.30 – 14.00	Lunch break	√	√	√	√	√
	14.00 – 17.00	<ul style="list-style-type: none"> <li>Continued Field Observation (if any)</li> <li>Verification of field visit and completing checklist</li> </ul>	√	√	√	√	√

Date	Time	Subjects	YWR	MJ	EP	PS	IF
			PRSPOLA	PRSPOLA/PRSPO-OHS/EMS	PRSPO-SCC/OHS/EMS	PRSPO-T OHS/EMS/SA	PRSPO-TOHS/T EMS/TS A
Saturday, 22/09/2018	08.00 – 12.00	<p>Field observation to <b>KUD Tanjung Jaya Bersama (scheme Smallholders)</b>:</p> <ul style="list-style-type: none"> <li>Implementation of Agronomy Aspect (Harvesting &amp; Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application)</li> <li>Implementation of Environmental, Conservation and Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management, HCV Area)</li> <li>Implementation of Occupational Health &amp; Safety Aspect</li> <li>Implementation of Legal Aspect (Land Ownership, Legal Boundaries)</li> <li>Consultation with internal stakeholders (village head, cooperative management, local contractor, local NGO's) – related Transparency and Social aspect.</li> </ul> <p><b>Sample taken: 9 smallholders plot (Hampanan 109)</b></p>	√	√	√	√	√
	12.00 – 14.00	Lunch break	√	√	√	√	√
	14.00 – 17.00	Off audit and stay onsite	√	√	√	√	√
Sunday 23/09/2018	08.00 – 17.00	Off day and stay onsite	√	√	√	√	√

**RSPO Public Summary Report**

**Revision 7 (Aug /2018)**

Date	Time	Subjects	YWR	MJ	EP	PS	IF
			PRSPOLA	PRSPOLA/ PRSPO-OHS/EMS	PRSPO-SCC/OHS/EMS	PRSPO-T OHS/EMS/SA	PRSPO-TOHS/T EMS/TS A
Monday 24/09/2018	08.00 – 12.00	Field observation to <b>Bungo Tebo POM:</b> <ul style="list-style-type: none"> <li>BMP for Mill Processing – site visit</li> <li>Supply Chain for CPO Mill (site visit) - FFB Receiving, Weighbridge, Dispatch CPO.</li> <li>Occupational Health &amp; Safety Aspect (Inspection to Chemical Storage, Hazardous Waste Storage, Fire Control Simulation, Processing Activities)</li> <li>Implementation of Environmental and Waste Management Aspect (POME Pond, Empty Bunch Area, Reservoir/Intake Point, Biogas Plant – <i>if any</i>)</li> <li>Consultation with internal stakeholders (labor union and gender committee) and local contractor for Mill and Estate.</li> </ul>	√		√	√	√
	12.00 – 14.00	Lunch break					
	14.00 – 17.00	<ul style="list-style-type: none"> <li>Supply Chain for CPO Mill (continued)</li> <li>Continued Field Observation (if any)</li> <li>Verification of field visit and completing checklist</li> </ul>					
Tuesday 25/09/2018	08.00 – 12.00	<ul style="list-style-type: none"> <li>Completing checklist and report preparation</li> </ul>	√	√	√	√	√
	12.00 – 14.00	Lunch break	√	√	√	√	√
	16.00 – 17.00	Closing Meeting <ul style="list-style-type: none"> <li>Presentation of audit findings (Noteworthy Positive Component, Non Conformities, OFI, Timelie of CAR's, Conclusion)</li> <li>Comments, Responses and Questions</li> </ul>	√	√	√	√	√

### Section 3: Assessment Findings

#### 3.1 Normative requirement applied for this assessment:

- PT Rigunas Agri Utama subsidiary of PT Inti Indosawit Subur Time Bound Plan
- RSPO P&C 2013 Generic
- RSPO Group Certification Standard 2016
- RSPO Supply Chain Certification Standard 2017
- RSPO P&C GA-NIWG 2017
- RSPO P&C INA-NIWG 2016
- RSPO P&C MY-NIWG 2014
- RSPO P&C PNG-NIWG 2017

#### 3.2 Time Bound Plan progress for multiple management units

Time Bound Plan		
Requirement	Remarks	Compliance
<b>Summary of the Time Bound Plan</b>		
Does the plan include all subsidiaries, estates and mills?	PT. Inti Indosawit Subur – Asian Agri Group has explained the certification plan for all of its subsidiaries; indicating all palm oil mills, company-owned estates and scheme smallholder as the supply base.	Comply
Have all the estates and mills certified within five years after obtaining RSPO membership?	Segati Mill (PT Mitra Unggul Pusaka) located in Pelalawan, Riau will planned Re-Audit in year 2018. Status of disclosure PT MUP has been submitted to RSPO by email on 29 November 2017, however there is no feedback from RSPO related to this.	Comply
Is the time bound plan challenging? <ul style="list-style-type: none"> <li>• Age of plantations.</li> <li>• Location.</li> <li>• POM development</li> <li>• Infrastructure.</li> <li>• Compliance with applicable law.</li> </ul>	The time bound plan is challenging. PT. Inti Indosawit Subur – Asian Agri Group demonstrate progress overtime. The age of plantation was generally mature. All of plantation has been incorporated with palm oil mill to process the FFB produced. The location of plantations were covering three provinces in Sumatera Utara Province, Riau Province and Jambi Province – Indonesia.	Comply
Have there been any changes since the last audit? Are they justified?	There is no changes from previous audit	Comply
If there have been changes, what circumstances have occurred?	There is no changes from previous audit	Comply
Have there been any stakeholder comments?	No there is haven't	Comply
Have there been any newly acquired subsidiaries?	No there is haven't	Comply
If yes, have the newly acquisitions certified within a three-year timeframe?	No there is haven't	Comply
Have there been any isolated	No isolated lapse.	Comply



lapses in implementation of the plan?		
<b>Un-Certified Units or Holdings</b>		
No replacement after dates defined in NIs Criterion 7.3: <ul style="list-style-type: none"> <li>Primary forest.</li> <li>Any area required to maintain or enhance HCVs in accordance with RSPO P&amp;C criterion 7.3.</li> </ul>	Segati Mill (PT Mitra Unggul Pusaka) located in Pelalawan, Riau will planned Re-Audit in year 2018. Status of disclosure of non-compliant land clearing PT MUP has been submitted to RSPO by email on 29 November 2017, the latest process is waiting final LUC report from external team. There is no feedback from RSPO afterward.	Comply
Any new plantings since January 1 <sup>st</sup> 2010 shall comply with the RSPO New Plantings Procedure.	Segati Mill (PT Mitra Unggul Pusaka) located in Pelalawan, Riau will planned Re-Audit in year 2018. Status of disclosure of non-compliant land clearing PT MUP has been submitted to RSPO by email on 29 November 2017, the latest process is waiting final LUC report from external team. There is no feedback from RSPO afterward.	Comply
Any Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 2.2, 6.4, 7.5 and 7.6.	Segati Mill (PT Mitra Unggul Pusaka) located in Pelalawan, Riau will planned Re-Audit in year 2018. Status of disclosure of non-compliant land clearing PT MUP has been submitted to RSPO by email on 29 November 2017, the latest process is waiting final LUC report from external team. There is no feedback from RSPO afterward.	Comply
Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 6.3.	Segati Mill (PT Mitra Unggul Pusaka) located in Pelalawan, Riau will planned Re-Audit in year 2018. Status of disclosure of non-compliant land clearing PT MUP has been submitted to RSPO by email on 29 November 2017, the latest process is waiting final LUC report from external team. There is no feedback from RSPO afterward.	Comply
Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1	Segati Mill (PT Mitra Unggul Pusaka) located in Pelalawan, Riau will planned Re-Audit in year 2018. Status of disclosure of non-compliant land clearing PT MUP has been submitted to RSPO by email on 29 November 2017, the latest process is waiting final LUC report from external team. There is no feedback from RSPO afterward.	Comply
Did the company conduct an internal audit? If so, has a positive assurance statement been produced?	Segati Mill (PT Mitra Unggul Pusaka) located in Pelalawan, Riau will planned Re-Audit in year 2018. Status of disclosure of non-compliant land clearing PT MUP has been submitted to RSPO by email on 29 November 2017, the latest process is waiting final LUC report from external team. There is no feedback from RSPO afterward.	Comply

### 3.3 Progress of scheme smallholders and/or outgrowers

<b>Progress of scheme smallholders or outgrowers towards compliance with relevant standards</b>		
<b>Requirement</b>	<b>Remarks</b>	<b>Compliance</b>
Has 100% of scheme smallholders and/or	All scheme smallholders associated to PT	Comply

scheme outgrowers comply with the standard within three years of the mill's initial certification?	Rigunas Agri Utama – Bungo Tebo Palm Oil Mill have been comply with the standard. No additional smallholder scheme within this certificate scope.	
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### 3.4 Details of findings

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

During the Certification Assessment there were Six (6) Major & Four (4) Minor nonconformities raised. The Bungo Tebo Mill – PT Rigunas Agri Utama Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

The implementation of the corrective action plans to address the minor nonconformity will be followed up during the next surveillance assessment. The implementation of the Corrective Actions for the Major Nonconformities has been verified for it effectiveness and closed accordingly.

<b>Summary of Total Number of Nonconformity</b>			
<b>Nonconformity</b>			
<b>NCR Ref #</b>	1679639-201809-M1	<b>Clause &amp; Category (Major / Minor)</b>	<b>Major 2.1.1</b>
<b>Date Issued</b>	27 September 2018	<b>Due Date</b>	26 December 2018
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	22-23 November 2018
<b>Statement of Nonconformity:</b>	The certificate holder cannot demonstrated evidence of Smallholder Cooperative Notary Deed "Akta Notaris Koperasi Plasma"		
<b>Requirement Reference:</b>	Evidence of compliance with relevant legal requirements shall be available.		
<b>Objective Evidence:</b>	Bungo Tebo Plasma has not been able to demonstrated the Notary Deed of Establishment of Cooperatives (Akta Notaris Pendirian Koperasi) which were approved by a Notary: - KOPERASI Tunas Harapan - KOPERASI Tanjung Jaya Bersama		
<b>Corrections:</b>	Management of Plasma Bungo Tebo has a communication and coordination with Investment Services "Dinas Penanaman Modal Pelayanan Modal Terpadu Satu Pintu Koperasi Usaha Kecil dan Menengah Kabupaten Tebo" to crosscheck and ask the copy/archive of Deed "Akta Notaris Pendirian Koperasi Tunas Harapan and Tanjung Jaya Bersama".  Investment Services of Tebo Regency "Dinas Penanaman Modal Pelayanan Modal Terpadu Satu Pintu Koperasi Usaha Kecil dan Menengah" issued the statement letter (Surat keterangan) which stated that before year 2008, approval of its deed "Akta Pendirian Koperasi" are does not required. In addition the letter also stated that "Akta Perubahan Anggaran Dasar Koperasi Tunas Harapan SK Nomor 09/BH/PAD/KOP.UKM/III/07 tanggal 7 Maret 2007 dan Akta Perubahan Anggaran Dasar Koperasi Tanjung Jaya Bersama SK Nomor		

	<p>47/BH/PAD/KOP.UKM/III/07 tanggal 22 Desember 2007” are recognized as a valid legality.</p> <p>Management of Plasma Bungo Tebo has also been able to show the initial Establishment Act of (Akte Pendirian awal) Koperasi Tunas Harapan and Koperasi Tanjung Jaya Bersama which have been authorized by Minister of Cooperative and Small Medium Enterprises, Republic of Indonesia as follows:</p> <ul style="list-style-type: none"> <li>- Deed of “Akta Pendirian” Koperasi Tani Tunas Harapan, Desa Teluk langkap Kecamatan Pembantu Sumay Kab. Bungo Tebo, approved by Minister of Cooperatives and Small Medium Business Enterprise No: 87/BH/KDK.5.3/IV/1999 dated 30 April 1999 about Approval of Cooperative Deeds.</li> <li>- Deed of “Akta Pendirian” Koperasi Tanjung Jaya Bersama, Desa Tuo Sumay, Kecamatan Sumay, Kab. Tebo, disahkan oleh approved by Minister of Cooperatives and Small Medium Business Enterprise No: 47/BH/KOP.UKM/XII/2007 dated 22 December 2007 about Approval of Cooperative Deeds.</li> </ul>
<b>Root Cause Analysis:</b>	<ul style="list-style-type: none"> <li>- There have been several changes to the management of KOPERASI so that there are several documents that are not properly compiled.</li> <li>- Lack of document control at KOPERASI official especially for legal document.</li> </ul>
<b>Corrective Actions:</b>	<ul style="list-style-type: none"> <li>- Filing all the licensing document of cooperative under assisted of PT Rigunas Agri Utama in the Plasma Office.</li> <li>- Make a checklist for monitoring the completeness of cooperative permit documents in the plasma office, and carry out monitoring every 3 months. Plasma Bungo Tebo management has already monitored the completeness of the Cooperative legality and licensing documents in November 2018. From the monitoring checklist document it can be shown that the licensing documents and cooperative legality already exist but there are still some documents that have not been collected in one file location and plasma management will collect documents immediately.</li> </ul>
<b>Assessment Conclusion:</b>	The corrective evidence of this NC is sufficient and the NC status is closed.

Summary of Total Number of Nonconformity			
Nonconformity			
<b>NCR Ref #</b>	1679639-201809-M2	<b>Clause &amp; Category (Major / Minor)</b>	<b>Major 4.5.1</b>
<b>Date Issued</b>	27 September 2018	<b>Due Date</b>	26 December 2018
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	22-23 November 2018
<b>Statement of Nonconformity:</b>	The application of IPM especially for weed control is not well monitored.		
<b>Requirement Reference:</b>	Monitoring of Integrated Pest Management (IPM) plan implementation shall be available.		
<b>Objective Evidence:</b>	<ul style="list-style-type: none"> <li>• There are some areas with uncontrolled weeds condition in the circle/path of palm oil plantation during field visits in Plasma Bungo Tebo at Plot 3161, 3163 and 3170 – Hamparan/Block 108 (KOPERASI Tani Sejahtera) and Plot 3307 -</li> </ul>		

	<p>Hamparan/Block 109 (KOPERASI Tanjung Jaya Bersama).</p> <ul style="list-style-type: none"> <li>In the document "Program dan Realisasi Penyemprotan Tahun 2018 Kebun Plasma Bungo Tebo", stated that spraying activities in all Plot of Plasma Bungo Tebo, scheduled in February and August, and has completed according to the schedule. However there is still spraying activities discovered during field visits in Hamparan/Block 88 - KOPERASI Tani Mandiri dated 19 September 2018; and found some conditions for areas that have not been sprayed, for example in plots 3161, 3163 and 3170 – Hamparan/Block 108 - KOPERASI Sejahtera Tani and Plots 3307 – Hamparan/Block 109 - KOPERASI Tanjung Jaya Bersama. In addition, some farmers/smallholder member interviewed stated that their plots were sprayed for three rotations a year.</li> </ul>
<p><b>Corrections:</b></p>	<ul style="list-style-type: none"> <li>Plasma Bungo Tebo management has conducted immediate weeds control particularly in Kavling 3161, 3163 and 3170 - Hamparan 108 (KOPERASI Sejahtera Tani) and Kavling 3307 – Hamparan 109 (KOPERASI Tanjung Jaya Bersama). Weeds control performed by two ways firstly by mechanical weeds control to cut the hard and high weeds, secondly by chemical weeds control by TUS team. Based on field visit to KOPERASI Tanjung Jaya Bersama Kavling 3307 and Kavling 107 KOPERASI Tunas Harapan and Kavling 3161, 3163 3170 KOPERASI Sejahtera Tani can be demonstrated that weeds has been controlled in circle and path area.</li> <li>Plasma Bungo Tebo management also has conducted the verification of spraying work and weeds condition in smallholder kavling/plots. Plasma management has issued the Memorandum No. 08/EST-KLO/MEMO/IV/18 dated 5 November 2018 concerning verification of spraying work result on smallholder plot/kavling. Spray verification was carried out to assess the quality and effectiveness of the spraying works in the farmers' plot by the TUS team, verification was carried out 2 weeks after the spraying works was done. An example of verification carried out on spraying in August and September 2018 at KOPERASI Tani Mandiri Hamparan/Block 88 can be shown. Based on the results of the verification, there are several plots that have not been effective in spraying so that it is sprayed again in the third week of September 2018.</li> <li>The Plasma Bungo Tebo has also made a Memorandum on "Tugas dan Tanggung Jawab Inspeksi Internal Petani" Nomor: 06/EST-KLO/MEMO/IX/18" dated September 25, 2017. In the Memorandum stated the PIC along with the duties and responsibilities of conducting smallholder kavling/plot inspection.</li> </ul>
<p><b>Root Cause Analysis:</b></p>	<ul style="list-style-type: none"> <li>Spraying is not simultaneous in one KT (Hamparan) due to inadequate working days of TUS team.</li> <li>The results of spraying in August included a number of plots whose weeds had not been controlled, due to the rain conditions after the spray, so that the spray follow-up was carried out in September on the hamparan (KT) 88.</li> <li>The lack of knowledge of smallholder member regarding program of weeds control (circle and path) program because farmers are not directly involved and only submit to the company.</li> </ul>
<p><b>Corrective Actions:</b></p>	<ul style="list-style-type: none"> <li>The Plasa Bungo Tebo Management has made a program &amp; review of internal</li> </ul>

	<p>inspections of smallholder member plot in 2018 and 2019. In the program stated that inspection of the smallholder plots includes:</p> <ul style="list-style-type: none"> <li>✓ Weed control</li> <li>✓ Pruning</li> <li>✓ Arrangement of frond stacking</li> <li>✓ Boundary markers</li> <li>✓ Waste management</li> </ul> <p>Inspections are carried out for a year every month and cover all KOPERASI. Inspections have been carried out since October 2018, KOPERASI which has been inspected include KOPERASI Tani Mandiri Hamparan 88, 89, KOPERASI Tunas Harapan Hamparan 48, 49; the total of plots that have been inspected are 91 plots of smallholder. The results of inspections of plot conditions were followed up by the Plasma Bungo Tebo by making an action plan such as conducting socialization to the smallholders in the plots, socializing the benefits of participating in TUS in weed control.</p> <ul style="list-style-type: none"> <li>- Plasma Bungo Tebo has also set a budget that has been approved by the company's top management for the construction of TUS Warehouse along with TUS equipment and the addition of TUS team personnel at Bungo Tebo Plasma SP6. The TUS warehouse is expected to be able to meet the needs of spraying in the plasma plantations which have sometimes been too late and ineffective because of the lack of resources of the TUS team and affordable TUS equipment from the plasma plantation. The budget for making TUS houses is approved by the Managing Director on November 7, 2018 and plans for construction will be carried out in January 2019. Evidence of approval for the TUS housing budget can be shown.</li> </ul>
<b>Assessment Conclusion:</b>	The corrective evidence of this NC is sufficient and the NC status is closed.

Summary of Total Number of Nonconformity			
Nonconformity			
<b>NCR Ref #</b>	1679639-201809-M3	<b>Clause &amp; Category (Major / Minor)</b>	<b>Major 4.7.2</b>
<b>Date Issued</b>	27 September 2018	<b>Due Date</b>	26 December 2018
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	22-23 November 2018
<b>Statement of Nonconformity:</b>	Risk assessment document is not consistent with the specified risk calculation standards.		
<b>Requirement Reference:</b>	A documented risk assessment shall be available and its implementation shall be recorded.		
<b>Objective Evidence:</b>	<p>Inconsistency in risk analysis at Bungo Tebo Estate:</p> <ul style="list-style-type: none"> <li>- Risk analysis has not referred to the related OSH regulations that have been evaluated;</li> <li>- Not consistent in determining the frequency value and consequences, because it does not describe the actual number of incidents/accidents (based on work accident records). Sample: wounds from harvest activities -</li> </ul>		

	<p>fall of midribs, rated frequency 1, while recording work accidents have shown 14 incidents of accidents due to fall of midrib during January - August 2018. According to the procedure, it should be given a value of 6.</p> <ul style="list-style-type: none"> <li>- Not consistent in preparing risk control. Samples: welding activities, grinding and lathe in the workshop are calculated with a value of 180, but no risk control is prepared. This is not consistent with procedures which state that the 70-200 risk level is substantial, make repairs as soon as possible and do not require the involvement of top management.</li> <li>- Not consistent in preparing the OSH program, which does not consider the results of the risk assessment. Currently the OSH program does not include risk control for activities with a 70-200 risk value such as welding, grinding, lathe in the workshop; cutting FFB with an ax (during the trip) - covering sharp parts, binding the ax safely on the motorbike; harvesting FFB with egrek - providing 3 pieces of fiber (14 meters), manual terracing;</li> </ul> <p>Inconsistency in risk analysis at Bungo Tebo POM:</p> <ul style="list-style-type: none"> <li>- Risk analysis has not referred to the related OSH regulations that have been evaluated;</li> <li>- Inconsistent in including non-routine activities such as engine maintenance, repairs, replacement of parts (bearings, chains, liners, steel cables, nozzles, etc.), cleaning processes at loading ramp stations, sterilizers, threshing, pressing. Does not include risk analysis for fabrication activities (use of welding machines, lathes, grinding machines) in the POM workshop.</li> <li>- Inconsistent in linking risk analysis with OSH programs. The OSH program currently does not consider the risk value of 200-400 such as activities at clarification stations.</li> </ul> <p>Inconsistency in risk analysis at Bungo Tebo Plasma:</p> <p>Not consistent in determining the severity of the impact between the effects of death, disability and injury - in calculating the level of risk;</p>
<p><b>Corrections:</b></p>	<ul style="list-style-type: none"> <li>- The company has listed the latest regulations related to OHS. There are 62 regulations referred to that are relevant to the application of OHS and its control.</li> <li>- The company has revised HIRADC for all activities in Bungo Tebo estate and plasma plantations as well as Bungo Tebo POM by referring to the latest relevant regulations. The HIRADC revision is carried out on November 6, 2018. The calculation of frequency and consequence values is in accordance with the procedures specified in the Hazard Identification SOP, Risk Assessment and Control Determination AA-SMK3-02-R0 on August 3, 2017. Risk assessment is also assessed based on evaluation results frequency of work accident rates and actual causes of work accidents. Risk control has been made for all risks identified and assessed with a risk value of 20 - 70 (intermediate, corrective actions can be scheduled later and adequate management with existing procedures) 70-200 (substantial and do repairs as soon as possible and no top management involvement is needed) and 200 - 400 (high and need attention from top management and immediate corrective action).</li> <li>- The company has also created a OHS program by considering the calculated</li> </ul>

	<p>risk value, for example 70-200 risk values such as welding, grinding, lathe in the workshop; cutting FFB with an ax (during the trip) - covering sharp parts, binding the ax safely on the motorbike; FFB harvest with egrek - provision of 3 connections (14 meters), manual terracing. Activities at the clarification station with a risk score of 180 OSH programs have been made by supervising work and using PPE by the field assistant.</p> <ul style="list-style-type: none"> <li>- Company has conducted the training of OHS concerning HIRADC procedure and standard. The training was particularly for safety committee meeting. Training was delivered by Sustainability team and OHS expert. The training was conducted on 17 October 2018, evidence of training can be demonstrated.</li> </ul>
<b>Root Cause Analysis:</b>	<ul style="list-style-type: none"> <li>- Safety Committee or "P2K3" meetings have not discussed in detail the risk analysis of potential hazards associated with relevant regulations.</li> <li>- The lack of PIC knowledge competencies that update risk analysis.</li> <li>- The unavailability of the agenda in the P2K3 meeting to review the annual K3 Program that has been made.</li> <li>- Risk identification has not been carried out on workshop activities at each station</li> </ul>
<b>Corrective Actions:</b>	<ul style="list-style-type: none"> <li>- Conduct a management review by adding an OHS regulatory review agenda every 3 months. Company has made a management review schedule for 2018-2019. PT Rigunas Agri Utama has coordinate with sustainability &amp; CSR department to be able to involve OHS managers in risk analysis reviews.</li> <li>- Add the format to the work accident log document by categorizing each work incident/accident: Job, stage, risk/damage. The format has been set and can be demonstrated during NCR visit.</li> <li>- Review available risk analysis by evaluating risk controls for all workers in PT Rigunas Agri Utama both Estate, Mill and Plasma/smallholder. Review was conducted at least once a year.</li> <li>- Enter the agenda at P2K3 meetings to update risks analysis of new non-routine activities. P2K3 meeting will conducted each month.</li> <li>- Refresh training for training in HIRADC set up and evaluation for PICs who are responsible every 1 year.</li> </ul>
<b>Assessment Conclusion:</b>	The corrective evidence of this NC is sufficient and the NC status is closed.

<b>Summary of Total Number of Nonconformity</b>			
<b>Nonconformity</b>			
<b>NCR Ref #</b>	1679639-201809-M4	<b>Clause &amp; Category (Major / Minor)</b>	<b>Minor 5.3.3</b>
<b>Date Issued</b>	27 September 2018	<b>Due Date</b>	26 December 2018
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	22-23 November 2018
<b>Statement of Nonconformity:</b>	<p>This major non-conformity escalated from Minor NC #1550974-201711-N1            Previous corrective action:            Make a schedule of waste disposal from housing to landfill and supervise as well</p>		

	<p>as monitoring the housing domestic waste management</p> <p>Corrective action implementation was found to be not effective. Waste disposal management in worker housing and smallholder not in line with company procedure.</p>
<b>Requirement Reference:</b>	A documented waste management plan to avoid or reduce pollution and its implementation shall be available
<b>Objective Evidence:</b>	<p>Visit to Bungo Tebo Estate employee housing, Afdeling I Sungai Lalo, audit team found:</p> <ul style="list-style-type: none"> <li>- Domestic waste is not properly disposed, found waste disposed in housing yards, dirty water drainage channels - not placed in trash bins;</li> <li>- Drainage of dirty water pooled, and turned black;</li> <li>- Found hazardous waste stored in housing and not sent to hazardous waste temporary storage;</li> <li>- The implementation of waste management is not in line with company procedures.</li> </ul> <p>Bungo Tebo Plasma Manager has establish the procedure "Surat Keputusan SOP Pengelolaan Kemasan Ex-Pupuk di Kebun No.027/DOK/SOP/AA/2016" dated 2 December 2016 and guidance "Identifikasi Sumber Polusi dan Rencana Pengurangan Polusi di Perkebunan Petani" dated 24 January 2018 - related to waste management in plasma farmers/smallholder. It was stated that the waste from the land (innerbag of ex fertilizer sack) must be collected by the plasma management and put into the temporary hazardous waste storage. However, implementation in the field is not in line with the procedure, for example:</p> <ul style="list-style-type: none"> <li>- At Koperasi Tunas Harapan, plot No.2370 - disposing of innerbag plastic ex fertilizer sack in the field;</li> </ul> <p>At Tanjung Jaya Bersama Cooperative, plot No.3274, 3276, 3279 farmers states that it burns of innerbag plastic ex fertilizer sack.</p>
<b>Corrections:</b>	<ul style="list-style-type: none"> <li>- The company has taken action by making a drainage channels and semitizing/concrete trenches in the Lalo housing. Curently semitizing/concrete trench has been made along 15 meters to the final sewer. Trench drainage channels have also been cleaned and normalized using bachoe loaders in lanes 1, 2, 3 and 4 of lalo housing. During a visit to the Lalo housing it can be demonstrated that the housing drainage canal is clean and can flow well and there is no puddle.</li> <li>- The company has also made improvements to the management of housing domestic waste by creating an additional garbage bins to temporarily accommodate housing waste. At present, there is an additional of 1 unit (2 garbage bin) size 4 x 2 m in the Lalo housing and 4 units of the garbage bin at Bukit Harapan housing. All employees are required to dispose of domestic waste in the garbage bin that has been provided. The company also provides sacks to hold garbage in each house before being dumped in the final trash cans/garcabge bin. The minutes and evidence of the garbage bin construction can be shown, during field visit it can be demonstrated that the trash cans has been adequately made.</li> </ul>



<b>Root Cause Analysis:</b>	<ul style="list-style-type: none"> <li>- The lack of awareness of residents in employee housing in the management of B3 &amp; non-B3 domestic waste</li> <li>- The lack of a number of garbage bins in each housing and there are still garbage bins that have been damaged</li> <li>- Housing drainage that does not yet have a clear final disposal direction</li> <li>- Farmers do not understand the environmental impact resulting from improper management of inner bag of fertilizer (scattered &amp; burned)</li> </ul>
<b>Corrective Actions:</b>	<ul style="list-style-type: none"> <li>- Periodically monitor the cleanliness of the residential environment by field assistant (Asisten Afdeling) every 3 months. Monitoring has been carried out on 6 – 8 November 2018 the Lalo housing estate (emplacement), Pulai housing estate, Cooperative housing, Kulim housing and Traksi housing estate. The results of monitoring can be shown in the "Checklist Pemeriksaan Lingkungan Areal perumahan AA-KL-801-FM".</li> <li>- The company also issued a Memorandum Number: 019/EST-KBT/MEMO/IX/18 dated November 5, 2018 concerning Sanctions for employees' that do not manage waste properly in their housing. For employees who dispose of litter will be given a sanction in the form of a reprimand letter and if they still performing violations three times in succession will be given a warning letter.</li> </ul>
<b>Assessment Conclusion:</b>	Corrective action made is sufficient and implemented during NCR Close Out visit. This NC is Closed.

<b>Summary of Total Number of Nonconformity</b>			
<b>Nonconformity</b>			
<b>NCR Ref #</b>	1679639-201809-M5	<b>Clause &amp; Category (Major / Minor)</b>	<b>Major 6.5.1</b>
<b>Date Issued</b>	27 September 2018	<b>Due Date</b>	26 December 2018
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	22-23 November 2018
<b>Statement of Nonconformity:</b>	Management of human resources related to the appointment of Daily Employees Released to Permanent Employees not in accordance with applicable labor regulations.		
<b>Requirement Reference:</b>	Documentation of pay and conditions for employees based on the existing manpower regulations shall be available.		
<b>Objective Evidence:</b>	<p>Based on interviews and verification of "Monthly Report TK Permata Agri" show that workers (a kindergarten teacher) under the management of Permata Agri Foundation has worked 21 (twenty one) days or more during the three (3) consecutive months. However, its status is still PHL, an example of which is verified:</p> <ul style="list-style-type: none"> <li>- Neneng Hasanah, S.Pd (PHL) has worked 21 (twenty one) days or more in the 2018 period, March: 25 days, April: 25 days, May: 25 days, June: 25 days, July: 26 days and August: 25 days (working as PHL since 2016).</li> <li>- Winny Andrinay Br Ginting (PHL) has worked 21 (twenty one) days or more in the 2018 period, March: 25 days, April: 25 days, May: 25 days, June: 25 days, July: 26 days and August : 25 days (worked as PHL since 2016).</li> <li>- Ms. Afriani, S.Pd.I (PHL) has worked 21 (twenty one) days or more in</li> </ul>		

	the 2018 period, March: 25 days, April: 25 days, May: 25 days, June: 25 days, July: 26 days and August: 25 days (working as PHL since 2016).
<b>Corrections:</b>	<p>The company has appointed PHL employees (Permata Agri Kindergarten teachers) as PKWT employees (Certain Time Contract Workers) with contracts made for 1 year and will be extended after the contract expires. The employment contract is made as follows:</p> <ul style="list-style-type: none"> <li>- Employee Contract No. 001/HRD-RO3/SPK/I/2018 tanggal 1 Oktober 2018 a.n Neneng Hasanah</li> <li>- Employee Contract No. 002/HRD-RO3/SPK/I/2018 tanggal 1 Oktober 2018 a.n Afriani</li> <li>- Employee Contract No. 003/HRD-RO3/SPK/I/2018 tanggal 1 Oktober 2018 a.n Winny Andriani Br. Ginting</li> </ul> <p>The employment contract is made in accordance with applicable labor regulations including terms and conditions, rights and obligations along with matters that can abort the employment contract. The employment contract is made based on agreement and signed by both parties between the company and the workforce. The rights stated in the contract same with the rights of permanent employees such as basic wages, fixed allowances, rice supply, housing, etc.</p> <p>During interview with Ms. Neneng hasanah, Afriani and Winny Andriani Br. Ginting indicated that they have signed a work contract without coercion and they have understood the contents of the contract of employment agreement.</p>
<b>Root Cause Analysis:</b>	The status of the kindergarten teacher (guru TK) is an employee under the Permata Agri Foundation and is not under the authority of PT Rigunas Agri Utama so the company has difficulty making decisions to establish TK teacher status as permanent employees.
<b>Corrective Actions:</b>	<ul style="list-style-type: none"> <li>- To identify the employees under the authority of the company and other parties outside the company related to the duties and responsibilities in the appointment SKU.</li> <li>- Identify the employees who have PHL status (casual workers) and make a SKU appointment program for 5 years.</li> </ul>
<b>Assessment Conclusion:</b>	Based on NCR Close Out visit, verifying conducted on those teachers (employees). It was concluded this corrective action is accepted and NC is Closed.

<b>Summary of Total Number of Nonconformity</b>			
<b>Nonconformity</b>			
<b>NCR Ref #</b>	1679639-201809-M6	<b>Clause &amp; Category (Major / Minor)</b>	<b>Major 6.12.1</b>
<b>Date Issued</b>	27 September 2018	<b>Due Date</b>	26 December 2018
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	22-23 November 2018
<b>Statement of Nonconformity:</b>	PT. Rigunas Agri Utama - Bungo Tebo has not yet established policies regarding forced labor and human trafficking, and has not yet defined the definition of forced labor and human trafficking.		

<b>Requirement Reference:</b>	There shall be evidence that no forms of forced or trafficked labor are used.
<b>Objective Evidence:</b>	The company has not been able to show policies related to prohibiting forced labor and human trafficking; and the company has not defined the definition of forced labor and human trafficking.
<b>Corrections:</b>	<p>PT Rigunas Agri Utama - Bungo Tebo has issued the Company Policy on 9 November 2018 signed by HRD Region Plantation Manager 3 Jambi regarding forced labor and human trafficking. The definition of forced labor as defined in the policy is the work carried out under the threat of punitive sanctions where workers do not have the freedom to agree on the implementation of the work. The policy states that PT Rigunas Agri Utama - Bungo Tebo prohibits any form of forced labor and human trafficking in every operational activity of the company in accordance with applicable national and international regulatory requirements in the following ways:</p> <p>The policy states that PT Rigunas Agri Utama - Bungo Tebo Plantation and Plant prohibits any form of forced labor and human trafficking in every operational activity of the company in accordance with applicable national and international regulatory requirements in the following ways:</p> <ul style="list-style-type: none"> <li>- Guaranteeing employees who will and are working in the company is not the result of human trafficking through a standardized employee recruitment system.</li> <li>- Communicating this policy to every staff, foreman, employee, supplier, contractor at all levels and functions of organizations and cooperatives that are guided by the company to care about this company policy and encourage them to be responsible for compliance.</li> </ul> <p>The policy has been communicated to all employees. Examples of socialization through muster morning on Afdeling 3 and Traksi on 14 November 2018. During interview with workers, they have aware and understand the company policy concerning on forced labor and human trafficking.</p>
<b>Root Cause Analysis:</b>	Company policy still includes policies related to forced labor and human trafficking implicitly and not explicitly explained in company policies.
<b>Corrective Actions:</b>	<ul style="list-style-type: none"> <li>- To socialize regularly to the employees and the relevant stakeholders regarding the company's policy of forced labor and human trafficking.</li> <li>- Monitoring the implementation of company policies and ensuring that policies have been implemented properly in terms of employee recruitment and employee employment contracts in accordance with applicable regulations</li> </ul>
<b>Assessment Conclusion:</b>	Corrective action made by certificate holder is demonstrated during NCR Close Out visit, then this NC is Closed.

<b>Summary of Total Number of Nonconformity</b>			
<b>Nonconformity</b>			
<b>NCR Ref #</b>	1679639-201809-N1	<b>Clause &amp; Category (Major / Minor)</b>	<b>Minor 2.2.2</b>
<b>Date Issued</b>	27 September 2018	<b>Due Date</b>	ASA-4
<b>Closed (Yes / No)</b>	No	<b>Date of nonconformity Closure</b>	

<b>Statement of Nonconformity:</b>	Legal boundary pegs in sample of smallholders plot are not found.
<b>Requirement Reference:</b>	Legal boundaries are demonstrated clearly and maintained.
<b>Objective Evidence:</b>	Based on field visit at sample smallholders plot "Koperasi Sejahtera Tani" (Hampanan 51 and Hampanan 108) on 21 September 2018, it is clearly: <ol style="list-style-type: none"> <li>1. Kavling/Plot No. 2307 (Saad Amri Aziz), 2 boundary pegs not founded.</li> <li>2. Kavling/Plot No. 3163 (Mushadi); 3161 (Azwir A); 3170 (Khoiriah/Darman), all boundary pegs are not founded.</li> </ol>
<b>Corrections:</b>	Installing smallholders plot missing pegs at Hampanan 51 and Hampanan 108 (Koperasi Sejahtera Tani): <ol style="list-style-type: none"> <li>1. Kavling/Plot No. 2307 (Saad Amri Aziz), 2 boundary pegs installed.</li> <li>2. Kavling/Plot No. 3163 (Mushadi); 3161 (Azwir A); 3170 (Khoiriah/Darman), all boundary pegs installed.</li> </ol>
<b>Root Cause Analysis:</b>	Missing boundary pegs due to human/cattle disturbance are not well identified and monitored.
<b>Corrective Actions:</b>	<ul style="list-style-type: none"> <li>- Monitoring of boundary pegs condition by smallholders assistant in accordance with available program.</li> <li>- Create monitoring plan on boundary pegs for entire smallholders cooperative plots.</li> <li>- Create letter of assignment for person in charge who responsible to check and monitor smallholders plot condition of each cooperative.</li> <li>- Create schedule of management review on boundary pegs monitoring result.</li> </ul>
<b>Assessment Conclusion:</b>	

<b>Summary of Total Number of Nonconformity</b>			
<b>Nonconformity</b>			
<b>NCR Ref #</b>	1679639-201809-N2	<b>Clause &amp; Category (Major / Minor)</b>	<b>Minor 4.7.6</b>
<b>Date Issued</b>	27 September 2018	<b>Due Date</b>	ASA-4
<b>Closed (Yes / No)</b>	No	<b>Date of nonconformity Closure</b>	
<b>Statement of Nonconformity:</b>	Medical and incident/social insurance (BPJS) for all workers are not properly covered.		
<b>Requirement Reference:</b>	All workers shall be provided with medical care, and covered by accident insurance (see criterion 6.5.3).		
<b>Objective Evidence:</b>	Based on Employee Data Record in Bungo Tebo Estate on August 2018 totally 735 workers consist of Monthly Permanent Workers (SKU-B) – 4.63%, Daily Permanent Workers (SKU-H) – 17.28% and Casual Daily Workers (PHL) – 78.10%.  However, based on Summary of Jamsostek Payment No. Ref: KBT EE.00.0952 within period June to August 2018, shows that several workers of PT Rigunas Agri Utama are not covered by social insurance (Jamsostek) as per regulation		

	<p>required. Collecting evidence as follow:</p> <ul style="list-style-type: none"> <li>- August 2018, payment validation number: 11001511001103241314, paid for 339 workers (SKU-H and PHL).</li> <li>- July 2018, payment validation number: 110015461808, paid for 356 workers (SKU-H and PHL).</li> <li>- June 2018, paid for 350 workers (SKU-H and PHL).</li> </ul> <p>Sample workers has verified: Mr. Zainuddin, Mr. Akmal, Mr. Jamhuri, Mr. Andi Shaputra and Mr. Munika Auzandi.</p>
<b>Corrections:</b>	Proposing of Mr. Zainuddin, Mr. Akmal, Mr. Jamhuri, Mr. Andi Shaputra and Mr. Munika Auzandi to registering on insurance.
<b>Root Cause Analysis:</b>	<ul style="list-style-type: none"> <li>- High of workers turnover</li> <li>- Worker presence are very less, then the workers feeling inconvenience to pay worker insurance.</li> </ul>
<b>Corrective Actions:</b>	<ul style="list-style-type: none"> <li>- Inventory the workers who have not registered in Jamsostek/insurance program and develop registration program for social insurance every 6 month.</li> <li>- Make an agreement with employees who have not registered with social insurance and new employees must agree to be registered and pay contributions for social insurance programs under applicable regulations.</li> </ul>
<b>Assessment Conclusion:</b>	

<b>Summary of Total Number of Nonconformity</b>											
<b>Nonconformity</b>											
<b>NCR Ref #</b>	1679639-201809-N3	<b>Clause &amp; Category (Major / Minor)</b>	<b>Minor 4.6.4</b>								
<b>Date Issued</b>	27 September 2018	<b>Due Date</b>	ASA-4								
<b>Closed (Yes / No)</b>	No	<b>Date of nonconformity Closure</b>									
<b>Statement of Nonconformity:</b>	PT Rigunas Agri Utama – Bungo Tebo cannot demonstrate that use of Gramoxone (a.i. Paraquat dichloride) will eliminated and only use for exceptional circumstances.										
<b>Requirement Reference:</b>	The evidence shall be available to demonstrate that use of Pesticides, categorized in Class 1A or 1B by World Health Organization, or those are listed in the Stockholm and Rotterdam Conventions, and paraquat are not used, except in specific situations identified in national Best Practice guidelines. The use of such pesticides shall be minimized and eliminated as part of a plan, and shall only be used in exceptional circumstances.										
<b>Objective Evidence:</b>	<p>The certificate holder has monitor use of Gramoxone (a.i. Paraquat dichloride) annually:</p> <p>Bungo Tebo Estate</p> <table border="1"> <thead> <tr> <th>Year</th> <th>Volume (L)</th> </tr> </thead> <tbody> <tr> <td>2015</td> <td>1,182</td> </tr> <tr> <td>2016</td> <td>2,670</td> </tr> <tr> <td>2017</td> <td>5,915</td> </tr> </tbody> </table>			Year	Volume (L)	2015	1,182	2016	2,670	2017	5,915
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2016	2,670										
2017	5,915										

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	<table border="1"> <tr> <td>2018*</td> <td>3,281</td> </tr> </table> <p>*data Jan-Aug 2018</p> <p>During audit on September 2018, use of Gramoxone (a.i. Paraquat dichloride) is decrease compare with 2017. The Certificate Holder has made strategic planning to reduce Gramoxone (a.i. Paraquat dichloride) totally 896 Liter as per mention in "Program Rencana Pengurangan Penggunaan Bahan Kimia (Pestisida ) TM dan TBM Kebun Bungo Tebo – 2018". However, there is no plan to eliminate use of Gramoxone (a.i. Paraquat dichloride).</p>	2018*	3,281												
2018*	3,281														
<b>Corrections:</b>	<p>Creating 5 years program to eliminate use of Gramoxone (Paraquat dichloride), as follow:</p> <table border="1"> <thead> <tr> <th>Year</th> <th>Volume (L)</th> </tr> </thead> <tbody> <tr> <td>2018</td> <td>3,382.25</td> </tr> <tr> <td>2019</td> <td>2,384.25</td> </tr> <tr> <td>2020</td> <td>1,192</td> </tr> <tr> <td>2021</td> <td>834</td> </tr> <tr> <td>2022</td> <td>417</td> </tr> <tr> <td>2023</td> <td>0</td> </tr> </tbody> </table>	Year	Volume (L)	2018	3,382.25	2019	2,384.25	2020	1,192	2021	834	2022	417	2023	0
Year	Volume (L)														
2018	3,382.25														
2019	2,384.25														
2020	1,192														
2021	834														
2022	417														
2023	0														
<b>Root Cause Analysis:</b>	Long term program to eliminating Gramoxone (Paraquat dichloride) not available.														
<b>Corrective Actions:</b>	<ul style="list-style-type: none"> <li>- Manager, Asst. Manager and Agronomy assistant shall monitor of Gramoxone use for spraying area 270 Ha in year 2018 (Oct-Dec).</li> <li>- Synchronizing between Monthly Work Plan (Oct-Dec) each division and Long term Program to eliminating Gramoxone.</li> <li>- Use of Gramoxone only for fern crops 1.5 cycle (889 Ha) in 2019.</li> <li>- Fern spraying with Gramoxone for palm crop on year of planting 2008 with total 512 Ha with dosage 0.6 Liter/Ha in 2020.</li> <li>- Fern spraying with Gramoxone for palm crop on year of planting 2008 with total 512 Ha with dosage 0.375 Liter/Ha in 2021.</li> <li>- Fern spraying with Gramoxone for palm crop on year of planting 2008 with total 512 Ha with dosage 0.2 Liter/Ha in 2022.</li> </ul>														
<b>Assessment Conclusion:</b>															

Summary of Total Number of Nonconformity			
Nonconformity			
<b>NCR Ref #</b>	1679639-201809-N4	<b>Clause &amp; Category (Major / Minor)</b>	<b>Minor 4.7.7</b>
<b>Date Issued</b>	27 September 2018	<b>Due Date</b>	ASA-4
<b>Closed (Yes / No)</b>	No	<b>Date of nonconformity Closure</b>	

<b>Statement of Nonconformity:</b>	Occupational accident investigation record is filled incomplete to helping root cause analysis and to prepare corrective action.
<b>Requirement Reference:</b>	Occupational injuries shall be recorded using Lost Time Accident (LTA) metrics.
<b>Objective Evidence:</b>	<p>Sample of work accident investigation sheet on Bungo Tebo Estate and Bungo Tebo Mill:</p> <ul style="list-style-type: none"> <li>- Accident Mr.S (harvester), 22 January 2018 eyes irritated from palm debris, located in block A94K. Investigation carried out, however the incident investigation form (why-tree form) to identify root cause and preparing correction has not been filled up completely.</li> <li>- Accident Mr. D (harvester), 18 April 2018, injured leg from fallen palm frond, accident occurred during harvesting block D08m. Investigation form (why-tree form) was not completely filled in order to analyzing root cause and preparing correction.</li> </ul> <p>Bungo Tebo POM:</p> <ul style="list-style-type: none"> <li>- Mr.H (Loading ramp), 17 January 2018 head injured from FFB flatting plate located on loading ramp. Investigation carried out, however accident investigation form to identify root cause and preparing correction has not been filled up completely.</li> </ul>
<b>Corrections:</b>	Revising accident investigation sheet/form for Mr.S (harvester), 22 January 2018, Mr. D (harvester), 18 April 2018, Mr.H (Loading ramp), 17 January 2018.
<b>Root Cause Analysis:</b>	Less competency of personal in charge who responsible for accident investigation.
<b>Corrective Actions:</b>	Refreshment training related accident investigation procedure to all supervisor (assistant and foreman).
<b>Assessment Conclusion:</b>	

<b>Opportunity for Improvements</b>	
OFI #	Description
<b>OFI 1</b>	Principle 8: Improvement against document control and administration.

<b>Observations</b>	
OBS Reference#	Description
1679639-201809-01	Principle 2 - Compliance with applicable laws and regulations  Progress of land claims handling and overlapping communities certificate land ownership (SHM) on PT Rigunas Agri Utama land use title (hGU) to Jambi Provincial Land Office.

<b>Positive Findings</b>	
PF #	Description
<b>PF 1</b>	

**3.4.1 Status of Nonconformities Previously Identified and Observations**

Non-Conformity			
<b>NCR Ref #</b>	1550974-201711-N1	<b>Clause &amp; Category (Major / Minor)</b>	<b>Minor 5.3.3</b>
<b>Closed (Yes / No)</b>	No	<b>Date of nonconformity Closure</b>	22-23 November 2018
<b>Statement of Nonconformity:</b>	Inconsistency found in implementation of waste management to avoid or reduce pollution.		
<b>Requirement Reference:</b>	A documented waste management plan to avoid or reduce pollution and its implementation shall be available		
<b>Objective Evidence:</b>	<ul style="list-style-type: none"> <li>- During visit to landfill area at Block B17b of Bungo Tebo Estate on 15 November 2017, it was found that domestic waste are spread at the area, landfill was not dogged and no sign and date of landfill closing.</li> <li>- The domestic waste management in housing area Bungo Tebo POM was not controlled properly, in housing area in Bungo Tebo POM - found scattered rubbish, in additional there was no provided trash can.</li> </ul>		
<b>Corrective Actions:</b>	- Make a schedule of waste disposal from housing to landfill and supervise as well as monitoring the housing domestic waste management		
<b>Assessment Conclusion:</b>	Corrective action implementation was found to be not effective. Waste disposal management in worker housing and smallholder not in line with company procedure.  Escalate to MAJOR.		

Opportunity for Improvement	
OFI#	Description
OFI 1	

**3.4.2 Summary of the Nonconformities and Status**

CAR Ref.	Category (Major / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
1137714M1	Major		19/12/2014	closed on 17/06/2015
1137714M2	Major		19/12/2014	closed on 17/06/2015
1137714M3	Major		19/12/2014	closed on 17/06/2015
1137714M4	Major		19/12/2014	closed on 17/06/2015
1137714M5	Major		19/12/2014	closed on 17/06/2015
1137714M6	Major		19/12/2014	closed on 17/06/2015



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1137714M7	Major		19/12/2014	closed on 17/06/2015
1137714M8	Major		19/12/2014	closed on 17/06/2015
1137714M9	Major		19/12/2014	closed on 17/06/2015
1137714M10	Major		19/12/2014	closed on 17/06/2015
1137714M11	Major		19/12/2014	closed on 17/06/2015
1137714M12	Major		19/12/2014	closed on 17/06/2015
1137714M13	Major		19/12/2014	closed on 17/06/2015
1137714M14	Major		19/12/2014	closed on 17/06/2015
1137714M15	Major		19/12/2014	closed on 17/06/2015
1137714M16	Major		19/12/2014	closed on 17/06/2015
1137714N1	Minor		19/12/2014	closed on 22/09/2016.
1137714N2	Minor		19/12/2014	Escalated into Major NC #1378035M4. Closed on 11/11/2016.
1137714N3	Minor		19/12/2014	Escalated into Major NC #1378035M4. Closed on 11/11/2016.
1137714N4	Minor		19/12/2014	Escalated into Major NC #1378035M4. Closed on 11/11/2016.
1137714N5	Minor		19/12/2014	closed on 22/09/2016.
1137714N6	Minor		19/12/2014	closed on 22/09/2016.
1137714N7	Minor		19/12/2014	closed on 22/09/2016.
1137714N8	Minor		19/12/2014	closed on 22/09/2016.
1137714N9	Minor		19/12/2014	closed on 22/09/2016.
1137714N10	Minor		19/12/2014	closed on 22/09/2016.
1137714N11	Minor		19/12/2014	closed on 22/09/2016.
1137714N12	Minor		19/12/2014	Escalated into Major NC #1378035M12. Closed on 21/11/2016.
1137714N13	Minor		19/12/2014	closed on 22/09/2016.
1137714N14	Minor		19/12/2014	Escalated into Major NC #1378035M14. Closed on 21/11/2016.
1137714N15	Minor		19/12/2014	closed on 22/09/2016.
1137714N16	Minor		19/12/2014	closed on 22/09/2016.
1137714N17	Minor		19/12/2014	closed on 22/09/2016.

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1137714N18	Minor		19/12/2014	closed on 22/09/2016.
1378035M1	Major		22/09/2016	closed on 21/11/2016.
1378035M2	Major		22/09/2016	closed on 21/11/2016.
1378035M3	Major		22/09/2016	closed on 21/11/2016.
1378035M4	Major		22/09/2016	closed on 21/11/2016.
1378035M5	Major		22/09/2016	closed on 21/11/2016.
1378035M6	Major		22/09/2016	closed on 21/11/2016.
1378035M7	Major		22/09/2016	closed on 21/11/2016.
1378035M8	Major		22/09/2016	closed on 21/11/2016.
1378035M9	Major		22/09/2016	closed on 21/11/2016.
1378035M10	Major		22/09/2016	closed on 21/11/2016.
1378035M11	Major		22/09/2016	closed on 21/11/2016.
1378035M12	Major		22/09/2016	closed on 21/11/2016.
1378035M13	Major		22/09/2016	closed on 21/11/2016.
1378035M14	Major		22/09/2016	closed on 21/11/2016.
1378035M15	Major		22/09/2016	closed on 21/11/2016.
1378035M16	Major		22/09/2016	closed on 21/11/2016.
1378035M17	Major		22/09/2016	closed on 21/11/2016.
1378035M18	Major		22/09/2016	closed on 21/11/2016.
1378035M19	Major		22/09/2016	closed on 21/11/2016.
1378035N1	Minor		22/09/2016	Escalated into Major NC #1550974-201711-M1. Closed on 17/01/2018.
1378035N2	Minor		22/09/2016	Escalated into Major NC #1550974-201711-M2. Closed on 17/01/2018.
1378035N3	Minor		22/09/2016	Closed on 21/11/2017
1550974-201711-M1	Major	4.1.2	22/11/2017	Closed on 17/01/2018
1550974-201711-M2	Major	4.3.6	22/11/2017	Closed on 17/01/2018
1550974-201711-M3	Major	4.6.6	22/11/2017	Closed on 17/01/2018
1550974-201711-M4	Major	4.7.1	22/11/2017	Closed on 17/01/2018
1550974-201711-M5	Major	4.7.3	22/11/2017	Closed on 17/01/2018
1550974-201711-M6	Major	5.3.2	22/11/2017	Closed on 17/01/2018
1550974-201711-M7	Major	SCC-E.5.1	22/11/2017	Closed on 19/12/2017
1550974-201711-N1	Minor	5.3.3	22/11/2017	Escalated to MAJOR 1679639-201809-M4

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1679639-201809-M1	Major	2.1.1	27/09/2018	Closed on 22-23/11/2018
1679639-201809-M2	Major	4.5.1	27/09/2018	Closed on 22-23/11/2018
1679639-201809-M3	Major	4.7.2	27/09/2018	Closed on 22-23/11/2018
1679639-201809-M4	Major	5.3.3	27/09/2018	Escalation of Minor 1550974-201711-N1
1679639-201809-M5	Major	6.5.1	27/09/2018	Closed on 22-23/11/2018
1679639-201809-M6	Major	6.12.1	27/09/2018	Closed on 22-23/11/2018
1679639-201809-N1	Minor	2.2.2	27/09/2018	Open
1679639-201809-N2	Minor	4.7.6	27/09/2018	Open
1679639-201809-N3	Minor	4.6.4	27/09/2018	Open
1679639-201809-N4	Minor	4.7.7	27/09/2018	Open

**3.5. Stakeholders Consultation**

Stakeholder consultation involved internal and external stakeholders. External stakeholders were contacted by telephone to arrange meetings at a location convenient to them to discuss **Bungo Tebo POM – PT Rigunas Agri Utama** Certification Unit’s environmental and social performance, legal and any known dispute issues.

Meetings were conducted with stakeholders to seek their views on the performance of the company with respect to the RSPO requirements and aspects where they considered that improvements could be made. At the start of each meeting, the interviewer explained the purpose of the audit followed by an evaluation of the relationship between the stakeholder and the company before discussions proceeded. The interviewer recorded comments made by stakeholders and later was verified with the management team. Any comment which is not complying to the RSPO P&C requirements have been incorporated as an assessment finding.

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 below.

<b>List of Stakeholders Contacted</b>	
<p><b>Internal Stakeholders</b></p> <ul style="list-style-type: none"> <li>- Gender Committee PT Rigunas Agri Utama – Bungo Tebo</li> <li>- Worker Union PT Rigunas Agri Utama – Bungo Tebo</li> <li>- Sample Worker of PT Rigunas Agri Utama – Bungo Tebo (Mill and Estate)</li> </ul>	<p><b>Union/Contractors/Local Communities</b></p> <ul style="list-style-type: none"> <li>- Representative of Punti Kalo village</li> <li>- CV Selamat Mandiri Pratama (local contractor)</li> <li>- Representative of Smallholder Cooperative “Tunas Harapan”, Teluk Langkap village.</li> <li>- Representative of Smallholder Cooperative “Tani Mandiri”, Kandang village</li> <li>- Representative of Smallholder Cooperative “Sejahtera Tani”, Punti Kalo village</li> <li>- Representative of Smallholder Cooperative “Tanjung Jaya Bersama”, Tuo Sumay village</li> </ul>

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Government Departments	NGO
<ul style="list-style-type: none"> <li>- Regency Land Agency (BPN Kabupaten Tebo).</li> <li>- Plantation Service (Dinas Perkebunan, Peternakan dan Perikanan) of Tebo Regency.</li> <li>- Environmental Service (Dinas Lingkungan Hidup) of Tebo Regency.</li> <li>- Manpower and Transmigration Service (Dinas Tenaga Kerja dan Transmigrasi) of Tebo Regency.</li> </ul>	<ul style="list-style-type: none"> <li>- Sawit Watch Indonesia (<a href="mailto:info@sawitwatch.or.id">info@sawitwatch.or.id</a>)</li> <li>- Aid Environment (<a href="mailto:info@aidenvironment.org">info@aidenvironment.org</a>)</li> <li>- WWF Indonesia (<a href="mailto:media@wwf.or.id">media@wwf.or.id</a>)</li> <li>- Yayasan SETARA Jambi (<a href="mailto:info@setarajambi.org">info@setarajambi.org</a>)</li> <li>- LSM Pemantau Korupsi &amp; Harta Negara, Tebo. No respond.</li> <li>- LSM Panglimo Djoenid Kab. Tebo. No respond.</li> </ul>

IS #	Description
<b>01</b>	<p><b>Feedbacks: National Land Services at Tebo Regency Level (Kantor Pertanahan Kab. Tebo)</b></p> <ol style="list-style-type: none"> <li>1. PT Rigunas Agri Utama already has complete legality.</li> <li>2. There is no mining permit at the HGU company PT Rigunas Agri Utama.</li> <li>3. In 2016, published 293 SHM indicated on the PT Rigunas Agri Utama HGU land. Several meetings have been held between the Regency Government. Tebo, BPN Kab. Tebo, PT Rigunas Agri Utama and SHM owners to find a solution. At present the settlement process is in the Regency Government. Tebo. As of January 2018 there was a meeting with the Jambi Provincial Regional Office.</li> </ol> <p><b>Management Responses:</b></p> <ol style="list-style-type: none"> <li>1. PT Rigunas Agri Utama has land legality in the form of HGU for its working area.</li> <li>2. There is no mining permit above the company's HGU.</li> <li>3. Indications of the issuance of SHM 293 parcels of PT Rigunas Agri Utama's HGUs are being handled by the TP3 Team (Plantation Settlement Settlement Team), Kab. Tebo. The last meeting on November 30, 2016 directed the Regional Office of the BPN Jambi Province to conduct field checks. Field Inspections were conducted in August 2017. Until now there was no official meeting from the District TP3. Tebo to discuss the continuation of this issues.</li> </ol> <p><b>Audit Team Findings:</b></p> <p>The land issues already verified and fill in the checklist. The company waiting a respond from local government related progress of these issues. Next surveillance auditor team should be contact to provincial government in Jambi to clarify the related issues.</p>
<b>02</b>	<p><b>Feedbacks: Plantation Agency of Tebo Regency (Dinas Perkebunan, Peternakan dan Perikanan Kab. Tebo)</b></p> <ol style="list-style-type: none"> <li>1. PT Rigunas Agri Utama routinely submits a Plantation Business Development Report (LPUP) every semester. 2017 semester LPUP has been reported.</li> <li>2. There are no complaints from the public regarding environmental pollution.</li> <li>3. In 2016, BPN Kab. Tebo issued a SHM whose indications were at HGU PT Rigunas Agri Utama. Currently the settlement process is in the Regency Government of Tebo.</li> </ol> <p><b>Management Responses:</b></p> <ol style="list-style-type: none"> <li>1. PT Rigunas Agri Utama has sent a Plantation Business Development Report (LPUP) SM 1 2017, SM 2 2017 and SM 1 2018 to the Office of Plantation, Animal Husbandry and Fisheries, Kab. Tebo</li> <li>2. There are no community complaints regarding environmental pollution</li> <li>3. Indications of the issuance of SHM 293 parcels of PT Rigunas Agri Utama's HGUs are being handled by the TP3 Team (Plantation Settlement Settlement Team), Kab. Tebo. The last meeting on November 30, 2016 directed the Regional Office of the BPN Jambi Province to conduct field checks. Field Inspections were conducted in August 2017. Until now there was no official meeting from the District TP3. Tebo to</li> </ol>

	<p>discuss the continuation of this issues.</p>
	<p><b>Audit Team Findings:</b> The land issues already verified and fill in the checklist. The company waiting a respond from local government related progress of these issues. Next surveillance auditor team should be contact to provincial government in Jambi to clarify the related issues.</p>
<p><b>03</b></p>	<p><b>Feedbacks: Environmental Agency of Tebo Regency (Dinas Lingkungan Hidup Kab. Tebo)</b></p> <ol style="list-style-type: none"> <li>1. PT Rigunas Agri Utama has a complete environmental permit and is currently still valid. Examples of permits are POME for Land Application and Hazardous Waste "LB3".</li> <li>2. The company actively submits routine reports, for example RKL / RPL every semester.</li> <li>3. There is no environmental pollution. There are no complaints from the public regarding environmental pollution.</li> <li>4. The Environmental Agency actively visits to PT Rigunas Agri Utama for Mill and Estate.</li> </ol> <p><b>Management Responses:</b></p> <ol style="list-style-type: none"> <li>1. Operational licenses related to the environment are owned by PT Rigunas Agri Utama such as: LA Permit, LB 3 Storage Permit and Medical Waste Burial Agreement.</li> <li>2. The company routinely sends environmental reports such as: Report on the implementation of Land Applications, Air quality monitoring reports, RKL / RPL Reports, River Water quality reports.</li> <li>3. There are no complaints of environmental pollution from the community.</li> <li>4. Department of Environment Kab. Tebo made 2 visits in 2018, namely supervision of environmental permits and PPLH in May 2018 and monitoring the monitoring of river water quality and Application Land in July 2018.</li> </ol> <p><b>Audit Team Findings:</b> No issues on environment reporting. NC raised related to domestic waste management on indicator 5.3.3.</p>
<p><b>04</b></p>	<p><b>Feedbacks: Manpower Agency of Tebo Regency (Dinas Tenaga Kerja dan Transmigrasi Kab. Tebo)</b></p> <ol style="list-style-type: none"> <li>1. There are no child laborers under the age of 18 in the company PT Rigunas Agri Utama.</li> <li>2. The company PT Rigunas Agri Utama has Estate Worker Union (SPBUN), administratively complete.</li> <li>3. The company PT Rigunas Agri Utama provides wages for its employees in accordance with the Minimum Wage of the Prov. Jambi (UMP) in 2018.</li> </ol> <p><b>Management Responses:</b></p> <ol style="list-style-type: none"> <li>1. PT Rigunas Agri Utama accepts workers on condition that they have a residence document (Identity Card and Family Card) with an age above 18 years</li> <li>2. PT Rigunas Agri has a Estate Supervisor Unit (PUK) of National Workers Union with the head of a.n Turino Junaidi Purba.</li> <li>3. PT Rigunas provides wages for its employees in accordance with the Jambi Province Minimum Wage (UMP) in 2018.</li> </ol> <p><b>Audit Team Findings:</b> During interview and clarifying on field, it is clear no child labour used within the certified plantation. Payment for workers are referred to applicable regulation (Provincial Minimum Wage).</p>
<p><b>05</b></p>	<p><b>Feedbacks: Village Supervisory Board of Kandang Village and Punt Kalo Village (Badan Pengawas Desa Kandang dan Desa Punt Kalo)</b></p> <ol style="list-style-type: none"> <li>1. Positive benefits of the existence of the company: improving the economy of the community, can work in a company. Farmers can sell FFB to Bungo Tebo Mill.</li> <li>2. After the company established, a new business are develops in the community.</li> <li>3. There is no environmental complaint from the community.</li> <li>4. Every year the company provides assistance to the community,</li> <li>5. The community still preserves the local culture of "kompangan", which is a musical art activity that is staged when it is festive.</li> </ol>

	<p><b>Management Responses:</b></p> <ol style="list-style-type: none"> <li>1. Maintain good relations and open communication with the village administrator of Punti Kalo village.</li> <li>2. The company maintains operational sustainability so that the community continues to feel the benefits of the company</li> <li>3. The company carries out environmental management properly in accordance with applicable regulations and procedures</li> <li>4. The company accepts all forms of input / requests from the village and considers the assistance that can be done. The preparation of the CSR program is conducted once every year by considering input from the village.</li> <li>5. The company supports the form of local cultural preservation efforts in the form of requests for assistance from the village to keep local culture alive.</li> </ol>
	<p><b>Audit Team Findings:</b> It is positive, clear and no issues during stakeholder consultation with surrounding local communities.</p>
<p><b>06</b></p>	<p><b>Feedbacks: Local Contractor for Replanting "CV Selamat Mandiri Pratama"</b></p> <ol style="list-style-type: none"> <li>1. Contract / work agreement for preparation activities for replanting (uprooted, chipping, making terraces and contour roads).</li> <li>2. All heavy equipment operators have valid licenses (SIO) stored in the Jambi office.</li> <li>3. PPE is provided by the contractor (safety shoes and helmet), while the first aid kit is carried by the foreman of the garden.</li> <li>4. Work results based on BAPP at the end of each month, for payment using the transfer system every 10th of the following month.</li> <li>5. Employment and Health BPJS is provided by the contractor.</li> </ol>
	<p><b>Management Responses:</b></p> <ol style="list-style-type: none"> <li>1. The company carries out a work contract (contract) for replanting work (uprooted, chipping, making terraces and contour roads)</li> <li>2. Contractors must employ operators who already have licenses (SIO)</li> <li>3. Operator PPE must be provided contractor and first aid kit provided by the company.</li> <li>4. Employment social and health insurance (BPJS) for operators are provided by contractors.</li> </ol>
	<p><b>Audit Team Findings:</b> It is positive, clear and no issues during stakeholder consultation with local contractor visited on field.</p>
<p><b>07</b></p>	<p><b>Feedbacks: Workers Union "SPSI" of PT Rigunas Agri Utama</b></p> <ol style="list-style-type: none"> <li>1. The organizational structure of Trade Unions consists of Estate, Mill and Smallholders employees. The total members until August 2018 were 576 members with SKU and BHL employee status.</li> <li>2. Regular meetings between trade unions and companies to discuss labor matters have not been carried out routinely.</li> <li>3. Meeting minutes are often not well-documented.</li> <li>4. Trade unions request cooperation from companies to periodically update employee data and be informed to unions. So that unions can also monitor their members properly.</li> <li>5. If a new employee is on probation and is still not a member of a trade union, how is the BPJS insurance involved?</li> <li>6. Some employees with a working period of +/- 5 months, BPJS insurance deductions have been made every month in the paycheck, but have not received the BPJS membership card. How is the progress?</li> <li>7. Proposing the Bungo Tebo Estate clinic to become a health facility, so that if there is an emergency, it can be referred to the Tebo Hospital or Bungo General Hospital. Because, so far the reference to Asian Agri Sehat in the Taman Raja clinic and then referred to the Jambi Hospital.</li> <li>8. How is the progress of the proposed trade union program related to making vegetable plant bibles to be distributed to each housing. So that residents can grow vegetables around the house, so they no longer need to buy at a rather expensive price.</li> </ol>
	<p><b>Management Responses:</b></p> <ol style="list-style-type: none"> <li>1. "SPSI" Trade Union at PT Rigunas Agri Utama consists of Estate, Mill and Smallholders employees. Total members are 576 members with SKU and BHL employee status.</li> </ol>

	<p>2. The annual meeting between SPSI and management is scheduled for February and July each year. If there are problems with the work of the SPSI management, you can directly convey to the office (PR and KTU) to find a solution.</p> <p>3. Minutes of company meetings and SPSI will be documented by attaching a attendance list and photographs in the future.</p> <p>4. Employee data will be given to SPSI every month so that SPSI can monitor membership.</p> <p>5. BPJS membership for new employees or probationary period will be registered by HRD to the BPJS office.</p> <p>6. The company will collect data on employees who do not have a BPJS employment card and will request a reprint of the card to BPJS Employment. For BPJS the health of participant cards already exists in the company in the form of softcopy and will be printed for all employees in stages.</p> <p>7. Because there is a change in the referral system based on zoning since September 1, 2018 at BPJS Kesehatan, the patient's referral from PT Rigunas Agri Utama becomes Jambi because the BPJS Health Center is still on behalf of the Asian Agri Sehat Clinic Taman Raja located in Tanjung Jabung Barat. Therefore PT Rigunas Agri Utama will take care of the registration of the Level I Health Facilities for its clinic to the Muara Bungo Health BPJS Branch.</p> <p>8. Vegetable planting in Sei Lalo Housing has been carried out, while the vegetable planting program for the Sei Lalo and Bukit Harapan employees housing will be continued when entering the rainy season so the success rate is high.</p>
	<p><b>Audit Team Findings:</b> For employees/workers status, it has been raised as NC on indicator 6.5.1.</p>
<p><b>08</b></p>	<p><b>Feedbacks: Gender Committee of PT Rigunas Agri Utama</b></p> <p>1. The organizational structure of the Gender Committee is an employee / plantation worker and factory, making it difficult to coordinate regular meetings.</p> <p>2. So far there have been no issues, reports or events related to violations and / or harassment of female workers.</p> <p>3. There is some socialization from external parties related to attention to employees / female workers. The last socialization in August 2018 concerning Prevention and Early Detection of Cervical and Breast Cancer. The socialization was carried out by Muara Bungo General Hospital.</p> <p>4. The majority of female workers in the garden are PHLs of local residents who live around the company, making it difficult to monitor whether there are violations of women's rights.</p> <p>5. Proposals for the core structure of the organization of the Gender Committee need to be replaced by non-workers, so that they can carry out organizational functions properly.</p> <p><b>Management Responses:</b></p> <p>1. The Chair of the Gender Committee is the Weigh Mill Clerk with strict working hours so that it is difficult to carry out its functions. A meeting will be held to discuss the organizational structure.</p> <p>2. There is no issue of violation and / or harassment of female workers.</p> <p>3. The company cooperates with BPJS Kesehatan to conduct early detection of cervical cancer. The company cooperates with Teluk Singkawang Health Center for posyandu activities and health education.</p> <p>4. The majority of female workers are BHLs who work in Replanting and come from surrounding villages. Monitoring for Protection is carried out through the representatives of gender committees in the garden. A gender committee coordinator will be formed for each department so that the gender committee can monitor and protect the rights of female workers.</p> <p>5. A gender committee meeting has been held to discuss the new organizational structure originating from female employee representatives from each department, factory and office and a new gender committee management structure has been formed with the Rini SPR chair (Assistant Nursery) and coordinator for each each department, office and factory 2 people who are tasked with monitoring daily female workers to prevent violations of women's workers' rights.</p> <p><b>Audit Team Findings:</b> It is positive, clear and no issues during stakeholder consultation with representative of gender committee.</p>

<p><b>09</b></p>	<p><b>Feedbacks: Smallholder Cooperative of Tunas Harapan, Teluk Langkap village</b></p> <ol style="list-style-type: none"> <li>1. Koperasi Tunas Harapan consists of 4 farmer groups with an area of 144 ha.</li> <li>2. Maintenance activities consist of spraying (chemical) treatments carried out by TUS at a cost of Rp. 50,000 per plot and manual maintenance activities are carried out by landowners / plots</li> <li>3. Fertilizer treatment was applied by the owner of the plot with the supply of fertilizer fertilizers by PT Rigunas Agri Utama through coordination with the Cooperative management.</li> <li>4. Harvesters are carried out by the owner of the plot, and for those who pay a shift of Rp. 150,000 to Rp. 200,000 according to the condition of the plot.</li> <li>5. The Management of the Farmers Group has a partnership with PT Rigunas Agri Utama regarding production, buying and selling FFB and maintaining plants after the lottery until credit</li> <li>6. FFB transport activities are carried out by third parties in collaboration with the Cooperative.</li> </ol> <p><b>Management Responses:</b></p> <ol style="list-style-type: none"> <li>1. Keep maintaining the partnership well.</li> <li>2. Circle, path and TPH Spray costs are charged Rp.50,000 / Kapling / month / rotation, wooden children are squeezed by each farmer</li> <li>3. Companies provide fertilizer recommendations, conduct 4 T fertilization counseling and provide fertilizer for farmers according to recommendations.</li> <li>4. In general, the flat area is paid at Rp. 150,000 / ton, while the flat area is paid at Rp. 200,000 / ton</li> <li>5. The company is committed to maintaining cooperation with all Asian Agri-assisted farmers</li> <li>6. Coordinate with the KUD and third parties so that the transport of plasma FFB is carried out correctly.</li> </ol> <p><b>Audit Team Findings:</b></p> <p>It is positive, clear and no issues during stakeholder consultation with sample individual smallholders on field.</p>
<p><b>10</b></p>	<p><b>Feedbacks: Smallholder Cooperative of Tani Mandiri, Kandang village</b></p> <ol style="list-style-type: none"> <li>1. Koperasi Tani Mandiri consists of 4 farmer groups with an area of 158 hectares</li> <li>2. Farmers already have SHM for each plot, leaving 2 farmers who do not have ownership certificates</li> <li>3. Maintenance activities consist of spraying (chemical) maintenance carried out by TUS and manual maintenance activities carried out by landowners / plots</li> <li>4. Fertilization treatment was applied by the owner of the plot with the supply of fertilizer fertilizers by PT Rigunas Agri Utama through coordination with the Cooperative management.</li> <li>5. The Management of the Farmers Group has a partnership with PT Rigunas Agri Utama regarding production, buying and selling FFB and maintaining plants after the lottery until credit</li> <li>6. Fee for the village is Rp. 2 / kg TBS.</li> </ol> <p><b>Management Responses:</b></p> <ol style="list-style-type: none"> <li>1. Keep maintaining the partnership well.</li> <li>2. All of the lots have already had SHM, but there are 2 plots that have not paid off so that the SHM is still at the Bank.</li> <li>3. The company provides training on spraying and farmers ask companies that do spraying and farmers do manual maintenance</li> <li>4. Company Recommends fertilization, conducts 4 T fertilization counseling and provides fertilizer for farmers according to recommendations.</li> <li>5. The company is committed to maintaining cooperation with all Asian Agri-assisted farmers</li> <li>6. Village fee funds are used for religious education funds.</li> </ol> <p><b>Audit Team Findings:</b></p> <p>It is positive, clear and no issues during stakeholder consultation with sample individual smallholders on field.</p>
<p><b>11</b></p>	<p><b>Feedbacks: Smallholder Cooperative of Sejahtera Tani, Punt Kalo village</b></p> <ol style="list-style-type: none"> <li>1. Sejahtera Tani Cooperative consists of 2 farmer groups with an area of 88 Ha.</li> <li>2. Maintenance activities consist of spraying (chemical) treatments carried out by TUS and manual maintenance activities carried out by landowners / plots</li> <li>3. Fertilizer treatment was applied by the owner of the plot with the supply of fertilizer fertilizers by PT Rigunas Agri Utama through coordination with the Cooperative management.</li> </ol>



	<p>4. Harvesters are carried out by the owner of the plot, and for those who pay a shift of Rp. 150,000 to Rp. 200,000 according to the condition of the plot.</p> <p>5. The Management of the Farmers Group has a partnership with PT Rigunas Agri Utama regarding production, buying and selling FFB and maintaining plants after the lottery until credit</p> <p>6. FFB transport activities are carried out by third parties in collaboration with KUD.</p> <p><b>Management Responses:</b></p> <ol style="list-style-type: none"> <li>1. Continue to maintain partnerships with all Asian Agri-assisted farmers</li> <li>2. The company provides training on spraying and farmers ask companies that do spraying and farmers do manual maintenance</li> <li>3. The company provides training on spraying and farmers ask companies that do spraying and farmers do manual maintenance</li> <li>4. In general, the flat area is paid at Rp. 150,000 / ton, while the flat area is paid at Rp. 200,000 / ton</li> <li>5. The company is committed to maintaining cooperation with all Asian Agri-assisted farmers</li> <li>6. The company is committed to maintaining cooperation with all Asian Agri-assisted farmers</li> </ol> <p><b>Audit Team Findings:</b></p> <p>It is positive, clear and no issues during stakeholder consultation with sample individual smallholders on field.</p>
<p><b>12</b></p>	<p><b>Feedbacks: Smallholder Cooperative of Tanjung Jaya Bersama, Tuo Sumay village</b></p> <ol style="list-style-type: none"> <li>1. There are some farmers who buy subsidized fertilizer through the Cooperative and the fertilizer storage location in the Block 46 house before being applied.</li> <li>2. The Cooperative does not arrange cooperation agreements with FFB transport parties, all under the control of the Farmers Group. So that there is no cooperation contract stored at the Cooperative office.</li> <li>3. The implementation of Annual Member Meetings (RAT) has not been conducted, because the implementation depends on the willingness of the members. There are only 27 members of the Tanjung Jaya Bersama Cooperative.</li> <li>4. Some farmer members want the management of plasma land to be carried out full managed by the company, so that the quality of plots and production can be the same as the estate.</li> </ol> <p><b>Management Responses:</b></p> <ol style="list-style-type: none"> <li>1. The house for storing fertilizers in Block 46 since 2013 is no longer used.</li> <li>2. Coordinate with the Farmers &amp; Cooperatives Group, so that the agreement files for fruit transport can be well-documented</li> <li>3. RAT cooperatives are the authority of the KUD. The company provides guidance to KUD members and administrators to immediately conduct RAT.</li> <li>4. Changes in the partnership pattern must first be reviewed when replanting.</li> </ol> <p><b>Audit Team Findings:</b></p> <p>It is positive, clear and no issues during stakeholder consultation with sample individual smallholders on field. No agrochemical stored on smallholders plots.</p>

<b>Formal Signing-off of Assessment Conclusion and Recommendation</b>	
<p>The audit objectives have been achieved and the certificate scope remains appropriate. Based on the results of this audit, it is concluded that <b>Bungo Tebo POM – PT Rigunas Agri Utama</b> has complied with the RSPO Supply Chain Certification Standard (June 2017) and audit criteria identified within the audit report. It is deemed that the management system continues to achieve its intended outcomes. Therefore, it is recommended that the certification of <b>Bungo Tebo POM – PT Rigunas Agri Utama</b> is continued.</p>	
<b>Report prepared by</b>	<b>Acceptance of Assessment Conclusion</b>
<b>Name:</b> <b>Yudwi Wisnu Rahmanto</b>	<b>Name:</b> <b>Bibit Sembiring</b>
<b>Company Name:</b> <b>on behalf BSI Malaysia Services Sdn Bhd.</b>	<b>Company Name:</b> <b>PT Rigunas Agri Utama</b>
<b>Title:</b> <b>Lead Auditor</b>	<b>Title:</b> <b>General Manager</b>
<b>Signature:</b> 	<b>Signature:</b> <p><i>(I the undersigned, being the most senior relevant management representative of the operation seeking or holding certification, agree with the contents of this report and accept the liability in execution of the procedure in the report.)</i></p> <p>to acknowledge</p> 
<b>Date:</b> <b>25<sup>th</sup> September 2018</b>	<b>Date:</b> <b>25<sup>th</sup> September 2018</b>

**Appendix A: Summary of Findings**

Criterion / Indicator	Assessment Findings	Compliance
<b>Principle 1: Commitment to Transparency</b>		
<b>Criterion 1.1:</b> Growers and millers provide adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.		
1.1.1	<p>List of information related to criterion 1.2 that can be accessed by relevant stakeholders shall be available.</p> <p>- Minor compliance -</p> <p><b>Mill and Estate:</b></p> <p>PT. Rigunas Agri Utama has a "Standard Operating Procedure Penanganan Permintaan Informasi Stakeholder No.SOP AA-GL-5008.1-R1" effective date 22/08/2011. The procedure lines out that initial response will be given within 14 working days. Information request will then recorded into logbook by public relation officer. After fulfilment the records of information request will be kept for 3 years.</p> <p>List of information that can be accessed by relevant stakeholders available under "Daftar Dokumen dan Informasi untuk Diakses Publik PT Rigunas Agri Utama", last review on 11<sup>th</sup> January 2018, such as:</p> <ul style="list-style-type: none"> <li>- AMDAL</li> <li>- Laporan RKL-RPL</li> <li>- Social Impact Assessment</li> <li>- HCV Identification</li> <li>- Perizinan lahan (Izin lokasi, izin prinsip, IPKH, Sertifikat HGU)</li> <li>- IMB</li> <li>- Perizinan Mesin-Mesin Pabrik</li> <li>- Laporan Pelaksanaan P2K3</li> <li>- LPUP (Laporan Perkembangan Usaha Perkebunan)</li> </ul>	Comply

		<ul style="list-style-type: none"> <li>- Document of Conservation of Management Plan</li> <li>- Environmental Management Plan</li> <li>- Document of CSR</li> <li>- Papan Harga TBS</li> <li>- LKPM</li> <li>- Lapooran KAHUTLA</li> <li>- Report of Water Surface</li> <li>- Tax and Retribution</li> <li>- Izin Badan Usaha</li> <li>- Company Policy</li> <li>- Continous Improvement Program</li> <li>- Document of SOP</li> <li>- Report of handing of hazardous waste</li> <li>- Report of land application</li> <li>- Laporan wajib tenaga kerja</li> <li>- Report of MCU</li> <li>- Laporan Proses Musyawarah dan Hasil Kompensasi Ganti Rugi Lahan</li> <li>- Public Summary Report dari Lembaga Sertifikasi.</li> </ul> <p>List of Stakeholders, updated in January 2018, e.g:</p> <ul style="list-style-type: none"> <li>- Government: Bupati Tebo; DPRD Tebo; Dinas Perkebunan, Peternakan dan Perikanan; Dinas Koperasi, Perdagangan, Perindustrian dan Tenaga Kerja, Dinas Lingkungan Hidup, BPJS Kesehatan Cabang Tebo, BPJS Kenetagakerjaan, Badan Pertanahan Nasional Tebo</li> <li>- Masyarakat: Camat Serai Serumpun, Camat Sumay, Kapolsek Serai Serumpun, Kapolsek Sumay, Danramil Tebo Tengah, Danramil Tebo Ulu, Babinsa Desa tuo Sumay, Puskesmas Sumay, Puskesmas seari Serumpun, Lembaga Adat Tuo Sumay, Kades SP1-SP7, Kades Dusun tuo, Kades Teriti, Kades Kandang, SPSI PT RAU</li> <li>- KOPERASIs: KOPERASI Sawit Sumay Makmur, KOPERASI Sawit Makmur, KOPERASI Sawit Makmur Bersama, etc (there are 19 KOPERASIs)</li> <li>- NGO: Sawit Watch, Serikat Petani Kelapa Sawit, WWF for Nature, World Agroforestry</li> </ul>	
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		<p>Centre (ICRAF), Environmental Services Program</p> <p><b>Scheme smallholders</b> (KOPERASI Tani Mandiri (21), KOPERASI Tunas Harapan (19), KOPERASI Sejahtera Tani (12) dan KOPERASI Tanjung Jaya Bersama (9))</p> <p>The list of information that can be access by relevant stakeholders in scheme smallholder has shown under "List Dokumen dan Informasi untuk Diakses Publik KOPERASI Tani Mandiri Kebun Plasma Tebo" las revised in February 2018, such as:</p> <ul style="list-style-type: none"> <li>- AMDAL</li> <li>- Laporan RKL-RPL</li> <li>- Akte pendirian kKoperasi</li> <li>- SIA</li> <li>- Buku RAT</li> <li>- Identifikasi HCV</li> <li>- Sertifikat tanah (SHM)</li> <li>- SOP agronomi</li> <li>- IMB</li> <li>- Pelaksanaan K3</li> <li>- Dokumen CSR</li> <li>- Pajak dan restribusi</li> <li>- Kebijakan Koperasi</li> <li>- Public Summary Report dari Lembaga Sertifikasi</li> <li>- Identifikasi dan pengurangan sumber polusi</li> <li>- Logbook keluhan</li> <li>- Mekanisme penanganan konflik area plasma</li> <li>- Mekanisme keluhan, konsultasi dan komunikasi</li> <li>- Program perbaikan terus menerus</li> </ul>	
1.1.2	Records of requests for information and	<b>Mill and Estate:</b>	Comply

<p>responses to the information requested shall be available.</p> <p>- Major compliance -</p>	<p>PT Rigunas Agri Utama has prepared a register of information request and responses to those information request under record called "Logbook Permintaan Informasi dan Respon Terhadap Permintaan Informasi PT. Rigunas Agri Utama Tahun 2018".</p> <p>In 2018, the register was recorded 37 informations required and its response (todate August 2018), such as:</p> <ul style="list-style-type: none"> <li>- Information inquiry – "Badan Koordinasi dari Penanaman Modal nomor 212/B.1/A.9/2018, dated 31th August 2018. The information request from the Badan Koordinasi Penanaman Modal Jakarta consist of report of program and realization of inversment. PT RAU has reponded by preparing and send through document "Berita Acara Hasil Pengawasan Penanaman Modal nomor 40/BAP/A.I/VIII/2018</li> <li>- Data inquiry – from Environment Agency in Tebo Regency related to Report of Environmental Management Plan in January-June 2018". PT RAU has reported the doument on 9<sup>th</sup> September 2018.</li> <li>- Information required – from Agricultural Agency in Tebo Regency (letter number: 525.04/Disbun-Pengemb/012) related to "Laporan Perkembangan Usaha Perkebunan" for 1<sup>st</sup> Semester 2018. PT RAU has responded by Group Manager on 1<sup>st</sup> September 2018.</li> <li>- Tanda Terima Elektronik (Sistem Pelaporan Elektronik Lingkungan – SIMPEL) of "RKL-RPL Semester 1 tahun 2018", to Ministry of Environment and Foresty of Republic of Indonesia, ID TTE: 1535469563, dated 28<sup>th</sup> August 2018.</li> </ul> <p><b>Scheme smallholders</b> (KOPERASI Tani Mandiri (21), KOPERASI Tunas Harapan (19), KOPERASI Sejahtera Tani (12) dan KOPERASI Tanjung Jaya Bersama (9))</p> <p>Cooperative has documented all information request and response in "Log Book Keluhan 2018", e.g:</p> <p>KOPERASI Tani Mandiri, in 2018 there are 10 informations request, e.g:</p> <ul style="list-style-type: none"> <li>- Dated 7<sup>th</sup> July 2018 -&gt; the information required from smallholder member (Mr Manulang): the information request related to the update of FFB price. The cooperative has reponded on 9<sup>th</sup> July 2018 that "FFB price was given by Dinas</li> </ul>	
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		<p>Perkebunan”</p> <ul style="list-style-type: none"> <li>- Dated 14<sup>th</sup> August 2018 -&gt; the information required from farmer smallholders member (Mr Herman): the information request of grading of FFB in POM. The cooperative has responded on 15<sup>th</sup> August 2018.</li> </ul> <p>KOPERASI Sejahtera Tani, year 2018 there are 5 informations request, e.g:</p> <ul style="list-style-type: none"> <li>- Dated 20<sup>th</sup> February 2018 -&gt; the information required from smallholder member (Mr Aan): the information request related to grading process in POM. The cooperative has responded on 22<sup>th</sup> June 2018.</li> <li>- Dated 28<sup>th</sup> June 2018 -&gt; the information required from smallholder member (Mr Wahid): the information request related to additional amount of member in Hamparan 51. The cooperative has responded on 29<sup>th</sup> June 2018 that the required will discussed with PT Rigunas Agri Utama.</li> </ul>	
<p><b>Criterion 1.2:</b>  Management documents are publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes.</p>			
<p>1.2.1</p>	<p>Publicly available documents shall include, but are not necessarily limited to:</p> <ul style="list-style-type: none"> <li>a) Land titles/user rights (Criterion 2.2)</li> <li>b) Occupational health and safety plans (Criterion 4.7)</li> <li>c) Plans and impact assessments relating to environmental and social impacts (Criteria 5.1, 6.1, 7.1 and 7.8)</li> <li>d) HCV documentation (Criteria 5.2 and 7.3)</li> <li>e) Pollution prevention and reduction plans (Criterion 5.6)</li> <li>f) Details of complaints and grievances (Criterion 6.3)</li> </ul>	<p><b>Mill and Estate:</b></p> <p>Publicly available documents available under “Daftar Dokumen dan Informasi untuk Diakses Publik PT. Rigunas Agri Utama 2018”, was updated on 11<sup>th</sup> January 2018 there are 32 publicly available document such as:</p> <ul style="list-style-type: none"> <li>- AMDAL, Laporan RKL-RPL, Social Impact Assessment, Dokumen Corporate Social Responsibility - Plans and impact assessments relating to environmental and social impacts (Criteria 5.1, 6.1, 7.1 and 7.8)</li> <li>- Perizinan Lahan (Izin Lokasi, Izin Prinsip, Izin Pelepasan Kawasan Hutan, HGU)- Land titles/user rights (Criterion 2.2)</li> <li>- Dokumen K3 - Occupational health and safety plans (Criterion 4.7)</li> <li>- Identifikasi HCV dan Lapoan JCV - HCV documentation (Criteria 5.2 and 7.3)</li> <li>- Program Management Lingkungan, Continuous Improvement Program - Pollution</li> </ul>	<p>Comply</p>

<p>g) Negotiation procedures (Criterion 6.4)  h) Continual improvement plans (Criterion 8.1)  i) Public summary of certification assessment report  j) Human Rights Policy (Criterion 6.13).</p>	<p>prevention and reduction plans (Criterion 5.6)</p> <ul style="list-style-type: none"> <li>- Rekaman Proses Musyawarah dan Hasil Kompensasi Ganti Rugi - Details of complaints and grievances (Criterion 6.3);</li> <li>- Standard Operating Procedure Social (Penanganan Informasi, Keluhan, Konflik Lahan, dll) - Negotiation procedures (Criterion 6.4)</li> <li>- Continuous Improvement Program - Continual improvement plans (Criterion 8.1)</li> <li>- Public summary report dari Lembaga Sertifikasi - Public summary of certification assessment report</li> <li>- Kebijakan Perusahaan - Human Rights Policy (Criterion 6.13)</li> <li>- IMB (izin mendirikan bangunan)</li> <li>- Izin izin pabrik</li> <li>- FFB price in Papan Harga TBS</li> <li>- Medical check up result</li> <li>- Laporan Pemakaian Air Permukaan</li> <li>- Wajib lapor tenaga kerja</li> <li>- Laporan analisa fisik dan kimia air sungai</li> </ul> <p><b>Scheme smallholders</b> (KOPERASI Tani Mandiri (21), KOPERASI Tunas Harapan (19), KOPERASI Sejahtera Tani (12) dan KOPERASI Tanjung Jaya Bersama (9))</p> <p>The list of information that can be access by relevant stakeholders in scheme smallholder has shown under "List Dokumen dan Informasi untuk Diakses Publik KOPERASI Tani Mandiri Kebun Plasma Tebo" las revised in February 2018, such as:</p> <ul style="list-style-type: none"> <li>- AMDAL - Plans and impact assessments relating to environmental and social impacts (Criteria 5.1, 6.1, 7.1 and 7.8)</li> <li>- aporan RKL_RPL - AMDAL - Plans and impact assessments relating to environmental and social impacts (Criteria 5.1, 6.1, 7.1 and 7.8)</li> <li>- Akte pendirian Koperasi</li> <li>- SIA AMDAL - Plans and impact assessments relating to environmental and social impacts (Criteria 5.1, 6.1, 7.1 and 7.8)</li> <li>- Buku RAT</li> <li>- Identifikasi HCV - - HCV documentation (Criteria 5.2 and 7.3)</li> </ul>	
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	<p>- Major compliance –</p>	<ul style="list-style-type: none"> <li>- Sertifikat tanah (SHM)- - Land titles/user rights (Criterion 2.2)</li> <li>- SOP agronomi</li> <li>- IMB</li> <li>- Pelaksanaan K3 - Occupational health and safety plans (Criterion 4.7)</li> <li>- Dokumen CSR</li> <li>- Pajak dan restribusi</li> <li>- Kebijakan Koperasi - Human Rights Policy (Criterion 6.13)</li> <li>- Public Summary Report dari Lembaga Sertifikasi</li> <li>- Identifikasi dan pengurangan sumber polusi - Pollution prevention and reduction plans (Criterion 5.6)</li> <li>- Logbook keluhan</li> <li>- Mekanisme penanganan konflik area plasma - Negotiation procedures (Criterion 6.4)</li> <li>- Mekanisme keluhan, konsultasi dan komunikas - - Details of complaints and grievances (Criterion 6.3)</li> <li>- Program perbaikan terus menerus - Continual improvement plans (Criterion 8.1)</li> </ul>	
<p><b>Criterion 1.3:</b>          Growers and millers commit to ethical conduct in all business operations and transactions.</p>			
<p>1.3.1</p>	<p>There shall be a written policy committing to a code of ethical conduct and integrity in all operations and transactions along with the documentation of socialisation process of the policy to all levels of the workers and operations.</p> <p>- Minor compliance –</p>	<p><b>Mill and Estate:</b>          PT Rigunas Agri Utama – Bungo Tebo POM has prepared a written policy to committing to a code of ethical conduct and integrity in all operation and transactions though Company Policy - "Kebijakan Perusahaan", signed by Managing Director on 1<sup>st</sup> December 2014. The policy mentioned company’s commitment to uphold and respect code of ethical conduct in all operation. The commitment including prevention of corruption, collusion and nepotism.</p> <p>The company policy is available on notice board. Based on interview with workers, during stakeholder consultation, it was noted that worker has a basic understanding of company policy related to code of ethical conduct.</p>	<p>Comply</p>

		<p>List of attendance on refresh the socialization of Company Policy “Kebijakan Perusahaan”, e.g:</p> <ul style="list-style-type: none"> <li>- On 23th March 2018 location in Division III was attended by 39 workers</li> <li>- On 17<sup>th</sup> June 2018 location in Nursery, was attended by 6 workers</li> <li>- On 16<sup>th</sup> July 2018 for workers in replanting, attended by 7 workers</li> </ul> <p><b>Scheme smallholders</b> (KOPERASI Tani Mandiri (21), KOPERASI Tunas Harapan (19), KOPERASI Sejahtera Tani (12) dan KOPERASI Tanjung Jaya Bersama (9))</p> <p>Cooperative has defined their policy for code of ethical conduct as in “Kebijakan Koperasi” was signed on 8<sup>th</sup> January 2018, in line 9 mentioned that commitment to respect code of ethical conduct and prohibit any form of corruption, bribery and fraud on use of data and resources in cooperative operation.</p> <p>The policy has been communicated to smallholder farmer/member , e.g:</p> <ul style="list-style-type: none"> <li>- In KOPERASI Tani Mandiri has conducted on 8<sup>th</sup> February 2018, was attended by 19 members of smallholder</li> <li>- In KOPERASI Bina Tani has conducted on 3<sup>rd</sup> February 2017, was attended by 40 members of smallholder</li> <li>- In KOPERASI Belarik Jaya has conducted on 6<sup>th</sup> February 2017, was attended by 31 smallholder farmers</li> </ul> <p>In KOPERASI Sawit Tambara Jaya has conducted on 7<sup>th</sup> February 2017, was attended by 12 members of smallholder</p>	
<p><b>Principle 2: Compliance with applicable laws and regulations</b></p>			
<p><b>Criterion 2.1</b></p>			
<p>There is compliance with all applicable local, national and ratified international laws and regulations.</p>			
<p>2.1.1</p>	<p>Evidence of compliance with relevant legal requirements shall be available.</p> <p>- Major compliance –</p>	<p><b>BUNGO TEBO POM AND ESTATE:</b></p> <p>The Certificate Holder have provide the documented evidence related legal compliance on land tenure namely “Hak Guna Usaha” or Land Use Permit and Plantation permit as per required within the certification scope.</p>	<p>Not Comply</p>

		<p>Land use right of PT Rigunas Agri Utama issued by National Land Board. There are two period regarding issuance of land tenure, in 1996 and 2016:</p> <ul style="list-style-type: none"> <li>➢ SK Menteri Agraria Kepala Badan Pertanahan Nasional No: 51/HGU/BPN/96, tertanggal 27 Nopember 1996. Luas yang diberikan hak 4,388.60 Ha.             <ul style="list-style-type: none"> <li>- Sertifikat HGU No. 1 Desa Tuo Sumai, tertanggal 1 Mei 1997. Area: 2,070 Ha become 1,604.3 Ha. Masa berlaku hingga 1 Mei 2032. (Reduction area 465.70 Ha in 2002 for scheme smallholder).</li> <li>- Sertifikat HGU No. 1 Desa Sungai Rambai, tertanggal 1 Mei 1997. Luas: 1,047.354 Ha. Masa berlaku hingga 1 Mei 2032. (pengurangan luas dari 2,318.5 Ha menjadi 1,047.354 Ha).</li> </ul> </li> </ul> <p>Former Land Use Right or "HGU" issued in 1996 is <b>2,651.654 Ha.</b></p> <ul style="list-style-type: none"> <li>➢ SK Kepala Kantor Wilayah BPN Prov. Jambi No: 03/HGU/BPN.15/2016, tertanggal 5 Agustus 2016. Luas total yang diberikan hak <b>715.63 Ha.</b> <ul style="list-style-type: none"> <li>- Sertifikat HGU No. 39 Desa Tuo Sumay, tertanggal 19 Agustus 2016. Area: <b>133.71 Ha.</b> Masa berlaku hingga 5 Agustus 2046.</li> <li>- Sertifikat HGU No. 40 Desa Teluk Singkawang, tertanggal 19 Agustus 2016. Area: <b>108.06 Ha.</b> Masa berlaku hingga 5 Agustus 2046.</li> <li>- Sertifikat HGU No. 41 Desa Tuo Sumay, tertanggal 19 Agustus 2016. Area: <b>103.97 Ha.</b> Masa berlaku hingga 5 Agustus 2046.</li> <li>- Sertifikat HGU No. 42 Desa Tuo Sumay, tertanggal 19 Agustus 2016. Area: <b>74.14 Ha.</b> Masa berlaku hingga 5 Agustus 2046.</li> <li>- Sertifikat HGU No. 43 Desa Tuo Sumay, tertanggal 19 Agustus 2016. Area: <b>134.02 Ha.</b> Masa berlaku hingga 5 Agustus 2046.</li> <li>- Sertifikat HGU No. 44 Desa Pinang Belai, tertanggal 19 Agustus 2016. Area: <b>161.73 Ha.</b> Masa berlaku hingga 5 Agustus 2046.</li> </ul> </li> </ul> <p>Total additional land use right issued in 2016 is <b>715.63 Ha.</b>          Therefore, total land use right of PT Rigunas Agri Utama is <b>3,367.28 Ha</b></p> <p>Plantation Permit (IUP) of PT Rigunas Agri Utama: "Surat Pendaftaran Usaha Perkebunan" Nomor: 87/Mentanhut-VII/2000, dated 9 October 2000. Hectarage: 4,388.5 Ha with capacity POM is 60 MT/Hr.</p>	
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		<p>Permit and license for POM's machinery, including the inspection:</p> <p>For palm oil mill:</p> <ul style="list-style-type: none"> <li>- "Akte Izin No.05/KU/2007 untuk Ketel uap Vickers Hoskins 22.5 kg/cm2 PT. Rigunas Agri Utama" – permit for boiler, dated 18 June 2007. Latest inspection by PJK3 Jambi, dated 16 June 2017.</li> <li>- "Izin/Pengesahan Pemakaian Turbin Uap No.001/566/TU/2015 untuk Turbin Shinko Ind. Ltd. S/N.605768-1" – license for turbine, dated 5 October 2015. Last inspection 15 June 2017, due in June 2019.</li> <li>- "Izin/Pengesahan Pemakaian Turbin Uap No.05/TU/2007 untuk Turbin Deesser rmd. S/N.5979" – license for turbine, dated 8 June 2007. Last inspection 16 June 2017, due in June 2019.</li> <li>- "Akte Izin No.02/566/KU/2015 untuk ketel uap" license for steam vessel, dated 1 October 2015. Last inspection 16 June 2017.</li> <li>- "Izin/Pengesahan Pemakaian Motor Diesel Pembangkit Tenaga Listrik No.08/MD/VI/2007 untuk Genset Cummins S/N.602040" license for turbine, dated 8 June 2007. Last inspection No.238/Disnakertrans 3-1/K3/MD on June 2018.</li> <li>- "Akte Izin No.01/566/RU/2015 untuk Sterilizer III" – license for sterilizer No.3, dated 1 October 2015. Last inspection 16 June 2017, due in June 2019.</li> <li>- "Akte Izin No.12/BU/2007 untuk Sterilizer II" – license for sterilizer No.2, dated 12 July 2007. Last inspection 16 June 2017, due in June 2019.</li> <li>- "Akte Izin No.13/BU/2007 untuk Sterilizer I" – license for sterilizer No.1, dated 12 July 2007. Last inspection 16 June 2017, due in June 2019.</li> <li>- "Akte Izin No.11/BU/2007 untuk Back Pressure Vessel" – license for back pressure vessel, dated 12 July 2007. Last inspection 16 June 2017, due in June 2019.</li> <li>- "Izin Pemakaian Steam Separator No.01/566/SS/2015 untuk Steam Sepatator" – license for steam separator, dated 5 October 2015. Last inspection 16 June 2017, due in June 2019.</li> <li>- "Izin/Pengesahan Penggunaan Instalasi Listrik di Tempat Kerja No.04/IL/2007 PT. Rigunas Agri Utama" – license for electrical installation, 8 June 2007. Last inspection 8</li> </ul>	
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		<p>June 2007.</p> <ul style="list-style-type: none"> <li>- "Pengesahan Pemakaian Instalasi Hydran dan Springkler No.560/257A/IHS/PK/IV/2012 PT. Rigunas Agri Utama PMKS Bungo Tebo" – license for hydrant, 24 April 2012. Last inspection 30 May 2018.</li> <li>- "Pengesahan Pemasangan/Pemakaian Instalasi Penyalur Petir di Tempat Kerja No.04/IPP/2007 untuk PT. Rigunas Agri Utama" – license for lightning arrester, 8 June 2007. Last inspection 30 May 2018.</li> <li>- "Pengesahan Pemasangan/Pemakaian Pesawat Angkat dan Angkut No.01/566/PA/2016 untuk Wheel Loader S/N. F5HPL413D-00222029" – license for wheel loader, dated 20 June 2016. Last inspection dated 30 May 2018.</li> <li>- "Izin Pengesahan Pemasangan/Pemakaian Pesawat Angkat dan Angkut No.560/01/PAA/2014 untuk Ford S/N. 000464F" – license for tractor, dated 29 September 2014. Last inspection 30 May 2018.</li> </ul> <p>For estate:</p> <ul style="list-style-type: none"> <li>- "Izin Pengesahan Pemasangan/Pemakaian Pesawat Angkat dan Angkut dan Alat-alat Berat No.560/01/PAA-MG/Sosnakertrans/III/2014 untuk Motor Grader" – for road grader, dated 29 September 2014. Last inspection 30 May 2018.</li> <li>- "Izin Pengesahan Pemasangan/Pemakaian Pesawat Angkat dan Angkut dan Alat-alat Berat No.560/02/PAA-BL/Sosnakertrans/III/2014 untuk backhoe loader" – for backhoe loader, dated 29 September 2014. Last inspection 30 May 2018.</li> <li>- "Izin Pengesahan Pemasangan/Pemakaian Pesawat Angkat dan Angkut dan Alat-alat Berat No.560/244/PAA-C/Sosnakertrans/V/2015 untuk Compactor" – for road compactor, dated May 2018. Last inspection 30 May 2018.</li> </ul> <p><b>SMALLHOLDERS: BUNGO TEBO PLASMA</b></p> <ol style="list-style-type: none"> <li>1. KOPERASI Tani Mandiri (sample: 21 individual smallholders blocks), village of Kandang. <ul style="list-style-type: none"> <li>- Akta Pendirian Koperasi Produksi "Tani Mandiri" Nomor: 6, tanggal 14 April 2014.</li> <li>- SK Kepala Dinas KOPPERINDAG dan PENGELOLAAN PASAR Kab. Tebo, Nomor:</li> </ul> </li> </ol>	
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2.1.2	<p>A documented system, which includes written information on legal requirements, shall be maintained.</p> <p>- Minor compliance –</p>	<p><b>BUNGO TEBO POM, ESTATE AND SMALLHOLDERS:</b></p> <p>Written information on legal requirements for Estate and Smallholders are available in "Evaluasi Kepatuhan Hukum". Responsible person for updating legal register onsite is Public Relation and Sustainability Officer, under Law Compliance and Social, Security, License Department.</p> <p>"Daftar Regulasi RSPO dan ISPO, updated 12 Juni 2018.</p> <p>Review against latest requirement related to health and safety and manpower regulation.:</p> <ul style="list-style-type: none"> <li>-Peraturan Pemerintah No.101 tahun 2014 tentang Pengelolaan Limbah Berbahaya dan Beracun;</li> <li>- Peraturan Pemerintah No.84 tahun 2014 tentang Penyelenggaraan Program Jaminan Sosial Tenaga - Kerja (Perubahan Peraturan Pemerintah No.14 tahun 1993);</li> <li>- Peraturan Menteri Pertanian No.39 tahun 2015 tentang Pendaftaran Pestisida;</li> <li>- Peraturan Menteri Tenaga Kerja No.5 tahun 2018 tentang Kesehatan dan Keselamatan Lingkungan Kerja;</li> <li>- Peraturan Menteri Tenaga Kerja No.38 tahun 2016 tentang Pesawat Tenaga dan Produksi;</li> <li>- Peraturan Menteri Tenaga Kerja No.9 tahun 2016 tentang Keselamatan dan Kesehatan Kerja di Ketinggian;</li> </ul> <p>All of the abovementioned regulation have been evaluated.</p>	Comply
2.1.3	<p>A mechanism for ensuring compliance shall be implemented.</p> <p>- Minor compliance –</p>	<p>Mechanism for ensuring compliance with legal requirements, the certificate holder using group procedure and it was stated on "Prosedur Pemenuhan Peraturan Perundang - undangan dan Perubahannya (SOP AA-GL-5001.1-R0)", dated 5 December 2009.</p> <p>This mechanism also applied for Smallholders under supervising of Plasma Manager.</p>	Comply



2.1.4	<p>A system for tracking any changes in the law shall be available and implemented.</p> <p>- Minor compliance –</p>	<p><b>BUNGO TEBO ESTATE AND MILL:</b></p> <p>The systems used for tracking any changes in laws and regulations is following its procedure "Prosedur Pemenuhan Peraturan Perundang - undangan dan Perubahannya (SOP AA-GL-5001.1-R0)", dated 5 December 2009.</p> <p>Document of "Evaluasi Kepatuhan Hukum" is the system used for tracking any changes in laws and regulations. In example:</p> <p>Evaluasi Kepatuhan Hukum updated 8 February 2018. Updating: Permentan No. 1 Tahun 2018; Permentan No. 5 Tahun 2018; Kep. Gubernur Jambi No: 1224/Kep.Gub/Disnaker/2017 tentang UMP 2018; Permentan No. 21 Tahun 2017 (pengganti Permentan 98/2013); Permenaker No. 5 Tahun 2018 (K3LK); Permeneg Agraria No. 14 Tahun 2018 (Izin Lokasi); Permen Agraria No. 7 Tahun 2017 (Penetapan HGU)</p> <p><b>SMALLHOLDERS BUNGO TEBO PLASMA:</b></p> <p>System used for tracking any changes in law and regulations for Smallholders is implemented through "Evaluasi Kepatuhan Hukum KOPERASI Tani Mandiri", updated on 13 February 2018.</p>	Comply
<p><b>Criterion 2.2</b>          The right to use the land is demonstrated, and is not legitimately contested by local people who can demonstrate that they have legal, customary or user rights.</p>			
2.2.1	<p>Documents showing legal ownership or lease, history of land tenure ownership/control, and the actual legal use of the land shall be available.</p> <p>- Major compliance -</p>	<p><b>BUNGO TEBO MILL AND ESTATE:</b></p> <p>The certificate holder (PT Rigunas Agri Utama) has had documented of legal ownership in form of Hak Guna Usaha. There are two period of HGU obtained, in 1997 (revised 1999), in 1997 (revised in 1999 and 2002) and 2016. Details of legal ownership as follow:</p> <p>National Land Board Decree issued on November 1996, Land Use Right Certificate issued on May 1997 (re-measurement in 1999):</p>	Comply

		<p>➤ SK Menteri Agraria Kepala Badan Pertanahan Nasional No: 51/HGU/BPN/96, tertanggal 27 Nopember 1996. Luas yang diberikan hak 4,388.60 Ha.</p> <ul style="list-style-type: none"> <li>- Sertifikat HGU No. 1 Desa Tuo Sumai, tertanggal 1 Mei 1997. Area: 2,070 Ha become 1,604.3 Ha. Masa berlaku hingga 1 Mei 2032. (Reduction area 465.70 Ha in 2002 for scheme smallholder).</li> <li>- Sertifikat HGU No. 1 Desa Sungai Rambai, tertanggal 1 Mei 1997. Luas: 1,047.354 Ha. Masa berlaku hingga 1 Mei 2032. (pengurangan luas dari 2,318.5 Ha menjadi 1,047.354 Ha).</li> </ul> <p>Former Land Use Right or "HGU" issued in 1996 is <b>2,651.654 Ha.</b></p> <p>Provincial of National Land Board Decree related Land Use Right issued on August 2016:</p> <p>➤ SK Kepala Kantor Wilayah BPN Prov. Jambi No: 03/HGU/BPN.15/2016, tertanggal 5 Agustus 2016. Luas total yang diberikan hak <b>715.63 Ha.</b></p> <ul style="list-style-type: none"> <li>- Sertifikat HGU No. 39 Desa Tuo Sumay, tertanggal 19 Agustus 2016. Area: <b>133.71 Ha.</b> Masa berlaku hingga 5 Agustus 2046.</li> <li>- Sertifikat HGU No. 40 Desa Teluk Singkawang, tertanggal 19 Agustus 2016. Area: <b>108.06 Ha.</b> Masa berlaku hingga 5 Agustus 2046.</li> <li>- Sertifikat HGU No. 41 Desa Tuo Sumay, tertanggal 19 Agustus 2016. Area: <b>103.97 Ha.</b> Masa berlaku hingga 5 Agustus 2046.</li> <li>- Sertifikat HGU No. 42 Desa Tuo Sumay, tertanggal 19 Agustus 2016. Area: <b>74.14 Ha.</b> Masa berlaku hingga 5 Agustus 2046.</li> <li>- Sertifikat HGU No. 43 Desa Tuo Sumay, tertanggal 19 Agustus 2016. Area: <b>134.02 Ha.</b> Masa berlaku hingga 5 Agustus 2046.</li> <li>- Sertifikat HGU No. 44 Desa Pinang Belai, tertanggal 19 Agustus 2016. Area: <b>161.73 Ha.</b> Masa berlaku hingga 5 Agustus 2046.</li> </ul> <p>Total additional land use right issued in 2016 is <b>715.63 Ha.</b></p> <p>Currently, total land use right of own estate (Bungo Tebo Estate and Mill) is <b>3,367.28 Ha.</b> However, total managed and certified area until ASA-3 is only <b>2,651.65 Ha.</b></p> <p>Local community occupies the rest of its area and those area is unable to managed by the company.</p>	
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<p>2.2.2</p>	<p>Legal boundaries are demonstrated clearly and maintained.          - Minor compliance -</p>	<p><b>BUNGO TEBO ESTATE:</b>          PT Rigunas Agri Utama have legal boundaries map "Peta Patok HGU" Scale 1:86,293. Monitoring checklist on legal boundaries "Laporan Pemeriksaan dan Perawatan Patok Batas" No: 001/SSL/LAP/I/2018 is available to ensure condition and accurate position of legal boundaries. Coordinate position also available in each legal boundaries within the report.          During field observation with sample legal boundaries pegs, all visited boundary pegs are clearly visible and maintained.</p> <ul style="list-style-type: none"> <li>- RAU 03<sup>5</sup> in Block D08L Afdeling 4: S 01° 19' 2.51"; E 102° 27' 01.36"</li> <li>- RAU 02<sup>5</sup> in Block D08J Afdeling 4: S 01° 27' 49.89"; E 102° 25' 59.95"</li> <li>- BPN 04/RAU 01<sup>3</sup> in Block D08E Afdeling 4: S 01° 17' 25.24"; E 102° 25' 01.58"</li> </ul> <p><b>SMALLHOLDERS: BUNGO TEBO PLASMA</b></p> <p>1. Koperasi Tani Mandiri (sample: 21 individual smallholders plot). Sample legal boundaries: 3 individual smallholders plot at Hamparan-90 (Farmer Group).</p> <ul style="list-style-type: none"> <li>➤ Saroni (plot 2516).              Boundary Pole 1: S 01° 24' 6.48"; E 102° 28' 58.47"              Boundary Pole 2: S 01° 24' 3.20"; E 102° 28' 58.22"              Boundary Pole 3: S 01° 24' 7.07"; E 102° 28' 55.62"              Boundary Pole 4: S 01° 24' 3.55"; E 102° 28' 54.01"</li> <li>➤ M. Hatta (plot 2604).              Boundary Pole 1: S 01° 24' 29.87"; E 102° 29' 10.51"              Boundary Pole 2: S 01° 24' 24.93"; E 102° 29' 12.68"</li> </ul>	<p>Not Comply</p>

		<p>Boundary Pole 3: S 01° 24' 30.04"; E 102° 29' 4.42"          Boundary Pole 4: S 01° 24' 26.07"; E 102° 29' 5.25"          ➤ Kartono (plot 2605).          Boundary Pole 1: S 01° 24' 25.87"; E 102° 28' 58.28"          Boundary Pole 2: S 01° 24' 28.95"; E 102° 28' 58.40"</p> <p>2. Koperasi Tunas Harapan (sample: 19 individual smallholders plot). Sample legal boundaries: 4 individual smallholders plot at Hamparan 107 (Farmer Group). 3155 (Fauzi); 3156 (Zainudin); 3157 (PAhrul Rozi) and 3158 (Mashuri) all boundaries are available in place.</p> <p>3. Koperasi Sejahtera Tani (sample: 12 individual smallholders plot). Sample legal boundaries: 4 individual smallholders plot at Hamparan 51 and 108 (Farmer Group).</p> <ul style="list-style-type: none"> <li>- Kavling/Plot No. 2307 (Saad Amri Aziz), 2 boundary pegs not founded.</li> <li>- Kavling/Plot No. 3163 (Mushadi); 3161 (Azwir A); 3170 (Khoiriah/Darman), all boundary pegs are not founded.</li> </ul> <p>4. Koperasi Tanjung Jaya Bersama (sample: 9 individual smallholders plot). Sample legal boundaries: 3 individual smallholders plot at Hamparan 109. All boundaries pegs are available.</p> <p>NC Minor:          Statement: Legal boundary pegs in sample of smallholders plot are not found.          Objective Evidence:          Based on field visit at sample smallholders plot "Koperasi Sejahtera Tani" (Hamparan 51 and Hamparan 108) on 21 September 2018, it is clearly:</p> <ol style="list-style-type: none"> <li>1. Kavling/Plot No. 2307 (Saad Amri Aziz), 2 boundary pegs not founded.</li> <li>2. Kavling/Plot No. 3163 (Mushadi); 3161 (Azwir A); 3170 (Khoiriah/Darman), all boundary pegs are not founded.</li> </ol>	
2.2.3	In the event that there is a dispute or a dispute	<b>BUNGO TEBO ESTATE AND MILL</b>	Comply

	<p>has occurred, adequate evidence of legitimate acquisition and compensation or compensation settlement process through conflict resolution which has been received through Free, Prior and Informed Consent by all related parties shall be provided.</p> <p>- Minor compliance -</p>	<p>Procedure to resolve land conflict in form of "Standard Operating Procedure (SOP) No.AA-GL-5003.1-R2 tentang Penanganan Konflik Lahan rev.2" dated 8th May 2015. The SOP has described flow process and mechanism to handle land conflict</p> <p>According to stakeholder consultation, it is informed that in 2016 there were land disputes (overlapping) within the Land Use Right (HGU) of PT Rigunas Agri Utama area, following:</p> <ol style="list-style-type: none"> <li>1. Local NGO "LSM Pemantau Korupsi dan Penyelamat Harta Negara", Letter No: 002/DPW/PK&amp;PHN/JP/KU/VI/2016, dated June 25, 2016. The letter contains indications that replanting activities of PT RAU are outside the HGU.</li> <li>2. Local NGO Panglimo Djoenid Kab. Tebo reported to the local police station (Tebo District) with a Letter No: 11 / PDJ / TBO / X / 16, September 28, 2016. The letter contained reports that several group of local communities had a valid Land Ownership Rights Certificate (SHM) above HGU of PT Rigunas Agri Utama and will carry out oil palm harvesting in the area.</li> </ol> <p>All of these problems have been mediated by the Regent of Tebo through Letter No: 005/1347 / Disbun / 2016, dated November 16, 2016 and also by the Plantation Office of Tebo Regency through letter No: 525/395 / Disbun / 2016, November 28, 2016</p> <p>The results of the meeting concluded that the disputed area would be resolved by law through an inventory of legal aspects where 294 documents issued in 2016 and the PT Rigunas Agri Utama HGU will be collected together. In addition, a participatory field examination will be conducted to ensure that the disputed location can be traced.</p> <p>Based on the results of the Mediation Meeting on November 30, 2016, it was concluded that the implementation of field checks was postponed after data synchronization was carried out. Data synchronization will be carried out at the Jambi Provincial Regional Office (Office of the Ministry of Agrarian and Spatial Planning / BPN Jambi Province). The Minutes of Meeting were signed by various parties, including:</p> <ol style="list-style-type: none"> <li>1. Plt. Sekretaris Daerah Kab. Tebo</li> <li>2. Kepala Kantor Kesbangpol Kab. Tebo</li> </ol>	
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		<ol style="list-style-type: none"> <li>3. Kapolsek Serai Serumpun</li> <li>4. KBO Intelkam Polres Tebo</li> <li>5. Kabid Bina Usaha Disbun Tebo</li> <li>6. Kasi Survey, Pengukuran dan Pemetaan BPN Tebo</li> <li>7. Kasi HT&amp;PT BPN Kab. Tebp</li> <li>8. Kasi Wasnas Kantor Kesbangpol Kab. Tebo</li> <li>9. Kasi Rehabilitasi Kantor LH Kab. Tebo</li> <li>10. Kasi Trantib Kec. Serai Serumpun</li> <li>11. Staf Dinas Kehutanan Kab. Tebo</li> <li>12. GM PT RAU</li> <li>13. Humas PT RAU</li> <li>14. GIS PT RAU</li> </ol> <p>Until current surveillance audit, there was no final decision on the follow-up results of the 30 November 2016 meeting.</p> <p>Auditor try to contact those local NGO for ensuring the progress of current issues, but NGO telephone number was not exist.</p> <p><b>SMALLHOLDERS: BUNGO TEBO PLASMA</b></p> <p>For smallholders, legal ownership is in the form of Land Certificate Ownership Right (Sertifikat Hak Milik). The smallholder legal ownership obtained in various year period, 2002, 2004, 2014 based on PIR-TRANS program since 1999 upto 2001. There is no issue related land dispute between smallholders.</p>	
2.2.4	There shall be an absence of significant land conflict, unless requirements for acceptable conflict resolution processes (see Criteria 6.3	<p><b>BUNGO TEBO ESTATE AND MILL</b></p> <p>According to information collected from statutory body (Kantor Pertanahan Kabupaten</p>	Comply

<p>and 6.4) are implemented and accepted by the parties involved.</p> <p>- Major compliance –</p>	<p>Tebo) as stakeholder during consultation at 18 September 2018, in 2016 there is issue from local community related to overlapping of land title between community land ownership (SHM) and company land title (HGU).</p> <ol style="list-style-type: none"> <li>1. Local NGO "LSM Pemantau Korupsi dan Penyelamat Harta Negara", Letter No: 002/DPW/PK&amp;PHN/JP/KU/VI/2016, dated June 25, 2016. The letter contains indications that replanting activities of PT RAU are outside the HGU.</li> <li>2. Local NGO Panglimo Djoenid Kab. Tebo reported to the local police station (Tebo District) with a Letter No: 11 / PDJ / TBO / X / 16, September 28, 2016. The letter contained reports that several group of local communities had a valid Land Ownership Rights Certificate (SHM) above HGU of PT Rigunas Agri Utama and will carry out oil palm harvesting in the area.</li> </ol> <p>All of these problems have been mediated by the Regent of Tebo through Letter No: 005/1347 / Disbun / 2016, dated November 16, 2016 and also by the Plantation Office of Tebo Regency through letter No: 525/395 / Disbun / 2016, November 28, 2016</p> <p>The results of the meeting concluded that the disputed area would be resolved by law through an inventory of legal aspects where 294 documents issued in 2016 and the PT Rigunas Agri Utama HGU will be collected together. In addition, a participatory field examination will be conducted to ensure that the disputed location can be traced.</p> <p>Based on the results of the Mediation Meeting on November 30, 2016, it was concluded that the implementation of field checks was postponed after data synchronization was carried out. Data synchronization will be carried out at the Jambi Provincial Regional Office (Office of the Ministry of Agrarian and Spatial Planning / BPN Jambi Province). The Minutes of Meeting were signed by various parties, including:</p> <ol style="list-style-type: none"> <li>1. Plt. Sekretaris Daerah Kab. Tebo</li> <li>2. Kepala Kantor Kesbangpol Kab. Tebo</li> <li>3. Kapolsek Serai Serumpun</li> <li>4. KBO Intelkam Polres Tebo</li> </ol>	
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		<ol style="list-style-type: none"> <li>5. Kabid Bina Usaha Disbun Tebo</li> <li>6. Kasi Survey, Pengukuran dan Pemetaan BPN Tebo</li> <li>7. Kasi HT&amp;PT BPN Kab. Tebp</li> <li>8. Kasi Wasnas Kantor Kesbangpol Kab. Tebo</li> <li>9. Kasi Rehabilitasi Kantor LH Kab. Tebo</li> <li>10. Kasi Trantib Kec. Serai Serumpun</li> <li>11. Staf Dinas Kehutanan Kab. Tebo</li> <li>12. GM PT RAU</li> <li>13. Humas PT RAU</li> <li>14. GIS PT RAU</li> </ol> <p>Until current surveillance audit, there was no final decision on the follow-up results of the 30 November 2016 meeting.</p> <p>Auditor try to contact those local NGO for ensuring the progress of current issues, but NGO telephone number was not exist.</p> <p>Total area: ± 606 Ha.</p> <p>Rumadi dkk: 263 persil/SHM (± 526 Ha) upon HGU certificate year 1997. Location in Block A94f – A94k, Afd. 1 (Year of Planting 1994), the remain area located in Block D08f, Afd. 4 (Planting Year 2008).</p> <p>Sayuti cs: 31 persil/SHM (± 80 Ha) upon HGU certificate year 1997 (5 certificate in HGU 2016 area), area located in Block D08a – D08f, Afd. 4 (Planting Year 2008).</p> <p><b>SMALLHOLDERS: BUNGO TEBO PLASMA</b></p> <p>For smallholders, legal ownership is in the form of Land Certificate Ownership Right</p>	
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		<p>(Sertifikat Hak Milik). The smallholder legal ownership obtained in various year period, 2002, 2004, 2014 based on PIR-TRANS program since 1999 upto 2001. There is no issue related land dispute between smallholders.</p>	
<p>2.2.5</p>	<p>For any conflict or dispute over the land, the evidence of the extent of disputed area is mapped out in a participatory way with involvement of affected parties (including neighboring communities and local government where applicable), shall be available.</p> <p>- Minor compliance –</p>	<p><b>BUNGO TEBO ESTATE AND MILL</b></p> <p>The Certificate Holder has prepared a procedure to resolve land conflict in form of Standard Operating Procedure (SOP) No.AA-GL-5003.1-R2 revision 2 dated 8 May 2015 regarding Land Conflict Handling. The SOP described flow process and mechanism to handle land conflict. The SOP has taking into consideration the FPIC guide for RSPO Member 2015, whereby in the SOP has regulate information conveyance, negotiation, participatory land measurement and other activities including engagement with relevant parties and other parties neighboring the plantation and/or conflict land. Up to this moment, company does not have planning to expand the plantation.</p> <p>Procedure to resolve land conflict against land disputes over the land on Indicator 2.2.4 above, the company has provide the evidence of resolve process with affected stakeholder facilitated by local government.</p> <p>All of these problems have been mediated by the Regent of Tebo through Letter No: 005/1347 / Disbun / 2016, dated November 16, 2016 and also by the Plantation Office of Tebo Regency through letter No: 525/395 / Disbun / 2016, November 28, 2016.</p> <p>Based on the results of the Mediation Meeting on November 30, 2016, it was concluded that the implementation of field checks was postponed after data synchronization was carried out. Data synchronization will be carried out at the Jambi Provincial Regional Office (Office of the Ministry of Agrarian and Spatial Planning / BPN Jambi Province).</p> <p>Until current surveillance audit, there was no final decision on the follow-up results of the 30 November 2016 meeting.</p> <p><b>SMALLHOLDERS: BUNGO TEBO PLASMA</b></p> <p>For smallholders, legal ownership is in the form of Land Certificate Ownership Right (Sertifikat Hak Milik). The smallholder legal ownership obtained in various year period, 2002, 2004, 2014 based on PIR-TRANS program since 1999 upto 2001. There is no issue</p>	<p>Comply</p>

		related land dispute between smallholders.	
2.2.6	<p>To avoid escalation of conflict, there shall be no evidence that palm oil operations have instigated violence in maintaining peace and order in their current and/or planned operations.</p> <p>- Major compliance –</p>	<p><b>BUNGO TEBO ESTATE AND MILL</b></p> <p>The Certificate Holder has prepared a procedure to resolve land conflict in form of Standard Operating Procedure (SOP) No.AA-GL-5003.1-R2 revision 2 dated 8 May 2015 regarding Land Conflict Handling. The SOP described flow process and mechanism to handle land conflict. The SOP has taking into consideration the FPIC guide for RSPO Member 2015, whereby in the SOP has regulate information land conveyance, negotiation, participatory land measurement and other activities including engagement with relevant parties and other parties neighboring the plantation and/or conflict land. Up to this moment, company does not have planning to expand the plantation.</p> <p>Procedure to resolve land conflict against land disputes over the land on Indicator 2.2.4 above, the company has provide the evidence of resolve process with affected stakeholder facilitated by local government.</p> <p>All of these problems have been mediated by the Regent of Tebo through Letter No: 005/1347 / Disbun / 2016, dated November 16, 2016 and also by the Plantation Office of Tebo Regency through letter No: 525/395 / Disbun / 2016, November 28, 2016.</p> <p>Based on the results of the Mediation Meeting on November 30, 2016, it was concluded that the implementation of field checks was postponed after data synchronization was carried out. Data synchronization will be carried out at the Jambi Provincial Regional Office (Office of the Ministry of Agrarian and Spatial Planning / BPN Jambi Province).</p> <p>Until current surveillance audit, there was no final decision on the follow-up results of the 30 November 2016 meeting.</p> <p><b>SMALLHOLDERS: BUNGO TEBO PLASMA</b></p> <p>For smallholders, legal ownership is in the form of Land Certificate Ownership Right (Sertifikat Hak Milik). The smallholder legal ownership obtained in various year period, 2002, 2004, 2014 based on PIR-TRANS program since 1999 upto 2001. There is no issue</p>	Comply

		related land dispute between smallholders.	
<b>Criterion 2.3</b>			
Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent.			
2.3.1	<p>Maps with appropriate scale showing the extent of recognized legal, customary or user rights (Criteria 2.2, 7.5 and 7.6) shall be developed through participatory mapping involving affected parties (including neighboring communities where applicable, and relevant authorities).</p> <p>- Major compliance -</p>	<p><b>BUNGO TEBO ESTATE AND MILL</b></p> <p>For land issue as above mention (Indicator 2.2.3; 2.2.4; 2.2.5), the land conflict area has been mapped "Peta Identifikasi Kepemilikan Lahan" Scale 1:43,082 and Identification of Unable Managed Area "Peta Identifikasi Area yang Tidak Dikuasai PT Rigunas Agri Utama – Kebun Bungo Tebo".</p> <p>According to stakeholder consultation contacted during this Surveillance, particularly local government authority (BPN Kabupaten Tebo), there is no customary or indigenous or traditional rights within the company area.</p> <p><b>SMALLHOLDERS: BUNGO TEBO PLASMA</b></p> <p>No customary and traditional rights within smallholder's area. For smallholders, legal ownership is in the form of Land Certificate Ownership Right (Sertifikat Hak Milik). The smallholder legal ownership obtained in various year period, 2002, 2004, 2014 based on PIR-TRANS program since 1999 upto 2001.</p>	Comply
2.3.2	<p>Copies of negotiated agreements including the process of free, prior and informed consent (FPIC) (Criteria 2.2, 7.5 and 7.6) shall be available and these include:</p> <ul style="list-style-type: none"> <li>a) Evidence of consultation</li> <li>b) Statement of transfer of rights</li> <li>c) Evidence of compensation</li> </ul> <p>See specific guidance 2.3.2</p> <p>- Minor compliance -</p>	<p><b>BUNGO TEBO ESTATE AND MILL</b></p> <p>Managed area within land use right and certification scope of PT Rigunas Agri Utama is developed from government program PIR-TRANS as per "Surat Keputusan Menteri Transmigrasi dan Pemukiman Perambah Hutan No.KEP/165/MEN/1994 tentang Izin Pelaksanaan Transmigrasi (sementara) Pola PIR Trans dengan Komoditas Kelapa Sawit kepada PT. Rigunas Agri Utama II di Lokasi Peranap, Kecamatan Tebo Ulu dan Tebo Tengah, Kabupaten Bungo Tebo" dated 13 Desember 1994. The land for oil palm plantation project it self has been released from forest area status as per "Surat Keputusan Menteri Kehutanan No.771/KptsII/1993 tentang Pelepasan Sebagian Kelompok Hutan Sungai Langisip, Sungai Kilis, Sungai Batanghari terletak di Kabupaten Bungo Tebo, Provinsi Jambi seluas 22.710 Ha" dated 18 November 1993. Land historical is clearly</p>	Comply

		<p>describe in "Risalah Panitia-B" for Land Use Right/HGU 1997 and HGU 2016.</p> <p>There is no land compensation during 2017 and 2018.</p> <p><b>SMALLHOLDERS: BUNGO TEBO PLASMA</b></p> <p>For smallholders, legal ownership is in the form of Land Certificate Ownership Right (Sertifikat Hak Milik). The smallholder legal ownership obtained in various year period, 2002, 2004, 2014 based on PIR-TRANS program since 1999 upto 2001.</p>	
2.3.3	<p>Relevant information shall be available in appropriate forms and languages, including analysis of impacts, proposed benefit sharing, and legal arrangements.</p> <p>- Minor compliance -</p>	<p><b>BUNGO TEBO ESTATE AND MILL</b></p> <p>Managed area within land use right and certification scope of PT Rigunas Agri Utama is developed from government program PIR-TRANS as per "Surat Keputusan Menteri Transmigrasi dan Pemukiman Perambah Hutan No.KEP/165/MEN/1994 tentang Izin Pelaksanaan Transmigrasi (sementara) Pola PIR Trans dengan Komoditas Kelapa Sawit kepada PT. Rigunas Agri Utama II di Lokasi Peranap, Kecamatan Tebo Ulu dan Tebo Tengah, Kabupaten Bungo Tebo" dated 13 Desember 1994. The land for oil palm plantation project it self has been released from forest area status as per "Surat Keputusan Menteri Kehutanan No.771/KptsII/1993 tentang Pelepasan Sebagian Kelompok Hutan Sungai Langisip, Sungai Kilis, Sungai Batanghari terletak di Kabupaten Bungo Tebo, Provinsi Jambi seluas 22.710 Ha" dated 18 November 1993. Land historical is clearly describe in "Risalah Panitia-B" for Land Use Right/HGU 1997 and HGU 2016.</p> <p>There is no land compensation during 2017 and 2018.</p> <p><b>SMALLHOLDERS: BUNGO TEBO PLASMA</b></p> <p>For smallholders, legal ownership is in the form of Land Certificate Ownership Right (Sertifikat Hak Milik). The smallholder legal ownership obtained in various year period, 2002, 2004, 2014 based on PIR-TRANS program since 1999 upto 2001.</p>	Comply
2.3.4	Evidence shall be available to show that	<b>BUNGO TEBO ESTATE AND MILL</b>	Comply

	<p>communities are represented through institutions or representatives of their own choosing, including legal counsel.</p> <p>- Major compliance -</p>	<p>Managed area within land use right and certification scope of PT Rigunas Agri Utama is developed from government program PIR-TRANS as per "Surat Keputusan Menteri Transmigrasi dan Pemukiman Perambah Hutan No.KEP/165/MEN/1994 tentang Izin Pelaksanaan Transmigrasi (sementara) Pola PIR Trans dengan Komoditas Kelapa Sawit kepada PT. Rigunas Agri Utama II di Lokasi Peranap, Kecamatan Tebo Ulu dan Tebo Tengah, Kabupaten Bungo Tebo" dated 13 Desember 1994. The land for oil palm plantation project it self has been released from forest area status as per "Surat Keputusan Menteri Kehutanan No.771/KptsII/1993 tentang Pelepasan Sebagian Kelompok Hutan Sungai Langisip, Sungai Kilis, Sungai Batanghari terletak di Kabupaten Bungo Tebo, Provinsi Jambi seluas 22.710 Ha" dated 18 November 1993. Land historical is clearly describe in "Risalah Panitia-B" for Land Use Right/HGU 1997 and HGU 2016.</p> <p>There is no land compensation during 2017 and 2018.</p> <p><b>SMALLHOLDERS: BUNGO TEBO PLASMA</b></p> <p>For smallholders, legal ownership is in the form of Land Certificate Ownership Right (Sertifikat Hak Milik). The smallholder legal ownership obtained in various year period, 2002, 2004, 2014 based on PIR-TRANS program since 1999 upto 2001.</p>	
<p><b>Principle 3: Commitment to long-term economic and financial viability</b></p>			
<p><b>Criterion 3.1</b></p>			
<p>There is an implemented management plan that aims to achieve long-term economic and financial viability.</p>			
<p>3.1.1</p>	<p>A documented management plan, a minimum of three years shall be available, including, where appropriate, plan for scheme smallholders.</p> <p>- Major compliance-</p>	<p><b>Bungo Tebo POM and Estate:</b></p> <p>The company has committed to economic and financial sustainability and has documented the working plan in the Financial Budget Plan "Rencana Kerja Perusahaan". The company has set up a business management plan for the next 5 years and the forecast have been well documented in the document "Proyeksi Produk Sustainable &amp; Non Sustainable PT Rigunas Agri Utama Group Bungo Tebo" 2018 - 2023. Management plan was set up including independent FFB suppliers. Its management plan include:</p> <ol style="list-style-type: none"> <li>1. FFB Production projection 2018 – 2023</li> </ol>	<p>Comply</p>

2. CPO, PK, production projection 2018 – 2023
3. OER, KER projection 2018 – 2023
4. Estate Cost Estimation: Upkeep cost, manuring cost, pest and disease management cost, pruning cost, census cost, terrace maintenance cost, road and bridge maintenance cost, harvesting cost.
5. Mill Cost, KCP Cost, Selling cost, Bulking cost and Tax portion actual 2017 and projection 2018 – 2023
6. Nett Profit/Loss

Crop Projection Bungo Tebo Estate 2018 – 2023:

YOP	Ha	Estimated Production (Ton)					
		2018	2019	2020	2021	2022	2023
1994	132	4,140	156	-	-	-	-
1995	300	7,800	1,488	-	-	-	-
1996	384	9,103	1,747	-	-	-	-
2008	512	12,288	12,852	-	-	-	-
2016	295	-	4,130	6,490	7,375	7,965	8,260
2017	449	-	-	6,286	9,878	11,225	12,123
2018	447	-	-	-	6,258	9,834	11,175
Total	2,519	33,331	20,373	12,776	23,511	29,024	31,558

Estimated Production Bungo Tebo POM 2018 – 2023:

Description	UOM	Estimated Production (Ton)					
		2018	2019	2020	2021	2022	2023
FFB Processed	Ton	282,040	271,040	265,718	260,218	254,718	249,218
CPO Production	Ton	58,666	56,572	55,780	54,410	53,050	51,698
PK Production	Ton	15,106	14,501	14,349	14,052	13,755	13,458
OER	%	21.56	20.87	20.99	20.91	20.83	20.74
KER	%	5.35	5.35	5.40	5.40	5.40	5.40

**Scheme Smallholder:**

KOPERASI has made a management plan for 5 years 2018 – 2023 and documented in “Estimasi Biaya” covering:

- FFB Production estimation
- Average FFB price
- Total Revenue
- Cost estimation: Fertilizing, Weeds control, Pruning, Transportation
- Nett income/profit

For example crop projection in KOPERASI for year 2018-2023:

KOPERASI Name	Ha	Estimated Production (Ton)					
		2018	2019	2020	2021	2022	2023
Tanjung Dani Sakti	220	3,881	3,299	3,134	2,977	1,828	687
Sumay Jaya	232	4,113	3,477	3,303	3,138	1,981	832
Sumber Usaha	184	2,784	2,871	3,015	3,109	3,211	3,321
Bina Tani	238	3,638	3,048	3,103	3,079	2,925	2,779
Belarik Jaya	182	3,191	3,555	3,513	3,480	3,456	3,441
Sawit Tambara Jaya	218	4,299	4,463	4,686	4,507	4,339	4,182
Tunas Harapan	144	2,948	3,444	3,617	3,462	3,316	3,179
Sejahtera Tani	88	1,790	1,800	1,890	1,863	1,841	1,824
Tani Mandiri	158	2,924	3,398	3,568	3,747	3,934	4,131
Tanjung Jaya Bersama	68	1,022	970	1,018	1,069	1,122	1,179
Tanjung Aur Duri	68	1,305	1,060	1,113	1,149	1,091	1,037
Sawit Sumay Makmur	858	17,638	17,241	16,379	10,560	5,782	-
Sawit Makmur	672	12,655	12,855	12,253	11,640	11,058	10,505
Barokah	372	6,957	7,088	6,894	6,549	6,222	5,911
Sawit Keluarga Sejahtera	136	2,254	2,610	2,480	2,356	2,238	2,126
Sawit Makmur Bersama	628	11,200	13,315	12,667	12,033	11,432	10,860
Sawit Karya Makmur	710	13,055	13,811	13,284	12,620	11,989	11,389
Sawit Tanduk Perkasa	738	14,042	16,425	16,417	16,175	15,974	15,813
Total	5,914	109,967	114,731	112,333	103,513	93,740	83,196

		<p>PT Rigunas Agri Utama assisted each KOPERASI to calculate estimation of upkeep cost (e.g. fertilizer application, weed control, pruning, harvesting) and FFB transportation.</p>																																																																																														
<p>3.1.2</p>	<p>An annual replanting program projected for a minimum of five years (but longer where necessary to reflect the management of fragile soils, see Criterion 4.3), with yearly review, shall be available.</p> <p>- Minor compliance-</p>	<p><b>Bungo Tebo Estate:</b></p> <p>Company has made the replanting programme Actual 2016 – 2017, and budget 2018 – 2019. Below are the programme of replanting PT Rigunas Agri Utama – Bungo Tebo Estate:</p> <table border="1" data-bbox="857 635 1550 935"> <thead> <tr> <th rowspan="2">Tahun Tanam</th> <th colspan="3">Actual</th> <th colspan="2">Budget</th> </tr> <tr> <th>2016</th> <th>2017</th> <th>2018 (todate June)</th> <th>2018</th> <th>2019</th> </tr> </thead> <tbody> <tr> <td>1994</td> <td>-</td> <td>133</td> <td>192</td> <td>192</td> <td>130</td> </tr> <tr> <td>1995</td> <td>295</td> <td>115</td> <td>255</td> <td>255</td> <td>280</td> </tr> <tr> <td>1996</td> <td>-</td> <td>201</td> <td>-</td> <td>-</td> <td>377</td> </tr> <tr> <td>2008</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> </tr> <tr> <td><b>Total</b></td> <td><b>295</b></td> <td><b>449</b></td> <td><b>447</b></td> <td><b>447</b></td> <td><b>787</b></td> </tr> </tbody> </table> <table border="1" data-bbox="857 999 1935 1299"> <thead> <tr> <th>Replanting Year</th> <th>Afdeling</th> <th>Year Planted</th> <th>Total Hectare</th> <th>Riparian area</th> <th>Planted area</th> </tr> </thead> <tbody> <tr> <td>2016</td> <td>I</td> <td>1995</td> <td>290</td> <td>2</td> <td>288</td> </tr> <tr> <td>2017</td> <td>II, III</td> <td>1994, 1995, 1996</td> <td>467</td> <td>15</td> <td>452</td> </tr> <tr> <td>2018</td> <td>I, III</td> <td>1994, 1996</td> <td>420</td> <td>7</td> <td>418</td> </tr> <tr> <td>2019</td> <td>I, II</td> <td>1994, 1995, 1996</td> <td>452</td> <td>4</td> <td>449</td> </tr> <tr> <td>2020</td> <td>II, III</td> <td>1995, 1996</td> <td>402</td> <td>6</td> <td>396</td> </tr> <tr> <td>2035</td> <td>IV</td> <td>2008</td> <td>512</td> <td>5</td> <td>507</td> </tr> <tr> <td>Total</td> <td></td> <td></td> <td>2,543</td> <td>37</td> <td>2,511</td> </tr> </tbody> </table> <p>Realisation replanting progamme 2016 – 2018:</p> <table border="1" data-bbox="857 1362 1704 1394"> <thead> <tr> <th>Work item</th> <th>Replanting Year</th> </tr> </thead> <tbody> <tr> <td></td> <td></td> </tr> </tbody> </table>	Tahun Tanam	Actual			Budget		2016	2017	2018 (todate June)	2018	2019	1994	-	133	192	192	130	1995	295	115	255	255	280	1996	-	201	-	-	377	2008	-	-	-	-	-	<b>Total</b>	<b>295</b>	<b>449</b>	<b>447</b>	<b>447</b>	<b>787</b>	Replanting Year	Afdeling	Year Planted	Total Hectare	Riparian area	Planted area	2016	I	1995	290	2	288	2017	II, III	1994, 1995, 1996	467	15	452	2018	I, III	1994, 1996	420	7	418	2019	I, II	1994, 1995, 1996	452	4	449	2020	II, III	1995, 1996	402	6	396	2035	IV	2008	512	5	507	Total			2,543	37	2,511	Work item	Replanting Year			<p>Comply</p>
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	2016	2017	2018
Planted area (ha)	295	449	447
Total planting (palm tree)	41,779	46,727	46,675
SPH (palm/ha)	142	104	104
Total road length (m)	49,554	72,044	15,672
Ratio road length/ha	168	160	35
Ditch (m)	14,500	26,523	11,695
Ratio ditch/ha	49	59	26
Main drain	6,358	-	-
Ratio main drain/ha	22	-	-
Terracing	119,588	305,630	313,327

Replanting activity performed mechanically and zero burning. During field visit, it can be demonstrated that company has apply zero burning for replanting activity.

**Scheme Smallholder:**

Kebun Plasma Bungo Tebo assisted by PT Rigunas Utama has made "Draft Replanting PT Rigunas Agri Utama Kebun Plasma Bungo Tebo" for each KOPERASI. Draft replanting covered the step of replanting work item begins from field survey, infrastructure development for plantation, felling, chipping, stacking, planting preparation, cover crop planting, planted. Below are the replanting plan begins from 2022 – 2027:

KOPERASI Name	Replanting Plan (Ha)							Total
	2020	2021	2022	2023	2024	2025	2026	
Tanjung Dani Sakti	220	-	-	-	-	-	-	220
Sumay Jaya	232	-	-	-	-	-	-	232
Sumber Usaha	-	-	50	-	-	-	134	184
Bina Tani	70	-	56	-	112	-	-	238
Belarik Jaya	118	-	-	-	-	-	64	182
Sawit Tambara Jaya	-	-	192	-	-	-	26	218
Tunas Harapan	-	-	132	-	-	12	-	144
Sejahtera Tani	-	-	60	-	-	28	-	88

		Tani Mandiri	-	-	-	-	-	124	34	158
		Tanjung Jaya Bersama	-	-	-	-	-	68	-	68
		Tanjung Aur Duri	-	-	26	-	42	-	-	68
		Sawit Sumay Makmur	858	-	-	-	-	-	-	858
		Sawit Makmur	-	352	320	-	-	-	-	672
		Barokah	280	-	92	-	-	-	-	372
		Sawit Keluarga Sejahtera	-	136	-	-	-	-	-	136
		Sawit Makmur Bersama	-	398	230	-	-	-	-	628
		Sawit Karya Makmur	-	206	204	-	300	-	-	710
		Sawit Tanduk Perkasa	-	368	148	-	100	122	-	738
		Total	1,778	1,460	1,510	-	554	354	258	5,914

Cost estimation for replanting also has been set by Plasma Bungo Tebo for each KOPERASI. Total cost estimation for each kavling/block of replanting was IDR 46,034,500 (cost estimation is not fixed and will be changed according to the current/update price).

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

**Criterion 4.1**

Operating procedures are appropriately documented, consistently implemented and monitored.

4.1.1	Standard Operating Procedures (SOPs) for estates (land clearing to harvesting) and SOP for mills (reception of FFB to dispatch of CPO and PKO) shall be available.  - Major compliance -	<p><b>Bungo Tebo POM and Estate:</b></p> <p>The company has procedures for estate starts from land preparation up to replanting, such as:</p> <ol style="list-style-type: none"> <li>1. SOP AA-APM-OP-1100.01-R4 dated 5/09/2016 Pembibitan;</li> <li>2. SOP AA-APM-OP-1100.02-R3 10/06/2015 Penanaman Areal Baru;</li> <li>3. SOP AA-APM-OP-1100.03-R2 24/07/2015 Pembuatan dan Perawatan Jalan dan Jembatan explains road and bridge construction and maintenance;</li> <li>4. SOP AA-APM-OP-1100.04-R3 07/12/2015 Pembuatan dan Pemeliharaan Parit berisi tentang tuntutan teknis pekerjaan pembuatan dan pemeliharaan parit secara sistematis explains culvert/drainage construction and maintenance;</li> <li>5. SOP AA-APM-OP-1100.05-R3 23/11/2016 Konservasi Tanah dan Air explains Soil &amp; Water Conservation;</li> <li>6. SOP AA-APM-OP-1100.06-R6 16/02/2017 Menanam kacang related to Planting cover</li> </ol>	Comply
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		<p>crops;</p> <ol style="list-style-type: none"> <li>7. SOP AA-APM-OP-1100.07-R6 16/02/2017, Menanam Kelapa Sawit related to Planting;</li> <li>8. SOP AA-APM-OP-1100.08-R6 11/05/2016 Pengendalian Gulma or Weed control;</li> <li>9. SOP AA-APM-OP-1100.09. R5 5/09/2016 Pemupukan related to Fertilizer application;</li> <li>10. SOP AA-APM-OP-1100.10. R6 23/11/2016 Pengendalian Hama dan Penyakit explains Pests &amp; Disease Control;</li> <li>11. SOP AA-APM-OP-1100.11. R1 01/02/2009 Pestisida dan Pengendaliannya for pesticide handling;</li> <li>12. SOP AA-APM-OP-1100.12. R3 23/11/2016 Kastrasi explains castration (cutting all generative product (male flower, female flower, all fruit, to support vegetative growth) – done 5-6 months before being harvested);</li> <li>13. SOP AA-APM-OP-1100.13. R3 04/03/2016 Tunas Pokok for pruning;</li> <li>14. SOP AA-APM-OP-1100.14. R3 16/02/2017 Sensus dan Identifikasi Pokok explains census and palm identification;</li> <li>15. SOP AA-APM-OP-1100.15. R2 01/10/2010 Sensus Produksi related to production census;</li> <li>16. SOP AA-APM-OP-1100.16. R1 01/02/2009 Konsolidasi Pohon Tumbang explains provision of support to fallen palm;</li> <li>17. SOP AA-APM-OP-1100.17. R1 23/10/2014 Pengelolaan Air related to water management;</li> <li>18. SOP AA-APM-OP-1100.18. R3 20/04/2015 Potong Buah related to harvesting;</li> <li>19. SOP AA-APM-OP-1100.19. R1 01/02/2009 Pengelolaan Transport explains FFB Transport;</li> <li>20. SOP AA-APM-OP-1100.20-R6 16/02/2017 Replanting;</li> </ol> <p>Bungo Tebo POM has established a procedure to process the FFB to become CPO and PK starts from reception of FFB to dispatch of CPO and PKO:</p> <ol style="list-style-type: none"> <li>1. SOP AA-MPM-OP-1400.02.R2 Stasiun Penerimaan for FFB receiving station;</li> <li>2. SOP AA-MPM-OP-1400.03.R1 Stasiun Rebusan for sterilizer;</li> <li>3. SOP AA-MPM-OP-1400.04.R1 Stasiun Pemisahan Berondolan for loose fruit separation;</li> <li>4. SOP AA-MPM-OP-1400.05-R1 Stasiun pengadukan dan pengempaan for pressing station;</li> </ol>	
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		<p>5. Internal Communication Group Certification SOP No. 007/DOK/SOP/AA2016          6. Assessment and Inspection Member Group Plantation SOP No. 013/DOK/SOP/AA/2016          7. FFB sale Mechanism SOP No. 020/DOK/SOP/AA/2016          8. Weeds Control procedure "Pengendalian Gulma" AA-SOP-06-KLO dated 1 February 2009.</p> <p>Group manager plasma cooperate with KOPERASI has developed the training programme for Agronomy Best management practise according to the procedure for smallholder member such as:</p> <ul style="list-style-type: none"> <li>- Training of Harvesting, performed on 25 January 2018 in KOPERASI Tani Mandiri.</li> <li>- Integrated pest management training, performed on 17 May 2018 in KOPERASI Tani Mandiri.</li> </ul> <p>Weeds control and plot upkeep, performed on 13 April 2018 in KOPERASI Tani Mandiri.</p>	
4.1.2	<p>Checking or monitoring of operations procedures is conducted at least once a year.</p> <p>- Minor compliance -</p>	<p><b>Bungo Tebo POM and Estate:</b></p> <p>PT Rigunas Agri Utama follows procedure for internal audit under Standard Operating Procedures AA-SOP-ES-6001-R1 01/03/2013. The procedure stated that internal audit conducted minimum once a year. Upon finding, management unit shall prepare review on audit finding and prepare root cause analysis, prepare corrective action – with person in charge and completion target.</p> <p>The latest RSPO internal audit at Bungo Tebo Estate has performed on 2 - 3 May 2018, resulting 7 non conformities. Last RSPO internal audit at Bungo Tebo POM has been performed at 2 – 3 May 2018, resulting 11 non conformities. Corrective action plan has been determined and implemented. All the status of non conformities have been closed on 23 May 2018.</p> <p>To check and monitor operations procedures, PT Rigunas Agri Utama – Bungo Tebo has conducted others internal audit and visit both in estate and mill, such as:</p> <ul style="list-style-type: none"> <li>- R&amp;D Pest and Disease Visit Report, conducted once a year to check and monitor the implementation of Agronomy best management practices particularly for pest and disease control and plant upkeep. Last visit performed in Bungo Tebo Estate on 3 – 5</li> </ul>	Comply

		<p>July 2018 (KBT/R&amp;D-AGRO/01-18) by Era Wahyudi. During visit found that in general, growth of plants were good, leaf color were green with white canopy, no nutrient deficiency found in all block visited. Recommendation: keep up the good work by continuous upkeep and fertilizing according to determined schedule.</p> <ul style="list-style-type: none"> <li>- Visiting Agent conducted once a year to check and monitor the implementation of general Agronomy best management practices. Last visit performed in Bungo Tebo Estate on 5 – 8 June 2018 (KBT/VA/FULL 01-18) by Sinnaiha, number of comments were made such as:             <ul style="list-style-type: none"> <li>✓ Mature: Palm circles along roads and open space were very grassy inhibiting clean loose fruit collection. Recommendation: Assisstant should be flexible when implementing spraying program and should priorities according to field condition; Identity blocks or areas that are susceptible to early regeneration of weeds and carry out additional spraying only on such areas.</li> <li>✓ Immature: Significant patches of Pennisetum were sighted in OP17 while sedges and asystasia were seen sporadically in both OP16 and OP17. Since land clearing, Pennisetum was not control in steep sections to prevent soil erosion. Recommendation: Noxious weeds must be eliminated or it will spread to other areas and increase cost of control every year; Remove manually all those in steep sections and plant Mucuna to speed up coverage; Noxious weeds must be eliminated before felling and monitored thereafter; land preparation must be programmed as accurate as possible to plant up legumes with in 90 days after felling especially on the steep section to cover the area quickly and to prevent erosion.</li> </ul> </li> <li>- "Laporan Kunjungan Advisory Nursery Service" (Report of Nursery Service Advisory) to Bungo Tebo Nursery on 26 May 2018 by Izharul Ihsan. Conclusion: growth of seedlings in Bungo Tebo Nursery were good, green and healthy; pest attack was in light category, however it spread widely and need immediate control; late growth of Batch 1710 was caused by growth influence in Pre Nursery and lack of water management. Recommendation: to control disease it is suggested to use Perfektan spray with dosage 2.5 cc/litre of water and weekly round; To increase growth of Batch 1710, suggested to increase watering round from twice a day to three times a day.</li> </ul>	
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		<p>conformities have been closed on 17 May 2018.</p> <ul style="list-style-type: none"> <li>▪ Latest internal audit performed in KOPERASI Sejahtera Tani on 8 May 2018, resulting 4 non conformities. Corrective action plans have been determined, and all non conformities have been closed on 22 May 2018.</li> <li>▪ Latest internal audit performed in KOPERASI Tanjung Jaya Bersama on 10 May 2018, resulting 5 non conformities. Corrective action plans have been determined, and all non conformities have been closed on 20 May 2018.</li> </ul> <p>R&amp;D Pest and Disease Visit Report, conducted once a year to check and monitor the implementation of Agronomy best management practices particularly for pest and disease control and plant upkeep. Last visit performed in Kebun Plasma Bungo Tebo on 12 – 13 September 2017 (KLO/R&amp;D-P&amp;D/01-2017) by Daniel Erikson H. The report mentioned that:</p> <ul style="list-style-type: none"> <li>➢ Leaf eater caterpillar in field were controlled. No activities or leaf defoliation found.</li> <li>➢ Control done by natural predator, Oeochopyla smaragdina and planting host plant along the main road.</li> <li>➢ Rat attack found in all block visited with light intensity. Result of FFB monitoring on the market or during harvesting, found 1 – 3 bunch attack by rat. Census result reported that rat attack is 3 – 4 %, still under the economic threshold.</li> </ul> <p>To check the quality of FFB harvested by farmers according to the procedure and FFB quality standard, Foreman/Mandor check the FFB quality in TPH each day before loading and delivered to Bungo Tebo POM. FFB quality divided in to cathegory: normal, abnormal, empty bunch, long stalk and unripe bunch.</p> <p>Plasma Bungo Tebo performed weeds control monitoring in monthly basis to monitor the work progress of upkeep in each KT and KOPERASI. The activity recorded in "Rencana dan Realisasi Kerja Tahun 2018".</p> <p>Head of Smallholder Visit conducted once a year to monitor the implementation of best management practice, infrastructure condition, FFB quality of harvesting. Latest visit in Bungo Tebo Plasma conducted on 25 – 27 April 2018 by Pangarapen Gurusinga. Visit report was available and Bungo Tebo Plasma has performed action taken for any issue from the visit result.</p>	
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<p>4.1.3</p>	<p>Records of monitoring and any follow-up actions shall be available.</p> <p>- Minor compliance -</p>	<p><b>Bungo Tebo POM and Estate:</b></p> <p>Records of monitoring and any follow up actions can be demonstrated during audit, such as:</p> <ul style="list-style-type: none"> <li>- RSPO internal audit report, which done in 2 – 3 May 2018 in both Bungo Tebo Estate and Palm Oil Mill. Audit result findings can be demonstrated and the corrective action has been implemented to addressed issue found during audit.</li> <li>- R&amp;D P &amp; D Visit Report Bungo Tebo Estate KBT/R&amp;D-AGRO/01-18 date of visit 3 – 5 July 2018 by Era Wahyudi. All issue found during visit has been addressed by company as explained in indicator 4.1.2 above.</li> <li>- Report Visiting Agent No.KBT/VA/FULL 01-18 by Sinnaiha, dated 5 – 8 June 2018 in Bungo Tebo Estate. All issue found during visit has ben addressed by company as explained in indicator 4.1.2 above.</li> <li>- Production Performance report, that explained the FFB production performance and evaluation as well as determined production target for next year. Evaluation of FFB production each block to date August 2018 can be demonstrated.</li> <li>- Mandor logbook, contain information of daily work monitoring covering: harvesting, spraying, fertilizing, pest and disease cencus, road and infrastructure maintenance, and others. During audit verified sample of Bungo Tebo Estate.</li> <li>- Visiting Engineering report No. PBT-VE-FULL 01-18 dated 2 – 6 March 2018 by TCJ Thomas. All issue found during visit has ben addressed by company as explained in indicator 4.1.2 above.</li> <li>- Internal Audit RSPO SSC report dated 2 August 2018 by Rico Santoso Pakpahan.</li> <li>- Daily Report Bungo Tebo POM, latest on 31 August 2018; contain information covering FFB receiving, FFB process: gross and net FFB processed, FFB stock, shift hour, process hour, press hour, press capacity, sterilizer process, Utility factor commercial and capacity, CPO and PK production, CPO and PK extraction rate, CPO and PK quality. Process performance evaluated each day by mill manager and some corrective action to address some issue has been developed by Bungo Tebo POM.</li> </ul> <p>It is a routine that the estate and mill management prepare monthly reports and send to the company’s head office for monitoring purpose as well. Monthly Report Document has</p>	<p>Comply</p>
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		<p>recorded all field inspection results.</p> <p><b>Scheme Smallholder:</b></p> <p>Records of monitoring and any follow up actions can be demonstrated during audit, such as:</p> <ul style="list-style-type: none"> <li>- RSPO Internal audit for Smallholder management conducted by Sustainability team of Asian Agri to check and ensure the plasma management was comply against regulation and RSPO standard. Internal audit performed once a year;</li> <li>- Latest internal audit performed in KOPERASI Tani Mandiri on 9 May 2018, resulting 4 non conformities. Corrective action plans have been determined, and all non conformities have been closed on 14 May 2018.</li> <li>- Latest internal audit performed in KOPERASI Tunas Harapan on 7 May 2018, resulting 10 non conformities. Corrective action plans have been determined, and all non conformities have been closed on 17 May 2018.</li> <li>- Latest internal audit performed in KOPERASI Sejahtera Tani on 8 May 2018, resulting 4 non conformities. Corrective action plans have been determined, and all non conformities have been closed on 22 May 2018.</li> <li>- Latest internal audit performed in KOPERASI Tanjung Jaya Bersama on 10 May 2018, resulting 5 non conformities. Corrective action plans have been determined, and all non conformities have been closed on 20 May 2018.</li> <li>- R&amp;D Pest and Disease Visit Report, conducted once a year to check and monitor the implementation of Agronomy best management practices particularly for pest and disease control and plant upkeep. Last visit performed in Kebun Plasma Bungo Tebo on 12 – 13 September 2017 (KLO/R&amp;D-P&amp;D/01-2017) by Daniel Erikson H.</li> <li>- Head of Smallholder Visit conducted once a year to monitor the implementation of best management practice, infrastructure condition, FFB quality of harvesting. Latest visit in Bungo Tebo Plasma conducted on 25 – 27 April 2018 by Pangarapen Gurusinga. Visit report, No. KLO/HS/01-2018 was available and Bungo Tebo Plasma has performed action taken for any issue from the visit result.</li> </ul>	
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<p>4.1.4</p>	<p>Records of the origins of all third-party FFB sourced (collector, deliver, Cooperative, Farmers Association and outgrower) shall be available.</p> <p>- Major compliance -</p>	<p>PT Rigunas Agri Utama – Bungo Tebo POM has a policy related to purchase of non-certified FFB under “Kebijakan Perusahaan” dated 1 December 2014”. Point 17 of the policy stated “Melakukan komunikasi dan evaluasi kepada pihak ketiga terkait asal penerimaan TBS dari lahan yang legalitasnya dapat dibuktikan; tidak ada pembakaran untuk pembukaan areal baru maupun peremajaan (replanting); tidak melakukan pembukaan areal gambut setelah September 2014; tidak terdapat konflik lahan dan tidak mempekerjakan anak-anak dalam pengelolaannya”. The meaning is to communicate and evaluate third party related to purchase of FFB from legally demonstrable area; no burning for new development or replanting; no new development in peat area after September 2014; no land conflict and not employing children in the process.</p> <p>The company has also established SOP “Pengawasan Sumber Pembelian TBS Luar” (AA-MM-506.2.R1) dated 1 September 2017. The objective of the procedure was to ensure third party FFB sourced from non-forest area, completed with legal use of the land. The SOP covers requirements that outside FFB supplier must provide statement letter and location map and GPS coordinate; legality documentation of the supplier such as SKGR, SK Camat and certificate. Compare location map with Rencana Tata Ruang Wilayah Provinsi (RTRWP) or Tata Guna Hutan Kesepakatan (TGHK). Verification of location by FFB Manager. For supplier categorized as agen, team conducted visit to the loading ramp; if agen bought FFB from farmer with delivery note, then team conducted visit directly to FFB source. Team established supplier data base and updated in 6 month interval.</p> <p>SOP Traceability – FFB Purchase (AA-SOP-MM-506.4-R1) dated 1 September 2017. The objective of the SOP is to tighten internal monitoring to minimize unwanted business risk. The SOP stated that all FFB supplier must have legal requirements comply to the applicable regulation in Indonesia; and all FFB supplier must have Statement Letter that all FFB delivered to Bungo Tebo POM are not from forest area, no deforestation, zero burning and not employed children.</p> <p>The are Seven (7) registered FFB supplier that supplied FFB to Bungo Tebo POM, which is PDASAN Jaya, Pandawa Lima Lapan, CV Asri Bersaudara, SDR, Koperasi Sawit Makmur, UD Royal and KOPERASI Sawit Tanduk Perkasa.</p>	<p>Comply</p>
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		<p>FFB that supplied from area that legally contested or coming from protected forest, plantation forest, conservation area – will be rejected. During audit evidence of supplier verification can be demonstrated for example supplier PDASAN Jaya, Pandawa 58 and UD Royal, filed verification conducted to all of their planted area and source of FFB from the local farmer. Verification result completed with farmer name, location, year planting and GPS coordinate.</p> <p>The cooperation agreement between company and local supplier recorded in the "Surat Pernyataan dan Jaminan". e.g., Surat Pernyataan dan Jaminan Pdasan Jaya dated 26 February 2015; CV Pandawa Lima Lapan dated 10 July 2017; and UD Royal dated 4 January 2016. A statement and warranty stating that the supplier is willing to comply with the provisions of PT Rigunas Agri Utama and FFB received from land that has been controlled in accordance with the laws and regulations and does not originate from restricted areas such as protected forest areas, industrial forest estate, production forest area and conservation areas.</p> <p>FFB receiving from third party recorded each day in "Laporan Harian Pabrik" and reported each month in "Laporan Unit Pabrik". Below are the FFB received since January to August 2018 from third party supplier: Pdasan Jaya is 2,140,302 kg; Pandawa Lima Lapan is 7,016,096 kg; CV Asri Bersaudara is 10,058,271 kg; SDR is 49,106,388 kg Koperasi Sawit Makmuris 5,833 kg; UD Royal is 14,136,156 kg; and KOPERASI Sawit Tanduk Perkasa is 1,452,127 kg. Total non-certified FFB from third party since January to August 2018 is 83,915,173 kg.</p> <p>Scheme Smallholder, Kebun Plasma Bungo Tebo send FFB to Bungo Tebo Mill. FFB price is determined by "Hasil Rapat Penetapan Harga TBS Kelapa Sawit" issued by Dinas Perkebunan Provinsi Jambi. For example FFB formula and price for period 17 to 23 August 2018 as follows:</p> <table border="1" data-bbox="875 1265 1912 1383"> <thead> <tr> <th>No.</th> <th>Plant Age (year)</th> <th>Formula</th> <th>FFB Price (IDR)</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>3</td> <td><math>87.50\% \times ((6,452.39 \times 17.58\%) + (5,064.29 \times 3.48\%))</math></td> <td>1,146.79</td> </tr> <tr> <td>2</td> <td>4</td> <td><math>87.50\% \times ((6,452.39 \times 18.26\%) + (5,064.29 \times 4.37\%))</math></td> <td>1,224.63</td> </tr> </tbody> </table>	No.	Plant Age (year)	Formula	FFB Price (IDR)	1	3	$87.50\% \times ((6,452.39 \times 17.58\%) + (5,064.29 \times 3.48\%))$	1,146.79	2	4	$87.50\% \times ((6,452.39 \times 18.26\%) + (5,064.29 \times 4.37\%))$	1,224.63	
No.	Plant Age (year)	Formula	FFB Price (IDR)												
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		3	5	$87.50\% \times ((6,452.39 \times 19.14\%) + (5,064.29 \times 4.52\%))$	1,280.96	
		4	6	$87.50\% \times ((6,452.39 \times 19.97\%) + (5,064.29 \times 4.67\%))$	1,334.47	
		5	7	$87.50\% \times ((6,452.39 \times 20.48\%) + (5,064.29 \times 4.78\%))$	1,368.14	
		6	8	$87.50\% \times ((6,452.39 \times 20.87\%) + (5,064.29 \times 4.94\%))$	1,397.25	
		7	9	$87.50\% \times ((6,452.39 \times 21.31\%) + (5,064.29 \times 5.00\%))$	1,424.75	
		8	10-20	$87.50\% \times ((6,452.39 \times 21.85\%) + (5,064.29 \times 5.31\%))$	1,468.98	
		9	21-24	$87.50\% \times ((6,452.39 \times 21.11\%) + (5,064.29 \times 5.26\%))$	1,424.98	
		10	> 25	$87.50\% \times ((6,452.39 \times 19.99\%) + (5,064.29 \times 5.22\%))$	1,359.97	

<b>Criterion 4.2</b>						
Practices maintain soil fertility at, or where possible improve soil fertility to a level that ensures optimal and sustained yield.						
4.2.1	A record of SOP implementation to maintain soil fertility that ensures optimal and sustained yield, shall be available.  - Major compliance -	<p><b>Bungo Tebo Estate:</b></p> <p>The company has established procedure soil fertility in "SOP AA-APM-OP-1100.09. R1" - SOP Pemupukan, consist of type and recommendation of fertilizer for immature and mature areas, cycle, dosage and schedule for fertilizer application.</p> <p>To maintain soil fertility, Bungo Tebo Estate applied placing palm frond above ground level (L shape) and empty bunch application as well as Palm Oil Mill Effluent (POME) application (land application). During field visit can be demonstrated that company has applied management strategy to maintain soil fertility according to the procedure.</p> <p>Bungo tebo Estate applied inorganic fertilizer. Record of fertilizer application in Bungo Tebo Estate 2018 as a recommendation are available in "Fertilizer application and recommendation 2018 Bungo Tebo Estate". Record of fertilizer input described in 4.2.2.</p> <p><b>Scheme Smallholder:</b></p> <p>Plasma Bungo Tebo has established procedure soil fertility in AA-PLASMA-PP-KS-03 – Panduan Pelaksanaan Pemupukan. The procedure covered type of fertilizer and its content, fertilizer quality analysis, fertilizer recommendation and fertilizer application which</p>				Comply

		<p>must be appropriate in dosage, time, place and technique.</p> <p>To maintain soil fertility, plasma management also applied palm frond stacking in U shape around palm oil trees. Plasma Bungo Tebo also applied inorganic fertilizer to maintain soil fertility. Record of fertilizer input mentioned in 4.2.2.</p>																																							
4.2.2	<p>Records of fertilizer inputs shall be available.          - Minor compliance -</p>	<p><b>Bungo Tebo Estate:</b></p> <p>The company has set the fertilizer recommendations each year by Research and Development department and recorded in Recommendation Fertilization Bungo Tebo Estate 2018. Fertilizer recommendation was develop based on periodical leaf sampling analysis and soil sampling analysis. Records of fertilizer input in Bungo Tebo Estate was available.</p> <p>Fertilizer recommendation and realization in 2018 in Bungo Tebo Estate:</p> <table border="1" data-bbox="857 783 1621 1027"> <thead> <tr> <th>Fertilizer Type</th> <th>Program (kg)</th> <th>Realization (kg)</th> <th>%</th> </tr> </thead> <tbody> <tr> <td>ZA</td> <td>362,863</td> <td>261,373</td> <td>72</td> </tr> <tr> <td>MOP</td> <td>273,092</td> <td>256,349</td> <td>94</td> </tr> <tr> <td>RP</td> <td>160,103</td> <td>-</td> <td>-</td> </tr> <tr> <td>Kieserite</td> <td>39,234</td> <td>39,237</td> <td>100</td> </tr> <tr> <td>Dolomite</td> <td>93,777</td> <td>93,778</td> <td>100</td> </tr> <tr> <td>HGFB</td> <td>13,532</td> <td>6,765</td> <td>50</td> </tr> </tbody> </table> <p><b>Scheme Smallholder</b></p> <p>Plasma Bungo Tebo has set the fertilizer recommendations assist by PT Rigunas Agri Utama based on leaf sampling analysis. Fertilizer input and recommendation recorded in "Rekomendasi Pemupukan Kelapa Sawit 2018 Kebun Plasma Bungo Tebo". Fertilizer recommendation and input for each KOPERASI were available, as follows:</p> <table border="1" data-bbox="857 1286 1917 1388"> <thead> <tr> <th>Fertilizer recommendation</th> <th>KOPERASI Tani Mandiri</th> <th>KOPERASI Tunas Harapan</th> <th>KOPERASI Sejahtera Tani</th> <th>KOPERASI Tanjung Jaya Bersama</th> </tr> </thead> <tbody> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	Fertilizer Type	Program (kg)	Realization (kg)	%	ZA	362,863	261,373	72	MOP	273,092	256,349	94	RP	160,103	-	-	Kieserite	39,234	39,237	100	Dolomite	93,777	93,778	100	HGFB	13,532	6,765	50	Fertilizer recommendation	KOPERASI Tani Mandiri	KOPERASI Tunas Harapan	KOPERASI Sejahtera Tani	KOPERASI Tanjung Jaya Bersama						Comply
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4.2.3	<p>Records of periodical leaf, soil and visual analysis shall be available.          - Minor compliance -</p>	<p><b>Bungo Tebo Estate:</b>          PT Rigunas Agri Utama – Bungo Tebo Estate conducted periodical leaf sampling analysis to provide fertilizer recommendation for the upcoming year. Analysis done by PT Nusa Pusaka Kencana Analytical &amp; QC Laboratory. Latest leaf sampling analysis conducted on June 2017, as evident in Foliar Analysis Report No. 60/LSU/AGR/06/17 dated 3 June 2017; number of sample Afdeling II: 11 samples; Afdeling III: 6 samples and Afdeling IV: 25 samples. Sample of result e.g. Ref no. 17L08417; Block D08A; YOP 2008; 8.04% Ash;</p>																																																																																																					

		<p>2.53% N; 0.156% P; 0.98% K; 0.22% Mg; 0.58% Ca; 17 ppm B.</p> <p>Soil analysis conducted by independent laboratory "Binalab". Latest soil analysis was evident as on document "Laporan Hasil Pengujian" No. 104-4/T/BINA/V/2018 dated 28 May 2018. Sample received on 18 April 2018, analysis performed on 4 to 22 May 2018. Parameter analysed consist clay, dust, sand, pH, C-Organic, N-Total, Na, Ca, Mg, Cd, Cu, Pb and Zn.</p> <p><b>Scheme Smallholder:</b></p> <p>Leaf sampling analysis conducted each year. Leaf sampling analysis conducted by PT Nusa Pusaka Kencana Analytical and QC Laboratory. Sample seen:</p> <ul style="list-style-type: none"> <li>- KOPERASI Tani Mandiri: Latest analysis done on 20/09/2017, based on Foliar Analysis Report No. 136/INT/R&amp;D/SEP/L/17 dated 29/09/2017 with 22 samples analyzed. Result sample No.13L11899; Block 88; YOP 99; 17.00% Ash; 8.06% N; 2.45% P; 0.17% K; 0.97% Mg; 0.22% Ca; 10 ppm Cu.</li> <li>- KOPERASI Tunas Harapan: Latest analysis done on 13/10/2017, based on Foliar Analysis Report No. 145/INT/R&amp;D/OKT/L/17 dated 19/10/2017 with 23 samples analyzed. Result sample No.13L11903; Block 48; YOP 96; 8.54% Ash; 2.51% N; 0.155% P; 1.04% K; 0.24% Mg; 0.71% Ca; 9 ppm B.</li> <li>- KOPERASI Sejahtera Tani: Latest analysis done on 12/11/2017, based on Foliar Analysis Report No. 131/INT/R&amp;D/DES/L/17 dated 14/12/2017 with 24 samples analyzed. Result sample No.13L11904; Block 108; YOP 99; 8.64% Ash; 2.46% N; 0.155% P; 0.82% K; 0.34% Mg; 0.73% Ca; 10 ppm B.</li> <li>- KOPERASI Tanjung Jaya Bersama: Latest analysis done on 14/12/2017, based on Foliar Analysis Report No. 131/INT/R&amp;D/DES/L/17 dated 14/12/2017 with 22 samples analyzed. Result sample No.13L11903; Block 109; YOP 99; 7.56% Ash; 2.15% N; 0.149% P; 0.95% K; 0.33% Mg; 0.55% Ca; 9 ppm B.</li> </ul> <p>Last Soil Analysis conducted on 01/07/2013 based on Soil Analysis Report</p>	
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		No.025/INT/R&D/ AGT/S/13, with 13 samples analyzed. Result sample no. 13S1478; Block Boring SP 1; Depth 0-15 m; particle size: 36% coarse sand; 19% fine sand; 15% silt; 30% clay; 0.11% N; 1.49% organic C; pH 4.38 H <sub>2</sub> O; 3.83 KCl; 0.56 Ca; 0.13 Mg; 0.09 K.																																																																																													
4.2.4	<p>A nutrient recycling strategy is recorded, including use of Empty Fruit Bunches (EFB), land application, and palm residues after replanting.</p> <p>- Minor compliance -</p>	<p><b>Bungo Tebo Estate:</b></p> <p>Bungo Tebo Estate has recorded use of nutrient recycling strategy by application of empty fruit bunch (EFB), land application and use of palm residues after replanting. Dosage of EFB application in mature oil palm was 250 kg/palm/year and for immature plantation 125 kg/palm/year. Rotation for EFB application is 12 months. Total EFB application in Bungo Tebo Estate for January to August 2018 was 7,587,980 kg, it was 45% from the total budget 16,896,000 kg.</p> <p>Sample document of EFB application program and realization are as follow:</p> <p><u>Mature</u></p> <table border="1" data-bbox="857 831 1899 1367"> <thead> <tr> <th>Afd</th> <th>Block</th> <th>YOP</th> <th>Ha</th> <th>Population</th> <th>Program (kg)</th> <th>Realization (kg)</th> </tr> </thead> <tbody> <tr><td rowspan="14">4</td><td>D08a</td><td>2008</td><td>30</td><td>4,211</td><td>1,051,552</td><td>-</td></tr> <tr><td>D08b</td><td>2008</td><td>30</td><td>4,012</td><td>1,001,859</td><td>-</td></tr> <tr><td>D08c</td><td>2008</td><td>30</td><td>4,144</td><td>1,034,821</td><td>-</td></tr> <tr><td>D08d</td><td>2008</td><td>30</td><td>4,226</td><td>1,055,298</td><td>-</td></tr> <tr><td>D08e</td><td>2008</td><td>32</td><td>4,411</td><td>1,101,495</td><td>-</td></tr> <tr><td>D08f</td><td>2008</td><td>30</td><td>4,321</td><td>1,079,021</td><td>-</td></tr> <tr><td>D08g</td><td>2008</td><td>41</td><td>5,800</td><td>1,448,350</td><td>-</td></tr> <tr><td>D08h</td><td>2008</td><td>25</td><td>3,291</td><td>821,814</td><td>-</td></tr> <tr><td>D08i</td><td>2008</td><td>44</td><td>5,717</td><td>1,427,623</td><td>713,812</td></tr> <tr><td>D08j</td><td>2008</td><td>44</td><td>6,353</td><td>1,586,443</td><td>1,586,443</td></tr> <tr><td>D08k</td><td>2008</td><td>18</td><td>2,554</td><td>637,773</td><td>637,773</td></tr> <tr><td>D08l</td><td>2008</td><td>52</td><td>7,421</td><td>1,853,139</td><td>1,853,139</td></tr> <tr><td>D08m</td><td>2008</td><td>35</td><td>4,726</td><td>1,180,155</td><td>1,180,155</td></tr> <tr><td>D08n</td><td>2008</td><td>33</td><td>4,172</td><td>1,041,813</td><td>1,041,813</td></tr> </tbody> </table>	Afd	Block	YOP	Ha	Population	Program (kg)	Realization (kg)	4	D08a	2008	30	4,211	1,051,552	-	D08b	2008	30	4,012	1,001,859	-	D08c	2008	30	4,144	1,034,821	-	D08d	2008	30	4,226	1,055,298	-	D08e	2008	32	4,411	1,101,495	-	D08f	2008	30	4,321	1,079,021	-	D08g	2008	41	5,800	1,448,350	-	D08h	2008	25	3,291	821,814	-	D08i	2008	44	5,717	1,427,623	713,812	D08j	2008	44	6,353	1,586,443	1,586,443	D08k	2008	18	2,554	637,773	637,773	D08l	2008	52	7,421	1,853,139	1,853,139	D08m	2008	35	4,726	1,180,155	1,180,155	D08n	2008	33	4,172	1,041,813	1,041,813	Comply
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<p><b>Criterion 4.3</b>  Practices minimise and control erosion and degradation of soils.</p>																																																		
4.3.1	<p>Maps of any fragile soils shall be available.</p> <p>- Major compliance -</p>	<p><b>Bungo Tebo Estate:</b></p> <p>PT Rigunas Agri Utama showed Peta Sebaran Satuan Tanah for Bungo Tebo Estate. The map indicated the predominant soil type consist of :</p>	Comply																																															

Soil classification	Slope (%)	Drainage	Class of land	Limitation factor	Hectare
Aquic dystrochrepts	0 – 8	Bad	Suitable (S3)	Drainage, retensi hara	143
Typic endoaquults	0 – 8	Bad	Suitable (S3)	Drainage, retensi hara, Texture	146
Typic hapludults	8 – 15	Good	Suitable (S3)	Drainage, retensi hara, Texture	14
Typic hapludults	15 – 30	Good	Suitable (S3)	Elevation, Topography, hara tersedia	754
Typic hapludults	>30	Good	Not Suitable bersyarat (N1)	Elevation, Topography, hara tersedia	1,574
<b>Total</b>					<b>2,361</b>

There is also topographic map indicating the elevation of Bungo Tebo Estate consist of 0-8% and >30%. The limitation for the area is steep slope on some area. PT Rigunas Agri Utama did not open the area with steep slope > 40%. Topografi level consist of 45 – 105 m.

**Scheme Smallholder:**

Plasma Bungo Tebo Group can be shown the soil maps in "Peta satuan tanah Kebun Plasma Bungo Tebo". Maps was provided by PT Rigunas Agri Utama. Based on soil survey semi detail, soil type in Plasma Bungo Tebo consist of:

Soil classification	Slope (%)	Drainage	Class of land	Limitation factor	Hectare
Aquic dystrochrepts	0 – 8	Bad (terhambat)	Suitable (S3)	Drainage, retensi hara, hara tersedia	349

		<table border="1"> <tr> <td>Typic endoaquults</td> <td>0 – 8</td> <td>Bad (terhambat)</td> <td>Not Suitable bersyarat (N1)</td> <td>Drainage, retensi hara, hara tersedia</td> <td>1,132</td> </tr> <tr> <td>Typic kandiudults</td> <td>8 – 15</td> <td>Good</td> <td>Suitable (S2)</td> <td>Retensi hara dan hara tersedia</td> <td>539</td> </tr> <tr> <td>Typic kandiudults</td> <td>15 – 30</td> <td>Good</td> <td>Suitable (S3)</td> <td>Tekstur, retensi hara dan lereng</td> <td>1,057</td> </tr> <tr> <td>Typic kandiudults</td> <td>&gt;30</td> <td>Good</td> <td>Not Suitable bersyarat (N1)</td> <td>Tekstur, retensi hara dan lereng</td> <td>2,197</td> </tr> <tr> <td>Typic hapludults</td> <td>15 – 30</td> <td>Good</td> <td>Suitable (S3)</td> <td>Tekstur, retensi hara dan lereng</td> <td>492</td> </tr> <tr> <td>Typic hapludults</td> <td>&gt;30</td> <td>Good</td> <td>Not Suitable bersyarat (N1)</td> <td>Tekstur, retensi hara dan lereng</td> <td>2,133</td> </tr> <tr> <td colspan="5">Total</td> <td>7,899</td> </tr> </table> <p>Based on soil maps semi detail indicated that there is no fragile soil identified in Plasma Bungo Tebo. There were identified soil as unsuitable class however it can be cultivated and optimized by EFB application particularly in soil with sandy texture.</p>	Typic endoaquults	0 – 8	Bad (terhambat)	Not Suitable bersyarat (N1)	Drainage, retensi hara, hara tersedia	1,132	Typic kandiudults	8 – 15	Good	Suitable (S2)	Retensi hara dan hara tersedia	539	Typic kandiudults	15 – 30	Good	Suitable (S3)	Tekstur, retensi hara dan lereng	1,057	Typic kandiudults	>30	Good	Not Suitable bersyarat (N1)	Tekstur, retensi hara dan lereng	2,197	Typic hapludults	15 – 30	Good	Suitable (S3)	Tekstur, retensi hara dan lereng	492	Typic hapludults	>30	Good	Not Suitable bersyarat (N1)	Tekstur, retensi hara dan lereng	2,133	Total					7,899	
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4.3.2	<p>A management strategy shall be in place for plantings on slopes above a certain limit (this needs to be soil and climate specific).</p> <p>- Minor compliance -</p>	<p><b>Bungo Tebo Estate:</b></p> <p>Company has establish the procedure for soil and water conservation Procedure No. AA-SOP-OP-1100-05.R3 dated 23 November 2016 "Konservasi Tanah dan Air". The procedure has determined strategy control erosion particular in slope area, such as: 0 – 5° , 6 – 12° , 13 -20° , and more than 20°. The company has applied silt pit, L shape stacking frond and terracing in slope area to reduce erosion. In addition, company also applied land cover crop in all area of replanting to prevent the soil erosion. The realization of soil and water conservation work are:</p> <p>1.Terracing, during year 2018 ytd August company has made terracing in the replanting</p>	Comply																																										

		<p>area of 408.07 ha as much as 277,053 meters.</p> <p>2.Maintenance "Tapak Koperasia" individual platform, realization in 2018 ytd August are 668 units.</p> <p>3.During year 2018, company has planed a land cover crop planting for 335.20 ha and has planting the land cover crop for 309.20 ha until the end of August 2018.</p> <p><b>Scheme Smallholder:</b></p> <p>Plasma Bungo Tebo has create the "Draft Replanting" dated 2 February 2017 which explain the steps of replanting such as survey and blocking area, road and drainage stacking, felling, chipping, holing, planting, terracing, etc. In the draft replanting Management Plasma Bungo Tebo has determined the strategy for planting on slopes by terracing. In the sloping area &gt; 10° plasma shall applied terrace contour. Wide of each terrace was 4 m and the distance between terracing was 7.30 – 8.90 m. Individual terrace was applied in the sloping area above certain limit. Detail of terracing and individual terrace was explain in the Draft Replanting.</p> <p>In addition, plasma management has determined in the replanting activity before planting Palm Oil tree there must be planting land cover crop (<i>Mucuna bracteata</i>) or leguminous cover plants to minimize soil erosion and enhance the soil fertility and soil structure. Legunimous cover plants was applied in 3 point for each palm oil plant.</p> <p>During field visit in KOPERASI Tani Mandiri, KOPERASI Tanjung Jaya Bersama, KOPERASI Tunas Harapan and KOPERASI Sejahtera tani there is no replanting activity. The oldest palm oil planting was 1994 and the nearest replanting will conducted in 2022 as explain in indicator 3.1.2.</p> <p>During field visit can be demonstrated that KOPERASI has applied individual terrace, U shape frond stacking and selective spraying to minimize the soil erosion.</p> <p>Terrace/individual terrace maintenance can be demonstrated in document "Pembuatan Tapak Koperasia". Sample seen, during January – September 2018 individual terracing and maintenance at KOPERASI tani Mandiri KT 89 plot 2405, 2409, 2413, 2422 and 2424 as much as 38 individual terrace; at KOPERASI Tanjung Jaya Bersama KT 109 plot 3306 and</p>	
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		3310 there were 14 terracing has made and maintain on September 2018.	
4.3.3	<p>A road maintenance program shall be in place.</p> <p>- Minor compliance –</p>	<p><b>Bungo Tebo Estate:</b></p> <p>Road maintenance program and progress was made and recorded in "Monitoring Program &amp; Realisasi Pengerasan Jalan Manual 2018" &amp; "Monitoring Program &amp; Realisasi Greeding Jalan 2018". Road maintenance implementation in Bungo Tebo Estate:</p> <ul style="list-style-type: none"> <li>- Road maintenance mechanically using Grader/Road Greeding in 2018 ytd August total 182,432 m (Afd I 45,585 m; Afd II 61,295 m; Afd III 24,772 m; Afd IV 50,780 m).</li> <li>- Road maintenance manually and road service by spreading split stone in 2018 total 104,242 m with volume split stone 2,152 m<sup>3</sup> (Afd II 22,750 m; Afd III 15,950 m; Afd IV 65,542 m).</li> <li>- Road hardening by spreading split stone and compactor in 2018 has performed and recorded in "Monitoring Realisasi Pengerasan Jalan". Total road hardening and compacting in 2018 was 6,989 m with split stone volume 2,097 m<sup>3</sup>.</li> </ul> <p>During field visit and audit in PT Rigunas Agri Utama found that road condition was in good condition and well maintained.</p> <p><b>Scheme Smallholder:</b></p> <p>KOPERASI has shown document of "Peta Kondisi Jalan", total road length in plasma Bungo Tebo is 357,470 m. Road condition in plasma Bungo Tebo year to date August 2018 divided in to:</p> <ul style="list-style-type: none"> <li>- Good condition 183,150 m</li> <li>- Medium condition 82,350 m</li> <li>- Bad condition 91,170 m</li> </ul> <p>Plasma Bungo Tebo has made the road maintenance programme. Road maintenance from</p>	Comply

		<p>January to August 2018 has progress :</p> <ul style="list-style-type: none"> <li>- Good Condition road 216,280 m</li> <li>- Medium condition road 45,000 m</li> <li>- Bad condition road 26,970 m</li> </ul> <p>During field visit in Plasma Bungo Tebo can be shown that road condition generally in good and medium condition particularly in main road, however in collection road the condition is medium and several found in bad condition.</p> <p>Evidence of road maintenance and service can be demonstrated in "Surat pengakuan Hutang" for example SPH No. KLO/2018/01/SPH-ALAT/005 KOPERASI Tani mandiri dated 2 February 2018. Contain information of heavy equipment usage and number of HM and cost of road maintenance and services.</p>	
4.3.4	<p>Subsidence of peat soils shall be minimised and monitored. A documented water and ground cover management programme shall be in place.</p> <p>- Major compliance –</p>	<p>Based on semi-detailed soil survey and field observation, there is no peat soil both in Bungo Tebo Estate and scheme smallholder area.</p>	Comply
4.3.5	<p>Drainability assessments shall be required prior to replanting on peat to determine the long-term viability of the necessary drainage for oil palm growing.</p> <p>- Minor compliance –</p>	<p>Based on semi-detailed soil survey and field observation, there is no peat soil both in Bungo Tebo Estate and scheme smallholder area.</p>	Comply
4.3.6	<p>A management strategy shall be in place for other fragile and problem soils (e.g. sandy, low organic matter, acid sulphate soils).</p> <p>- Minor compliance –</p>	<p><b>Bungo Tebo Estate:</b></p> <p>In procedure no. AA-SOP-OP-1100-05.R3 "Konservasi Tanah dan Air" has determined strategy control erosion particular in slope area, such as: 0 – 5°, 6 – 12°, 13 -20°, and more than 20°. The company has applied silt pit, L shape stacking frond and terracing in</p>	Comply

		<p>slope area to reduce soil erosion.</p> <p>Based on soil analysis, there is no fragile soil in PT Rigunas Agri Utama – Bunyo Tebo Estate. Based on Peta Sebaran Satuan Tanah for Bungo Tebo Estate the predominant soil type consist of: Aquic dystrodepts, Typic hapludults, Typic endoaquults.</p> <p><b>Scheme Smallholder:</b></p> <p>Smallholder has implemented minimum spraying (using spraying team service), selected spraying only in circle, path and TPH area. Frond stacking letter U applied to minimized soil erosion particularly in sloping area. In area with bad drainage, smallholder has made the ditch to drainage the area. During field visit there is no flood area in plasma Bungo Tebo. KOPERASI also has applied individual terrace and U shape frond stacking to minimize the soil erosion.</p>	
<p><b>Criterion 4.4</b>  Practices maintain the quality and availability of surface and groundwater</p>			
<p>4.4.1</p>	<p>An implemented water management plan shall be in place.</p> <p>- Minor compliance -</p>	<p><b>Bungo Tebo POM and Estate:</b></p> <p>The company has a water management plan as documented in “Water management Kebun Bungo Tebo – Praktek Praktek Mempertahankan Kualitas dan ketersediaan Air permukaan dan Air Tanah – Water Sustainable”. Water Management Plan, covering: identification water need as regulated in “Peraturan Menteri PU No.14/PRT/M/2010 (domestic consumption is 60 liters/person/day and water needed for mill processing, Ground and surface water resources and its permit, management and monitoring waste water, included domestic waste water, etc.</p> <p>Bungo Tebo Estate has obtained a permit of ground water usage from Kantor Pelayanan Terpadu Satu Pintu Tebo Regency based on “izin Pengambilan Air Bawah Tanah (IPA) Nomor: 546.2/02/IPA/KPTSP/2016 dated 21 May 2016, valid until 3 years.</p> <p>Bungo Tebo POM has obtained permit of surface water usage from Bupati Tebo according to “Keputusan Bupati Tebo Nomor: 565/ESDM/2008 Tentang Pemberian Izin Pemanfaatan</p>	<p>Comply</p>



		<p>Air Permukaan Kepada PT Rigunas Agri Utama di Kecamatan Sumay Tahun 2008” dated 7 October 2008, valid since Bungo Tebo POM operate the mill.</p> <p>Water consumption for domestic has monitored regularly and reported to Dinas Energi dan Sumberdaya Mineral Tebo Regency. Latest report of water usage period April – June 2018 reported on 8 August 2018. Company also paid the retribution fee for water cusage to “Dinas Pendapatan Daerah”. Sample seen water consumption report No. SPTPD 001/PAT/2018 period July 2018, water volume usage 31,396 m<sup>3</sup>, retribution fee 934,802 Rupiah.</p> <p>The company has conducted measurement of water quality regularly and consistent, the result shown that water quality is complies with national regulation.</p> <p>Regular monitoring of water quality has been conducted by company cooperated with Testing laboratory SUCOFINDO. Water sample was taken from Observing well within land application and non land application area, upstream and downstream of Pemuatan River, Lalo River and Belangkai River water (downstream and upstream). Sample taken every six month. Certificate analysis No. 02388/CLAKAL dated 12 June 2018 for surface water analysis shown that all parameter tested were in accordance with Environmental Minister Regulation PP. No. 82, 2001 (Class II). Certificate Anlysis No. 02340/CLAKAL dated 12 June 2018 for ground water/drinking water analysis shown that all parameter tested were in accordance with Permenkes 492/Menkes/SK/IV/2020.</p> <p>No chemical applied nearby water sources and protected riparian zones this has been confirmed during field visit to estate block area and interview with chemical sprayers.</p> <p><b>Scheme smallholders:</b></p> <p>The soil and water conservation in form of maintain soft weed by selective spraying (team TUS). The</p> <p>soft weed for natural cover crop – in order to maintain micro-climate and minimize surface run-off.</p>	
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		<p>Management of Plasma Bungo Tebo has issued the policy of prohibition of chemical application in riparian area according to "Memorandum Nomor: 02/EST-KLO/MEMO/X/17 dated 2 October 2017". Policy stated that to achieve the sustainable palm oil management in Plasma Bungo Tebo, Plasma Management prohibit the chemical application at riparian area 3 m at left and right side of river.</p>	
<p>4.4.2</p>	<p>Protection of water courses and wetlands, including securing and maintaining appropriate riparian and other buffer zones, at the time of or prior to replanting shall be demonstrated.</p> <p>- Major compliance -</p>	<p><b>Bungo Tebo POM and Estate:</b></p> <p>The water used for domestic purposes comes from the surface water then pumped into the tank and supplied to employee housing. To maintain the water source, the Bungo Tebo Estate has planted the native trees around riparian rivers as programmed and recorded in "Riparian Restoration Program Tahun 2018". The company has demarcated left and right side along the river, treat it as riparian zones. There is no chemical-related spraying in the area, to prevent contamination into the river water.</p> <p>Procedure for maintaining riparian zone is on SOP AA-APM-OP-1100.05. R3 "Konservasi Tanah dan Air", it is stated that at during land clearing area along the river shall be conserved. During field visit at Bungo Tebo Estate can be demonstrated that company has conserved the riparian area and exclude from the replanting plan. Company also prohibit performing chemical spraying activity in riparian zone to prevent the water pollution.</p> <p>Company also has defined the procedure of Riparian restoration AA-KL-12-EFP R1, dated 22 April 2016. The procedure explain the riparian restoration process in area undisturbed and disturbed area (planting area) by placing the stake, planting the local species and erosion barrier species.</p> <p>Company has a program to improve the riparian 2018 by restoration and rehabilitation at Belangkai purun river, Lalo river, Benanai river, Rotan river, Salak Sengkilang river and Anak pinang river. The programme performed by providing the nursery of natural vegetation and planting the natural vegetation in riparian area to enrich the biodiversity and enhance the conservation value. Natural vegetation nursery such as: Sungkai (<i>Pteronema canescens</i>) and Angsana (<i>Albizia saman</i>), Ketapang and Ficus. Number of species planting in nursery around &gt; 1,000 tree.</p>	<p>Comply</p>

		<p><b>Scheme smallholders:</b></p> <p>The soil and water conservation in form of maintain soft weed by selective spraying (team TUS). The soft weed for natural cover crop – in order to maintain micro-climate and minimize surface run-off.</p> <p>Management of Plasma Bungo Tebo has issued the policy of prohibition of chemical application in riparian area according to “Memorandum Nomor: 02/EST-KLO/MEMO/X/17 dated 2 October 2017”. Policy stated that to achieve the sustainable palm oil management in Plasma Bungo Tebo, Plasma Management prohibit the chemical application at riparian area 3 m at left and right side of river.</p> <p>During interview with smallholder member in KOPERASI Tani Mandiri, KOPERASI Tunas Harapan, KOPERASI Tanjung Jaya Bersama and KOPERASI Sejahtera Tani indicated that they have understand regarding the protection of water course and prohibition of chemical application near to riparian area.</p>	
4.4.3	<p>Records for monitoring of effluent especially BOD (Biochemical Oxygen Demand) and efforts to comply with legal requirements, shall be available (see criteria 2.1 and 5.6).</p> <p>- Minor compliance –</p>	<p><b>Bungo Tebo POM:</b></p> <p>Bungo Tebo POM has a procedure to manage the palm oil mill effluent, under AA-MPM-OP-1400.13- R1. The process detail is from recovery tank into cooling pond, into acidification pond (anaerob bactery activation) into primary anaerob pond (decomposistion), secondary anaerobic pond. The purpose was to reduce BOD &lt;100 ppm.</p> <p>Based on field visit, Bungo Tebo POM are using 6 ponds with 3 buffer ponds was not used. Acid pond capacity: 4,500 m<sup>3</sup>; cooling pond capacity 4,500 m<sup>3</sup>; anaerobic pond I capacity 10,600 m<sup>3</sup>; secondary anaerobic pond 1 capacity 10,600 m<sup>3</sup>; sedimentation pond capacity 10,600 m<sup>3</sup>; buffer ponds capacity 15,428 m<sup>3</sup>.</p> <p>Mill has a work instruction for management of POME pond, under “Work Instruction Pengoperasian Kolam Limbah”. The fresh palm oil mill effluent was processed in order to meet “Keputusan Menteri Lingkungan Hidup No.Kep.51/MenLH/10/1995 which stated the</p>	Comply

parameter should be within pH 6-9; BOD 100 mg/L; COD 350 mg/L; TSS 250 mg/L; Oil and Fat 25 mg/L; NH3 50 mg/L.

Mill effluent was utilized for land application, adding nutrient to oil palm plantation. The land application permit was based on "Keputusan Bupati Tebo No.354 Tahun 2015 tentang Izin Pemanfaatan Air Limbah Pabrik Kelapa Sawit pada Tanah di Perkebunan Kelapa Sawit Milik PT. Rigunas Agri Utama" dated 23 June 2015 valid for 5 years. The permit regulates the application of palm oil mill effluent with maximum BOD sets at 5,000 ppm. Bungo Tebo POM has analyzed the waste water quality each month by "UPTD Laboratorium Lingkungan Daerah – Dinas Lingkungan Hidup Provinsi Jambi". Below are the analysis result of waste water quality since January – June 2018:

Parameter (mg/l)	Analysis result						
	Jan	Feb	March	April	May	June	July
pH	7.57	7.56	8.04	8.00	7.80	7.32	7.44
BOD	2,215	2,415	1,205	1,810	1,932	5,430	3,210
COD	5,080	5,082	3,656	3,560	3,150	11,450	5,080
Oil & Fat	121	237	118	219	125	205	53
Cd	< 0.002	<0.002	< 0.002	<0.002	<0.002	<0.002	<0.002
Cu	0.36	0.04	0.151	0.216	0.177	0.219	0.447
Pb	< 0.03	<0.03	<0.03	<0.03	<0.33	<0.03	<0.03
Zn	0.853	0.666	0.162	0.270	0.402	0.235	0.514

From the analysis result can be shown that generally the parameter analyze has met with the standard of Land application permit, however there is BOD parameter exceed the threshold in June 2018 due to lack of circulation of waste water during sampling taken in the sampling point. Bungo Tebo POM has taken action to improve the circulation. In July 2018, the BOD analysis result has met with the permit. Bungo Tebo POM has obtained Blue PROPER as well during period 2016 – 2017 and 2017 – 2019, it was indicated that company has comply with environmental regulation in regards of environmental quality analysis.

Company has regularly reported to "Dinas Lingkungan Hidup Kabupaten Tebo" on

		<p>monthly basis. Record seen: "Daftar Distribusi Eksternal Laporan Land Aplikasi Period July 2018" dated 21 August 2018. Company also send the report to "Badan Lingkungan Hidup Provinsi Jambi", "Kementerian Lingkungan Hidup Republik Indonesia" for report of land application period January – July 2018.</p>																															
<p>4.4.4</p>	<p>Monitoring of mill water use per ton of FFB shall be recorded.</p> <p>- Minor compliance –</p>	<p><b>Bungo Tebo POM:</b></p> <p>Mill water use per tonne of FFB is monitored monthly. Result of monitoring of mill water use per tonne of FFB was sighted in January to August 2018. The organisation has a program to reduce water consumption, such as: recycle the water cooler turbine discharge water basin; recycle condensate water discharge water dilution; minimize duration of cleaning to be every two weeks.</p> <p>The following is mill water use per tonne of FFB since January to July 2018 at Bungo Tebo POM. Water efficiency, budget for process water use is determined as 1.38 m<sup>3</sup>/ton FFB processed. The result for 2018 shows as follow:</p> <table border="1" data-bbox="857 863 1704 1394"> <thead> <tr> <th>Month</th> <th>Water usage of POM (m<sup>3</sup>)</th> <th>Water usage per Ton FFB m<sup>3</sup>/ton FFB)</th> </tr> </thead> <tbody> <tr> <td>January</td> <td>14,360</td> <td>0.70</td> </tr> <tr> <td>February</td> <td>14,790</td> <td>0.69</td> </tr> <tr> <td>March</td> <td>12,318</td> <td>0.75</td> </tr> <tr> <td>April</td> <td>13,980</td> <td>0.67</td> </tr> <tr> <td>May</td> <td>17,060</td> <td>0.62</td> </tr> <tr> <td>June</td> <td>15,970</td> <td>0.66</td> </tr> <tr> <td>July</td> <td>18,968</td> <td>0.67</td> </tr> <tr> <td>August</td> <td>19,086</td> <td>0.70</td> </tr> <tr> <td><b>Total</b></td> <td><b>126,532</b></td> <td><b>0.68</b></td> </tr> </tbody> </table>	Month	Water usage of POM (m <sup>3</sup> )	Water usage per Ton FFB m <sup>3</sup> /ton FFB)	January	14,360	0.70	February	14,790	0.69	March	12,318	0.75	April	13,980	0.67	May	17,060	0.62	June	15,970	0.66	July	18,968	0.67	August	19,086	0.70	<b>Total</b>	<b>126,532</b>	<b>0.68</b>	<p>Comply</p>
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		From the data above indicated that water consumption for process is still under budget.																					
<b>Criterion 4.5</b>																							
Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate integrated Pest Management (IPM) techniques.																							
4.5.1	Monitoring of Integrated Pest Management (IPM) plan implementation shall be available.  - Major compliance -	<p><b>Bungo Tebo Estate:</b></p> <p>Estate and scheme smallholder management conduct regular census to monitor the pest infestation, prior to application of pesticide to control pest outbreak. Estate carried out monthly pest monitoring through pest census on rats and <i>Tirathaba</i>, leaf eating caterpillar and bagworm, and other type of pest.</p> <p>Based on record review and interview with manager estate and smallholder, there has been no application of pesticide throughout 2018. Pest such as rat – controlled through natural predator, barn owl; leaf eating caterpillar and bagworm is under control – through natural predator, nurtured and maintained the host plant such as <i>Turnera subulata</i>, <i>Antigonon</i>, etc. Company has an effort to improving the natural predator of caterpillar pest by planting host plan such as: <i>Cassia tora</i>, <i>Turnera subulata</i> and <i>Antigonon leptopus</i> along the main road and production road. To improve natural predator of rats, company has effort to introduce the barn owl and create the nest for barn owl/barn owl boxes.</p> <p>Plan to reduce pesticide use, as in “Program Rencana Pengurangan Penggunaan Bahan Kimia (Pestisida ) TM dan TBM Kebun Bungo Tebo – 2018”.</p> <p>Planning for Pheromone trap:</p> <table border="1"> <thead> <tr> <th>Planting year</th> <th>Block (Ha)</th> <th>February</th> <th>May</th> <th>August</th> </tr> </thead> <tbody> <tr> <td>2016</td> <td>4 (137 Ha)</td> <td>4 units</td> <td>4 units</td> <td>4 units</td> </tr> <tr> <td>2018</td> <td>5 (150 Ha)</td> <td>-</td> <td>-</td> <td>5 units</td> </tr> <tr> <td>2017</td> <td>4 (114 Ha)</td> <td>4 units</td> <td>4 units</td> <td>4 units</td> </tr> </tbody> </table>	Planting year	Block (Ha)	February	May	August	2016	4 (137 Ha)	4 units	4 units	4 units	2018	5 (150 Ha)	-	-	5 units	2017	4 (114 Ha)	4 units	4 units	4 units	Not Comply
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		2017	5 (133 Ha)	5 units	5 units	5 units	<p>Monitoring of Integrated Pest Management (IPM) was evident in several document, among others:</p> <ol style="list-style-type: none"> <li>1. Pelaksanaan Sensus Ulat Pemakan Daun – 2018, contain information of schedule and realization of leaf eater caterpillar census. Census scheduled and implemented in monthly basis. Result presented in "Rekap Sensus Hama Penyakit Verifikasi". Based on result period June 2018 it was noted that area attached was 14 Ha (1.05%) in mature area and 11 Ha (0.01%) in immature area, it was all under the economic threshold that need immediate control (5%).</li> <li>2. Pelaksanaan Sensus Tikus – 2018, contain information of schedule and realization of rat census. Census scheduled and implemented in two month intervals. Result presented in "Rekap Sensus Hama Tikus Verifikasi". Based on result period May 2018, it was noted that total percent of attack was 1.12%, it was under the economic threshold that need immediate control (20%).</li> <li>3. Pelaksanaan Sensus <i>Tyto alba</i> – 2018, contain information of schedule and realization of barn-owl census. Census scheduled and implemented in three month intervals. Results presented in "Sensus Kandang Burung Hantu". Based on result period July 2018, it was noted total cages 79 in good condition and 1 in broken condition; amount of <i>Tyto alba</i> 43 adults, 2 child and 25 eggs; total occupation 37 cages or 47%.</li> <li>4. Pelaksanaan Sensus Ganoderma – 2018, contain information of schedule and realization of Ganoderma census. Census scheduled and implemented in four month intervals. Result presented in "Rekapitulasi Sensus Pokok <i>Ganoderma</i> sp." Based on result period August 2018, it was note there was no plant infected by Ganoderma.</li> <li>5. Program and Progress of Host Plant – 2018, as follows:</li> </ol>			
		2018	4 (120 Ha)	-	-	-				
			Total (Ha)	Road Length (m)	Progress until Dec 2017 (m)	Program 2018 (m)	Realization until Aug 2018	Variance (m)		

Mature	1,328	175,353	25,340	23,590	20,824	2,766
Immature	1,191	131,856	24,272	16,998	16,034	964
Total	2,519	307,209	49,612	40,588	36,858	3,730

**Scheme Smallholder**

Cooperative management refers to Procedure Pengendalian Hama dan Penyakit AA-Plasma- PP-KS-02 dated 1 September 2011. The procedure covers pest and disease census, monitoring technique, calculation method, identification of pest (leaf eating caterpillar, rat, rhino beetle, tirathaba, white ant). Integrated pest management implemented by Plasma Bungo Tebo as explain below.

KOPERASI Tani Mandiri, KOPERASI Tunas Harapan, KOPERASI Sejahtera Tani and KOPERASI Tanjung Jaya Bersama have shows document as follows:

- "Formulir Sensus Hama Ulat Pemakan Daun" contains information of leaf eater census recapitulation. Census of leaf eater conducted each month by census team. For example census recapitulation dated 4 August 2018 in KT 88, dated 19 August 2018 in KT 89 KOPERASI Tani Mandiri; KT 48 KOPERASI Tunas Harapan, shown that there was very light intense of caterpillar attack.
- "Formulir Sensus Burung Hantu dan KBH" contains information of *Tyto alba* (barn owl) census and barn owl box condition. Barn owl census performed each 3 month by census team. For example census recapitulation in July 2018 in KOPERASI Tani Mandiri, counted 3 adults barn owls, 1 juvenile barn owl and 2 eggs, all barn owl box condition was in good condition. In whole Afdeling I Plasma Bungo Tebo, counted 18 adult barn owl, 15 juvenile and 17 eggs, 64 box in good condition and 2 were broken.
- "Rencana dan Realisasi Penanaman Host Plan" contains information of beneficial plant/host plan in area KOPERASI Tani Mandiri, e.g. in July 2018 reported that 50 plant of *Casia tora* have been planted; in KOPERASI Tunas Harapan, 20 plant have been planted.
- "Rekap Serangan Hama Tikus" contains information of the result of rats census. The census performed in each 2 months. For example census recapitulation in July 2018



		<p>KOPERASI Tani Mandiri shows 1.66% attack; KOPERASI Tunas Harapan shows 1.34% attack; KOPERASI Sejahtera Tani shows 1.4% attack; KOPERASI Tanjung Jaya Bersama 1.04% attack.</p> <p>- "Rencana dan Realisasi Kerja Semprot Piringan Tahun 2018" contain information of plan and realization of spraying circle and path. KOPERASI Tani Mandiri (158 Ha) consist of Hamparan 88, 89, 90 and 105, programmed in February and August; KOPERASI Tunas Harapan (114 Ha) consist of Hamparan 48, 49, 50 and 107, programmed in February and August; KOPERASI Sejahtera Tani (88 Ha) consist of Hamparan 51, and 108, programmed in February and August; KOPERASI Tanjung Jaya Bersama (68 Ha) consist of Hamparan 109, programmed in February and August; based on document review all program have been realized based on the schedule.</p> <p>NC Major: Statement: The application of IPM especially for weed control is not well monitored. Objective Evidence:</p> <ul style="list-style-type: none"> <li>• There are some areas with uncontrolled weeds condition in the circle/path of palm oil plantation during field visits in Plasma Bungo Tebo at Plot 3161, 3163 and 3170 – Hamparan/Block 108 (KOPERASI Tani Sejahtera) and Plot 3307 - Hamparan/Block 109 (KOPERASI Tanjung Jaya Bersama).</li> <li>• In the document "Program dan Realisasi Penyemprotan Tahun 2018 Kebun Plasma Bungo Tebo", stated that spraying activities in all Plot of Plasma Bungo Tebo, scheduled in February and August, and has completed according to the schedule. However there is still spraying activities discovered during field visits in Hamparan/Block 88 - KOPERASI Tani Mandiri dated 19 September 2018; and found some conditions for areas that have not been sprayed, for example in plots 3161, 3163 and 3170 – Hamparan/Block 108 - KOPERASI Sejahtera Tani and Plots 3307 – Hamparan/Block 109 - KOPERASI Tanjung Jaya Bersama. In addition, some farmers/smallholder member interviewed stated that their plots were sprayed for three rotations a year.</li> </ul>	
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4.5.2	<p>Training records of Integrated Pest Management (IPM) shall be available.</p> <p>- Minor compliance –</p>	<p><b>Bungo Tebo Estate:</b></p> <p>Training related to integrated pest management:</p> <p>“Pelatihan Alat Fogging” dated 4 April 2018, attended 33 workers from the group, PT. Rigunas sent Zuldayain and Rd. Sofi for the training.</p> <p>“Field training for pest and disease census/verification” for pest and disease worker, carried out on August 2018.</p> <p>“Field training for barn own box census” for pest and disease worker, dated 16 and 20 August 2018.</p> <p><b>Scheme Smallholder</b></p> <p>All KOPERASI in cooperation with PT Rigunas Agri Utama conducted Integrated Pest Management (IPM) training. Training activity covered: mechanism of pest and disease monitoring, census and monitoring technique, action taken, type of pest and disease, attack symptoms and its control. Evidence of training can be demonstrated in the form of Minutes training, attendances list and training subject.</p> <p>Integrated pest management training, performed on 17 May 2018 in KOPERASI Tani Mandiri; on 15 May 2018 in KOPERASI Sejahtera Tani, attended by 10 person; on 16 May 2018 in KOPERASI Tanjung Jaya Bersama, attended by 10 participants.</p>	Comply
<p><b>Criterion 4.6</b>  Pesticides are used in ways that do not endanger health or the environment.</p>			
4.6.1	<p>Documented evidence shall be available to show that pesticide used based on regulations and the use of pesticide is specific to target species with appropriate dosage which have minimal impact on non-target species.</p>	<p>The justification of pesticide used is explained under company procedure. PT. Rigunas Agri Utama shows procedure of weed control - “SOP Pengendalian Gulma No.AA-APM-OP-1100.08- R1” dated 1 November 2008. Chapter IV explains the weed control program for woody, grass, fern, <i>caladium</i>, wild banana (<i>Musa spp</i>), <i>Asystasia</i>. The document does explain active ingredients use to control each type of weed, dosage per application, type of nozzle used and volume of spraying per application. Chapter V explains selection of</p>	Comply

	<p>- Major compliance -</p>	<p>pesticide and its active ingredients content, nature of the pesticide and target species. Chapter VII describes calculation of actual area implemented per hectare plantation (spraying factor), spraying rotation and spraying output.          "SOP Pestisida dan Pengelolaannya No.AA-APM-OP-1100.11-R1" explains the handling of pesticide, emergency response, and disposal.</p> <p>Interview with herbicide sprayer indicated that they understood the target species and active ingredients to control them. Sprayer shows knowledge on minimizing chemical impact on beneficial weed. Justification for use of pesticide is clear, and understood by workers.</p> <p>Spraying works were conducted by selected spraying on specific target, for example weeds spraying on circle, path and TPH. Other areas except specific area were not applied. Riparian area along the river also prohibit to performed spraying to minimize dan reduce the negative environmental impact to the river and ecosystem. Pesticide and herbicide used by company was registered in the book of pesticides - "Komisi Pestisida" and has permit from government.          Type of pesticide use by PT. Rigunas Agri Utama, Bungo Tebo Estate:</p> <table border="1" data-bbox="857 975 1677 1366"> <thead> <tr> <th>Agrochemical</th> <th>Active ingredients</th> <th>License/permit number</th> </tr> </thead> <tbody> <tr> <td>Metsulindo</td> <td>Metil metulfuron 20%</td> <td>RI.010301199991484</td> </tr> <tr> <td>Dithane 80WP</td> <td>Mankozeb 80%</td> <td>RI.010201197459</td> </tr> <tr> <td>Perfektan 425EC</td> <td>Dimetoat 425 g/l</td> <td>RI.01010120011583</td> </tr> <tr> <td>Polydor 25EC</td> <td>Lamda sihalotrin 25 g/l</td> <td>RI.01010120041994</td> </tr> <tr> <td>Lindomin 865SL</td> <td>2-4 Dimetil Amina</td> <td>RI.0103011989867</td> </tr> </tbody> </table>	Agrochemical	Active ingredients	License/permit number	Metsulindo	Metil metulfuron 20%	RI.010301199991484	Dithane 80WP	Mankozeb 80%	RI.010201197459	Perfektan 425EC	Dimetoat 425 g/l	RI.01010120011583	Polydor 25EC	Lamda sihalotrin 25 g/l	RI.01010120041994	Lindomin 865SL	2-4 Dimetil Amina	RI.0103011989867	
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4.6.2	Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per Ha and number of applications) shall be available. - Major compliance -	<p>The Company maintains record of pesticide use in 2017 and 2018. Below are the pesticide usage:</p> <table border="1"> <thead> <tr> <th>Agrochemical</th> <th>Active ingredients</th> <th>Volume application</th> <th>Active ingredients use</th> <th>Active ingredients use per Ha</th> <th>LD50 (oral mg/kg BW)</th> </tr> </thead> <tbody> <tr> <td>Metsulindo</td> <td>Metil metulfuron 20%</td> <td>460</td> <td>92</td> <td>0.2</td> <td>50 mg/kg bw</td> </tr> <tr> <td>Perfektan 425EC</td> <td>Dimetoat 425 g/l</td> <td>10</td> <td>4.25</td> <td>0.425</td> <td>201 mg/kg bw</td> </tr> </tbody> </table>	Agrochemical	Active ingredients	Volume application	Active ingredients use	Active ingredients use per Ha	LD50 (oral mg/kg BW)	Metsulindo	Metil metulfuron 20%	460	92	0.2	50 mg/kg bw	Perfektan 425EC	Dimetoat 425 g/l	10	4.25	0.425	201 mg/kg bw	Comply						
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		Polydor 25EC	Lamda sihalotrin 25 g/l	827	21	0.025	2625 mg/kg bw	
		Solusi 865SL	2-4 Dimetil Amina 865	156	134.94	0.8	>1000 mg/kg bw	
		Amcothene 75SP	Acephate 75.05%	33	2.48	0.075	943 mg/kg bw	
		Elang 480SL	Isopropil Amina Glifosat 480 g/l	3916	1880	0.48	5000 mg/kg bw	
		Bionasa 480 ASA	Isopropil Amina Glifosat	1047	502.56	0.267	5600 mg/kg bw	
		Kenlon 480EC	Triklopir butoxy ethyl ester 480 g/l	66	31.68	0.48	4500 mg/kg bw	
		Kenrane 288	Trifluoroksipir 288 g/l	747	215	0.288	5000 mg/kg bw	
		Gramoxone 276SL	Paraquat 276 g/l	5915	1633	0.267	612 mg/kg bw	
		Racumin		901	6.76	0.0075		
2018								
		Agrochemical	Active ingredients	Volume application	Active ingredients use	Active ingredients use per Ha	LD50 (oral mg/kg BW)	
		Metsulindo	Metil metulfuron 20%	256	51	0.2	50 mg/kg bw	
		Perfektan 425EC	Dimetoat 425 g/l	33	14.03	0.425	201 mg/kg bw	
		Polydor 25EC	Lamda	1178	29	0.025	2625 mg/kg bw	

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		sihalotrin 25 g/l				
	Solusi 865SL	2-4 Dimetil Amina 865	31	27.01	0.8	>1000 mg/kg bw
	Lindomin 865SL	2-4 Dimetil Amina 865	38	32.63	0.865	n/a
	Amcothene 75SP	Acephate 75.05%	34	2.55	0.075	943 mg/kg bw
	Elang 480SL	Isopropil Amina Glifosat 480 g/l	4086	1961	0.48	5000 mg/kg bw
	Kenlon 480EC	Triklopir butoxy ethyl ester 480 g/l	176	84.62	0.48	4500 mg/kg bw
	Kenrane 288	Trifluoroksipir 288 g/l	525	151	0.288	5000 mg/kg bw
	Regent 50SC	Fipronil 50 g/l	1	0.05	0.05	?
	Gramoxone 276SL	Paraquat 276 g/l	3285	907	0.267	612 mg/kg bw
	Gulmaron 80WP	Diuron 80%	129	103.24	0.8	
	Racumin	brodifacum				
	Racun tikus R&D		316	2.37	0.0075	?
<p>Warehouse note:</p> <p>"Bukti Permintaan Pemakaian Barang No.SIN/01/02/2002" dated 1 February 2018, issuance of Polydor 5 liters for treating Oryctes in Division III, block C17a of 35Ha.</p> <p>"Bukti Permintaan Pemakaian Barang No.SIN18/02/2039" dated 8 February 2018, issuance of 11 liters Gramoxone (Paraquat) + 0.5 kg Metsulindo (Methyl metsulfuron) for treating woody (Clidemia) in Division I, block A94g of 47 Ha.</p>						

		<p>Elang 480SL: Glyphosate</p> <p>3 May 2018: 244.05 liter – 25 July 2018: 52.95 liter = 191.1 liter  + 25 July 2018: + 800 liter equal to 852.75 liter  25 July 2018: 852.75 – 8 August 2018: 493.75 = 359 liter  Incoming: 8 August 2018: 1000 equal to 1493.75  8 August 2018: 1493.75 – 14 September 2018: 593.3 = 900.45  1450.55 liter</p> <p>Gramoxone – Paraquat</p> <p>1 January 2018: 922.3 liters – 7 February 2018: 120.25 liter = 802.05  + 7 February 2018: + 1000 liters equal to 1120.25 liter  7 February 2018: 1120.25 liter - 16 March 2018: 289.5 liter = 830.75  +16 March 2018: additional 400 liter equal to 689.5 liter  16 March 2018: 689.5 liter - 11 May 2018: 21.55 liter = 667.95  +14 May 2018: additional 400 liter equal to 421.55 liter  14 May 2018: 421.55 liter – 29 June 2018: 185.18 liter = 236.37  + 29 June 2018: 400 liter equal to 585.18 liter  29 June 2018: 585.18 liter – 25 July 2018: 241.43 liter = 343.75  + 25 July 2018: 400 liter equal to 641.43 liter  25 July 2018: 641.43 liter – 4 August 2018: 499.53 liter = 141.9  + 8 August 2018: 400 liter equal to 899.53 liter  8 August 2018: 899.53 liter – 15 September 2018: 608.48 liter = 291.05</p>	
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		<p>+ 15 September 2018: 600 liter equal to 1208.48 liter 15 September 2018: 1208.48 liter – 20 September 2018: 1146.08 = 62.4 3376.22 liter</p> <p>Metsulindo – Metil metsulfuron 4 May 2018: 172.22 kg – 10 September 2018: 72.26 kg 10 September 2018: 72.26 kg – 18 September 2018: 65 kg.</p> <p>MSDS for TSP in Bahasa Indonesia – using respirator AS/NZS 1715 and AS/N25 1716.</p> <p><b>BUNGO TEBO SMALLHOLDERS:</b></p> <p>KOPERASI has record the pesticide use each month and recorded in "Pemakaian Bahan Kimia Plasma Bungo Tebo 2017" and "Pemakaian Bahan Kimia Plasma Bungo Tebo 2018". Below are the data of pesticide use with active ingredients, LD50, area treated, amount of active ingredients applied per Ha and number of applications in each KOPERASI:</p> <table border="1" data-bbox="857 946 1684 1366"> <thead> <tr> <th colspan="5">KOPERASI Tanjung Jaya Bersama 68 Ha</th> </tr> <tr> <th>Agrochemical</th> <th>Gramoxone (Paraquat 276 g/l)</th> <th>Metsulindo Metil (Metsulfuron 20%)</th> <th>Elang 480 SL (Isopropil Amina Glifosat 480 g/l)</th> <th>Kenrane (Trifluoroksipir 288 g/l)</th> </tr> </thead> <tbody> <tr> <td>LD50 Oral (mg/kg)</td> <td>612</td> <td>50</td> <td>5000</td> <td>5000</td> </tr> <tr> <td colspan="5" style="text-align: center;">2016</td> </tr> <tr> <td>Volume application</td> <td>22.4 l</td> <td>0.47 kg</td> <td>35.36 l</td> <td>8.63 l</td> </tr> <tr> <td>a.i. Use</td> <td>6182.4 g</td> <td>0.09 kg</td> <td>16972.8 g</td> <td>2487.16 g</td> </tr> <tr> <td>a.i. per Ha</td> <td>90.91 g/Ha</td> <td>0.001 kg/Ha</td> <td>249.6 g/Ha</td> <td>36.57 g/Ha</td> </tr> </tbody> </table>	KOPERASI Tanjung Jaya Bersama 68 Ha					Agrochemical	Gramoxone (Paraquat 276 g/l)	Metsulindo Metil (Metsulfuron 20%)	Elang 480 SL (Isopropil Amina Glifosat 480 g/l)	Kenrane (Trifluoroksipir 288 g/l)	LD50 Oral (mg/kg)	612	50	5000	5000	2016					Volume application	22.4 l	0.47 kg	35.36 l	8.63 l	a.i. Use	6182.4 g	0.09 kg	16972.8 g	2487.16 g	a.i. per Ha	90.91 g/Ha	0.001 kg/Ha	249.6 g/Ha	36.57 g/Ha	
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2017				
Volume application	21.7 l	1.09 kg	34 l	8.5 l
a.i. Use	6005.76 g	0.218 kg	16320 g	2448 g
a.i. per Ha	88.32 g/Ha	0.0032 kg/Ha	240 g/Ha	36 g/Ha
2018 (up to August 2018)				
Volume application	20.4 l	1.02 kg	34 l	8.5 l
a.i. Use	5630.4 g	0.204 kg	16320 g	2448 g
a.i. per Ha	82.3 g/Ha	0.003 kg/Ha	240 g/Ha	36 g/Ha
KOPERASI Tani Mandiri 158 Ha				
Agrochemical	Gramoxone (Paraquat 276 g/l)	Metsulindo Metil (Metsulfuron 20%)	Elang 480 SL (Isopropil Amina Glifosat 480 g/l)	Kenrane (Trifluorokspir 288 g/l)
LD50 Oral (mg/kg)	612	50	5000	5000
2016				
Volume application	52.14 l	2.53 kg	82.16 l	20.07 l
a.i. Use	14390.64 g	0.506 kg	39436.8 g	5780.16 g
a.i. per Ha	91.08 g/Ha	0.0032 kg/Ha	227.48 g/Ha	36.58 g/Ha
2017				
Volume application	50.56 l	2.53 kg	74.88 l	18.29 l
a.i. Use	13954.56 g	0.506 kg	35954.4 g	5367.52 g

a.i. per Ha	88.32 g/Ha	0.0032 kg/Ha	227.48 g/Ha	33.33 g/Ha
2018 (up to August 2018)				
Volume application	47.4 l	2.37 kg	68 l	17 l
a.i. Use	13082.4 g	0.474 kg	32640 g	4896 g
a.i. per Ha	82.8 g/Ha	0.003 kg/Ha	240 g/Ha	36 g/Ha
KOPERASI Tunas Harapan 144 Ha				
Agrochemical	Gramoxone (Paraquat 276 g/l)	Metsulindo Metil (Metsulfuron 20%)	Elang 480 SL (Isopropil Amina Glifosat 480 g/l)	Kenrane (Trifluoroksipir 288 g/l)
LD50 Oral (mg/kg)	612	50	5000	5000
2016				
Volume application	47.52 l	2.3 kg	74.88 l	18.29 l
a.i. Use	3115.52 g	0.46 kg	35942.4 g	5367.52 g
a.i. per Ha	91.08 g/Ha	0.0031 kg/Ha	249.6 g/Ha	36.58 g/Ha
2017				
Volume application	46.08 l	2.304 kg	74.88 l	18.28 l
a.i. Use	12718.08 g	0.4608 kg	35942.4 g	5364.64 g
a.i. per Ha	88.32 g/Ha	0.003 kg/Ha	249.6 g/Ha	36.56 g/Ha
2018 (up to August 2018)				
Volume application	43.2 l	2.16 kg	72 l	18 l

		a.i. Use	11923.2 g	0.432 kg	34560 g	5184 g														
		a.i. per Ha	82.8 g/Ha	0.003 kg/Ha	240 g/Ha	36 g/Ha														
4.6.3	<p>Any use of pesticides shall be minimized as part of a plan, and in accordance with Integrated Pest Management (IPM) plans. There shall be no prophylactic use of pesticides, except in specific situations identified in Indonesia Best Practice guidelines.</p> <p>- Major compliance -</p>	<p>Based on the company procedure, prophylactic use of pesticide is not allowed. Based on review to pesticide and herbicide use record, interview with sprayer and storekeeper – it was confirmed no prophylactic use of pesticide.</p> <p>Estate and scheme smallholder management conduct regular census to monitor the pest infestation, prior to application of pesticide to control pest outbreak. Estate carried out monthly pest monitoring through pest census on rats and <i>Tirathaba</i>, leaf eating caterpillar and bagworm, and other type of pest.</p> <p>Based on record review and interview with manager estate and smallholder, there has been no application of pesticide throughout 2018. Pest such as rat – controlled through natural predator, barn owl; leaf eating caterpillar and bagworm is under control – through natural predator, nurtured and maintained the host plant such as <i>Turnera subulata</i>, <i>Antigonon</i>, etc. Company has an effort to improving the natural predator of caterpillar pest by planting host plant such as: <i>Cassia tora</i>, <i>Turnera subulata</i> and <i>Antigonon leptopus</i> along the main road and production road. To improve natural predator of rats, company has effort to introduce the barn owl and create the nest for barn owl/barn owl boxes.</p> <p>Plan to reduce pesticide use, as in “Program Rencana Pengurangan Penggunaan Bahan Kimia (Pestisida ) TM dan TBM Kebun Bungo Tebo – 2018”</p> <table border="1"> <thead> <tr> <th>Working Plan</th> <th>Target</th> <th>Type of Pesticide</th> <th>Reduction estimate</th> </tr> </thead> <tbody> <tr> <td>Pest &amp; disease census 5 rounds per annum</td> <td>To supress leaf eating caterpillar population</td> <td>Amcothene (Acephate 75.05%)</td> <td>7,015 kg</td> </tr> <tr> <td>Cultivation of Host plant 4 rounds per annum</td> <td>To reduce the pest population by inviting natural predator to maintain ecosystem balance</td> <td>Polydor (Lamda sihalotrin 25 g/l)</td> <td>1,531 liters</td> </tr> </tbody> </table>						Working Plan	Target	Type of Pesticide	Reduction estimate	Pest & disease census 5 rounds per annum	To supress leaf eating caterpillar population	Amcothene (Acephate 75.05%)	7,015 kg	Cultivation of Host plant 4 rounds per annum	To reduce the pest population by inviting natural predator to maintain ecosystem balance	Polydor (Lamda sihalotrin 25 g/l)	1,531 liters	Comply
Working Plan	Target	Type of Pesticide	Reduction estimate																	
Pest & disease census 5 rounds per annum	To supress leaf eating caterpillar population	Amcothene (Acephate 75.05%)	7,015 kg																	
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		Barn owl box installation 2 rounds per annum	Rat control through its natural predator ( <i>Tyto alba</i> )	Racumin	5,102 kg																											
		EFB application for inter-row 1.5 round per annum	To reduce weed growth: woody, <i>Asystasia</i> , ferns on interrow	Metsulindo (Metil metsulfuron )	68 kg																											
				Gramoxone (Paraquat 276 g/l)	869 liters																											
		Weed slashing for Immature Div.IV	To minimize weed growth on palm circle for immature area.	Glifosat	869 liters																											
				Fluoroxypyr	217 liters																											
		Woody handling 1 round per annum	To reduce weed growth: woody, <i>Asystasia</i> , ferns on interrow	Triclophyr	43 liters																											
				2,4 Dimethyl amine	94 liters																											
		Planting LCC for replanting area 1 round per annum	To reduce weed growth: woody, <i>Asystasia</i> , ferns on interrow	Metsulindo (Metil metsulfuron )	30 kg																											
				Gramoxone (Paraquat 276 g/l)	411 liters																											
		<p>Planning for Pheromone trap:</p> <table border="1"> <thead> <tr> <th>Planting year</th> <th>Block (Ha)</th> <th>February</th> <th>May</th> <th>August</th> </tr> </thead> <tbody> <tr> <td>2016</td> <td>4 (137 Ha)</td> <td>4</td> <td>4</td> <td>4</td> </tr> <tr> <td>2018</td> <td>5 (150 Ha)</td> <td>-</td> <td>-</td> <td>5</td> </tr> <tr> <td>2017</td> <td>4 (114 Ha)</td> <td>4</td> <td>4</td> <td>4</td> </tr> <tr> <td>2017</td> <td>5 (133 Ha)</td> <td>5</td> <td>5</td> <td>5</td> </tr> </tbody> </table>					Planting year	Block (Ha)	February	May	August	2016	4 (137 Ha)	4	4	4	2018	5 (150 Ha)	-	-	5	2017	4 (114 Ha)	4	4	4	2017	5 (133 Ha)	5	5	5	
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		2018	4 (120 Ha)																																
4.6.4	<p>The evidence shall be available to demonstrate that use of Pesticides, categorized in Class 1A or 1B by World Health Organization, or those are listed in the Stockholm and Rotterdam Conventions, and paraquat are not used, except in specific situations identified in national Best Practice guidelines. The use of such pesticides shall be minimized and eliminated as part of a plan, and shall only be used in exceptional circumstances.</p> <p>- Minor compliance -</p>	<p>Paraquat is not banned in Indonesia according to Act No.12/1992 regarding plant cultivation system, article 60 (g) jo. Article 38, and Ministry of Agriculture regulation No.107/Permentan/SR.140/9/2014 regarding pesticides supervisor. National regulation mentioned that paraquat dichloride is classified as limited active ingredient. Therefore user must hold a certificate of limited pesticide use and the manufacturer have to train the user prior to application. PT. Rigunas Agri Utama is starting to record the use of paraquat. Paraquat use in PT. Rigunas Agri Utama varied from year-to-year. The Gramoxone (a.i. paraquat) use increase from 2015-2017, however shows decline in 2018.</p> <p>Monitoring of paraquat use in 2015 to 2018 (up to August).</p> <table border="1" data-bbox="857 831 1189 1093"> <thead> <tr> <th colspan="2">Bungo Tebo Estate</th> </tr> <tr> <th>Year</th> <th>Volume</th> </tr> </thead> <tbody> <tr> <td>2015</td> <td>1,182 liters</td> </tr> <tr> <td>2016</td> <td>2,670 liters</td> </tr> <tr> <td>2017</td> <td>5,915 liters</td> </tr> <tr> <td>2018*</td> <td>3,281 liters</td> </tr> </tbody> </table> <p>*) August 2018</p> <p>Use of gramoxone (a.i. paraquat) in scheme smallholder/plasma:</p> <table border="1" data-bbox="857 1225 1697 1396"> <thead> <tr> <th colspan="3">KOPERASI Sejahtera Tani</th> <th>88 Ha</th> </tr> <tr> <th>Active Ingredient</th> <th>Year</th> <th>Volume</th> <th>a.i/Ha</th> </tr> </thead> <tbody> <tr> <td>Paraquat dichloride 276 g/l</td> <td>2015</td> <td>29.92 l</td> <td>93.84 g/Ha</td> </tr> <tr> <td>Paraquat dichloride 276 g/l</td> <td>2016</td> <td>29.04 l</td> <td>91.08 g/Ha</td> </tr> </tbody> </table>					Bungo Tebo Estate		Year	Volume	2015	1,182 liters	2016	2,670 liters	2017	5,915 liters	2018*	3,281 liters	KOPERASI Sejahtera Tani			88 Ha	Active Ingredient	Year	Volume	a.i/Ha	Paraquat dichloride 276 g/l	2015	29.92 l	93.84 g/Ha	Paraquat dichloride 276 g/l	2016	29.04 l	91.08 g/Ha	Not Comply
Bungo Tebo Estate																																			
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		Paraquat dichloride 276 g/l	2017	28.16 l	88.32 g/Ha		
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KOPERASI Tanjung Jaya Bersama						68 Ha	
		Active Ingredient	Year	Volume	a.i		
		Paraquat dichloride 276 g/l	2015	23.12 l	93.84 g/Ha		
		Paraquat dichloride 276 g/l	2016	22.4 l	90.91 g/Ha		
		Paraquat dichloride 276 g/l	2017	21.76 l	88.32 g/Ha		
		Paraquat dichloride 276 g/l	2018	20.4 l	82.8 g/Ha		
KOPERASI Tunas Harapan						144 Ha	
		Active Ingredient	Year	Volume	a.i		
		Paraquat dichloride 276 g/l	2015	48.96 l	93.84 g/Ha		
		Paraquat dichloride 276 g/l	2016	47.52 l	91.08 g/Ha		
		Paraquat dichloride 276 g/l	2017	46.08 l	88.32 g/Ha		
		Paraquat dichloride 276 g/l	2018	43.2 l	82.8 g/Ha		
KOPERASI Tani Mandiri						158 Ha	
		Active Ingredient	Year	Volume	a.i		
		Paraquat dichloride 276 g/l	2015	53.72 l	93.84 g/Ha		
		Paraquat dichloride 276 g/l	2016	52.14 l	91.08 g/Ha		
		Paraquat dichloride 276 g/l	2017	50.56 l	88.32 g/Ha		
		Paraquat dichloride 276 g/l	2018	47.4 l	82.8 g/Ha		

		<p>NC Minor:</p> <p>PT. Rigunas Agri Utama - Bungo Tebo has not plan the use of Gramoxone (a.i. Paraquat) to be eliminated as a part of a plan, and shall only be used in exceptional circumstances.</p> <p>Objective Evidence:</p> <p>Company monitored the use of Gramoxone (a.i. Paraquat) on yearly basis: Bungo Tebo Estate.</p> <p>Year Volume</p> <p>2015: 1,182 liters</p> <p>2016: 2,670 liters</p> <p>2017: 5,915 liters</p> <p>2018*: 3,281 liters (as of September 2018)</p> <p>As at audit, September 2018 - the use of Gramoxone (a.i. Paraquat) declined from volume used in 2017. PT. Rigunas Agri Utama - Bungo Tebo demonstrated plan to reduce Gramoxone (a.i. Paraquat) use by 869 liters as in "Program Rencana Pengurangan Penggunaan Bahan Kimia (Pestisida) TM dan TBM Kebun Bungo Tebo – 2018". No plan to eliminate the use of Gramoxone (a.i. Paraquat)</p>	
4.6.5	<p>Evidence of pesticide application by trained person and in accordance with application guidelines in product label and storage guidelines shall be available. Appropriate safety equipment shall be provided and utilized. All precautions attached to the products shall be properly observed, applied, and understood by workers (see Criterion 4.7).</p> <p>- Major compliance -</p>	<p>Company conducted pesicide training "Pelatihan Pestisida Terbatas" in cooperation with PT. Syngenta Indonesia (pesticide supplier vendor) for the 94 worker (related to chemical work): Mr.Alex Jaluhu, Mrs. Sumiyati, Mrs. Neliyati, Mrs. Meriana, Mrs.Deliani on 5 August 2018. Certificate on progress.</p> <p>At scheme smallholder's oil palm plantation, the weed control/spraying program was carried by trained sprayers from PT. Rigunas Agri Utama. Company conducted pesicide training "Pelatihan Pestisida Terbatas" by PT. Syngenta Indonesia for the worker: Mr. Aditia Purba, Mrs. Rosmiati, Mrs. Sumiyati, Mrs. Meriana on 5 August 2018. Certificate on</p>	

		<p>progress.</p> <p>Confirmed during field visit and interview with abovementioned sprayers: PPE used consist of goggle, filtered respirator, latex hand glove, apron, overall uniform, rubber boot.</p>	
4.6.6	<p>Storage of pesticides shall be according to recognised best practices. All pesticides containers shall be properly managed according to the existing regulations and or instructions enclosed on the containers (see criterion 5.3).</p> <p>- Major compliance -</p>	<p>Pesticides warehouse found to be in accordance with hazard identification and risk assessment and national guideline for limited pesticide use. Empty chemical containers had been used for mixing chemicals for spraying pesticides in the field.</p> <p>All empty pesticides container are properly managed by sending it to temporary hazardous waste storage. The company has licensed temporary hazardous waste storage, where all hazardous waste from all estates and mills were collected. For proper disposals hazardous waste were delivered to licensed processor using licensed transporter. Storage keeper maintains the balance of incoming and outgoing hazardous waste.</p> <p>Scheme smallholders:</p> <p>Pesticides application such as weed control, circle and path spraying in scheme smallholder's area are conducted by company worker, Team Unit Semprot (TUS). Storage of pesticides are handled by Bungo Tebo Estate store keeper. The disposals of empty chemical container were using the same facility with Bungo Tebo Estate and Mill.</p>	
4.6.7	<p>Application of pesticides shall be by proven methods that minimize risk and negative</p>	<p>Company conducted pesticide training "Pelatihan Pestisida Terbatas" in cooperation with PT. Syngenta Indonesia (pesticide supplier vendor) for the 94 worker (related to chemical</p>	Comply



	<p>impacts.</p> <p>- Minor compliance -</p>	<p>work): Mr.Alex Jaluhu, Mrs. Sumiyati, Mrs. Neliyati, Mrs. Meriana, Mrs.Deliani on 5 August 2018. Certificate on progress.</p> <p>At scheme smallholder’s oil palm plantation, the weed control/spraying program was carried by trained sprayers from PT. Rigunas Agri Utama. Company conducted pesticide training “Pelatihan Pestisida Terbatas” by PT. Syngenta Indonesia for the worker: Mr. Aditia Purba, Mrs. Rosmiati, Mrs. Sumiyati, Mrs. Meriana on 5 August 2018. Certificate on progress.</p> <p>Confirmed during field visit and interview with abovementioned sprayers: PPE used consist of goggle, filtered respirator, latex hand glove, apron, overall uniform, rubber boot.</p>	
4.6.8	<p>Pesticides may only be applied aerially where there is a documented justification. Surrounding communities shall be informed of impending aerial pesticide applications with all relevant information within reasonable time prior to application.</p> <p>- Major compliance -</p>	<p>There is no aerial application of pesticide by PT. Rigunas Agri Utama at the company owned plantation and the scheme smallholder plantation.</p>	Comply
4.6.9	<p>Evidence of training on handling pesticide for workers and scheme smallholder (if any) shall be available.</p> <p>- Minor compliance -</p>	<p>Company conducted pesticide training “Pelatihan Pestisida Terbatas” in cooperation with PT. Syngenta Indonesia (pesticide supplier vendor) for the 94 worker (related to chemical work): Mr.Alex Jaluhu, Mrs. Sumiyati, Mrs. Neliyati, Mrs. Meriana, Mrs.Deliani on 5 August 2018. Certificate on progress.</p> <p>At scheme smallholder’s oil palm plantation, the weed control/spraying program was carried by trained sprayers from PT. Rigunas Agri Utama.</p> <p>Company conducted pesticide training “Pelatihan Pestisida Terbatas” in cooperation with PT. Syngenta Indonesia (pesticide supplier vendor) for the worker: Mr. Aditia Purba, Mrs. Rosmiati, Mrs. Sumiyati, Mrs. Meriana on 5 August 2018. Certificate on progress.</p>	Comply

4.6.10	<p>Proof that pesticide waste has been handled as per legal regulations and understood by worker and manager, shall be demonstrated.</p> <p>- Minor compliance -</p>	<p>At scheme smallholder’s oil palm plantation, the weed control/spraying program was carried by trained sprayers from PT. Rigunas Agri Utama. Company conducted pesticide training “Pelatihan Pestisida Terbatas” by PT. Syngenta Indonesia for the worker: Mr. Aditia Purba, Mrs. Rosmiati, Mrs. Sumiyati, Mrs. Meriana on 5 August 2018. Certificate on progress.</p> <p>Confirmed during field visit and interview with abovementioned sprayers: PPE used consist of goggle, filtered respirator, latex hand glove, apron, overall uniform, rubber boot.</p>	Comply
4.6.11	<p>Annual medical records of pesticide operators, and follow-up treatment of medical results, shall be available.</p> <p>- Major compliance -</p>	<p>PT. Rigunas Agri Utama provides medical check up for 110 Bungo Tebo Estate workers on June 2018. Sampled workers: Mrs. Delyani, Sumiyati, Meriana (sprayer team), Mr. Maria, Leni Muslihah (fertilizer applicator). The MCU result have been communicated to worker, priority for one with symptoms, dated 1 August 2018. The result as recommended by company doctor – fit to work.</p> <p>At scheme smallholder’s oil palm plantation, the weed control/spraying program was carried by trained sprayers from PT. Rigunas Agri Utama. Company conducted Medical Check Up for the worker: Mr. Citra Aditia Purba, Mrs. Rosmiati, Mrs. Sumiati, Mrs. Meriana – have been participated in medical check up on July 2018; the result shows no sign of intoxication or detriment effect on the worker health. The MCU result have been communicated to the worker on 1 August 2018. Confirmed during interview, no abnormal nail color, no dizziness symptom, no skin rashes – sign of intoxication.</p>	Comply
4.6.12	<p>Records shall be available to show that spraying is not conducted by pregnant or breast-feeding women.</p> <p>- Major compliance -</p>	<p>Bungo Tebo Estate requested the female sprayer and fertilizer applicator to participated in pregnancy test. The female worker tested with pregnancy test pack by midwife in company clinic, on regular basis. Records dated 12 January 2018, 16 February 2018, 9 March 2018, 13 April 2018 and 11 May 2018, 15 June 2018 for sampled workers: Mrs.</p>	Comply

		<p>Delyani, Sumiyati, Meriana (sprayer), Mrs. Maria, Leni Musliah (fertilizer applicator).</p> <p>At scheme smallholder’s oil palm plantation, the weed control/spraying program was carried by trained sprayers from PT. Rigunas Agri Utama. Company conducted regular pregnancy screening (test pack with midwife at company clinic) for the female worker:</p> <p>Mrs. Rosmiati, Mrs. Sumiati, Mrs. Meriana - pregnancy screening on 13 July 2018, 10 August 2018, 14 September 2018 – result negative/not pregnant. None of the female worker is breastfeeding their children.</p> <p>Confirmed during interview, screening carried out by midwife, worker understood the screening for their own health and safety – no objection, there have been no case of pregnant/breastfeeding female worker doing spraying work.</p>	
<p><b>Criterion 4.7</b>  An occupational health and safety plan is documented, effectively communicated and implemented.</p>			
<p>4.7.1</p>	<p>A health and safety policy shall be in place. A health and safety plan shall be documented and implemented, and its effectiveness monitored.  - Major compliance -</p>	<p>PT. Rigunas Agri Utama developed health and safety policy.</p> <p>The health and safety policy is cited from “Kebijakan Perusahaan” signed by top management on 1 December 2014 – written in Bahasa Indonesia. Chapter 4 mentioned “to determine measurable objective and target to prevent accident and occupational disease for all worker and other interested parties, through continuous improvement”. The policy has been disseminated to all workers.</p> <p>The safety report has been sent to Labour Department office on three-monthly basis. PPE checklist to monitor the use of PPE for each work activity.</p> <p>Policy for health and safety have been established at each smallholder cooperative/KOPERASI. “Kebijakan Koperasi Tani Mandiri” dated 2 January 2017, stated “Menerapkan dan memelihara sistem manajemen lingkungan, sosial, keselamatan pangan, kesehatan dan keselamatan kerja terpadu. Mencegah pencemaran lingkungan, kecelakaan</p>	<p>Comply</p>

		<p>dan penyakit akibat kerja terhadap pekerja. Mengintegrasikan isu lingkungan, sosial, kesehatan dan keselamatan kerja dalam kegiatan koperasi serta mengadopsi teknologi terbaik yang tersedia. Mengkomunikasikan kebijakan ini kepada setiap pemangku kepentingan dan menyediakan informasi yang memadai bagi parapihak sesuai dengan hukum yang berlaku tentang kesehatan dan keselamatan kerja” – to implement and maintain an integrated environment, social, food security, health and safety management system; To prevent environmental pollution and work related disease to workers; Integrating issues on environment, social, health and safety into cooperative activities; To communicate the policy and to provide sufficient information to all stakeholders, in accordance to regulation for environment, social, health and safety.</p> <p>Koperasi Sejahtera Tani established the policy dated 9 January 2017.</p> <p>Koperasi Tanjung Jaya Bersama established the policy on 23 January 2017.</p>	
4.7.2	<p>A documented risk assessment shall be available and its implementation shall be recorded.</p> <p>- Major compliance -</p>	<p>PT. Rigunas Agri Utama-Bungo Tebo Estate has prepared a procedure for risk assessment. The risk assessment method was calculating exposure x frequency x severity. Bungo Tebo Estate and Bungo Tebo POM have documented in form HIRADC, date of last review January 2018. The risk acceptance level, have been established for each risk score tier.</p> <p>A number of notes for HIRADC Bungo Tebo Estate:</p> <ul style="list-style-type: none"> <li>- Inconsistency in determining the value for frequency and severity, as it does not reflect the actual incident/accident – from incident record. Sample: injury from fallen palm frond during harvesting activity, valued 1, while accident record stated 14 accidents from fallen frond, and the procedure stated value is 6.</li> <li>- Inconsistency in preparing risk control. Sample: activity of welding, grinding, lathing was scored 180, however no prepared risk control. This is not consistent with procedure stating risk level score 70-200 deemed substantial, need immediate improvement and does not required top management;</li> <li>- Inconsistency in correlating risk assessment in preparing OHS program. The current OHS program has not take into consideration risk level scored 70-200 such as activity welding, grinding, lathing in workshop, cutting FFB with axe (during journey onto and from field), FFB harvest with palm sickle.</li> </ul>	Not Comply

		<p>Comments for HIRADC Bungo Tebo POM:</p> <ul style="list-style-type: none"> <li>- Inconsistency to include non-routine activities such as maintenance, spare part replacement (bearing, chain, liner, steel cable, nozzle, etc.), cleaning process at loading ramp, sterilizer, threshing, press, etc. Not including fabrication (welding, lathing, grinding, etc.) process in mill's workshop.</li> <li>- Inconsistency in connecting risk assessment in preparing OHS program. The current OHS program has not take into consideration risk level scored 200-400 such as activity oil purifying in clarification station.</li> </ul> <p>NC Major:</p> <p>The documented risk assessment for Bungo Tebo Estate, Bungo Tebo POM and Bungo Tebo Smallholder was not consistent with the standard for risk calculation that has been established.</p> <p>Objective Evidence:</p> <p>PT. Rigunas Agri Utama-Bungo Tebo Estate has prepared a procedure for risk assessment. The risk assessment method was calculating exposure x frequency x severity. Bungo Tebo Estate and Bungo Tebo POM have documented in form HIRADC, date of last review January 2018. The risk acceptance level, have been established for each risk score tier.</p> <p>Inconsistency for HIRADC Bungo Tebo Estate:</p> <ul style="list-style-type: none"> <li>- Risk analysis have not cross-referenced with the applicable laws and regulation related to OHS that have been evaluated.</li> <li>- Inconsistency in determining the value for frequency and severity, as it does not reflect the actual incident/accident – from incident record. Sample: injury from fallen palm frond during harvesting activity, valued 1, while accident record stated 14 accidents from fallen frond, and the procedure stated value is 6.</li> <li>- Inconsistency in preparing risk control. Sample: activity of welding, grinding, lathing was</li> </ul>	
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		<p>scored 180, however no prepared risk control. This is not consistent with procedure stating risk level score 70-200 deemed substantial, need immediate improvement and does not required top management;</p> <ul style="list-style-type: none"> <li>- Inconsistency in correlating risk assessment in preparing OHS program. The current OHS program has not take into consideration risk level scored 70-200 such as activity welding, grinding, lathing in workshop, cutting FFB with axe (during journey onto and from field), FFB harvest with palm sickle.</li> </ul> <p>Inconsistency for HIRADC Bungo Tebo POM:</p> <ul style="list-style-type: none"> <li>- Risk analysis have not cross-referenced with the applicable laws and regulation related to OHS that have been evaluated.</li> <li>- Inconsistency to include non-routine activities such as maintenance, spare part replacement (bearing, chain, liner, steel cable, nozzle, etc.), cleaning process at loading ramp, sterilizer, threshing, press, etc. Not including fabrication (welding, lathing, grinding, etc.) process in mill's workshop.</li> <li>- Inconsistency in connecting risk assessment in preparing OHS program. The current OHS program has not take into consideration risk level scored 200-400 such as activity oil purifying in clarification station.</li> </ul> <p>Inconsistency for Risk Assessment Bungo Tebo Smallholder:</p> <ul style="list-style-type: none"> <li>- Inconsistency for determining the severity level between fatality, permanent disability and injury in calculating risk level;</li> </ul>	
4.7.3	<p>Records of Occupational Health and Safety (OHS) program (see 4.8) and Personal Protective Equipment (PPE) training in accordance with the result of hazard identification and risk analysis shall be available to all workers.</p> <p>- Major compliance -</p>	<p>Bungo Tebo Estate prepared OHS program, with OTP: to minimize the number of work related accident in Bungo Tebo Estate, program: safety committee meeting, refresh OHS training;</p> <p>To achieve zero fatality, zero permanent disabled, zero fire, program: program review and emergency response simulation twice per annum, safety briefing, safety committee performance evaluation, safety briefing on morning muster;</p> <p>To implement safe culture in workplace, program: OHS communication, PPE use inspection, emergency response equipment inspection,</p> <p>To review risk assessment/HIRADC, program: review during monthly safety committee</p>	Comply

		<p>meeting;</p> <p>To reduce sick rate at clinic, program: Jumat Bersih program and healthy house competition;</p> <p>Implementation of improvement:</p> <ul style="list-style-type: none"> <li>- Fire extinguisher inspection at chemical store, fertilizer store and material warehouse dated 1 August 2018 and 3 September 2018;</li> <li>- Modification of axe cover for harvester using PVC pipe;</li> <li>- Installation of axe cover and hook for harvester on each harvester’s motorcycle (for safe and easy transportation);</li> </ul> <p>Provision of PPE for worker: provision of helmet and hand glove to 10 EFB applicators, dated 6 February 2018. Sampled name: Mr. Jamhuri, Akmal, Ramlan.</p> <ul style="list-style-type: none"> <li>- PPE use monitoring: “Monitoring Kondisi Alat Pelindung Diri” for 9 fertilizer applicators under mandor Fadli Nasution dated 24 August 2018 – found to use respirator and goggle; for 13 harvesters under Mandor J. Girsang, dated 10 August 2018 – all found to use helmet, goggle, rubber boot, sickle cover, axe cover; for 5 sprayers under mandor M. Efendi, dated 6 August 2018 –all found to use hat, goggle, respirator, fabric hand glove, rubber hand glove, apron, rubber boot.</li> <li>- Giving warning letter to worker that does not wear PPE: No.006/KBT-RAU/SP/08/2018 to Mr. Agus Salim – dated 30 August 2018, for not using PPE during grinding in estate workshop.</li> </ul> <p>Training/certification for Bungo Tebo Estate:</p> <ul style="list-style-type: none"> <li>- “Sertifikat Pembinaan Teknik Keselamatan dan Kesehatan Kerja Pesawat Angkat dan Angkut Operator K3 Motor Grader No.Ser.11380-OPK3-PAA/II/2016 nama Jayan Nainggolan” dated 12 February 2016.</li> <li>- “Sertifikat Pembinaan Teknik Keselamatan dan Kesehatan Kerja Pesawat Angkat dan Angkut Operator K3 Motor Grader No.Ser.13.5545-OPK3-PAA/VI/2013 nama Iskandar” dated 7 June 2013. Lisensi K3 Operator No. 13.5545-OPK3-PAA/VI/2013 dated 7 June 2013</li> </ul>	
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		<p>Implementation of OHS program:</p> <ul style="list-style-type: none"> <li>- Fire hydrant inspection on 15 August 2018 and 5 September 2018 (5 hydrant points and hydrant hose box) in Bungo Tebo POM;</li> <li>- Fire extinguisher inspection on 15 August 2018 and 5 September 2018;</li> <li>- First aid kit inspection in Bungo Tebo POM dated 15 August 2018;</li> <li>- Completion of bolard safety latch for capstand, safety sign installation on lorry track, remote control modification for capstand, simulation after modification.</li> </ul> <p>Job Safety Analysis for tank cleaning in clarification area, using gas detector O<sub>2</sub> (20 %), LEL (15 %), H<sub>2</sub>S (12 ppm) and CO (70 ppm) level inside tank – prior to washing the tank, dated 27 February 2018. Conclusion safe to work.</p> <p>Training/certification for Bungo Tebo POM:</p> <ul style="list-style-type: none"> <li>- “Sertifikat Pembinaan dan Pengujian Lisensi K3 Operator Pesawat Uap Kelas I No.690/PNK3-PUBT/OB-I/VII/08 nama Jimmer Hutagalung” dated 7 July 2008. Licese “Lisensi K3 Operator Pesawat Uap No.P.08.690-OPK3-PUBT-B.I/VI/2013 nama Jimmer Hutagalung” dated 7 June 2013-7 June 2018 (on progress extension).</li> <li>- “Sertifikat Pembinaan Teknik Keselamatan dan Kesehatan Bidang Operator Pesawat Uap Kelas 2 No.Ser.656-OPK3-PUBT-B.II/VI/2013 nama Suwito” dated 24 June 2013. License – “Lisensi K3 Operator Pesawat Uap No. 656-OPK3-PUBT-B.II/VI/2013 nama Suwito” dated 24 June 2013-24 June 2018 (on progress extension).</li> <li>- “Sertifikat Pembinaan Teknik Keselamatan dan Kesehatan Bidang Pesawat Tenaga dan Produksi Operator K3 Diesel No.Ser.13.132/OP.D.K3/PTP/V/2013 nama Kadri” dated 13 May 2013. License “Lisensi K3 Operator Pesawat Tenaga &amp; Produksi No.13.276-OPDK3-PTP/V/2013 dated 13 May 2013-13 Mau 2018 (on progress extension).</li> <li>- “Sertifikat Juru Las Kelas II No.S.227/JL/PNK3/VI/2014 nama Royal Andi W Panggabean” dated 20 June 2014.</li> <li>- “Sertifikat Pembinaan dan Pengujian Lisensi K3 Operator Pesawat Uap Kelas I No.688/PNK3-PUBT/OB-I/VII/08 nama Darmawansyah” dated 7 July 2008. License – “Lisensi K3 Operator Pesawat Uap No.P-08.688/PNK3-PUBT/OB-I/VII/08 nama Darmawansyah” dated 7 June 2013-7 June 2018.</li> </ul>	
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		<p>- All of the license for operator is in progress for extension, as per Memorandum Mill Manager NO.128/PBT/06/18 dated 4 June 2018. Response from Dinas Tenaga Kerja dan Transmigrasi Provinsi Jambi dated September 2018 stating the abovementioned licenses for operator is in extension process.</p> <p>Company provided PPE for POM worker:</p> <p>Provision of safety shoes for Mr. Jufrinal (security), Jimmer Hutagalung (boiler operator) on 6 January 2018. And for Mr. Darmawansyah (mandor proses), Suwito (boiler operator), Kadri (engine room operator), Royal Andi W Panggabean (mechanic) dated 8 January 2018.</p> <p>Suwito (boiler operator): ear plug (5 March 2018), uniform (23 July 2018), hand glove and masker (6 August 2018);</p> <p>Muslihudin (sterilizer operator): ear plug (5 March 2018), uniform (23 July 2018), hand glove and masker (6 August 2018);</p> <p>Asriadi (grading keeper): masker and helmet (9 May 2018);</p> <p>Rapolo and Arliadi (KCP operator): ear muff (21 August 2018);</p> <p>Rozali (boiler operator): hand glove, masker, helmet, goggle and ear plug (4 June 2018);</p> <p>Kadri (engine room operator): ear muff (2 July 2018);</p> <p>Training related to risk assessment and the related PPE use for smallholder in KOPERASI Tani Mandiri, conducted on 23 July 2018 – attended by 29 smallholder members. This was due to each smallholder performed the harvesting, fertilizer application, pruning themselves. Recorded under "Notulen Pelatihan dan Penyuluhan Kesehatan dan Keselamatan Kerja (K3) Pembina Plasma dan KOPERASI dengan Kelompok Tani".</p> <p>PPE provided by company, supplied to cooperative/KOPERASI and then distributed to</p>	
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		<p>smallholder member needed: KOPERASI Tunas Harapan distributed helmet, goggle and sickle cover to 20 smallholder members whose harvest oil palm themselves on July 2017, among them: 2030 Fauzi and 2053 Asnawi; KOPERASI Tani Mandiri distributed helmet, goggle and sickle cover to 20 smallholder members whose harvest oil palm themselves on October 2017, among them: 2041 Husin, 2404 Abdul Wahab, 2388 Sukarman, 2385 T. Purba;</p>	
<p>4.7.4</p>	<p>The responsible person(s) for occupational health and safety shall be identified and there shall be records of periodical meetings on health and safety issues.</p> <p>- Major compliance -</p>	<p>Bungo Tebo POM: Appointed safety officer, as per "Sertifikat Keputusan Menteri Tenaga Kerja dan Transmigrasi No.KEP.P.1753/NAKER-BINWASK3/VIII/2018 tentang Penunjukan Ahli Keselamatan dan Kesehatan Kerja Umum nama Sofianto", dated 1 August 2018-1 August 2021. Safety committee has been established: Surat Keputusan Kepala Dinas Sosial, Tenaga Kerja dan Transmigrasi Kabupaten Tebo No.560/364/PK/SOSNAKERTRANS/2016 tentang Pembentukan dan Pengesahan Panitia Pembina Keselamatan dan Kesehatan Kerja (P2K3) PT. Rigunas Agri Utama PMKS Bungo Tebo", dated 14 September 2016. Currently in process of re-application, as the organization have latest structure dated 4 September 2018 (transferred worker). Safety meeting on 27 January 2018, discussing the OHS performance December 2017, accident investigation from December 2017, risk analysis, sick level in clinic, revised structure and checking emergency infrastructure. Safety meeting on 26 February 2018, discussing the OHS performance January 2018, nearmiss and accident investigation from January 2018, fire extinguisher inspection, sick level in clinic, risk analysis. Safety meeting on 24 March 2018, discussing the OHS performance February 2018, accident investigation from February 2018, risk analysis, sick level in clinic, revised safety committee structure. OHS performance period January – March 2018 reported to Dinas Sosial Tenaga Kerja dan</p>	<p>Comply</p>

		<p>Transmigrasi Kabupaten Tebo, receipt dated 17 April 2018.</p> <p>Bungo Tebo Estate:</p> <p>"Sertifikat Pembinaan Pengawasan Norma Keselamatan dan Kesehatan Kerja Ahli K3 No.Ser.16.2514/AK3/U/V/2016 nama Heri Purwanto", dated 9 May 2016.</p> <p>Appointed safety officer, as per "Keputusan Menteri Tenaga Kerja No.KEP.2584/NAKER-BINWASK3/V/2016 tentang Penunjukan Ahli Keselamatan dan Kesehatan Kerja Umum PT. Rigunas Agri Utama" dated 9 May 2016.</p> <p>Safety committee has been established: Surat Keputusan Kepala Dinas Sosial, Tenaga Kerja dan Transmigrasi Kabupaten Tebo No.560/106/PK/SOSNAKERTRANS/2014 tentang Pembentukan dan Pengesahan Panitia Pembina Keselamatan dan Kesehatan Kerja (P2K3) PT. Rigunas Agri Utama Bungo Tebo", dated November 2016.</p> <p>PT. Rigunas Agri Utama has submitted an application for revision of safety committee structure since 10 April 2018. Until not has not responded by Dinas Sosial Tenaga Kerja dan Transmigrasi Kabupaten Tebo.</p> <p>Safety meeting on 12 January 2018, discussing the OHS performance December 2017, accident investigation from December 2017, risk analysis, sick level in clinic, revised structure and checking emergency infrastructure.</p> <p>Safety meeting on 6 February 2018, discussing the OHS performance January 2018, 3 accident investigation from January 2018, fire extinguisher inspection, sick level in clinic, risk analysis.</p> <p>Safety meeting on 5 March 2018, discussing the OHS performance February 2018, accident investigation from February 2018, risk analysis, sick level in clinic, revised safety committee structure.</p> <p>OHS performance period January – March 2018 reported to Dinas Sosial Tenaga Kerja dan Transmigrasi Kabupaten Tebo, dated 5 April 2018.</p>	
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4.7.5	<p>A procedure for emergency and work accident shall be available in Indonesian Language; and the workers, who have attended First Aids training, are available in the working areas.</p> <p>- Minor compliance -</p>	<p>Emergency and work accident procedure available under: "Prosedur Kesiagaan dan Tanggap Darurat No.AA-EMS-820-PR" dated 5 April 2017, for spillage and fire; "Prosedur Pengendalian Gempa Bumi, Banjir dan Tanah Longsor No.AA-KL-18-EFP" dated 1 December 2010, for earthquake, flood and landslide;</p> <p>Bungo Tebo Estate has established a emergency response team, led by GM – Mr. Bibit Sembiring. The team consist of logistic and transportation.</p> <p>Emergency response SOP available in Bahasa Indonesia. The fire fighting simulation involving 10 workers, in Bungo Tebo POM, dated 15 May 2018. The scenario involving land fire in warehouse, at the same time two worker passed out and lubricant spillage. Evaluation: additional fire extinguisher and flags required.</p> <p>First aid kit inspection dated 6 August 2018 and 9 August 2018 for first aid box, located in front of office. First aid kit inspection dated 4 June 2018, 27 July 2018 and 8 August 2018 for Division III fertilizer applicator supervisor's first aid box. First aid kit inspection dated 5 May 2018, 12 July 2018 and 23 August 2018 for Division II FFB transport supervisor's first aid box.</p> <p>Trained first aider in Bungo Tebo Estate: Mrs. Sari Afdolina Gultom, Mrs. Debi Zuhria AM.Keb, Mr. Fadli AMd.Kep. License for first aider as per "Surat Keputusan Kepala Dinas Sosial, Tenaga Kerja dan Transmigrasi Kabupaten Tebo No.560/107/PK/Sosnakertrans/2014 tentang Pengesahan Petugas Pertolongan Pertama pada Kecelakaan PT. Rigunas Agri Utama – Bungo Tebo atas nama Fadli Amd.Kep." dated December 2014.</p> <p>Training for first aider: "Training Pertolongan Pertama Gawat Darurat", training material consist of initial assessment, secondary assessment, evacuation technique, first aid box introduction. The training dated 27 July 2018 attended by 38 participants. The employee have been followed by sampled/interviewed workers: Juprinal (Bungo Tebo POM), Janes</p>	Comply

		<p>P.S, Maria, Neliyati, Leni Muslih (Bungo Tebo Estate), Aditia Purba (Bungo Tebo Plasma).</p> <p>Bungo Tebo POM have prepared a map of hydrant points, fire extinguishers, first aid boxes in the premise.</p> <p>PT. Rigunas Agri Utama assisted each cooperative/KOPERASI to lined out emergency response procedure "Prosedur Tanggap Darurat". Sighted in KOPERASI Tanjung Jaya Bersama – "Prosedur Tanggap Darurat", prepared/latest review by Mr.Faizal (secretary) on 5 March 2018, consist of contingency plan for spillage, earthquake, fire, flooding. In KOPERASI Tunas Harapan – "Prosedur Tanggap Darurat", prepared/latest review by Mr.Fauzi (secretary) on 2 January 2018, consist of contingency plan for spillage, earthquake, fire, flooding.</p> <p>Emergency response team structure in KOPERASI Tani Mandiri has been established. Confirmation with the commander, 2392 Mr. Shofi and 2404 Mr. Abdul Wahab, understand the emergency response plan.</p> <p>Training related to first aid/emergency response procedure provided by PT. Rigunas Agri Utama to KOPERASI Tani Mandiri smallholder member, dated 2 August 2018 – attended by 29 smallholder members. The training covers bleeding control, bone trauma, open wound treatment, burn wound, venomous animal bites, pesticide intoxication. Mr. Abdul Wahab attend the training.</p> <p>-</p>	
4.7.6	<p>All workers shall be provided with medical care, and covered by accident insurance (see criterion 6.5.3).</p> <p>- Minor compliance –</p>	<p><b>Bungo Tebo Estate:</b>  The organization has provided medical care for all mill and estate workers. If there was unhealthy worker, company clinic is available inside the estate area. Furthermore, all mill and estate workers are covered by BPJS Kesehatan (medical insurance) and BPJS Ketenagakerjaan (social insurance). Records of BPJS Kesehatan and BPJS Ketenagakerjaan member list are available.  Evidence of payment was sighted and documented under "Rincian Iuran Tenaga Kerja untuk BPJS June – Agustus 2018", such as:</p>	Not Comply

		<p>Estate</p> <ul style="list-style-type: none"> <li>- Payment Slip month August 2018, amount Rp 51.067.636, no validasi 11001511001103241314, covering for 339 workerr</li> <li>- Payment Slip month August 2018, amount Rp 8.582.470 no validasi 110015461808, covered for 343 workers</li> <li>- Payment Slip month August 2018, amount Rp Rp 52.702.602 covered for 350 workeres, dated 14<sup>th</sup> September 2018</li> <li>- Payment Slip month August 2018, amount Rp 53.583.042, no validasi 110015461808, covered for 356 workeres, dated 14<sup>th</sup> September 2018</li> </ul> <p><b>Bungo Tebo Mill:</b></p> <ul style="list-style-type: none"> <li>- Payment Slip month August 2018, amount Rp 5.099.284 no validasi 110001548221214, covered for 20 workers</li> <li>- Payment Slip month August 2018, amount Rp 12.595.955, no validasi 0015233203, covered for 79 workers</li> </ul> <p><b>Bungo Tebo Smallholders:</b> All KOPERASI's have identified employees who have registered in BPJS program personally and employees who have not been registered in BPJS program. KOPERASI facilitate the employee to be registered in BPJS program.</p> <p>NC Minor: Statement: Medical and incident/social insurance (BPJS) for all workers are not properly covered.</p> <p>Objective evidence: Based on Employee Data Record in Bungo Tebo Estate on August 2018 totally 735 workers consist of Monthly Permanent Workers (SKU-B) – 4.63%, Daily Permanent Workers (SKU-H) – 17.28% and Casual Daily Workers (PHL) – 78.10%.</p> <p>However, based on Summary of Jamsostek Payment No. Ref: KBT EE.00.0952 within</p>	
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		<p>period June to August 2018, shows that several workers of PT Rigunas Agri Utama are not covered by social insurance (Jamsostek) as per regulation required. Collecting evidence as follow:</p> <ul style="list-style-type: none"> <li>- August 2018, payment validation number: 11001511001103241314, paid for 339 workers (SKU-H and PHL).</li> <li>- July 2018, payment validation number: 110015461808, paid for 356 workers (SKU-H and PHL).</li> <li>- June 2018, paid for 350 workers (SKU-H and PHL).</li> </ul> <p>Sample workers has verified: Mr. Zainuddin, Mr. Akmal, Mr. Jamhuri, Mr. Andi Shaputra and Mr. Munika Auzandi.</p>	
<p>4.7.7</p>	<p>Occupational injuries shall be recorded using Lost Time Accident (LTA) metrics.</p> <ul style="list-style-type: none"> <li>- Minor compliance</li> </ul>	<p>Bungo Tebo Estate recorded the injuries January-August 2018:</p> <p>Medical aid with &lt;2 lost mandays: 5 incidents, lost 5 mandays; Medical aid with &gt;2 lost mandays: 5 incidents, lost 14 mandays; First aid: 19 incidents;</p> <p>Accident investigation:</p> <p>Supratman (harvester), 22 January 2018 eyes irritated from palm debris, located in block A94K. Investigation carried out, however the incident investigation form (why-tree form) to identify root cause and preparing correction has not been filled up completely.</p> <p>Diki Periandi (harvester), 18 April 2018, injured leg from fallen palm frond, accident occurred during harvesting block D08m. Investigation form (why-tree form) was not completely filled in order to analyzing root cause and preparing correction.</p> <p>Bungo Tebo POM recorded the injuries January-August 2018:</p> <p>Medical aid with &lt;2 lost mandays: 7 incidents, lost 8 mandays; First aid: 0 incidents; Nearmiss: 35 cases;</p>	<p>Not Comply</p>

		<p>Accident investigation:</p> <p>Habibi (Loading ramp), 17 January 2018 head injured from FFB flattening plate located on loading ramp. Investigation carried out, however accident investigation form to identify root cause and preparing correction has not been filled up completely.</p> <p>Scheme smallholder management of PT. Rigunas Agri Utama recorded the lost time injury under record "Rekaman Kecelakaan Kerja" period 2017 and 2018. Record verified and sighted:</p> <p>"Rekaman Kecelakaan Kerja KOPERASI Tanjung Jaya Bersama 2017" recorded 1 accident befall to Mr. Annun, dated 17 April 2017, injured index finger when opening sickle cover before harvesting. Zero lost time – continue to work after wound toilet. "Rekaman Kecelakaan Kerja KOPERASI Tanjung Jaya Bersama 2018" recorded 1 accident befall to Mr. Adi, dated 15 March 2018, injured eyes when harvesting. Zero lost time – continue to work.</p> <p>"Rekaman Kecelakaan Kerja KOPERASI Tunas Harapan 2017" recorded 1 accident befall to Mr. Aan, dated 3 April 2017, injured hand when placing sickle during harvesting. Zero lost time – continue to work after wound toilet. "Rekaman Kecelakaan Kerja KOPERASI Tunas Harapan 2018" recorded 1 accident befall to Mr. Hairul, dated 2 May 2018, injured shoulder from falling frond when harvesting. Zero lost time 2 days.</p> <p>"Rekaman Kecelakaan Kerja KOPERASI Tani Mandiri 2017" recorded 1 accident befall to Mr. Haikal (harvester), dated 25 August 2017, injured shoulder from falling frond. Zero lost time 2 days. "Rekaman Kecelakaan Kerja KOPERASI Tani Mandiri 2018" recorded 1 accident befall to Mr. Gunawan, dated 23 July 2018, injured hand during frond stacking. Zero lost time – continue to work.</p> <p>NC Minor:</p> <p>Accident investigation form has not been filled up completely in order to analyzing root</p>	
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		<p>cause and prepare corrective action.</p> <p>Objective Evidence:</p> <p>Sampled accident investigation:</p> <p>Bungo Tebo Estate:</p> <ul style="list-style-type: none"> <li>- Accident Mr.S (harvester), 22 January 2018 eyes irritated from palm debris, located in block A94K. Investigation carried out, however the incident investigation form (why-tree form) to identify root cause and preparing correction has not been filled up completely.</li> <li>- Accident Mr. D (harvester), 18 April 2018, injured leg from fallen palm frond, accident occurred during harvesting block D08m. Investigation form (why-tree form) was not completely filled in order to analyzing root cause and preparing correction.</li> </ul> <p>Bungo Tebo POM:</p> <ul style="list-style-type: none"> <li>- Mr.H (Loading ramp), 17 January 2018 head injured from FFB flattening plate located on loading ramp. Investigation carried out, however accident investigation form to identify root cause and preparing correction has not been filled up completely.</li> </ul>	
<p><b>Criterion 4.8</b>  All staff,workers, smallholders and contract workers are appropriately trained.</p>			
<p>4.8.1</p>	<p>Records of training program related to the aspects of RSPO Principles and Criteria shall be available.</p> <p>- Major compliance -</p>	<p>The training program for estate in "Program Pelatihan Environmental &amp; Sustainability Tahun 2018" prepared by Training Center Asian Agri, Pekanbaru – based on competence mapping. Training program: Sustainability Awareness (RSPO P&amp;C, ISCC, ISPO), planned November 2018; Basic Fire training planned March 2018; First aider/"Pertolongan Pertama Gawat Darurat" planned July 2018; Handling hazardous waste planned for April 2018; Safety Use Herbicide and Chemical planned May 2018; HCV training planned February 2018; Basic Safety training planned June 2018; Heavy machinery operator training planned May 2018;</p> <p>The training program for palm oil mill in "Program Pelatihan Environmental &amp; Sustainability</p>	<p>Comply</p>

		<p>Tahun 2018” prepared by Training Center Asian Agri, Pekanbaru – based on competence mapping. Training program: Traceability and Mass Balance planned for May 2018; Pelatihan Operator Boiler planned for December 2018, Pelatihan Operator Air planned for November 2018; Penanganan Limbah B3 dan Bahan Kimia planned for October 2018.</p> <p>PT. Rigunas Agri Utama prepared training program for scheme smallholder management staff as in “Program Pelatihan Staff Plasma Tahun 2018, PT. Rigunas Agri Utama”. The training program prepared by Training Center Asian Agri, Pekanbaru – based on competence mapping. Training program: Self development and character building, planned February 2018; Basic Fire training planned February 2018; Change management planned April 2018; Communication skill planned June 2018; Training on SOP Administration planned for August 2018; Training on SOP fertilizer application planned for April 2018.</p>	
4.8.2	<p>Records of training for each employee shall be maintained.          - Minor compliance –</p>	<p>Training record:</p> <p>Basic fire dated 6 February 2018, attended by 24 workers. Sampled worker attended: Mrs. Maria br Bangun (Bungo Tebo Estate), Jimmer Nainggolan, Abdul M. Ginting (Bungo Tebo POM).</p> <p>HCV training dated 6 February 2018, attended by 18 workers. Sampled worker attended: Mrs. Maria br Bangun (Bungo Tebo Estate), Mr. Abdul M Ginting (Bungo Tebo POM), Mr. Buhori (Bungo Tebo Plasma);</p> <p>Personal Data Training:</p> <p>Sugiyatno (Mechanic): Pelatihan Road Grader dan Excavator: 3-4 December 2014, Heavy machinery training 19-20 July 2017;</p> <p>Janes Siregar (Spraying Mandor): Pelatihan HCV 30 April 2013, Pelatihan Pertolongan Pertama Gawat Darurat 20 October 2014, Pelatihan Pestisida Terbatas 27 November 2014, Pelatihan Budaya Kerja Asian Agri 16 June 2015, Pelatihan Penggunaan Alat Semprot 4 April 2016, Pelatihan Penggunaan Alat Semprot Atila &amp; SA15 dated 22 March 2017;</p> <p>Hendrik Cipta (fire fighter): Sustainable Awareness 14 April 2016, Basic Fire 16 February</p>	Comply

		<p>2018;</p> <p>Maria Bangun (fertilizer applicator): HCV awareness 16 February 2018, Basic Fire 16 February 2018;</p> <p>Delyani (Sprayer): Pelatihan Pestisida Terbatas 5 August 2018;</p> <p>Rosmiati (Sprayer): Pelatihan Pestisida Terbatas 5 August 2018;</p> <p>Sumiyati (Sprayer): Pelatihan Pestisida Terbatas 5 August 2018;</p> <p>Meriana (Sprayer Plasma): Pelatihan Pestisida Terbatas 5 August 2018;</p> <p>Zuldayain (IPM worker) joined training "Pelatihan Alat Fogging" dated 4 April 2018;</p> <p>Rd. Sofi (IPM worker) joined training "Pelatihan Alat Fogging" dated 4 April 2018;</p> <p>Shofian Andri joined "Pelatihan Sertifikasi Operator Pesawat Angkat dan Angkut" dated 8 August 2018 for travel and loading training.</p> <p>Jimmer Hutagalung (mechanic): "Pelatihan Operator Pesawat Uap Kelas I" 27 May – 1 June 2008, "Pelatihan PPGD" dated 18 February 2016, "Refresh external &amp; internal water treatment" 26 April 2017;</p> <p>Darmawansyah (Process mandor): "Pelatihan Operator Pesawat Uap Kelas I" 27 May – 1 June 2008, "Pelatihan Pemadaman Kebakaran" dated 5 August 2013, "Pelatihan Dasar Pencegahan &amp; Pemadaman Kebakaran" 23 April 2017;</p> <p>Dewi Anggraini (weighbridge): "Pelatihan PPGD" dated 18 February 2016, "Pelatihan Traceability dan Mass Balance" 13 April 2017, "Pelatihan Critical Control Point" 21 May 2018.</p> <p>Record of training plan for scheme smallholder management:</p> <p>Self development and character building training on 26-27 February 2018 in Pekanbaru;</p>	
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		<p>Training module sighted, training attended by Mr. Evan Ardyanto from Plasma Bungo Tebo;</p> <p>Basic fire training carried out 6 February 2018; Training module and pictorial documentation evident – 24 emergency team participated on the training;</p> <p>Training on SOP fertilizer application carried out 12 April 2018 in Tungkal Ulu; training module sighted; training attended by Mr. Ahmad Bastari and Mr. Sutrisno from Plasma Bungo Tebo;</p>	
<p><b>Principle 5: Environmental responsibility and conservation of natural resources and biodiversity</b></p>			
<p><b>Criterion 5.1</b></p>			
<p>Aspects of plantation and mill management, including replanting, that have environmental impacts are identified, and plans to mitigate the negative impacts and promote the positive ones are made, implemented and monitored, to demonstrate continual improvement.</p>			
<p>5.1.1</p>	<p>Environmental impact assessment document(s) shall be available.</p> <p>- Major compliance -</p>	<p><b>Bungo Tebo POM, Estate and Scheme Smallholders:</b></p> <p>The previous SEIA was "ANDAL (Analisa Dampak Lingkungan) &amp; RKL-RPL (Rencana Pengelolaan Lingkungan – Rencana Pemantauan Lingkungan Perkebunan Kelapa Sawit Pola PIR-TRANS dan Pabrik Pengolahan Minyak Sawit PT Rigunas Agri Utama" datum 2003. The documents have been approved based on "Persetujuan Komisi AMDAL Propinsi Jambi No.273 Tahun 2003" dated 11<sup>th</sup> July 2003.</p> <p>The latest SEIA was available in term of "Adendum ANDAL (Analisa Dampak Lingkungan) &amp; Rencana Pengelolaan Lingkungan Hidup – Rencana Pemantauan Lingkungan Hidup (RKL – RPL)" regarding Development of Kernel Crushing Plant (KCP) with production capacity 200 ton/day, development of electricity power (PLTBG) that produced electricity 3 MW and replanting for 2,506 Ha. The documents have been approved based on Decree of Tebo regent No.86 Year 2017" dated 2<sup>nd</sup> February 2017 regarding Environment Permit (Izin Lingkungan) and No.85 Year 2017 dated 2<sup>nd</sup> February 2017 regarding "Kelayakan Lingkungan".</p> <p>This documents covers the area of 8,676 Ha (2,551 Ha planted for nucleus estate and 6,116 Ha planted for scheme smallholders), with palm oil mill capacity 60 tons FFB/hour,</p>	<p>Comply</p>

		<p>KCP 200 ton/day, electricity power 3 MW and 2,506 replanting area in the nucleus estate. The area of study covers Tuo Sumai Village, Sungai Rambai Village, Pinang Belai Village (SP1), Sekuntum Jayo Village (SP2), Bukit Pemuatan Village (SP5) and Napal Putih Village (SP6) – Sumai sub-district, Tebo Regency, Jambi Province, year of study 2016.</p> <p>All significant impacts have been identified i.e. reduction of soil and water quality, reduction of air quality, impact to socio-economic of local community, impact to occupational health and safety, work and road traffic accident, land fire, and disturbance of natural water balance. Plan to monitor and manage of each identified environment impact have been provided and documented.</p> <p>PT Rigunas Agri Utama, Bungo Tebo Estate and Mill and Smallholder also has evaluate the environmental impact assessment each year and presented in "Evaluasi Aspek Dampak Lingkungan" EMS-431-003-LT revision 01 dated 12 February 2018 for Bungo Tebo Mill and Bungo Tebo Estate. Environmental impact assessment smallholder, updated on 22 January 2018 sample seen: "Evaluasi Aspek Dampak Lingkungan KOPERASI Tani Mandiri", "Evaluasi Aspek Dampak Lingkungan KOPERASI Sejahtera Tani", "Evaluasi Aspek Dampak Lingkungan KOPERASI Tunas Harapan", "Evaluasi Aspek Dampak Lingkungan KOPERASI Tanjung Jaya Bersama".</p> <p>Plasma Bungo Tebo also has give the training regarding "Analisis Mengenai Dampak Lingkungan" to the smallholder member. Siginificant impact of their operation and how to minimize the impact has socialize by Plasma Bungo Tebo, sample seen: Socialization and training to KOPERASI Sejahtera Tani on 3 March 2018, to KOPERASI Tani Mandiri on 12 March 2018, to KOPERASI Tanjung Jaya Bersama on 15 March 2018, to KOPERASI Tunas Harapan on 6 March 2018. During interview with smallholder indicated that they have understanding on significant impact of their operation to the environment and how to mitigathe/minimize the impact.</p>	
5.1.2	Environment management plan document to prevent negative impacts, its implementation report and revision (if the identification of impact requires changes in current company's practices) shall be available. The company's	<p><b>Bungo Tebo POM, Estate and Scheme Smallholders:</b></p> <p>Company has implemented environmental management system to manage impact from plantation and milling operations. The documents of "Rencana Kelola Lingkungan – Rencana Pemantauan Lingkungan" are available and in line with ANDAL document.</p>	Comply

	<p>management shall appoint the responsible person(s) for the implementation of the document.</p> <p>- Minor compliance -</p>	<p>Company is also demonstrating environmental management plan as part of environment management system.</p> <p>Company has implemented environmental management system to manage impact from plantation and milling operations. The documents of "Rencana Kelola Lingkungan – Rencana Pemantauan Lingkungan" are available and in line with ANDAL document. Company is also demonstrating environmental management plan as part of environment management system.</p> <p>The Environmental Management Plan in 2018, as follows:</p> <ol style="list-style-type: none"> <li>1. Significant Impacts: Mobilisation of heavy equipment and material during replanting; decrease of air quality; Program: air quality are maintained (parameter SO<sub>2</sub>, CO, NO<sub>2</sub>, O<sub>3</sub>, HC, PM<sub>10</sub>, PM<sub>2.5</sub>) under standard based on PP No.41/1999 regarding Air Pollution Control.</li> <li>2. Significant Impact: increase of noise level; program: Decree of Minister of Environment No. KEP- 48/MENLH/11/1996, regarding standard of noise level;</li> <li>3. Significant Impact: decrease of community health; program: increase community sanitary environment, clean and healthy attitude of community</li> <li>4. Significant Impacts: Soil erosion due to replanting activity; Program:             <ul style="list-style-type: none"> <li>- Make terrace in areas with a slope &gt; 12°</li> <li>- Planting legume cover crop</li> <li>- Make a trench subsidence in lowland areas</li> <li>- Make a stop in the area of the bunch terasan</li> <li>- Making the hoof to areas with a slope &lt; 12°</li> </ul> </li> </ol> <p>The company has shown evidence of the implementation of the Environmental Management Program for Significant Impacts of land and forest fires due to the dry season are:</p>	
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		<ul style="list-style-type: none"> <li>- Establish Emergency Response Organization Structure</li> <li>- Established a monitoring tower</li> <li>- Established a post of karhutla</li> </ul> <p>As for the program from other significant impacts have a target time of realization until 31 December 2018.</p> <p>Company appoint manager Estate and Mill PT Rigunas Agri Utama to control and ensure the document RKL implementation. RKL implementation report is submitted to the government every 6 months, latest Environmental Management Report for Semester I (January - June 2018) has submitted to Dinas Lingkungan Hidup Kabupaten Tebo on 5/09/2018 and Dinas Lingkungan Hidup Provinsi Jambi on 11/09/2018. Evidence of report submission can be demonstrated in "Tanda Terima Laporan Pelaksanaan Izin Lingkungan".</p>	
5.1.3	<p>Environment monitoring plan document, its implementation report, and the corrective plan (if non-conformance arised from the monitoring result) shall be available. This plan is reviewed on two-yearly basis.</p> <p>- Minor compliance –</p>	<p><b>Bungo Tebo POM, Estate and Scheme Smallholders:</b></p> <p>Environment monitoring plan document, its implementation report, and the corrective plan (if non-conformance arised from the monitoring result) available under Report on Environmental Management and Monitoring implementation (Laporan RKL-RPL) and submit to the government regularly (per semester).</p> <p>The company also has conducted monitoring of environmental impact semester I year 2018, such as:</p> <ul style="list-style-type: none"> <li>- Air emission monitoring of Boiler. Analysis conducted each semester by Sucofindo. Latest analysis conducted on 25 May 2018. Report of Analysis no 2342/CLAKAL, dated 12 June 2018, sample test location: Boiler No 01 and Boiler No 02. The result of analysis was complied with Kep 07/MENLH/2007, Attachment I.</li> <li>- Air emission and Noise monitoring of Generator Set. Analysis conducted each semester by Sucofindo. Latest analysis conducted on 25 May 2018. Report of Analysis no 2343/CLAKAL, dated 12 June 2018, sample test location: Genset G.1, Genset G.2, Genset Kebun Pulai, Genset Afd. 1. The result of analysis was complied with Kep</li> </ul>	Comply

		<p>PermenLH No.13 year 2009 attachment I (Particulate, Opacity, SO<sub>2</sub>, NO<sub>2</sub>, CO). The noise analysis generally exceed the threshold according to SE Menaker No.Per.13/MEN/X/2011, company has taken action by providing the PPE (ear muff/ear plug) to reduce the noise impact for operator.</p> <ul style="list-style-type: none"> <li>- Air ambient outdoor monitoring conducted each semester by Sucofindo. Latest analysis conducted on 25 May 2018. Report of Analysis no 2348/CLAKAL, dated 12 June 2018, sample test location: Area before Bungo tebo POM and after Bungo Tebo POM. The result of analysis was complied with PP RI No. 41 year 1999 and KepMenLH No. 48/MENLH/11/1996.</li> <li>- Air ambient indoor monitoring conducted each semester by Sucofindo. Latest analysis conducted on 25 May 2018. Report of Analysis no 2346/CLAKAL, dated 12 June 2018, sample test location: Indoor Area of Bungo Tebo POM (between Kernel station and engine room station). The result of analysis was complied with SE Menaker No. Per.13/MEN/X/2011 and Kep.Menaker No. 51/MEN/1999.</li> <li>- Odor monitoring conducted each semester by Sucofindo. Latest analysis conducted on 26 May 2018. Report of Analysis no 2345/CLAKAL, dated 12 June 2018, sample test location: Area of Waste Water Pond Instalation. The result of analysis was complied with KepMenLH No. 50/MENLH/11/1996.</li> <li>- Surface Water quality monitoring conducted each semester by Sucofindo. Latest analysis conducted on 23 May 2018. Report of Analysis no 2388/CLAKAL, dated 12 June 2018, sample test location: upstream and downstream of Pemuatan river, Lalo river, Belangkai river. The result of analysis was complied with PP No. 82, 2001 (Class II).</li> </ul> <p>Waste water monitoring analysis conducted each month by "UPTD Laboratorium Lingkungan Daerah – Dinas Lingkungan Hidup Provinsi Jambi". The results analysis from January – August 2018 can be demonstrated (for example LHU No. 835/LHU/L2JBI/VII/18 July 2018) and are still below the quality standard in accordance KepMenLH no 28-29 tahun 2003 Tentang Pedoman Syarat dan Tata Cara Perizinan Pemanfaatan Air Limbah Minyak Sawit di Perkebunan Kelapa Sawit. Detail record available at indicator 4.4.3.</p>	
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<p><b>Criterion 5.2</b>          The status of rare, threatened or endangered species and other High Conservation Value habitats, if any, that exist in the plantation or that could be affected by plantation or mill management, shall be identified and operations managed to best ensure that they are maintained and/or enhanced.</p>		
<p>5.2.1</p>	<p>Record(s) on the results of High Conservation Value (HCV assessment) that includes both the planted area and the relevant wider landscape-level considerations (such as wildlife corridors) shall be available.</p> <p>- Major compliance -</p>	<p><b>Bungo Tebo Estate and Scheme Smallholder</b></p> <p>Company including scheme smallholder has conducted HCV identification in coordination with Faculty of Forestry from "Institut Pertanian Bogor/IPB". The identification result recorded and reported under "Laporan Akhir Identifikasi Keberadaan Nilai Konservasi Tinggi (NKT) di areal PT. Rigunas Agri Utama, Kabupaten Tebo". The scope of study covers nucleus estate (of PT. Rigunas's plantation) of 2,551 Ha and smallholder estate/plantation of 5,914 Ha, located in Sumay district, Rambai district and Serai Serumpun district. The HCV identification was using "Panduan Identifikasi Kawasan Bernilai konservasi Tinggi di Indonesia", published by "Konsorsium Revisi HCV Toolkit Indonesia", July 2008.</p> <p>The author of HCV report consist of:</p> <ul style="list-style-type: none"> <li>- Dr. Ir. H. Nyoto Santoso, MS.: Team leader, listed as RSPO HCV assessor (listed as Provisionally licensed assessor, date 23<sup>rd</sup> April 2015);</li> <li>- Udi Kusdinar, S.Hut.: Social and Cultural aspects, listed as RSPO HCV assessor.</li> <li>- Sulfan Ardiansyah, S.Hut.: Flora ecology and environmental services, listed as RSPO HCV assessor.</li> <li>- M. Syayidina Ali, Amd.: GIS, (listed as Provisionally licensed assessor, date 23<sup>rd</sup> April 2015).</li> <li>- Gilang Prastya Pambudi, S.Hut.: Social- cultural aspect, listed as RSPO HCV assessor.</li> </ul> <p>The HCV identification survey was carried out on 23 – 27<sup>th</sup> April 2013. The involvement of interested parties in form of interview, discussion and/or public consultation. For example: Discussion with authorities of Serai Serumpun district, interview with Pinang Belai village, discussion with villagers of Sekutur Jaya village, interview with committee of KOPERASI Sumai Makmur, interview with Sumay district public servants, interview with villagers of</p>

Comply

		<p>Sungai Rambai vilage, etc.</p> <p>The public consultation was carried out on 26<sup>th</sup> April 2013, located in “Balai Kecamatan Serai Serumpun”, which attended by 28 participants, representing village authorities, villagers, elderly and community figures, district head and KOPERASI Plasma.</p> <p>The HCV identification document has explained the general condition of landscape surrounding company’s plantation: there is no protected forest/ecosystem that feasible for wildlife to maintain its viability. Therefore no recommendation for wildlife corridor.</p>	
5.2.2	<p>Whererare, threatened or endangered (RTE) species and or other HCVs are present or affected by the plantation and mill operations, an appropriate measures that are expected to maintain or enhance them shall be implemented through a management plan.</p> <p>- Major compliance -</p>	<p><b>Bungo Tebo Estate and Scheme Smallholder</b></p> <p>HCV identified in Bungo Tebo Estate based on HCV assessment report in 2013 consist of:</p> <ul style="list-style-type: none"> <li>- HCV 1.2, HCV 4.1 in Riprian area Lalo river, Pinang river, Belangkai Purun, Rotan river, Benanai, Belangkai, Belangkai Purun, Benanai pul river with area 17.54 ha.</li> <li>- HCV 6 in Makam Karyawan Afd. III with area 0.05 ha.</li> </ul> <p>HCV identified in Bungo Tebo Plasma consist of:</p> <ul style="list-style-type: none"> <li>- HCV 1.2 and 4.1 in Riprian area of river Kebung, Lawai, Sukorejo, Sekutur, Lalo, Benanai, Benanai Bul, Belangkai, Cenio, Anak Batang Sumay with area 52.04 ha.</li> </ul> <p>However, according to Area Statement of Bungo Tebo Estate updated in August 2018, total HCV area maintained is 37 Ha. Riparian and buffer zone along the river identified is not replanted and stay remaining to conserved by Certificate Holder.</p> <p>While, HCV in Smallholders area mostly is riparian. Actually, the identified river is not calculated within the land ownership certificate or “Sertifikat Hak Milik” of smallholders. All area of smallholders is planted refered to land ownership certificate size. Therefore, HCV area in the certified area of smallholders is absence or not exist.</p> <p>RTE species identified in area Bungo Tebo Estate and Plasma such as:</p> <ul style="list-style-type: none"> <li>- Kucing kuwuk (<i>Prionailurus bengalensis</i>)</li> </ul>	Comply

		<ul style="list-style-type: none"> <li>- Lutung (<i>Presbytis melalophos</i>)</li> <li>- Lutung abu – abu (<i>Trachypithecus cristatus</i>)</li> <li>- Berang-berang (<i>Prionodon linsang</i>)</li> <li>- Gajah (<i>Elephas maximus</i>)</li> <li>- Pijantung kecil (<i>Arachnotera longirostra</i>)</li> <li>- Raja udang meninting (<i>Alcedo meninting</i>)</li> <li>- Elang hitam (<i>Ictinaetus malayensis</i>)</li> <li>- Burung madu kelapa (<i>Anthreptes malaccensis</i>)</li> <li>- Elang ular bido (<i>Spilornis cheela</i>)</li> <li>- Kipas belang (<i>Rhipidura javanica</i>)</li> <li>- Cekakak belukar (<i>Halcyon smirnensis</i>)</li> <li>- Cekakak sungai (<i>Halcyon chloris</i>)</li> <li>- Burung madu sepa raja (<i>Aethopyga siparaja</i>)</li> </ul> <p>Company and cooperative was working together to monitor elephant movement and drive away elephant (if comes near plantation). Record seen: "Pemantauan Serangan Gajah Afdeling IV KBT Tahun 2018", was based on daily patrol. Based on patrol report since January – August 2018, there was no elephant attack in Division IV Bungo Tebo Estate. The records was in line with statement from farmers, village authorities and local communities. Based on the interview, community was stating that since early 2014, there was no more elephant attack. However there was a report of presence of Elephant in June/July 2018 in the border of Plasma Bungo Tebo though there was no attack to the plantation.</p> <p>Training on RTE species (including elephant control) started since 2013 when HCV identification team from Faculty of Forestry from "Institut Pertanian Bogor/IPB" had a</p>	
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		<p>meeting with stakeholders on 20<sup>th</sup> March 2015, attended by 20 smallholder farmers and representatives from other company on elephant control. BKSDA then brought into providing best practices.</p> <p>Bungo Tebo Estate has monitor the RTE species regularly each week and reported in "Daftar temuan Satwa Liar Mingguan di Areal Lindung". Sample seen monitoring on August 2018, there were a presence of several animal such as: Trenggiling (<i>Manis javanica</i>), Musang (<i>Paradoxurus hermaphrodites</i>), Babi hutan (<i>Sus crofa</i>), Berang – berang (<i>Aonyx cinerea</i>), Elang (<i>Ictinaetus malayanus</i>), Bubut alang-alang (<i>Centropus bengalensis</i>), Kobra (<i>Naja sumatrana</i>), burung puyuh (<i>Coturnix coturnix</i>), Ayam hutan (<i>Gallus sp</i>), Monyet ekor panjang (<i>Macaca fascicularis</i>), Landak (<i>Hystrix brachyura</i>), Biawak (<i>Varanus salvator</i>), Macan akar (<i>Prionailurus bengalensis</i>), Beruk (<i>Macaca nemestrina</i>).</p> <p>Plasma Bungo Tebo has performed monitoring of wildlife each quarter by head of KT (Pengurus Perlindungan Satwa Liar). Wildlife monitoring recorded in "Formulir Daftar Temuan Satwa Liar". For example monitoring result at KOPERASI Tani Mandiri, KOPERASI Tunas Harapan, KOPERASI Sejahtera Tani and KOPERASI Tanjung Jaya Bersama on July 2018 there were found the presence of Ular sawah (<i>Phyton reticulatus</i>), Biawak (<i>Varanus salvator</i>), Elang hitam (<i>Ictinaetus malayanus</i>), Burung Balam (<i>Spilopelia chinensis</i>).</p> <p>Company reported the management and monitoring of HCV including the animal presence each semester to BKSDA Provinsi Jambi. Latest report semester I has submit to BKSDA on 15 August 2018, report receipt from BKSDA can be demonstrated.</p>	
5.2.3	<p>Program(s) to socialize the status of protected, rare, threatened or endangered (RTE) to all workers shall be available, including records of appropriate sanction disciplinary measures to any individual working for the company who is found to capture, harm, collect or kill these species.</p> <p>- Minor compliance –</p>	<p><b>Bungo Tebo Estate and Scheme Smallholder</b></p> <p>Company and smallholder has made the programme to socialize the status of protected, rare, threatened or endangered (RTE) to all workers minimum once a year. Programme presented in Conservation Management Plan PT Rigunaa Agri Utama Bungo Tebo including Scheme Smallholder 2018. For example awareness of HCV and RTE species conducted on 6 February 2018 attended by workers and local people from surrounding plasma plantation.</p> <p>HCV socialization and training has been conducted by Plasma management Bungo Tebo to</p>	Comply

		<p>smallholder member, sample seen: socialization in KOPERASI Tani Mandiri, KOPERASI Tunas Harapan, KOPERASI Tanjung Jaya Bersama and KOPERASI Sejahtera Tani on 11 May 2018, record of socialization can be demonstrated in minutes of socialization, attendance list.</p>	
<p>5.2.4</p>	<p>Once the management plan is prepared, continuous monitoring documentation and report regarding the status of the RTE and HCVs are affected by the operations of the plantation and palm oil mill shall be available, and the results of monitoring are to be used to follow-up on the improvement of the management plan.</p> <p>- Minor compliance –</p>	<p><b>Bungo Tebo Estate and Scheme Smallholder</b></p> <p>Company and smallholder has conducted monitoring of flora and fauna on 6-monthly basis, carried out by Conservation and HCV Officer. The monitoring result was reported into "Laporan Monitoring Tumbuhan dan Satwa Liar", document verified for period first semester 2018. For example monitoring on August 2018, there were a presence of several animal such as: Trenggiling (<i>Manis javanica</i>), Musang (<i>Paradoxurus hermaphroditus</i>), Babi hutan (<i>Sus crofa</i>), Berang – berang (<i>Aonyx cinerea</i>), Elang (<i>Ictinaetus malayanus</i>), Bubut alang-alang (<i>Centrophus bengalensis</i>), Kobra (<i>Naja sumatrana</i>), burung puyuh (<i>Coturnix coturnix</i>), Ayam hutan (<i>Gallus sp</i>), Monyet ekor panjang (<i>Macaca fascicularis</i>), Landak (<i>Hystrix brachyura</i>), Biawak (<i>Varanus salvator</i>), Macan akar (<i>Prionailurus bengalensis</i>), Beruk (<i>Macaca nemestrina</i>). Report of monitoring flora and fauna also submit to BKSDA (Balai Konservasi Sumberdaya Alam) Provinsi Jambi on 15 August 2018.</p> <p>Specific monitoring for elephant was done through patrol on areas whtere indicated as elephant range/path. The patrol carried out on daily basis and reported under "Laporan Monitoring Serangan Gajah". Based on report review since January – August 2018 there was no elephant attack.</p> <p>KOPERASI has appointed responsible person who monitor the RTE species according to:</p> <ul style="list-style-type: none"> <li>- "Surat Keputusan Pengurus KOPERASI Tani Mandiri Desa Kandang, Kec. Tebo tengah, Kab. Tebo Nomor:17/KUD-TM/TM/I/2018 dated 11 January 2018", appointed person Mukhlisin (head of KT) KOPERASI Tani Mandiri.</li> <li>- "Surat Keputusan Pengurus KOPERASI Sejahtera Tani Desa Punt Kalo, Kec. Sumay, Kab. Tebo Nomor:15/KUD-ST/ST/II/2018 dated 5 February 2018", appointed person Muzir (head of KT) KOPERASI Sejahtera Tani.</li> </ul>	<p>Comply</p>

		<ul style="list-style-type: none"> <li>- "Surat Keputusan Pengurus KOPERASI Tanjung Jaya Bersama Desa Tuo Sumay, Kec. Sumay, Kab. Tebo Nomor:18/KUD-TJB/TJB/I/2018 dated 4 January 2018", appointed person Paisal (head of KT) KOPERASI Tanjung Jaya Bersama.</li> <li>- "Surat Keputusan Pengurus KOPERASI Tunas Harapan Desa Teluk Langkap, Kec. Sumay, Kab. Tebo Nomor:011/KUD-TH/TH/IV/2017 dated 5 February 2017", appointed person Saukani (head of KT) KOPERASI Tunas Harapan.</li> </ul> <p>Plasma Bungo Tebo has performed monitoring of wildlife each quarter appointed person. Wildlife monitoring recorded in "Formulir Daftar Temuan Satwa Liar". For example monitoring result at KOPERASI Tani Mandiri, KOPERASI Tunas Harapan, KOPERASI Sejagtera Tani and KOPERASI Tanjung Jaya Bersama on July 2018 there were found the presence of Ular sawah (<i>Phyton reticulatus</i>), Biawak (<i>Varanus salvator</i>), Elang hitam (<i>Ictinaetus malayanus</i>), Burung Balam (<i>Spilopelia chinensis</i>).</p>	
5.2.5	<p>Where HCV areas overlapped with an identified local community's land, there shall be evidence of a negotiated agreement that optimally safeguard their HCVs and the local community's rights.</p> <p>- Minor compliance –</p>	<p><b>Bungo Tebo Estate and Scheme Smallholder</b></p> <p>All HCV area has been identified was located within company and/or scheme smallholder control and monitoring. There was no HCV areas identified located under local community right.</p> <p>Company has in cooperation with community for the management of HCV, as written in Statement "Pernyataan Bersama" signed by PT. Rigunas Agri Utama' s management, six (6) village heads and 9 leaders of KOPERASI. The statement was stating commitment towards: to protect wildlife inside the scheme smallholder plantation SP1 – SP7, and agreed to no-hunting policy; Community agreed to stop the use of poison and electricity to catch fish; To protect river buffer zone through: no chemical fertilizer application, using organic fertilizer, to plant river buffer zone with local species tree – and to nurture/maintain the tree; no use of open-fire in scheme smallholder plantation; to actively participate in electric fence program to drive away elephant; to communicates the policy to communities. The statement was signed on 26<sup>th</sup> April 2013 by all representatives.</p>	Comply
<p><b>Criterion 5.3</b></p> <p>Waste is reduced, recycled, re-used and disposed of in an environmentally and socially responsible manner.</p>			



<p>5.3.1</p>	<p>A documented identified source of all waste and pollution, shall be available.          - Major compliance -</p>	<p><b>Bungo Tebo Mill and Estate:</b></p> <p>Waste and pollution sources have been identified and documented, including used lubricant and filter, old battery, used laboratory chemical, clinical/medical waste, mill effluent, EFB, smoke, dust, fiber and shell, empty agrochemical container, boiler ash, scrap iron, used tires, waste water and domestic household refuse. Record of identification was presented in "Evaluasi Aspek Dampak Lingkungan" EMS-431-003-LT revision 01 dated 12 February 2018 for Bungo Tebo Mill and Bungo Tebo Estate.</p> <p>Company has establish the procedure to manage the waste generated from all activity, such as:</p> <ul style="list-style-type: none"> <li>- Procedure AA-KL-05-EFP, procedure of non hazardous waste handling covering: mill wate (used rail, used part, ex chemical non hazardous/toxic, EFB, fiber, shell), estatewaste (used polybag, ex fertilizer sack), office waste (used paper, used work equipment), Workshop waste (used hose, used drum, scraped/used parts, used tire), Power generator waste (used hose, used parts, scarped), Logistic waste (ex fertilizer sack, used drum).</li> <li>- Procedure AA-KL-11-EFP, procedure of laboratory waste handling.</li> <li>- Procedure to utilize the fiber and shell (solid waste) as a boiler fuel SOP No. AA-MPM-OP-1400.04-R1 "Pemanfaatan fiber untuk bahan bakar".</li> <li>- EFB (Empty Fruit Bunch) utilization as a mulching or organic fertilizer according to SOP Pemupukan AA-APM-OP-1100.09-R1.</li> <li>- Company also utilize the waste water from waste water installation in to the plantation as land application according to SOP AA-PL-04-EFP Rev. 2 dated 15 Jan 2010 and "Keputusan Bupati tebo Nomor 354 Tahun 2015 tentang izin Pemanfaatan Air Limbah pabrik Kelapa Sawit Pada Tanah di Perkebunan Kelapa Sawit PT Rigunas Agri Utama" dated 23 June 2015 valid until 5 years.</li> </ul> <p>All polluting activities has been assessed including emission from boiler and generator, effluent from mill waste water, particulate from boiler stack, noise, used lubricant and</p>	<p>Comply</p>
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		<p>filter, old battery, used laboratory chemical, clinical/medical waste, mill effluent, EFB, smoke, dust, fiber and shell, empty agrochemical container, boiler ash, scrap iron, used tires, waste water and domestic household refuse.</p> <p><b>Scheme smallholders:</b></p> <p>Waste Management Plan is documented in "Identifikasi Sumber polusi dan rencana pengurangan polusi di perkebunan petani" – Identification of pollutant and mitigation of pollution in smallholders' plantation. Sample seen for KOPERASI Tani Mandiri, KOPERASI Tunas Harapan, KOPERASI Tanjung Jaya Bersama, KOPERASI Sejahtera Tani. The document were available and can be demonstrated during audit. KOPERASI has identified waste product and source of pollutant, such as: applying pesticides, fertilizing, harvesting and transportation. Pollutant identified such as in harvesting: FFB transporter vehicle exhaust, dust; Fertilizer application: Fertilizer transporter vehicle exhaust, fertilizer residue, bag and plastic; Weed control/spraying: water and soil pollution from leaching herbicide; pest and disease control: water and soil pollution from leaching pesticide; General activity: exhaust from generator.</p>	
5.3.2	<p>There shall be evidence that all chemicals and their empty containers are disposed of responsibly.</p> <p>- Major compliance -</p>	<p><b>Bungo Tebo Mill and Estate:</b></p> <p>Company has establish the procedure of hazardous waste handling "SOP Penanganan Bahan Berbahaya dan Beracun" AA_KL-03-EFP Rev. 4 dated 15 November 2011. The procedure explains the guidance to identify hazardous waste, collect hazardous waste, recording hazardous waste, safe handling of hazardous waste and disposal of hazardous waste through licensed contractors. The hazardous waste in storage is recorded and balancing stock is maintained.</p> <p>All empty agrochemical containers were triple rinsed, the jerry can were reused for spraying activities, while bottles containers were stored in the designated area and categorized as hazardous waste (B3). Records of chemical containers quantity disposed were evident. Liquid waste from agrochemical was reused for the next spraying application. Several ex-chemicals materials containers that use at mills operations such as laboratory chemicals ex-containers and the others, such as boiler additive liquids, lubricants, workshop materials, used battery, etc. were categorized as hazardous wastes</p>	Comply

		<p>that stored at temporary hazardous waste storage (TPS B3) that will be managed by licensed vendor, namely Konsorsium PT Sumatera Deli Lestari Indah – PT Indostar Cargo and PT Karya Nusa Bumi Persada and PT Prasadha Pamunah Limbah Industri. Company has cooperate agreement according to “Kesepakatan Kerjasama Pengelolaan Limbah B3” No. 001/IIS-SDLI-ISC-KNBP/III/2018 and No. 002/IIS-SDLI-ISC-PPLI/III/2018 dated 2 March 2018 valid until 1 March 2019. Type of waste, such as waste oils, used batteries, light bulbs, and non-economical waste (used fabric majun, used filters, used gloves, empty jerry cans, contaminated soil waste, medical/clinic waste and used oil).</p> <p>PT Karya Nusa Bumi Persada has obtained the licenced from Indonesia Ministry of Environment and Forestry according to “Keputusan Menteri Lingkungan Hidup dan Kehutanan Republik Indonesia Nomor: SK.218/Menlhk/Setjen/PSLB.3/3/2016 tentang Izin Pengelolaan Limbah B3 untuk kegiatan pemanfaatan Limbah B3” dated 15 March 2016. PT Indo Star cargo as a transporter of hazardous waste has obtained the licence from the government based on “SK Dirjen Perhubungan Darat Nomor: SK.797/A/309/DJPD/2018/120710258BB” dated 26 February 2018, valid until 5 years. PT Indostar Cargo also has obtained the recommendation of transporting hazardous waste from Ministry of Environment and Forestry according to Recommendation letter No. B-5455/Dep.IV/LH/PDAL/05/2014 dated 6 May 2014 valid until 5 years. PT Prasadha Pamunah Limbah Industri has a licenced of hazardous waste management/processing based on “Keputusan Kepala Badan Pengendalian Dampak Lingkungan Nomor: KEP-67/BAPEDAL/05/1994” dated May 1994, valid for 30 years.</p> <p>The temporary hazardous waste storage PT Rigunas Agri Utama has permit according to “Keputusan Bupati Tebo Nomor 421 Tahun 2014 Tentang Izin Tempat Penyimpanan Sementara Limbah Bahan Berbahaya dan Beracun Perkebunan dan Pabrik Kelapa Sawit Pada PT Rigunas Agri Utama di Desa Tuo Sumay” dated 26 June 2014. Permit is renewal in 2017 according to “Keputusan Bupati Tebo Nomor 328 Tahun 2017 Tentang Perubahan atas Keputusan Bupati Tebo Nomor 421 Tahun 2014 Tentang Izin Tempat Penyimpanan Sementara Limbah Bahan Berbahaya dan Beracun Perkebunan dan Pabrik Kelapa Sawit Pada PT Rigunas Agri Utama di Desa Tuo Sumay” dated 29 May 2017. Permit valid for 5 years and permit to store the hazardous waste for 180 days because of producing</p>	
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		<p>hazardous waste less than 50 kg/day.</p> <p>The latest transportation by Indostar Cargo in 2018 was carried out on 23 July 2018. The hazardous waste delivered consist of:</p> <ul style="list-style-type: none"> <li>- Used oil 3 drum (545 kg), hazardous waste manifest number 0023947</li> <li>- Used filter 1 drum (71 pcs), hazardous waste manifest number 0023948</li> <li>- Used battery 10 pcs (100 kg), hazardous waste manifest number 0023951</li> <li>- Ex chemical container/jerrycan/bottle 5 drum (941 kg), hazardous waste manifest number 0023949</li> <li>- Medical waste 1 sack (6 pile), hazardous waste manifest number 0023950</li> </ul> <p>The manifest of hazardous waste as an evidence of hazardous waste delivery to licenced vendor were available.</p> <p>The disposal and storage of chemical waste is reported each quarter to related government agency. The company has sent a document of "Laporan Pelaksanaan Penyimpanan Limbah B3" period April - June 2018, reported to the office of Environment Agency in Tebo regency and Jambi province on 7 and 8 August 2018.</p> <p><b>Scheme smallholders:</b></p> <p>The KOPERASI has "Mekanisme Pengelolaan Sampah", explains the handling of organic to be composted and inorganic waste to be segregated and collected. Plasma Bungo tebo and each KOPERASI has identified waste product and source of pollutant and present in "Identifikasi Sumber Polusi di Perkebunan Petani" updated 24 January 2018. The source of waste and pollutant at plasma generated from fertilizing activity (ex fertilizer sack and inner bag), harvesting and transportation (palm frond and emission), applying pesticide/herbicide by TUS (ex chemical container). Herbicide applicatoin was carried out by PT Rigunas Agri Utama – Bungo Tebo Estate sprayer team. All herbicide empty containers and other waste were temporarily stored in licensed hazardous waste storage.</p>	
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		<p>Empty fertilizer sacks were triple rinse, then re- uses for loose fruit layer. Plasma Bungo Tebo has also issued the decree letter "Surat Keputusan SOP Pengelolaan Kemasan Ex Pupuk di Kebun No. 027/DOK/SOP/AA/2016" dated 2 December 2016 to manage the ex fertilizer sack and inner bag.</p>	
<p>5.3.3</p>	<p>A documented waste management plan to avoid or reduce pollution and its implementation shall be available.</p> <p>- Minor compliance –</p>	<p><b>Bungo Tebo Estate and Mill:</b></p> <p>Waste and pollution sources have been identified and documented, including used lubricant and filter, old battery, used laboratory chemical, clinical/medical waste, mill effluent, EFB, smoke, dust, fiber and shell, empty agrochemical container, boiler ash, scrap iron, used tires, waste water and domestic household refuse. Record of identification was presented in "Evaluasi Aspek Dampak Lingkungan" EMS-431-003-LT, revision 9, issued on 15 January 2018.</p> <p>Waste management plan is documented in "Evaluasi Aspek – Dampak Lingkungan", updated 15 January 2018. Waste management consists of medical waste, domestic waste, and hazardous waste to reduce pollution into the environment.</p> <p>Hazardous and medical waste is disposed to the register collector, while domestic waste disposed to the landfill, organic and an organic waste is separated in line site, organic waste to the landfill and some of anorganic waste is collected for re-cycle.</p> <p>Company has also establish the procedure to manage the waste generated from all activity, such as:</p> <ul style="list-style-type: none"> <li>- Procedure AA-KL-05-EFP, procedure of non hazardous waste handling covering: mill wate (used rail, used part, ex chemical non hazardous/toxic, EFB, fiber, shell), estatewaste (used polybag, ex fertilizer sack), office waste (used paper, used work equipment), Workshop waste (used hose, used drum, scraped/used parts, used tire), Power generator waste (used hose, used parts, scarped), Logistic waste (ex fertilizer sack, used drum).</li> <li>- Procedure AA-KL-11-EFP, procedure of laboratory waste handling.</li> <li>- Procedure to utilize the fiber and shell (solid waste) as a boiler fuel SOP No. AA-MPM-</li> </ul>	<p>Not Comply</p>

		<p>OP-1400.04-R1 "Pemanfaatan fiber untuk bahan bakar".</p> <ul style="list-style-type: none"> <li>- EFB (Empty Fruit Bunch) utilization as a mulching or organic fertilizer according to SOP Pemupukan AA-APM-OP-1100.09-R1.</li> <li>- Company also utilize the waste water from waste water installation in to the plantation as land application according to SOP AA-PL-04-EFP Rev. 2 dated 15 Jan 2010 and "Keputusan Bupati tebo Nomor 354 Tahun 2015 tentang izin Pemanfaatan Air Limbah pabrik Kelapa Sawit Pada Tanah di Perkebunan Kelapa Sawit PT Rigunas Agri Utama" dated 23 June 2015 valid until 5 years.</li> </ul> <p>The company has sent hazardous waste including medical waste to transporter PT Indostar Cargo as provided in the record "Berita Acara Serah Terima Limbah B3", dated 23 July 2018. Manifest of hazardous waste handover were available.</p> <p>Review of "Neraca Limbah B3" at temporary hazardous waste storage it has been set the column of maximum storage time, based on the "Catatan Serah Terima Limbah B3". Based on Decree of Tebo Regent No.328 Year 2017 regarding permit of temporary hazardous waste storage, maximum storage time limit are 90 days for hazardous waste that produced 50 kg/day or more, 180 days for 1<sup>st</sup> category hazardous waste that produced less that 50 kg/day, and 365 days for 2<sup>nd</sup> category hazardous waste that produced less that 50 kg/day.</p> <p>Hazardous waste from Bungo Tebo POM sent to temporary hazardous waste at Bungo Tebo Estate based on real time basis. Record of hazardous waste delivery recorded in "Catatan Serah Terima Limbah B3". Sample seen: Catatan Serah Terima Limbah B3 dated 20 September 2018 consist of: used oil 260 L, Used filter 20 pcs, ex Paint container 6 pcs, used battery 4 pcs. The hazardous waste incomeing from Bungo Tebo POM was updated in "Lembar Neraca Limbah B3" at temporary hazardous wste storage.</p> <p>The company has sent a document of "Laporan Pelaksanaan Penyimpanan Limbah B3" each quarter to Ministry of Environment at Jakarta, office of Environment in Jambi Province and Tebo Regency. Latest report has submit on 7 and 8 August 2018 fro period April – June 2018. The report has referred to the Government Regulation No.101 Year</p>	
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		<p>2014 regarding Management of Hazardous Waste.</p> <p><b>Scheme smallholders:</b></p> <p>The KOPERASI has "Mekanisme Pengelolaan Sampah", explains the handling of organic to be composted and inorganic waste to be segregated and collected. KOPERASI identified waste product and source of pollutant, such as: applying pesticides, fertilizing, harvesting and transportation, e.g. plastic ex fertilizer bags. Herbicide applicatoin was carried out by PT Rigunas Agri Utama – Bungo Tebo Estate sprayer team. All herbicide empty containers and other waste were temporarily stored in licensed hazardous waste storage. Empty fertilizer sacks were triple rinse, then re-uses for loose fruit layer.</p> <p>KOPERASI has determined "Identifikasi Sumber Polusi di Perkebunan Petani" updated 24 January 2018. In the document present type of pollution and action plan to reduce and mitigate the pollution/waste. For example: optimizing FFB transportation to minimize the air emission, perform appropriate manuring according to recommendation to minimize the water and soil pollution, collect the ex fertilizer sack and inner bag in particular storage to minimize the waste and prevent the soil and water pollution.</p> <p>Plasma Bungo Tebo has also issued the decree letter "Surat Keputusan SOP Pengelolaan Kemasan Ex Pupuk di Kebun No. 027/DOK/SOP/AA/2016" dated 2 December 2016</p> <p>NC Minor – escalated into NC Major:</p> <p>This major non-conformity escalated from Minor NC #1550974-201711-N1</p> <p>Previous corrective action:</p> <p>Make a schedule of waste disposal from housing to landfill and supervise as well as monitoring the housing domestic waste management.</p> <p>Corrective action implementation was found to be not effective. Waste disposal management in worker housing and smallholder not in line with company procedure.</p> <p>Objective Evidence:</p>	
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		<p>Visit to line site/housing in Bungo Tebo Estate, Division I, Sungai Lalo - audit team found:</p> <ul style="list-style-type: none"> <li>- Waste are scattered all over place,</li> <li>- Domestic waste water drainage was clogged and turned into black,</li> <li>- Hazardous waste such as paint can and used oil container stored in housing.</li> </ul> <p>Implementation not in line with company procedure.</p> <p>Bungo Tebo Smallholder has SOP "Surat Keputusan SOP Pengelolaan Kemasan Ex-Pupuk di Kebun No.027/DOK/SOP/AA/2016" dated 2 December 2016 and guidance "Identifikasi Sumber Polusi dan Rencana Pengurangan Polusi di Perkebunan Petani" dated 24 January 2018 - for waste management in smallholder. It is stated the fertilizer waste to be collected by smallholder management. However, the implementation at smallholder level was found not consistent with guidance:</p> <ul style="list-style-type: none"> <li>- Koperasi Tunas Harapan, block No.2370 - throws fertilizer inner bag into the field;</li> <li>- Koperasi Tanjung Jaya Bersama, smallholder from block No.3274, 3276, 3279 stated they burned the fertilizer inner bag.</li> </ul>	
<p><b>Criterion 5.4</b> Efficiency of fossil fuel use and the use of renewable energy is optimized.</p>			
5.4.1	<p>A plan for improving efficiency of the use of fossil fuels and to optimize renewable energy shall be in place and monitored.</p> <ul style="list-style-type: none"> <li>- Minor compliance –</li> </ul>	<p><b>Bungo Tebo POM and Estate:</b></p> <p>Mill Manager monitored all energy used in Bungo Tebo Palm Oil Mill. All energy use recorded under document "Pemakaian Energi 2018". KTU maintained Fossil fuel records and trends. Energy use records include accurate measurements of renewable energy use per tonne of FFB processed. Fossil fuel usage is recorded for operational purpose, including the efficiency analysis. Company already maximise the renewable energy use. All oil palm shell and fibre were consumed internally as boiler fuel.</p> <p>Fossil fuel usage in Bungo Tebo Estate recorded and documented by monthly for all equipment and machineries. It was sight monitoring of fossil fuel usage per km to assess</p>	Comply



		<p>the efficiency of fuel usage of each vehicle/machineries. The renewable energy sources monitored as part of the palm oil mill operation.</p> <p>Plan for improving efficiency of energy available in waste management plan. Monitoring of renewable energy use is available since period 2014 – 2017 and January – August 2018. Evidence record in “Pemakaian Energi PMKS Bungo Tebo Tahun 2010 s/d 2018”).</p> <p>Bungo Tebo POM monitored the diesel usage each month. Since January – December 2017 total disel fuel usage was 103,650 L, budget 69,597 L (due to FFB process was under budget). Actual diesel fuel usage since January – August 2018 was 80,720 L and budget was 97,176 L. Bungo Tebo POM and Estate has a programme to minimize the fossil fuel usage:</p> <ul style="list-style-type: none"> <li>- Shutting down the generator set on holiday at 12.00 – 13.00</li> <li>- Reduce the generator set usage during turbin operation</li> <li>- Reduce the electricity usage by:             <ul style="list-style-type: none"> <li>✓ Change the electricity source from generator set to be PLN electricity. Determined and install the MCB with only 2 Ampere in each house.</li> <li>✓ Change the lamp 250 W as much as 6 pcs in thresher station with lamp XL 65 watt as much as 12 pcs with operating time 14 hour/day</li> <li>✓ Change the lamp 500 W as much as 2 pcs in press station with lamp XL 65 watt as much as 8 pcs with operating time 14 hour/day</li> <li>✓ Change the lamp 1000 W as much as 2 pcs in kernel station with lamp XL 65 watt as much as 8 pcs with operating time 14 hour/day</li> <li>✓ Modify bunch crusher machine from 2 elektromotor 15 KW usage to become 1 elektromotor 15 KW</li> <li>✓ Inactivate 2 unit pump recovery 15 KW which use for deliver the wate water from recovery to IPAL.</li> </ul> </li> </ul>	
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		<p>✓ Inactivate 1 unit motor ripple mill 15 KW</p> <p><b>Scheme Smallholders:</b></p> <p>Bungo Tebo Smallholder has a policy to minimize fossil fuel usage by managing FFB transportation and operating transportation according to necessity and improve the transportation line. Smallholder has recorded realization of minimising fossil fuel usage in "Pedoman Pemanfaatan Efisiensi Sumber Energi" to improve the efficiency of fossil fuel usage.</p> <p>Fossil fuel use as energy source for FFB transportation, fertilizer transportation and field operation. Realization progress as recorded are as follows:</p> <ul style="list-style-type: none"> <li>• Optimizing FFB transportation, not to return to Kavling</li> <li>• Relocating TPH along the collection road to become one way to ease the FFB transportation</li> </ul> <p>Reducing the use of grass cutting machine for weeds control and cooperate with TUS (spraying team) to handle weeds control in farmers kavling</p>	
<p><b>Criterion 5.5</b>          Use of fire for preparing land or replanting is avoided, except in specific situations as identified in the ASEAN guidelines or other regional best practice.</p>			
5.5.1	<p>Records of land clearing with zero burning shall be available, referring to the ASEAN Policy on Zero Burning (2003) or other recognised techniques based on the existing regulations.</p> <p>- Major compliance -</p>	<p>PT Rigunas Agri Utama as subsidiary of PT Inti Indosawit Subur has policy of zero burning dated 1 December 2014 which stated "Melakukan praktek tanpa bakar dalam kegiatan pembangunan perkebunan dan secara aktif mendukung inisiatif mencegah dan mengawasi kebakaran hutan dan asap" that is Performing zero burning practices in developing plantation and actively support initiative to prevent forest fire and haze. There is an SOP for land preparation and replanting AA-APM-OP-1100.20.R6, which mentioned strictly on zero burning policy.</p> <p>Company also conducted the daily fire patrol to prevent the fire and ensure the zero burning, recorded in "Laporan Pemantauan Kebakaran Lahan dan Pabrik". Monthly monitoring for 1<sup>st</sup> semester 2018 can be demonstrated. The report has been sent to "Dinas</p>	Comply

		<p>Perkebunan, Perikanan dan Peternakan Kabupaten Tebo” on 29 August 2018. Based on the report there is no fire/burning during 1<sup>st</sup> semester 2018.</p> <p>Curently PT Rigunas Agri Utama is conducted replanting activity. Replanting performed by contractor based on Agreement letter and SPK. In the agreement letter and SPK also mentioned that zero burning in replanting activity. Replanting activity performed mechanically by heavy equipment, consist of:</p> <ul style="list-style-type: none"> <li>- Felling and chipping by excavator</li> <li>- Terracing by excavator</li> <li>- Making planting hole</li> <li>- Road creating by bulldozer</li> <li>- Ditch and drainage system by excavator</li> <li>- Plow and harrowing by tractor</li> <li>- Fertilizing</li> <li>- Planting cover crop</li> <li>- Planting palm trees.</li> </ul>	
5.5.2	<p>Where fire has been used for eradication of pest during replanting, the records of the analysis of the use of fire and permit from the authorised agency shall be available.</p> <p>- Minor compliance -</p>	<p><b>Bungo Tebo Estate:</b>          No open burning was noted for land preparation nor for eradication of pest during replanting.</p> <p><b>Scheme smallholder:</b>          The oil palm plantation of KOPERASI Tani Mandiri, KOPERASI Tunas Harapan, KOPERASI Sejahtera Tani and KOPERASI Tanjung Jaya Bersama were planted between years 1996 – 1999. Up to this audit of 3<sup>rd</sup> annual surveillance assessment (ASA3), no land clearing for replanting performed since first planting.</p>	Comply
<p><b>Criterion 5.6</b></p> <p>Plans to reduce pollution and emissions, including greenhouse gases, are developed, implemented and monitored.</p>			
5.6.1	<p>Document(s) assessing pollution and emission sources, including gaseous, particles, soot emissions and effluent, shall be available. (see Criterion 4.4)</p>	<p><b>Bungo Tebo POM and Estate:</b>          Company has updated “Evaluasi Aspek Dampak Lingkungan” EMS-431-003-LT, revision 9, issued on 15 January 2018 covering: input, environmental aspect, caused, environmental</p>	Comply

	<p>- Major compliance -</p>	<p>impact potential, and control. All polluting activities has been assessed including emission from boiler and generator, effluent from mill waste water, particulate from boiler stack, noise, etc.</p> <p>There are no any significant changes related to document on assessing pollution and emission sources from last assessment.</p> <p>Based on Significant pollution and GHG emission was identified, for estates comes from using of pesticides, action plan to reducing pesticide was made such as program of integrated pest control where minimize to use chemical/pesticides. Graph of emission and pollutant were provided to monitor trend of them in monthly basis.</p> <ul style="list-style-type: none"> <li>- Using EFB as organic fertilizer.</li> <li>- Planting beneficial plant</li> <li>- Efficiency of fossil fuel.</li> <li>- Using fibre and shell for boiler</li> <li>- Capturing methane gas from POME</li> <li>- Increasing renewable energy usage as electricity from methane capture facility</li> </ul> <p>Identification of significant pollution and GHG emission in each unit/station as documented in "Environmental Aspect &amp; Impact List", updated on 15<sup>th</sup> February 2018, consist of: input, environmental aspect, caused, environmental impact potential, and control.</p> <p>Company has develop mitigation program to reduce GHG emission.</p> <p><b>Scheme Smallholders:</b></p> <p>Evaluation of environmental aspect in KOPERASI contains: aspect, impact, evaluation criteria, significance, operational control. The document covers all activites in plantation and pollution potency, e.g.: fertilizer leaching, fertilizer waste, pesticide and containers, emission form transportation, waste lubricant from tranportation, etc.</p> <p>Smallholders has update the identification of pollutant and recorded in "Identifikasi Sumber</p>	
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		<p>Polusi di Perkebunan Petani dan Rencana Pengurangan Polusi” dated 24 January 2018. In addition to EIA document, assessment of polluting activities in smallholder has been reported. Smallholder has “Evaluasi Aspek Dampak Lingkungan” latest update on 22 January 2018 sample seen: “Evaluasi Aspek Dampak Lingkungan KOPERASI Tani Mandiri, KOPERASI Tunas Harapan, KOPERASI Tanjung Jaya Bersama, KOPERASI Sejahtera Tani.</p>	
<p>5.6.2</p>	<p>Significant pollutants and greenhouse gas (GHG) emissions shall be identified, and plan to reduce or minimize them implemented.</p> <p>- Major compliance -</p>	<p><b>Bungo Tebo POM and Estate:</b></p> <p>PT Rigunas Agri Utama – Bungo Tebo POM has a Standard Operating Procedure “Manajemen dan Metode Menghitung Emisi Gas Rumah Kaca (GHG) AA-MPM-OP-1400.19.R1”, dated 3 January 2014. The procedure explains the management and method to calculate green house gas emission.</p> <p>The management plan through avoiding planting on high carbon stock area, increase the carbon sequestration, reducing use of fossil fuel, implementing zero-burning policy in all company operation, using technology to minimize GHG emission (e.g. methane capture). Currently company has implemented:</p> <ul style="list-style-type: none"> <li>- Avoidance planting on high carbon stock area: planting oil palm on mineral soil (land suitability report); Bungo Tebo Estate conserve all riparian area at Lalo river, Pinang river, Belangkai Purun, Rotan river, Benanai, Belangkai, Belangkai Purun, Benanai pul river.</li> <li>- Increase the carbon sequestration: based on PalmGHG monitoring 2017, the own crop sequestration indicating -23,657.1 tCO<sub>2</sub>e or -0.6 tCO<sub>2</sub>e/ton FFB;</li> <li>- Reducing use of fossil fuel; Bungo Tebo POM has use 100% fibre and most of shell as a boiler fuel; Replace the generator set usage for electricity by PLN to reduce the diesel fuel, currently company has proposed to PLN and has follow up by PLN and planed in the end of the year the electricity will installed to the Sei Lalo &amp; Pulai housing (192 house).</li> <li>- Implementing zero burning policy: replanting with mechanical method, no burning evident during field visit;</li> </ul>	<p>Comply</p>

		<ul style="list-style-type: none"> <li>- Introduce technology to minimize GHG emission: plan to install methane capture/biogas plant.</li> <li>- Monitoring of GHG emission planned for annual basis, which will act as basis for decision- making.</li> </ul> <p>Bungo Tebo Mill wastewater was processed through a series of wastewater treatment ponds: one cooling pond, one acid pond, two anaerobic ponds, one aeration pond, one sediment pond, and three buffer ponds. Process parameter monitoring and maintenance of the ponds were sighted. Quality of wastewater effluent is monitored quarterly in line with the requirements.</p> <p>The results of wastewater effluent monitoring were reviewed including measurement of BOD; the result of discharge effluent conforms to the limits for parameters.</p> <p><b>Scheme smallholders:</b></p> <p>Scheme smallholders have developed the programme on how to reduce emission. The programs such as reduce diesel consumption, reduce electricity consumption; reduce chemical fertilizer, pesticide training, etc. it was sighted records of each programme as evidence of implementation. Cooperative and smallholder farmer has conducted GHG assessment in October 2017, as reported in "Rencana Pengurangan Pencemaran dan Emisi" consist of:</p> <ul style="list-style-type: none"> <li>- Harvesting activity, mitigation of emission from FFB transporter exhaust that impact in form of environment pollution and respiratory problem. The mitigation plan in form of optimizing FFB transport route and regulating the harvesting market on the field, to improve efficiency;</li> <li>- Fertilizer activity: emission from fertilizer application that impact in form of water pollution. The mitigation plan in form of fertilizer planning and correct (dosage, timing, type, method) fertilizer application;</li> </ul> <p>Smallholder plot upkeep: sourced from manual weeding (using grass cutting machine) and use of herbicide application, the impact identified was smoke from grass cutting machine, gasoline spillage, water and pollution, as well as herbicide pollution to soil and water. The</p>	
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		<p>planing was to provide training for operators, correct (type, dosage, targeted weed) application of herbicide and calibration of knapsack.</p>	
<p>5.6.3</p>	<p>A monitoring plan and results of regular reporting on emission and pollutants from estate and mill operations using appropriate methods, shall be available.</p> <p>- Minor compliance –</p>	<p><b>Bungo Tebo POM and Estate:</b></p> <p>The company has conducted monitoring of emission, and then calculate it using RSPO PalmGHG Calculator Version 3.0.1. The monitoring and calculation covers estate, smallholder and mill operation. Emission reduction has achieved.</p> <p>The company has prepared a strategy to reduce and mitigate pollution and emission. Monitoring of pollution and emission quality for plantation has planned and implemented, e.g. air quality ambient for boiler and generator, water quality test for river (upstream and downstream), effluent water quality, noise, etc. Monitoring of any pollutant has done in daily, weekly and monthly basis, report of monitoring recorded in the "RKL/RPL" report, and this report submitted to the related institution every 6 month.</p> <p>It was available result of monitoring and calculation of pollutant and emission using Palm GHG Calculator Version 3.0.1. Emissions per product from estate and mill activities for year 2017 are 0.88 tCO<sub>2</sub>e/ton CPO and 0.85 tCO<sub>2</sub>e/ton PKO. The summary of the Nett GHG emitted in 2017 for PT Rigunas Agri Utama – Bungo Tebo POM and supply base are available in Appendix C of this report.</p> <p><b>Scheme smallholders:</b></p> <p>There has been evidence that KOPERASI Tani Mandiri, KOPERASI Tunas Harapan, KOPERASI Tanjung Jaya Bersama, KOPERASI Sejahtera Tani has conducted monitoring on GHG mitigation, as documented in "Dokumen Identifikasi Sumber Polusi di Perkebunan Petani (Pencemaran dan Polusi)".</p>	<p>Comply</p>

<b>Principle 6: Responsible consideration of employees and of individuals and communities affected by growers and mills</b>			
<b>Criterion 6.1</b>			
Aspects of plantation and mill management that have social impacts, including replanting, are identified in a participatory way, and plans to mitigate the negative impacts and promote the positive ones are made, implemented and monitored, to demonstrate continual improvement.			
6.1.1	<p>A social impact assessment (SIA) including records of meetings shall be documented.</p> <p>- Major compliance -</p>	<p><b>Mill, Estate and Scheme smallholder</b></p> <p>PT Rigunas Agri Utama has had the document of Social Impact Assessment as in place in form of "ANDAL (Analisa Dampalk Lingkungan) &amp; RKL-RPL (Rencana Pengelolaan Lingkungan – Rencana Pemantauan Lingkungan Perkebunan Kelapa Sawit Pola PIR-TRANS dan Pabrik Pengolahan Minyak Sawit PT Rigunas Agri Utama" year 2003. The documents have been approved based on "Persetujuan Komisi AMDAL Propinsi Jambi No.273 Tahun 2003" dated 11<sup>th</sup> July 2003. This documents covers the plantation area of 10,367.55 Ha (2,193.85 planted for nucleus estate and 8,173.70 Ha planted for scheme smallholders), with palm oil mill capacity 60 tons FFB/hour, the area of study covers Tuo Sumai village, Sungai Rambai village, Pinang Belai village (SP1), Sekuntum Jayo village (SP2), Bukit Pemuatan village (SP5) and Napal Putih village (SP6) – Sumai sub-district, Tebo Regency, Jambi Province, dated back 2003. Records of consultation incorporated in the document.</p> <p>The company also has had revising EIA document "Adendum ANDAL and RKL-RPL year 2017. The additional scope of Developmet including developmet activities of Kernel Chrusing Plant (KCP) capacity 200 ton/day, development of Biogas Power Plant (Pembangkit Listrik Tenaga Biogas – PLTBG) generating 3MW and Replanting Program 2,506 Ha location in Sumay District and Serai Serumpun District, Tebo Regency, Jambi Province. The permit of KCP has been approved.</p> <p>Company was in cooperation with researcher team, "Tim Peneliti Fakultas Pertanian Universitas Jambi" in 2011 to conduct social impact assessment. The result of assessment was reported under "Laporan Hasil Penelitian Identifikasi dan Evaluasi Aspek Sosial dan Ekonomi Masyarakat sekitar Perkebunan PT RAU, Kabupaten Tebo". The researcher consist of: Prof. Dr. Ir. Zulkifli Alamsyah, MSc; Ir. Gindo Tampubolon, MS; Zakky Fathoni, S.P MSC; Fuad Muchlis, SP.M.Si; Idris Sardi, SP.M.Si.</p>	Comply



		<p>The research object covers company's employee and surrounding village community, whose affected by social impact – from company operation activity. Identification criterion: social structure, provision of social facility, local community empowerment, organization reinforcement, environment management system, health and safety management system, health status, welfare status – of community. Variable being used: community characteristic, community and organization structure, social resources, individual and family changes, welfare indicator, economic facility, and community participation.</p> <p>PT Rigunas Agri Utama able to demonstrate a series of meeting with stakeholders. Community involvement during the assessment, in form of observation, interview and focus group discussion. Sample being used 471 households out of 7,815 households in three districts: Serai Serumpun, Sumay and Tebo Tengah district and thirteen (13) villages surrounding PT. Rigunas Agri Utama. Data analysis was using H-Assessment Diagram.</p>	
6.1.2	<p>There shall be evidence that the assessment has been conducted with the participation of affected parties.</p> <p>- Major compliance -</p>	<p><b>Mill and Estate and Scheme Smallholders:</b></p> <p>PT Rigunas Agri Utama able to demonstrate a series of meeting with stakeholders. Community involvement during the assessment, in form of observatoin, interview and fcus group discussion. Sample being used 471 households out of 7,815 households in three districts: Serai Serumpun, Sumay and Tebo Tengah district and thirteen (13) villages surrounding PT. Rigunas Agri Utama. Data analysis was using H-Assessment Diagram.</p> <p>Result of assessment:</p> <p>Based on document verification and interview result with surrouding community, it was known that social impact identiication conducted by PT. Rigunas Agri Utama has taking into participation all interested parties, including local communities. In preparation of "Identifikasi dan Evaluasi Aspek Sosial dan Ekonomi Masyarakat 2011" community was involved during observation, interview and focus group discussion. Sample being used 471 households out of 7,815 households in three districts: Serai Serumpun, Sumay and Tebo Tengah district and thirteen (13) villages surrounding PT. Rigunas Agri Utama.</p> <p>During the preparation of AMDAL (2001) and Adendum ANDAL (2017), company has all</p>	Comply

		interested parties to be involve, through filling in questionnaire, focus group discussion and interview. Presentation of AMDAL draft was attended by all interested parties, village authorities, district authorities, local communities, etc. The result of AMDAL draft presentation was incorporated as input for revision.	
6.1.3	Plans for management and monitoring of social impacts to avoid or reduce negative impacts and promote positive ones, based on social impact assessment, through consultation with the affected parties, shall be available, documented and timetabled, including responsibilities for implementation.  - Major compliance -	<p><b>Mill and Estate and Scheme Smallholders:</b></p> <p>PT Rigunas Agri Utama has shown the document of plans for management and monitoring of social impacts to avoid or reduce negative impacts and promote positive ones, based on social impact assessment, through consultation with the affected parties under "Rencana Kelola Sosial year 2018".</p> <p>Based on document interview with stakeholders during surveillance visit e.g. BPD Kandang Village adn Head of Punt Kalo Village have noted shows social management of PT. Rigunas has involving surrounding communities.</p> <p>PT Rigunas Agri Utama has been communicating with surrounding villages before starting Corporate Social Responsibility activity.</p>	Comply
6.1.4	The documented plan for management and monitoring of social impacts, shall be reviewed at least on two-yearly basis. If necessary, the plan should be updated. There shall be evidence that the review process includes participation of all affected parties.  - Minor compliance –	<p><b>Mill and Estate and Scheme Smallholders:</b></p> <p>PT Rigunas Agri Utama has documented and reviewed the plan for management and monitoring of social impacts under "Evaluasi Rencana Kelola Sosial Tahun 2017". The document plan for management and monitoring of social impact has been reviewed minimum 2 yearly and continuously update when necessary, and the last review has conducted on 29<sup>th</sup> September 2017.</p> <p>Based on document verification upon "Laporan Pelaksanaan Izin Lingkungan Semester II Tahun 2017 dan Semester I tahun 2018" company has presents a discussion on social impact management.</p>	Comply
6.1.5	Particular attention shall be paid to the impacts of smallholder schemes (where the plantation includes such a scheme).  - Minor compliance –	<p><b>Mill and Estate and Scheme Smallholders:</b></p> <p>As explained in indicator 6.1.1, the scope social impact assessment covers the impact of scheme smallholder development – as an integral part of PT. Rigunas Agri Utama.</p>	Comply

<b>Criterion 6.2</b>			
There are open and transparent methods for communication and consultation between growers and/or millers, local communities and other affected or interested parties.			
6.2.1	Communication and consultation procedures shall be documented. - Major compliance -	<p><b>Mill and Estate:</b></p> <p>Company has developed a communication procedure Under Mekanisme Penanganan Permintaan Informasi Stakeholder "(No. SOP; AA-GL-5008.1-R1) dated 22<sup>nd</sup> August 2011, which explains the company responses against all information request sent by stakeholders including response time of 14 working days after information request accepted. Mekanisme komunikasi, konsultasi masyarakat lokal (SOP No. AA-GL-5009.1.RO). Mekanisme Konflik lahan (SOP AA-GL- 5003.R.2). SOP related to communication and consultation is described in the SOP AA-GL-5009.1-R0 - Mechanism local communication/public consultation for interested parties.</p> <p><b>Scheme smallholders</b> (KOPERASI Tani Mandiri (21), KOPERASI Tunas Harapan (19), KOPERASI Sejahtera Tani (12) dan KOPERASI Tanjung Jaya Bersama (9))</p> <p>Communication mechanism has been established and documented inside "Mekanisme Komunikasi, Konsultasi dan Keluhan". Stakeholder and/or smallholder farmer can write down in guest list and recorded in record book. Answer can be given by cooperative chairman or upon discussion for concensus. The decision was informed both verbal and in written to stakeholder and/or smallholder farmer. Administration officer from cooperative records down any decision being informed to stakeholder and/or smallholder member.</p>	Comply
6.2.2	The company shall have official(s) who is responsible for consultation and communications with parties. - Minor compliance -	<p><b>Mill and Estate:</b></p> <p>The company has appointed officers responsible to carried out communication and consultation with local communities is Public Relations/Humas Department as regulated in Pgae 3 in Standar Operisional Procedure No AA-GL-5009.1-R0 on - Mechanism local communication/public consultation for interested parties.</p> <p><b>Scheme smallholders</b> (KOPERASI Tani Mandiri (21), KOPERASI Tunas Harapan (19),</p>	Comply

		<p>KOPERASI Sejahtera Tani (12) dan KOPERASI Tanjung Jaya Bersama (9))</p> <p>The cooperative has appointed officer (secretary KOPERASI) to responsible for consultation and communicatoin with outside parties. The appointment based on "Surat Keputusan Pengurus KOPERASI tentang Penjukan/Pengangkatan Petugas yang Bertanggung Jawab untuk Melakukn Konsultasi dan Komunikasi dengan Pihak Luar", e.g:</p> <ul style="list-style-type: none"> <li>- KOPERASI Tunas Harapan – SK Pengurus KOPERASI Tunas Harapan nomor 15/KUD-TH/TH/I/2017, namely Mr Fauzi, dated 1 January 2017</li> <li>- KOPERASI Sejahtera Tani - SK Pengurus KOPERASI Sejahtera Tani nomor 21/KUD-STST/II/2017, namely Mr Muzir, dated 1<sup>st</sup> February 2018</li> <li>- KOPERASI Tanjung Jaya Bersama - SK Pengurus KOPERASI Tanjung Jaya Bersa,a nomor 23/KUD-TJB/TJB/II/2017, namely Mr Paisal dated 1<sup>st</sup> Fabruary 2018</li> </ul>	
6.2.3	<p>The company shall have a list of stakeholders, records of communications, including confirmation of receipt and that efforts are made to ensure understanding by affected parties, and records of actions taken in response to input from stakeholders.</p> <p>- Minor compliance -</p>	<p><b>Mill and Estate:</b></p> <p>List of Stakeholders, updated in January 2018, e.g:</p> <ul style="list-style-type: none"> <li>- Government: Bupati Tebo; DPRD Tebo; Dinas Perkebunan, Peternakan dan Perikanan; Dinas Koperasi, Perdagangan, Perindustrian dan Tenaga Kerja, Dinas Lingkungan Hidup, BPJS Kesehatan Cabang Tebo, BPJS Kenetagakerjaan, Badan Pertanahan Nasional Tebo</li> <li>- Masyarakat: Camat Serai Serumpun, Camat Sumay, Kapolsek Serai Serumpun, Kapolsek Sumay, Danramil Tebo Tengah, Danramil Tebo Ulu, Babinsa Desa tuo Sumay, Puskesmas Sumay, Puskesmas seari Serumpun, Lembaga Adat Tuo Sumay, Kades SP1-SP7, Kades Dusun tuo, Kades Teriti, Kades Kandang, SPSI PT RAU</li> <li>- KOPERASIs: KOPERASI Sawit Sumay Makmur, KOPERASI Sawit Makmur, KOPERASI Sawit Makmur Bersama, etc (there are 19 KOPERASIs)</li> <li>- NGO: Sawit Watch, Serikat Petani Kelapa Sawit, WWF for Nature, World Agroforestry Centre (ICRAF), Environmental Services Program</li> </ul> <p>PT Rigunas Agri Utama has prepared a register of information request and responses to those information request under record called "Logbook Permintaan Informasi dan Respon Terhadap Permintaan Informasi PT. Rigunas Agri Utama Tahun 2018".</p>	Comply

		<p>In 2018, the register was recorded 37 informations required and its response (todate August 2018), such as:</p> <ul style="list-style-type: none"> <li>- Information inquiry – “Badan Koordinasi dari Penanaman Modal nomor 212/B.1/A.9/2018, dated 31th August 2018. The information request from the Badan Koordinasi Penanaman Modal Jakarta consist of report of program and realization of inversment. PT RAU has reponded by preparing and send through document “Berita Acara Hasil Pengawasan Penanaman Modal nomor 40/BAP/A.I/VIII/2018</li> <li>- Data inquiry – from Environment Agency in Tebo Regency related to Report of Environmental Management Plan in January-June 2018”. PT RAU has reported the doument on 9<sup>th</sup> September 2018.</li> <li>- Information required – from Agricultural Agency in Tebo Regency (letter number:n 525.04/Disbun-Pengemb/012) related to “Laporan Perkembangan Usaha Perkebunan” for 1<sup>st</sup> Semester 2018. PT RAU has responded by Group Manager on 1<sup>st</sup> September 2018.</li> <li>- Tanda Terima Elektronik (Sistem Pelaporan Elektronik Lingkungan – SIMPEL) of “RKL-RPL Semester 1 tahun 2018”, to Ministry of Environment and Forestry of Republic of Indonesia, ID TTE: 1535469563, dated 28<sup>th</sup> August 2018.</li> </ul> <p><b>Scheme smallholders</b> (KOPERASI Tani Mandiri (21), KOPERASI Tunas Harapan (19), KOPERASI Sejahtera Tani (12) dan KOPERASI Tanjung Jaya Bersama (9))</p> <p>Cooperative has prepared mechanisme on communication with interested parties under Standard Operatioal Procedure PT Rigunas Agri Utama Kebun Plasma Bunga Tebo No.007/DOK/SOP/AA/2016 tentang Komunikasi Internal Group Sertifikasi, dated 2<sup>nd</sup> December 2018.</p> <p>Data seen:</p> <p>List of stakeholders in KOPERASI Tani Mandiri “Daftar Nama Stakeholders KOPERASI Tahun 2018, consist of:</p> <ul style="list-style-type: none"> <li>- Stakeholders Local (40 stakeholders), e.g: SDN 217/VIII Bukit Hrapan, SDN Tanjung Dani, Kades SP 1- SP7, Kades Jatiberarik, Kades Dusun Tuo, Kades Teriti, Kades</li> </ul>	
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		<p>Kandang, Lembaga Adat Tuo Sumay</p> <ul style="list-style-type: none"> <li>- Stakeholders in Sub-District Level (7 stakeholders), e.g: Camat Serai Serumpun, Camat Sumay, Kapolsek Sumay, Kapolsek Serai Serumpun, Danramil Tebo Ulu, Puskesmas Sumay and Babinsa Sumay</li> <li>- Stakeholders in District Level ( stakeholders), e.g: Bupati Tebo, DPRD Tebo, Dinas Perkebunan, Dinas Sosial Tenaga Kerja dan Transmigrasi, KLH</li> <li>- Local NGO: LSM Merah Putih,</li> </ul> <p>Cooperative has documented all information request and response in "Log Book Keluhan 2018", e.g:</p> <p>KOPERASI Tani Mandiri, in 2018 there are 10 informations request, e.g:</p> <ul style="list-style-type: none"> <li>- Dated 7<sup>th</sup> July 2018 -&gt; the information required from smallholder member (Mr Manulang): the information request related to the update of FFB price. The cooperative has repsonded on 9<sup>th</sup> July 2018 that "FFB price was given by Dinas Perkebunan"</li> <li>- Dated 14<sup>th</sup> August 2018 -&gt; the information required from farmer smallholders member (Mr Herman): the information request of criterion of grading of FFB in POM. Thec cooperative has responded on 15<sup>th</sup> August 2018.</li> </ul> <p>KOPERASI Sejahtera Tani, year 2018 there are 5 informations request, e.g:</p> <ul style="list-style-type: none"> <li>- Dated 20<sup>th</sup> February 2018 -&gt; the information required from smallholder member (Mr Aan): the information request related to grading process in POM. The cooperative has repsonded on 22th June 2018.</li> <li>- Dated 28<sup>th</sup> June 2018 -&gt; the information required from smallholder member (Mr Wahid): the information request related to additional amount of member in Hampanan 51. The cooperative has repsonded on 29<sup>th</sup> June 2018 that the required will discussed with PT Rigunas Agri Utama.</li> </ul>	
<b>Criterion 6.3</b>			

There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties.			
6.3.1	<p>The mechanism, open to all affected parties, shall resolve disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants and whistleblowers, where requested, as long as that information is supported with adequate initial evidence.</p> <p>- Major compliance -</p>	<p><b>BUNGO TEBO ESTATE AND MILL</b></p> <p>The Certificate Holder has had a mechanism to handle complaint from external party, in form of "Prosedur Penanganan Keluhan, Dokumen No. SOP AA-GL-5005-R0 01". Complaint from internal stakeholder was regulated as per "Mekanisme Penyampaian Keluhan dan Penyelesaian Keluhan Karyawan, Dokumen No.SOP.AA-HR-308 0.5-R0".</p> <p>Also, a procedure to uphold policy on secrecy of whistle blower under "Mekanisme Jaminan Pelapor dan Pengungkapan Kasus" dated 12 June 2015 is available. The mechanism mentioned policy to maintain anonymity of complainant or whistleblower (if requested).</p> <p><b>SMALLHOLDERS: BUNGO TEBO PLASMA</b></p> <p>Cooperative has prepared mekanisme on ommunication with interested parties under "Mekanisme Komunikasi, Konsultasi dan Keluhan" dated 2 December 2016, available in "Buku Panduan dan Catatan Petani" page 19.</p>	Comply
6.3.2	<p>There shall be records of process and outcome of dispute resolution.</p> <p>- Major compliance -</p>	<p><b>BUNGO TEBO ESTATE AND MILL</b></p> <p>PT. Rigunas Agri Utama has appointed public relation officer to reform the complaint and respond administrative system. Public relation officer is responsible to record any complaint, provide respond for complaint and record the resolution process; should any complaint come from external stakeholder. Each Assistant is responsible to record and follow up complaint from internal stakeholder. PT Rigunas Agri Utama is able to demonstrate complaint/dispute register under "Logbook Keluhan Stakeholder" and internal complaint/dispute register "Logbook Keluhan Internal".</p> <p>Based on "Logbook Keluhan Stakeholder" period January – August 2018, no complaint or disputes are present.</p>	Comply

		<p><b>SMALLHOLDERS: BUNGO TEBO PLASMA</b></p> <p>According to stakeholder consultation with representative of sample Cooperative; Koperasi Tani Mandiri, Koperasi Sejahtera Tani, Koperasi Tanjung Jaya Bersama and Koperasi Tunas Harapan, there is no complaint or disputes during 2018.</p>	
<p><b>Criterion 6.4</b></p> <p>Any negotiations concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.</p>			
6.4.1	<p>A procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, shall be available, referring to decision of the Constitution Court.</p> <p>- Major compliance –</p>	<p><b>BUNGO TEBO ESTATE AND MILL</b></p> <p>The Certificate Holder has had a procedure to resolve land conflict in form of Standard Operating Procedure (SOP) No.AA-GL-5003.1-R2 revision 2 dated 8 May 2015 regarding Land Conflict Handling. The SOP described flow process and mechanism to handle land conflict. The SOP has taking into consideration the FPIC guide for RSPO Member 2015, whereby in the SOP has regulate information land conveyance, negotiation, participatory land measurement and other activities including engagement with relevant parties and other parties neighboring the plantation and/or conflict land. Including, identifying whether or not customary, legal or other rights and its compensation calculation.</p> <p><b>SMALLHOLDERS: BUNGO TEBO PLASMA</b></p> <p>For smallholders, legal ownership is in the form of Land Certificate Ownership Right (Sertifikat Hak Milik). The smallholder legal ownership obtained in various year period, 2002, 2004, 2014 based on PIR-TRANS program since 1999 upto 2001. There is no issue related land dispute between smallholders.</p>	Comply
6.4.2	<p>A procedure for calculating and distributing fair compensation shall be established, implemented, monitored and evaluated in a participatory way. Corrective actions are taken as a result of this evaluation.</p>	<p><b>BUNGO TEBO ESTATE AND MILL</b></p> <p>The Certificate Holder has had a procedure to resolve land conflict in form of Standard Operating Procedure (SOP) No.AA-GL-5003.1-R2 revision 2 dated 8 May 2015 regarding Land Conflict Handling. The SOP described flow process and mechanism to handle land conflict. The SOP has taking into consideration the FPIC guide for RSPO Member 2015,</p>	Comply



	<p>- Minor compliance –</p>	<p>whereby in the SOP has regulate information land conveyance, negotiation, participatory land measurement and other activities including engagement with relevant parties and other parties neighboring the plantation and/or conflict land. Including, identifying whether or not customary, legal or other rights and its compensation calculation.</p> <p><b>SMALLHOLDERS: BUNGO TEBO PLASMA</b></p> <p>For smallholders, legal ownership is in the form of Land Certificate Ownership Right (Sertifikat Hak Milik). The smallholder legal ownership obtained in various year period, 2002, 2004, 2014 based on PIR-TRANS program since 1999 upto 2001. There is no issue related land dispute between smallholders.</p>	
<p>6.4.3</p>	<p>Compensation claims, process and outcome of any negotiated agreements shall be documented, with evidence of the participation of affected parties.</p> <p>- Major compliance –</p>	<p><b>BUNGO TEBO ESTATE AND MILL</b></p> <p>Managed area within land use right and certification scope of PT Rigunas Agri Utama is developed from government program PIR-TRANS as per "Surat Keputusan Menteri Transmigrasi dan Pemukiman Perambah Hutan No.KEP/165/MEN/1994 tentang Izin Pelaksanaan Transmigrasi (sementara) Pola PIR Trans dengan Komoditas Kelapa Sawit kepada PT. Rigunas Agri Utama II di Lokasi Peranap, Kecamatan Tebo Ulu dan Tebo Tengah, Kabupaten Bungo Tebo" dated 13 Desember 1994. The land for oil palm plantation project it self has been released from forest area status as per "Surat Keputusan Menteri Kehutanan No.771/KptsII/1993 tentang Pelepasan Sebagian Kelompok Hutan Sungai Langisip, Sungai Kilis, Sungai Batanghari terletak di Kabupaten Bungo Tebo, Provinsi Jambi seluas 22.710 Ha" dated 18 November 1993. Land historical is clearly describe in "Risalah Panitia-B" for Land Use Right/HGU 1997 and HGU 2016.</p> <p>There is no land compensation during 2017 and 2018.</p> <p><b>SMALLHOLDERS: BUNGO TEBO PLASMA</b></p> <p>For smallholders, legal ownership is in the form of Land Certificate Ownership Right (Sertifikat Hak Milik). The smallholder legal ownership obtained in various year period,</p>	<p>Comply</p>

		2002, 2004, 2014 based on PIR-TRANS program since 1999 upto 2001. There is no issue related land dispute between smallholders.	
<b>Criterion 6.5</b>			
Pay and conditions for employees and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages.			
6.5.1	Documentation of pay and conditions for employees based on the existing manpower regulations shall be available.  - Major compliance -	<p><b>Mill, Estate and Scheme smallholders</b> (KOPERASI Tani Mandiri (21), KOPERASI Tunas Harapan (19), KOPERASI Sejahtera Tani (12) dan KOPERASI Tanjung Jaya Bersama (9))</p> <p>Company/Cooperative have established the minimum wage for worker based on governor decree, which updated on yearly base. The 2018 wage was based on "Surat Keputusan Gubernur Jambi No.224/KEP.GUB/DISNAKERT/2017 tentang Penetapan Upah Minimum Provinsi Jambi Tahun 2018". The minimum wage, as per the decree was Rp. 2,243,718.59 per month for 7 hours per day and 40 hours per week. With piece rate of Rp. 89.748 per working day for daily workers.</p> <p>Based on review of payments slip in August 2018, there is no worker paid below minimum wages, e.g:</p> <ul style="list-style-type: none"> <li>- Mrs LM (PHL) -&gt; total working day in August 2018 is 11, salary: IDR 987,723, premi: IDR 42,042, potongan (BPJS IDR 44,847), total THP IDR 984,407 or IDR 93,571 per day (above of minimum piece rate IDR 89,748)</li> <li>- Mrs MBB (PHL) -&gt; total working day in August 2018 is 19, salary: IDR 1,705,231, premi: IDR 169,457, potongan (BPJS IDR 44,847), total THP IDR 1,829,814 or IDR 98,667 per day (above of minimum piece rate IDR 89,748)</li> <li>- Ms JMH (PHL) -&gt; total working day in June 2018 is 7, salary: IDR 628,242, premi: IDR 446,498, total THP IDR 1,094,738 or IDR 156,391 per day (above of minimum piece rate IDR 89,748)</li> </ul> <p><b>Bungo Tebo Smallholders:</b></p> <p>Workers in KOPERASI was paid as per work contract. Document of salary payment</p>	Not Comply

		<p>available under "Bukti Penerimaan Gaji Pengurus dan Karyawan KOPERASI", e.g:</p> <ul style="list-style-type: none"> <li>- Namely Fauzi (sekertaris KOPERASI Tunas Harapan) - payment slip in June-August 2018 (Basic Rp 2,100,00 + tunjangan Rp 150,000) _&gt; SPK basic Rp 2,243,718</li> <li>- Mukhlisin (Sekertaris KOPERASI Tani Mandiri) - payment slip in June-July 2018 (Basic Rp 2,100,00 + tunjangan Rp 150,000) _&gt; SPK basic Rp 2,500,000</li> <li>- Sabaran Ali (sekertaris KOPERASI Sejahtera Tani) - payment slip in June-August 2018 (Basic Rp 2,100,000 + tunjangan Rp 150,000) _&gt; SPK basic Rp 2,243,718 dan SK nomor 07/SK/KUD-ST/IV/2017 atas nama Muzir. (atasnama muzir di slip sebagai bendahara)</li> <li>- For piece rate workers, the wage based on agreed piece rate by both parties. Harvesting rate Rp. 150 – 200/kg FFB, depends on harvesting plot condition.</li> </ul> <p>NC Major:</p> <p>Statement: Management of human resources related to the appointment of Daily Employees Released to Permanent Employees not in accordance with applicable labor regulations.</p> <p>Objective evidence:</p> <p>Based on interviews and verification of "Monthly Report TK Permata Agri" show that workers (a kindergarten teacher) under the management of Permata Agri Foundation has worked 21 (twenty one) days or more during the three (3) consecutive months. However, its status is still PHL, an example of which is verified:</p> <ul style="list-style-type: none"> <li>- Neneng Hasanah, S.Pd (PHL) has worked 21 (twenty one) days or more in the 2018 period, March: 25 days, April: 25 days, May: 25 days, June: 25 days, July: 26 days and August: 25 days (working as PHL since 2016).</li> <li>- Winny Andrinay Br Ginting (PHL) has worked 21 (twenty one) days or more in the 2018 period, March: 25 days, April: 25 days, May: 25 days, June: 25 days, July: 26 days and August : 25 days (worked as PHL since 2016).</li> <li>- Ms. Afriani, S.Pd.I (PHL) has worked 21 (twenty one) days or more in the 2018</li> </ul>	
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		<p>period, March: 25 days, April: 25 days, May: 25 days, June: 25 days, July: 26 days and August: 25 days (working as PHL since 2016).</p>	
<p>6.5.2</p>	<p>Collective Labor Agreement/Company Regulation, in accordance with the manpower regulations, shall be available in understandable language; and explained by the management or Labor Union to the workers.</p> <p>- Major compliance -</p>	<p><b>Mill and Estate:</b></p> <p>Worker Agreement between PT Rigunas Agri Utama and labour union is referred into collective working agreement (PKB 2015 – 2017), between BKS-PPS (collective community of oil palm company) and PP. FSP. PPSPSI (collective workere union organization) in Sumatra island. Collective Work Agreement (PKB) was registered as per "Surat Direktur Persyaratan Kerja, Kesejahteraan dan Analisa Diskriminasi Dirjen Pembinaan Hubungan Industrial dan Jaminan Sosial Tenaga Kerja - Kementerian Tenaga Kerja RI No.KEP.88/PHIJSK-PKKAD/PKB/VI/2015 tentang Pendaftaran PKB antara BKS-PPS dengan PP.FSP.PP-SPSI" dated 18<sup>th</sup> June 2015.</p> <p>During the surveillance audit (September 2018), the Collective Labor Agreement still in progress on re-registered in Manpower Ministry Republic of Indonesia based on letter by BKS-PPS (Badan Kerjasama Perusahaan Perkebunan Sumatera) no 72/BKS-PPS/217 dated 12 July 2017 that stated "PKB year 2017-2019 still on progress of approval, however PKB 2015-2017 still valid).</p> <p>Based on document review, it was noted that term and condition, such as working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc, are covered in PKB and contracts which have been signed by all workers. Collective working agreement made in the 'Bahasa Indonesia' and understood by all workers.</p> <p><b>Scheme smallholders</b> (KOPERASI Tani Mandiri (21), KOPERASI Tunas Harapan (19), KOPERASI Sejahtera Tani (12) dan KOPERASI Tanjung Jaya Bersama (9))</p> <p>Work agreement between cooperative and staff available in "Perjanjian dan Pengangkatan</p>	<p>Comply</p>

		<p>Karyawan Tetap KOPERASI”, s.g:</p> <ul style="list-style-type: none"> <li>- KOPERASI Tunas Harapan – Surat Perjanjian Kerja No 09/SPK/KUD-TJB/IV/2017 tentang Perjanjian dan Pengangkatan Karyawan Tetap KOPERASI Tunas Harapan, namely Mr Fauzi (Sekertaris KOPERASI Tunas Harapan), dated 11<sup>th</sup> June 2017.</li> <li>- KOPERASI Tani Mandiri – Surat Perjanjian Kerja No 09/SPK/KUD-TM/IV/2017 tentang Perjanjian dan Pengangkatan Karyawan Tetap KOPERASI Tani Mandiri, namely Mr Mukhlisin (Sekertaris KOPERASI Tani Mandiri), dated 15<sup>th</sup> April 2017.</li> <li>- KOPERASI Tanjung Jaya Bersama – Surat Perjanjian Kerja No 09/SPK/KUD-TH/IV/2017 tentang Perjanjian dan Pengangkatan Karyawan Tetap KOPERASI Tanjung Jaya Bersama, namely Mr Paisli (Sekertaris KOPERASI Tnjung Jaya Bersama), dated 11<sup>th</sup> April 20172017.</li> <li>- KOPERASI Sejahtera Tani – Surat Perjanjian Kerja No 09/SPK/KUD-ST/IV/2017 tentang Perjanjian dan Pengangkatan Karyawan Tetap KOPERASI Sejahtera Tani, namely Mr Muzir (Sekertaris KOPERASI Sejahtera Tani), dated 11<sup>th</sup> June 2017.</li> </ul> <p>Inside the work contract, covers: employment status and task, salary, employee obligation, sanction, work termination, dispute settlement, and additional regulation. Contract was made available in Bahasa Indonesia and understood by both parties.</p>	
6.5.3	<p>Growers and millers shall provide adequate housing, water supplies, medical, educational and welfare amenities to national standards or above, where such public facilities are unavailable or inaccessible.</p> <p>- Minor compliance –</p>	<p><b>Mill and Estate:</b></p> <p>PT Rigunas Agri Utama has provided facility for employee as in “Inventarisasi Bangunan dan Infrastruktur”, updated in July 2018, such as:</p> <ul style="list-style-type: none"> <li>- Kantor afdeling (4 units)</li> <li>- Guest house (2 units)</li> <li>- Staff housing (5 units)</li> <li>- Poliklinik (1 unit): Permit for company clinic: “Surat Kantor Penanaman Modal Daerah dan Pelayanan Perizinan Terpadu tentang Surat Izin Penyelenggaraan Klinik Rawat Jalan Pelayanan Medik Dasar No.445/01/SIK/KPMD-PPT/2015 untuk PT. Rigunas Agri Utama, penanggungjawab dr.Arde Hidayat”, dated 16 February 2015. “Surat Izin Praktek Dokter No.446/09/DU/KPMD-PPT/2016 untuk dr. Arde Hidayat” dated 4 April</li> </ul>	Comply

		<p>2016-24 February 2021. "Surat Izin Praktek Dokter No.446/07/DU/DPM-PTSP-K.UKM/2017 untuk dr. Yudi Chandra" dated 16 January 2017-23 May 2019.</p> <ul style="list-style-type: none"> <li>- Masjid/Mosque (3 units)</li> <li>- Balai Karyawan (3 units)</li> <li>- Koperasi (1 unit)</li> <li>- D2 type employee housing (38 units);</li> <li>- E4 type employee housing (216 units);</li> <li>- E1 employee housing of 85 units;</li> <li>- Mill worker housing of 84 units;</li> <li>- School buses (4 units)</li> <li>- Sport facilities.</li> </ul> <p>Housing for worker was adequate. Housing compound was completed with electricity and clean water (from bore well). During visit, the condition of housing was relatively good.</p> <p><b>Scheme smallholders</b> (KOPERASI Tani Mandiri (21), KOPERASI Tunas Harapan (19), KOPERASI Sejahtera Tani (12) dan KOPERASI Tanjung Jaya Bersama (9))</p> <p>Workers that worked in scheme smallholder plantation area was lived in their villages. Clean water need has been fulfilled through water well and buying gallon water.</p>	
6.5.4	<p>There shall be demonstrable efforts to improve workers' access to adequate, sufficient and affordable food.</p> <p>- Minor compliance –</p>	<p><b>Mill and Estate:</b></p> <p>Company gave access to outside merchant to sell primary need and/or basic need. Another night fair usually available in Dusun Tanjung Dani between Kebun Bukit Harapan and Sungai Ranau, not far from housing location. Basic needs also available in Pasar Teluk Singawang, Kecamatan Sumay (less than 7 km).</p> <p><b>Scheme smallholders</b> (KOPERASI Tani Mandiri (21), KOPERASI Tunas Harapan (19), KOPERASI Sejahtera Tani (12) dan KOPERASI Tanjung Jaya Bersama (9))</p> <p>Scheme smallholder lives in the villages surrounding the plantation. The basic need can be</p>	Comply

		easily accessed, since these worker lives outside the plantation.	
<b>Criterion 6.6</b>			
The employer respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.			
6.6.1	<p>A record of the company's policy in understandable language recognising freedom of association, shall be available.</p> <p>- Major compliance –</p>	<p><b>Mill and Estate:</b></p> <p>Freedom of association policy documented in "Kebijakan perusahaan, dated 1<sup>st</sup> December 2014" which state that: "respect all employee to form and be part of trade union of their choice and to bargain collectively." Freedom of association policy is written in Bahasa Indonesia, so that all employees can understand.</p> <p>The company policy is available on notice board. Based on interview with workers, during stakeholder consultation, it was noted that worker has a basic understanding of company policy related to code of ethical conduct.</p> <p>List of attendance on refresh the socialization of Company Policy "Kebijakan Perusahaan", e.g:</p> <ul style="list-style-type: none"> <li>- On 23th March 2018 location in Division III was attended by 39 workers</li> <li>- On 17<sup>th</sup> June 2018 location in Nursery, was attended by 6 workers</li> <li>- On 16<sup>th</sup> July 2018 for workers in replanting, attended by 7 workers</li> </ul> <p>Worker union of PT. Rigunas Agri Utama has been established and acknowledged by "Dewan Pimpinan Cabang Konfederasi Serikat Pekerja Seluruh indonesia" as per "Surat Keputusan No.002/SK/PUK/V/2013 tentang Pengesahan Komposisi dan Personalia Pimpinan Unit Kerja (PUK) KSPSI PT. Rigunas Agri Utama, Desa Tou Sumay, Kecamatan Sumay, Kabupaten Tebo masa bakti 2013 – 2018" dated 10<sup>th</sup> May 2013.</p>	Comply

		<p>Worker union of PT Rigunas Agri Utama has also been registered to Manpower Agency in Tebo Regency based on letter no 02/SP-SB/HISK/2013, dated 9<sup>th</sup> September 2013.</p> <p><b>Scheme smallholders</b> (KOPERASI Tani Mandiri (21), KOPERASI Tunas Harapan (19), KOPERASI Sejahtera Tani (12) dan KOPERASI Tanjung Jaya Bersama (9))</p> <p>Cooperative has defined the policy related to freedom of association has been established in "Kebijakan Koperasi" updated on 2<sup>nd</sup> January 2017 in poin 9 mentioned that "Menghormati hak asasi manusia dengan memperlakukan seluruh karyawan KUD maupun petani secara adil, baik dalam hal penerimaan, penialaian, kondisi dan lingkungan kerja serta keterwakilan tanpa memandang suku, kasta, asal negara, agama/kepercayaan, cacat, jender, orientasi seksual, keanggotaan serikat pekerja, afiliasi politik dan/atau umur"</p> <p>The policy has been disseminated to smallholder farmer/member, e.g:</p> <ul style="list-style-type: none"> <li>- In KOPERASI Tani Mandiri has conducted on 8<sup>th</sup> January 2018, was attended by 19 members of smallholder and on 10<sup>th</sup> July 2018 was attended by 20 smallholders member</li> <li>- In KOPERASI Sejahtera Tani has conducted on 17<sup>th</sup> May 2018 was attended by 15 smallholders member and on 12<sup>th</sup> March 2018 was attended by 15 smallholders members.</li> <li>- In KOPERASI Tunas Harapan has conducted on 5<sup>th</sup> February 2018 was attended by 17 smallholders member</li> <li>- In KOPERASI Sejahtera Tani has conducted on 17<sup>th</sup> May 2018 was attended by 15 smallholders member and on 25<sup>th</sup> April 2018 was attended by 16 smallholders member</li> <li>- In KOPERASI Sejahtera Tani has conducted on 17<sup>th</sup> May 2018 was attended by 15 smallholders member</li> <li>- Tanjung Jaya Bersama has conducted by 6<sup>th</sup> July 2018 was attended by 10 smallholder member and on 12<sup>th</sup> March 2018 was attended by 12 smallholder member.</li> </ul>	
6.6.2	Records of meetings with labor unions or workers representatives shall be available.	<p><b>Mill and Estate:</b></p> <p>Records of meeting with labour unions have documented.</p>	Comply



	<p>- Minor compliance –</p>	<p>Evidence seen:</p> <ul style="list-style-type: none"> <li>– Program of meeting between SPSI and Management of PT Rigunas Agri Utama Bungo Tebo Group year 2018</li> <li>– Minutes of meetings with main labour unions or workers representatives been documented, e.g:             <ul style="list-style-type: none"> <li>– Minute of Notulen between PUK-SPSI PT Rigunas Agri Utama and Management on 27<sup>th</sup> July 2018, agenda: celebrate of independent day of Republic of Indonesia – August 2018-</li> <li>– Minute of Notulen between PUK-SPSI PT Rigunas Agri Utama and Management on 2<sup>nd</sup> February 2018, agenda: kegiatan manisan karyawan 2018.</li> </ul> </li> </ul> <p><b>Scheme smallholders</b> (KOPERASI Tani Mandiri (21), KOPERASI Tunas Harapan (19), KOPERASI Sejahtera Tani (12) dan KOPERASI Tanjung Jaya Bersama (9))</p> <p>No worker union. Most of the workers are field worker, which as temporary worker.</p>	
<p><b>Criterion 6.7</b> Children are not employed or exploited.</p>			
<p>6.7.1</p>	<p>There shall be documented evidence that minimum age requirements are met.</p> <p>- Major compliance –</p>	<p><b>Mill and Estate:</b></p> <p>PT Rigunas AGri Utama has own policy signed by management on 1<sup>st</sup> December 2014 that stated that: It is not allowed all children to work in every activities/processes in company.</p> <p>Company also has a procedure AA-HR-305-2-00 – Recruitment and Selection which stated that every candidate must have identity card "(KTP), Kartu Keluarga, Surat Nikah (if married)".</p> <p>The company has own policy signed by management on 1 December 2014 that stated children is not allowed to work in every activities/processes in company. Communication of the policy to Bungo Tebo Estate worker: sampled on 8 May 2018, "Sosialisasi Larangan Mempekerjakan Anak di Bawah Umur" to 12 harvesters.</p> <p>Document seen:</p>	<p>Comply</p>

		<ul style="list-style-type: none"> <li>- Based on document review as listed in "Daftar Karyawan PT Rigunas Agri Utama Kebun dan Pabrik Bungo tebo" updated in September 2018, there are no underage workers. List of workers did not show any worker under 18 years old when they joined the company.</li> <li>- PMKS Bungo Tebo – the youngest worker in Tebo POM namely Mr Antoni Ramadana (date of birth 28<sup>th</sup> November 1988 ~ 20<sup>th</sup>), joint date on 1<sup>st</sup> August 2017 (when 19 years old).</li> <li>- Bungo Tebo Estate – the youngest worker in Bungo Tebo Estate namely Mr Wawan Indra, date of birth 15<sup>th</sup> March 1997, joint date 1<sup>st</sup> July 2015 (18 years old and 3 months)</li> </ul> <p><b>Scheme smallholders</b> (KOPERASI Tani Mandiri (21), KOPERASI Tunas Harapan (19), KOPERASI Sejahtera Tani (12) dan KOPERASI Tanjung Jaya Bersama (9))</p> <p>Cooperative has defined the policy to prohibit underage worker has been established in "Kebijakan Koperasi" updated on 2<sup>nd</sup> January 2017 in poin 10 mentioned that "Melarang anak-anak bekerja dalam setiap kegiatan operasional kebun"</p> <p>The policy has been disseminated to smallholder farmer/member, e.g:</p> <ul style="list-style-type: none"> <li>- In KOPERASI Tani Mandiri has conducted on 8<sup>th</sup> January 2018, was attended by 19 members of smallholder and on 10<sup>th</sup> July 2018 was attended by 20 smallholders member</li> <li>- In KOPERASI Sejahtera Tani has conducted on 17<sup>th</sup> May 2018 was attended by 15 smallholders member and on 12<sup>th</sup> March 2018 was attended by 15 smallholders members.</li> <li>- In KOPERASI Tunas Harapan has conducted on 5<sup>th</sup> February 2018 was attended by 17 smallholders member</li> <li>- In KOPERASI Sejahtera Tani has conducted on 17<sup>th</sup> May 2018 was attended by 15 smallholders member and on 25<sup>th</sup> April 2018 was attended by 16 smallholders member</li> <li>- Tanjung Jaya Bersama has conducted by 6<sup>th</sup> July 2018 was attended by 10 smallholder member and on 12<sup>th</sup> March 2018 was attended by 12 smallholder member.</li> </ul>	
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		<p>Smallholder cooperative/KOPERASI has established policy related to minimum age of worker as in "Kebijakan Koperasi Tani Mandiri" dated 2 January 2017, stated "Melarang anak-anak bekerja dalam setiap kegiatan operasional perkebunan" – to prohibit children to work in all aspect of plantation operation. This policy continuously disseminated to smallholder member: on 8 January 2018 for 20 members and on 10 July 2018 to 20 members.</p> <p>Smallholder cooperative/"Koperasi Tanjung Jaya Bersama" has established policy related to minimum age of worker as in "Kebijakan Koperasi Tani Mandiri" dated 2 January 2017, stated "Melarang anak-anak bekerja dalam setiap kegiatan operasional perkebunan" – to prohibit children to work in all aspect of plantation operation. This policy continuously disseminated to smallholder member: on 12 March 2018 for 12 members.</p> <p>During visit to KOPERASI Tani Mandiri, KOPERASI Tunas Harapan, KOPERASI Sejahtera Tani, KOPERASI Tanjung Jaya Bersama and interview with respective sampled smallholder – all of the sampled smallholder was performing plantation activities themselves. The audit team did not found: worker under 18 year old or children following their parent to oil palm block.</p>	
<p><b>Criterion 6.8</b>  Any form of discrimination based on race, caste, national origin, religion, disability, gender, sexual orientation, union membership, political affiliation, or age, is prohibited.</p>			
<p>6.8.1</p>	<p>A company's policy on equal opportunity and treatment for work shall be available and documented.</p> <p>- Major compliance –</p>	<p><b>Mill and Estate:</b></p> <p>The company has Equal Opportunities policy as documented in Company Policy "Kebijakan Perusahaan", dated 1<sup>st</sup> December 2014 stated: "To treat equal for all employee in term of recruitment, work performance, and representative without discrimination on race, caste, national origin, religion, disability, gender, sexual orientation, union membership, political affiliation, or age".</p>	<p>Comply</p>

		<p>The company policy is available on notice board. Based on interview with workers, during stakeholder consultation, it was noted that worker has a basic understanding of company policy related to code of ethical conduct.</p> <p>List of attendance on refresh the socialization of Company Policy "Kebijakan Perusahaan", e.g:</p> <ul style="list-style-type: none"> <li>- On 23th March 2018 location in Division III was attended by 39 workers</li> <li>- On 17<sup>th</sup> June 2018 location in Nursery, was attended by 6 workers</li> <li>- On 16<sup>th</sup> July 2018 for workers in replanting, attended by 7 workers</li> </ul> <p><b>Scheme smallholders</b> (KOPERASI Tani Mandiri (21), KOPERASI Tunas Harapan (19), KOPERASI Sejahtera Tani (12) dan KOPERASI Tanjung Jaya Bersama (9))</p> <p>Cooperative has defined the policy on equal opportunity and treatment for work has been established in "<i>Kebijakan Koperasi</i>" updated on 2<sup>nd</sup> January 2017 in poin 9 mentioned that "<i>Menghormati hak asasi manusia dengan memperlakukan seluruh karyawan KUD maupun petani secara adil, baik dalam hal penerimaan, penilaian, kondisi dan lingkungan kerja serta keterwakilan tanpa memandang suku, kasta, asal negara, agama/kepercayaan, cacat, jender, orientasi seksual, keanggotaan serikat pekerja, afiliasi politik dan/atau umur</i>"</p> <p>The policy has been disseminated to smallholder farmer/member, e.g:</p> <ul style="list-style-type: none"> <li>- In KOPERASI Tani Mandiri has conducted on 8<sup>th</sup> January 2018, was attended by 19 members of smallholder and on 10<sup>th</sup> July 2018 was attended by 20 smallholders member</li> <li>- In KOPERASI Sejahtera Tani has conducted on 17<sup>th</sup> May 2018 was attended by 15 smallholders member and on 12<sup>th</sup> March 2018 was attended by 15 smallholders members.</li> <li>- In KOPERASI Tunas Harapan has conducted on 5<sup>th</sup> February 2018 was attended by 17 smallholders member</li> </ul>	
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		<ul style="list-style-type: none"> <li>- In KOPERASI Sejahtera Tani has conducted on 17<sup>th</sup> May 2018 was attended by 15 smallholders member and on 25<sup>th</sup> April 2018 was attended by 16 smallholders member</li> <li>- Tanjung Jaya Bersama has conducted by 6<sup>th</sup> July 2018 was attended by 10 smallholder member and on 12<sup>th</sup> March 2018 was attended by 12 smallholder member.</li> </ul> <p>Smallholder cooperative/KOPERASI has established policy to prohibit discrimination based on race, caste, national origin, religion, disability, gender, sexual orientation, union membership, political affiliation, or age.</p> <p>"Kebijakan Koperasi Sejahtera Tani" dated 9 January 2017, stated "Menghormati hak asasi manusia dengan memperlakukan seluruh karyawan KOPERASI maupun petani secara adil, baik dalam hal penerimaan, penilaian, kondisi dan lingkungan kerja, serta keterwakilan tanpa memandang suku, kasta, asal negara, agama/kepercayaan, cacat, jender, orientasi seksual, keanggotaan serikat pekerja, afiliasi politik dan/atau umur" – to respect human rights by treating all cooperative worker and smallholder member in equal manner, in terms of recruitment, evaluation, work condition and work environment inspite of race, caste, national origin, religion/belief, disability, gender, sexual orientation, worker union membership, political view, or age. This policy disseminated to smallholder member: on 12 March 2018 for 15 members and on 17 May 2018 to another 15 members.</p> <p>Smallholder cooperative/"Koperasi Tunas Harapan" has established policy related to anti-discrimination as in "Kebijakan Koperasi Tunas Harapan" dated 2 January 2017. Policy communicated to smallholder members on 25 April 2018 and 5 February 2018 to 16 members.</p>	
6.8.2	<p>Evidence shall be provided that employees and groups including local communities, women, and migrant workers have not been discriminated.</p> <p>- Major compliance –</p>	<p><b>Mill and Estate:</b></p> <p>Company has provided a policy in relation to this indicator requirement, stated in "Kebijakan Perusahaan", dated 1<sup>st</sup> December 2014. During the audit, there is no issue has found with regards to discrimination against local communities, women, and migrant workers.</p> <p>The company policy is available on notice board. Based on interview with workers, during</p>	Comply

		<p>stakeholder consultation, it was noted that worker has a basic understanding of company policy related to code of ethical conduct.</p> <p>List of attendance on refresh the socialization of Company Policy “Kebijakan Perusahaan”, e.g:</p> <ul style="list-style-type: none"> <li>- On 23th March 2018 location in Division III was attended by 39 workers</li> <li>- On 17<sup>th</sup> June 2018 location in Nursery, was attended by 6 workers</li> <li>- On 16<sup>th</sup> July 2018 for workers in replanting, attended by 7 workers</li> </ul> <p>Company has provided evidence that employees and groups including local communities, women, and migrant workers have not been discriminated. List of employee of PT Rigunas Agri Utama updated 2017, shows equal opportunity and right without discrimination on race, religion, age, national orgin.</p> <p>During audit, all worker, including contract worker was given housing, rice benefit, work insurance, working tools and PPE – similar treatment with permanent worker.</p> <p><b>Scheme smallholders</b> (KOPERASI Tani Mandiri (21), KOPERASI Tunas Harapan (19), KOPERASI Sejahtera Tani (12) dan KOPERASI Tanjung Jaya Bersama (9))</p> <p>Cooperative has defined the policy to provide equal opportunity policy to all worker as written in “Kebijakan Koperasi” updated on 2 January 2017.</p> <p>During field audit, it was not found discrimination against gender, tribe, religion and race. All worker has the right and obligation in accordance to the type of work.</p>	
6.8.3	<p>Records of evidence that equal opportunity and treatment for work shall be available.</p> <p>– Minor compliance -</p>	<p><b>Mill and Estate:</b></p> <p>Dissemination on company policy for Bungo Tebo POM, dated 8 August 2018 for 25 Bungo Tebo POM worker.</p> <p>Dissemination on company policy for Bungo Tebo POM, dated 12 July 2018 for 25 Bungo Tebo POM worker. Sampled worker: Royal Andi Panggabean, Sinta Rukun Baru.</p>	Comply

		<p>Records of evidence that equal opportunity and treatment for work available.</p> <p>Evidences seen:</p> <ul style="list-style-type: none"> <li>- Recruitment process was documented in procedure AA-HR-305-2-00 – Recruitment and Selection. Based on that procedure, it was described that recruitment and promotion of workers based on worker competency.</li> <li>- The process of recruitment, selection and promotion was conducted transparently, and this was communicated to of candidates.</li> <li>- Recruitment process namely Mr Hazirin:             <ul style="list-style-type: none"> <li>• Memorandum No 002/KBT/MEMO/09/18, dated 1<sup>st</sup> September 2018 tentang Permohonan Penambahan Karyawan Bibitan, namely Mr Hazairin.</li> <li>• Surat Perjanjian Kerja Harian Lepas nomor KBT/RAU/SPKHL/2018, namely Mr Hazairin</li> </ul> </li> </ul> <p><b>Scheme smallholders</b> (KOPERASI Tani Mandiri (21), KOPERASI Tunas Harapan (19), KOPERASI Sejahtera Tani (12) dan KOPERASI Tanjung Jaya Bersama (9))</p> <p>Recruitment was based on procedure, whereby mentioned recruitment and promotion of workers based on worker competency.</p> <p>Based on visit and interview to KOPERASI Tani Mandiri, KOPERASI Tunas Harapan, KOPERASI Sejahtera Tani, KOPERASI Tanjung Jaya Bersama and the sampled smallholder – smallholder No.2388, 2392, 2404 found that no discrimination. The smallholder member at each cooperative comes from different places: Java, Jambi, Malay, Batak, and other region.</p> <p>Cooperative/scheme smallholder KOPERASI Tani Mandiri implement uniform tariff for service provision to smallholder member; example: FFB transport sets at Rp.200/kg. All member of KOPERASI Tani Mandiri, farmer group/"hampan 88" received PPE from company/cooperative, such as helmet and sickle cover. Cooperative provides palm hook to smallholder member on 9 May 2018.</p> <p>At KOPERASI Tunas Harapan, smallholder member received working tools such as uniform, sickle and grinding stone dated 11 April 2018.</p>	
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<b>Criterion 6.9</b>			
There is no harassment or abuse in the work place, and reproductive rights are protected.			
6.9.1	<p>A policy to prevent sexual and all other forms of harassment and violence, shall be documented, implemented and communicated to all levels of the workforce.</p> <p>- Major compliance –</p>	<p><b>Mill and Estate:</b></p> <p>Policy to prevent sexual and all other forms of harassment and violence determined in “Kebijakan Perusahaan Asian Agri tanggal 1 Desember 2014”. Chapter 15 stated company prevent sexual harassment and any form of violence to women and protect the reproductive rights.</p> <p>The company policy is available on notice board. Based on interview with workers, during stakeholder consultation, it was noted that worker has a basic understanding of company policy related to code of ethical conduct.</p> <p>List of attendance on refresh the socialization of Company Policy “Kebijakan Perusahaan”, e.g:</p> <ul style="list-style-type: none"> <li>- On 23th March 2018 location in Division III was attended by 39 workers</li> <li>- On 17<sup>th</sup> June 2018 location in Nursery, was attended by 6 workers</li> <li>- On 16<sup>th</sup> July 2018 for workers in replanting, attended by 7 workers</li> </ul> <p>PT Rigunas Agri Utama has formed A Gender Committee since April 2013 and consist of Chairwoman, vice chairwoman, secretary vice secretary, members. Gender Committee activities such as handle complaint from female workers, reporting and data collecting if case appeared concerning sexual harassment.</p> <p>Dissemination on company policy on preventing sexual harrasment and protection of reproductive rights, for Bungo Tebo Estate, latest dated 23 March 2018 for 9 Bungo Tebo Estate workers: Hamdani, A Rahman, Afrizal, Riri, Ansori, T. Ahmadi, Suherman.</p> <p>Dissemination on company policy on preventing sexual harrasment and protection of reproductive rights, for Bungo Tebo Estate, latest dated 17 June 2018 for 7 Bungo Tebo</p>	Comply



		<p>Estate workers: Runggu, Rolies, Nurhayati, Nurtiani, Lismarleni, Nurjanah, Uliah.</p> <p>Dissemination on company policy on preventing sexual harrasment and protection of reproductive rights, for Bungo Tebo Estate, latest dated 22 September 2018 for 16 Bungo Tebo Estate workers.</p> <p><b>Scheme smallholders</b> (KOPERASI Tani Mandiri (21), KOPERASI Tunas Harapan (19), KOPERASI Sejahtera Tani (12) dan KOPERASI Tanjung Jaya Bersama (9))</p> <p>Cooperative has defined the policy to prevent sexual harassment and any form of violence has been established in "<i>Kebijakan Koperasi</i>" updated on 2<sup>nd</sup> January 2017 in poin 9 mentioned that "<i>Menghormati hak asasi manusia dengan memperlakukan seluruh karyawan KUD maupun petani secara adil, baik dalam hal penerimaan, penilaian, kondisi dan lingkungan kerja serta keterwakilan tanpa memandang suku, kasta, asal negara, agama/kepercayaan, cacat, jender, orientasi seksual, keanggotaan serikat pekerja, afiliasi politik dan/atau umur</i>"</p> <p>The policy has been disseminated to smallholder farmer/member, e.g:</p> <ul style="list-style-type: none"> <li>- In KOPERASI Tani Mandiri has conducted on 8<sup>th</sup> January 2018, was attended by 19 members of smallholder and on 10<sup>th</sup> July 2018 was attended by 20 smallholders member</li> <li>- In KOPERASI Sejahtera Tani has conducted on 17<sup>th</sup> May 2018 was attended by 15 smallholders member and on 12<sup>th</sup> March 2018 was attended by 15 smallholders members.</li> <li>- In KOPERASI Tunas Harapan has conducted on 5<sup>th</sup> February 2018 was attended by 17 smallholders member</li> <li>- In KOPERASI Sejahtera Tani has conducted on 17<sup>th</sup> May 2018 was attended by 15 smallholders member and on 25<sup>th</sup> April 2018 was attended by 16 smallholders member</li> <li>- Tanjung Jaya Bersama has conducted by 6<sup>th</sup> July 2018 was attended by 10 smallholder member and on 12<sup>th</sup> March 2018 was attended by 12 smallholder member.</li> </ul>	
6.9.2	A policy to protect the reproductive rights, shall be documented, implemented and	<b>Mill and Estate:</b>	Comply

	<p>communicated to all levels of the workforce.</p> <p>- Major compliance –</p>	<p>Policy to prevent sexual and all other forms of harassment and violence determined in "Kebijakan Perusahaan Asian Agri tanggal 1 Desember 2014". Chapter 15 stated company prevent sexual harassment and any form of violence to women and protect the reproductive rights.</p> <p>The company policy is available on notice board. Based on interview with workers, during stakeholder consultation, it was noted that worker has a basic understanding of company policy related to code of ethical conduct.</p> <p>List of attendance on refresh the socialization of Company Policy "Kebijakan Perusahaan", e.g:</p> <ul style="list-style-type: none"> <li>- On 23th March 2018 location in Division III was attended by 39 workers</li> <li>- On 17<sup>th</sup> June 2018 location in Nursery, was attended by 6 workers</li> <li>- On 16<sup>th</sup> July 2018 for workers in replanting, attended by 7 workers</li> </ul> <p>Dissemination on company policy on preventing sexual harrasment and protection of reproductive rights, for Bungo Tebo Estate, latest dated 23 March 2018 for 9 Bungo Tebo Estate workers: Hamdani, A Rahman, Afrizal, Riri, Ansori, T. Ahmadi, Suherman.</p> <p>Dissemination on company policy on preventing sexual harrasment and protection of reproductive rights, for Bungo Tebo Estate, latest dated 17 June 2018 for 7 Bungo Tebo Estate workers: Runggu, Rolies, Nurhayati, Nurtiani, Lismarleni, Nurjanah, Uliah.</p> <p>Dissemination on company policy on preventing sexual harrasment and protection of reproductive rights, for Bungo Tebo Estate, latest dated 22 September 2018 for 16 Bungo Tebo Estate workers.</p> <p><b>Scheme smallholders</b> (KOPERASI Tani Mandiri (21), KOPERASI Tunas Harapan (19), KOPERASI Sejahtera Tani (12) dan KOPERASI Tanjung Jaya Bersama (9))</p> <p>Cooperative (Plasma RAU) has defined the policy to to protect the reproductive rights has been established in "Kebijakan Koperasi" was signed on 2 January 2017, in poin 11 mentioned that "Mencegah pelecehan seksual dan berbagai bentuk kekerasan terhadap</p>	
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		<p><i>perempuan serta melindungi hak-hak reproduksinya”</i></p> <p>The policy has been disseminated to smallholder farmer/member, e.g:</p> <ul style="list-style-type: none"> <li>- In KOPERASI Tani Mandiri has conducted on 8<sup>th</sup> January 2018, was attended by 19 members of smallholder and on 10<sup>th</sup> July 2018 was attended by 20 smallholders member</li> <li>- In KOPERASI Sejahtera Tani has conducted on 17<sup>th</sup> May 2018 was attended by 15 smallholders member and on 12<sup>th</sup> March 2018 was attended by 15 smallholders members.</li> <li>- In KOPERASI Tunas Harapan has conducted on 5<sup>th</sup> February 2018 was attended by 17 smallholders member</li> <li>- In KOPERASI Sejahtera Tani has conducted on 17<sup>th</sup> May 2018 was attended by 15 smallholders member and on 25<sup>th</sup> April 2018 was attended by 16 smallholders member</li> <li>- Tanjung Jaya Bersama has conducted by 6<sup>th</sup> July 2018 was attended by 10 smallholder member and on 12<sup>th</sup> March 2018 was attended by 12 smallholder member.</li> </ul>	
6.9.3	<p>A specific grievance mechanism which respects anonymity of complainants where requested, and as long as they are supported with adequate information, shall be documented, implemented, and communicated to all workforce.</p> <p>- Minor compliance –</p>	<p><b>Mill and Estate:</b></p> <p>In case there is any harassment and violence, it will be reported to Gender Committee to be followed up. Documented procedure has been established to describe handling mechanism of sexual harassment case - SOP AA-HR-309.01-R0 dated 1<sup>st</sup> February 2009. Company has formed A Gender Committee since April 2013 and consist of Chairwoman, vice chairwoman, secretary, vice secretary, members.</p> <p>Gender Committee activities such as handle complaint from female workers, reporting and data collecting if case appeared concerning sexual harassment.</p> <p>Based on interview with Gender Committee there were no a specific grievance of complainants in 2018.</p> <p>Company has prepared a mechanism to handle complaint from external party, in form of “Prosedur Penanganan Keluhan, Dokumen No. SOP AA-GL-5005-R0 01”. Complaint from internal stakeholder was regulated in “Mekanisme Penyampaian Keluhan dan Penyelesaian Keluhan Karyawan, Dokumen No.SOP.AA-HR-308 0.5-R0”.</p>	Comply

		<p>Company has also prepared a procedure to uphold policy on secrecy of whistle blower under "Mekanisme Jaminan Pelapor dan Pengungkapan Kasus" dated 12 June 2015.</p> <p><b>Scheme smallholders</b> (KOPERASI Tani Mandiri (21), KOPERASI Tunas Harapan (19), KOPERASI Sejahtera Tani (12) dan KOPERASI Tanjung Jaya Bersama (9))</p> <p>Cooperative has prepared mekanisme on communication with interested parties under "Mekanisme Komunikasi, Konsultasi dan Keluhan" dated 2 December 2016, available in Buku Pintar Petani Plasma page 19.</p> <p>Smallholder organization has demonstrated evidence of communication/dissemination of specific grievance mechanism which respects anonymity and protects complainants to smallholder member and workers in surrounding of KOPERASI.</p> <p>The cooperative has also shown the procedure on specific grievance mechanism which respects anonymity of complainants where requested, and as long as they are supported with adequate information under SOP "Komunikasi Internal Group Sertifikasi" no 007/DOK/SOP/AA/2016, was issued on 2<sup>nd</sup> December 2016.</p> <p>Based on interview with smallholder farmer, they have demonstrated on understanding with mechanism to communication and consultation.</p>	
<p><b>Criterion 6.10</b>          Growers and millers deal fairly and transparently with smallholders and other local businesses.</p>			
6.10.1	<p>Current and past prices paid for Fresh Fruit Bunches (FFB), shall be publicly available.          - Minor compliance -</p>	<p><b>Mill, Estate and Scheme smallholders</b> (KOPERASI Tani Mandiri (21), KOPERASI Tunas Harapan (19), KOPERASI Sejahtera Tani (12) dan KOPERASI Tanjung Jaya Bersama (9))</p> <p>FFB price for FFB supplier was available in Bungo Tebo POM Notice Board. Interview with a number of FFB suppliers, it was noted that FFB price they received was accordance to FFB price sets by company. FFB supplier or smallholders able to access the</p>	Comply

		<p>FFB price by phone and local media/notice board as well.          FFB price for scheme smallholder determined by "Tim Penetapan Harga TBS Dinas Perkebunan Provinsi Jambi", released on weekly basis. There were current and past prices available such as prices for period 21-27 September 2018 based on "Hasil Rapat Penetapan Harga TBS Kelapa Sawit Untuk periode 21-27 September 2018", has been demonstrated as follows:</p> <ul style="list-style-type: none"> <li>- Planting age 10 – 20 year is IDR 1,487.05/kg</li> <li>- Planting age 21 – 24 year is IDR 1,442.49/kg</li> <li>- Planting age ≥ 25 year is IDR 1,376.64/kg</li> </ul> <p>FFB price was informed to smallholder farmer via short message and disseminated the price determination letter to each KOPERASI (smallholder) by Smallholder Manager.</p>	
<p>6.10.2</p>	<p>Pricing mechanisms for Fresh Fruit Bunches (FFB) and inputs/services shall be explained and documented (where these are under the control of the mill or plantation).</p> <p>- Major compliance -</p>	<p><b>Mill, Estate and Scheme smallholders</b> (KOPERASI Tani Mandiri (21), KOPERASI Tunas Harapan (19), KOPERASI Sejahtera Tani (12) dan KOPERASI Tanjung Jaya Bersama (9))</p> <p>Mechanism for FFB price establishment has been understood by smallholder. FFB price for scheme smallholder was established based on price sets by "Dinas Perkebunan Provinsi Jambi", released on weekly basis. FFB price was informed to smallholder farmer via short message and it was also made available in KOPERASI offices and mill gate.</p> <p>As an alternative, smallholder can inquire the FFB pricing to KOPERASI office or to PT. Rigunas Agri Utama.</p> <p>FFB price establishment was documented by company under "Sistem Penerimaan, Penetapan dan Pembayaran TBS". The FFB price establishment was done with basis of:</p> <ul style="list-style-type: none"> <li>- Market price, determined by FFB Purchase and informed one day before informed to supplier;</li> <li>- Margin between medium size FFB and large size FFB was Rp. 20/kg</li> <li>- Price changes will be informed one day before the changes, and it was applicable for</li> </ul>	

		<p>large size FFB.          Mechanism for FFB price has been known, understood and explained to FFB suppliers. Based on interview with a number of FFB supplier, they can demonstrate their understanding.</p>	
6.10.3	<p>Evidence shall be available that all parties understand the contractual agreements they enter into, and that contracts are fair, legal and transparent.</p> <p>- Minor compliance -</p>	<p><b>Mill, Estate and Scheme smallholders</b> (KOPERASI Tani Mandiri (21), KOPERASI Tunas Harapan (19), KOPERASI Sejahtera Tani (12) dan KOPERASI Tanjung Jaya Bersama (9))</p> <p>All parties have been understood the contractual agreements they enter into, and that contracts are fair, legal and transparent.</p> <p>FFB price determination and informatoin of FFB price has been done in transparent manner and understood by FFB supplier. FFB price chagnes was carried out one daybefore effective implementation.</p> <p>FFB price for scheme smallholder was based on FFB price determined by "Dinas Perkebunan Provinsi Jambi". This was explained clearly in agreement/contract with PT. Rigunas Agri Utama.</p> <p>FFB purchasing Jambi will provide information of FFB price via SMS and telephone call to suppliers. Evidence of SMS and information of FFB price changes can be demonstrated during interview with suppliers.</p> <p>Work agreement between company and smallholder farmer group was available in "Surat Perjanjian Produksi, jual Beli TBS dan Pemeliharaan tanaman setelah Undian Kapling sampai Akad Kredit antara Petani dengan Perusahaan Inti". It was signed by both party and acknowledged by village head, district head and regent.</p> <p>Data seen:</p> <ul style="list-style-type: none"> <li>- KOPERASI Sejahtera Tani - Surat Perjanjian Produksi, jual Beli TBS dan Pemeliharaan tanaman setelah Undian Kapling sampai Akad Kredit antara Petani dengan Perusahaan Inti" - KT Harapan Bersama, dated 21th May 2001</li> </ul>	Comply

		<ul style="list-style-type: none"> <li>- KOPERASI Tunas Harapan - Surat Perjanjian Produksi, jual Beli TBS dan Pemeliharaan tanaman setelah Undian Kapling sampai Akad Kredit antara Petani dengan Perusahaan Inti” – KT Tunas Harapan I, dated 21th May 2001</li> <li>- KOPERASI Tanjung Jaya Bersama – Perjanjian Kerjasama Antara Petani Peserta dan {erusahaan Inti Dalam Rangka Proyek PIR-TRANS PT Rigunas Agri Utama di Kebun Bungo Tebo, dated 9 October 2004.</li> <li>- Surat Perjanjian Kerja antra KOPERASI Tani Mandiri dengan Pengusaha Angkutan TBS nomor 22/SPK/KUD-TM/TBS/II/2018 tentang Kejasama Angkutan TBS Kebun Plasma Wilaya Kerja KOPERASI Tani Mandiri ke PMKS PT Rigunas Agri Utama, dated 10 Februari 2018, value IDR 150/Kg</li> <li>- Surat Perjanjiann Kerja antara KOPERASI Tunas Harapan dengan Pengusaha Angkutan TBS nomor 20/SPK/KUD-TM/TBS/II/2018 tentang Kejasama Angkutan TBS Kebun Plasma Wilaya Kerja KOPERASI Tunas Harapan ke PMKS PT Rigunas Agri Utama, dated 10 Februari 2018, value IDR 150/Kg.</li> </ul>	
6.10.4	<p>Agreed payments shall be made in a timely manner.</p> <p>- Minor compliance -</p>	<p>FFB payment system has been established. FFB paid based on weighbridge ticket and original delivery order, received by Jambi regional office. Payment made by transferring money to supplier’s account.</p> <p>Unscheduled payment will be done as soon as FFB weighbrdige ticket and original delivery order received by Jambi regional office.</p> <p><b>Scheme smallholders</b> (KOPERASI Tani Mandiri (21), KOPERASI Tunas Harapan (19), KOPERASI Sejahtera Tani (12) dan KOPERASI Tanjung Jaya Bersama (9))</p> <p>FFB payment system for schem smallholder has been established under “Surat Perjanjian Produksi, Jual Beli TBS dan Pemeliharaan Tanaman Setelah Undian Kapling sampai Akad Kredit antara Petani dengan Perusahaan Inti”. Based on the agreement, FFB payment made once a month to smallholder farmer group’s account. It will then cascaded to individual smallholder farmer. Based on document verification, and transfer notes for period July – August 2016, payment made in timely manner.</p>	Comply

		<p>Data verified:</p> <p>KOPERASI Tunas Harapan</p> <ul style="list-style-type: none"> <li>- Bukti Bayar ke Sport Shop JJS in Muara Bungo, dated 7<sup>th</sup> August 2018 untuk pembelian kaos dan logo (10 pcs) value IDR 1,000,000;-</li> <li>- Local kontraktor, dated 5<sup>th</sup> April 2018 untuk Pemblian Krokos 7 trip, value IDR 6,300,000;-</li> </ul> <p>KOPERASI Tanjung Jaya Bersama</p> <ul style="list-style-type: none"> <li>- Local kontraktor (Mr Hasan), dated 3<sup>rd</sup> August 2018 untuk pembayaran batu sebanyak 5 trip, value IDR 5,000,000;-</li> </ul> <p>KOPERASI Tani Mandiri</p> <p>Local contractor (Mr harian), dated 5<sup>th</sup> February 2018 untuk pembayaran kayu (1m3) value IDR 1,900,000;-</p>	
<p><b>Criterion 6.11</b>          Growers and millers contribute to local sustainable development where appropriate.</p>			
<p>6.11.1</p>	<p>Records of contributions to local development based on the results of consultation with local communities shall be available.</p> <p>- Minor compliance -</p>	<p><b>Mill and Estate:</b></p> <p>Records of contributions to local development based on the results of consultation with local communities available under "Laporan Pelaksanaan CSR periode Januari – Desember 2017".</p> <p>Based on interview with official representative in (BDP in Kandang Village and Head of Punt Kalo Village ) stated that in preparing of CSR program, the company has taking into consideration suggestion and request from communities, survey result, data capture and verification upon project proposals – as well as budget for the program.</p> <p>A number of stages that has been carried out:</p>	<p>Comply</p>



		<ul style="list-style-type: none"> <li>- Evaluation on CSR program year 2017;</li> <li>- Identification on CSR program requirement year 2018;</li> <li>- Verification on villages requirement on CSR year 2018;</li> <li>- Selection on program proposal for CSR program 2018;</li> <li>- Budget preparation for CSR 2018;</li> </ul> <p>Report of implementation the program CSR year 2018 (January – July 2018) also available and able to demonstrated.</p> <ul style="list-style-type: none"> <li>- Education/Pendidikan:             <ul style="list-style-type: none"> <li>• Furniture supply for Elementary school “SDN 204/Napal Putih”, Preschool “TK – PAUD” Sei Lalo village.</li> </ul> </li> <li>- Healthcare/Kesehatan:             <ul style="list-style-type: none"> <li>• Free Medical Check Up at Sub-village of Tanjung Dani</li> <li>• Donation for developing children healthcare integrated services “posyandu” at Tuo Sumay village.</li> </ul> </li> <li>- Sosial:             <ul style="list-style-type: none"> <li>• Ceramics for mosque at Sekutur Jaya village – June 2018</li> <li>• Build a toilet for mosque at Teriti village – June 2018</li> <li>• Build a Church of Tebo</li> <li>• Road maintenance</li> </ul> </li> <li>- Environmental/Lingkungan:             <ul style="list-style-type: none"> <li>• Support for village fire monitoring at village of Tuo Sumay, Teriti, Muaro Sekalo, Suo-Suo and Semambu – September 2017</li> </ul> </li> </ul> <p><b>Scheme smallholders</b> (KOPERASI Tani Mandiri (21), KOPERASI Tunas Harapan (19), KOPERASI Sejahtera Tani (12) dan KOPERASI Tanjung Jaya Bersama (9))</p> <p>Cooperative has actively contributed to village development available in document of “Kegiatan Sosial KOPERASI year 2017”, such as:</p> <ul style="list-style-type: none"> <li>- Date 17<sup>th</sup> August 2018 -&gt; contribution on Indonesian Independent day party (IDR</li> </ul>	
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		<p>500,000)</p> <ul style="list-style-type: none"> <li>- Based on interview with management of KOPERASI -&gt; village fee of Rp. 2/kg FFB being sold. The fee then managed to support education, religious festival and other activity.</li> </ul>	
6.11.2	<p>Where there are scheme smallholders, there shall be evidence that efforts and/or resources have been allocated to improve scheme smallholder productivity.</p> <p>- Minor compliance -</p>	<p><b>Mill, Estate and Scheme smallholders</b> (KOPERASI Tani Mandiri (21), KOPERASI Tunas Harapan (19), KOPERASI Sejahtera Tani (12) dan KOPERASI Tanjung Jaya Bersama (9))</p> <p>PT. Rigunas Agri Utama was a oil palm plantation company that was developed to support government program PIR-Trans.</p> <p>In ASA-3 year 2018, the realisation of scheme smallholder plantation was 5,914 Ha consisted of 18 cooperatives/KOPERASI and 124 smallholder farmer group and more than 2957 smallholders.</p> <p>PT. Rigunas Agri Utama has a staff which responsible to managed scheme smallholder plantation. A plasma coordinator heads of a estate manager, head assisstant and 4 assistants. 9 staff members and 43 non-staff.</p> <p>A form of cooperation is PIR-Trans with full managed by smallholders. Company established a management for scheme smallholder with roles of training, counseling and maintain scheme smallholder.</p> <p>Oil palm plantation upkeep and harvesting activities performed by smallholders and supervised by company. Standard upkeep and treatment of plants and harvesting in accordance with best practice agronomic also applied by smallholders and supervised by company. Fertilizer recommendation for scheme smallholder, including fertilizer order was managed and prepared by PT. Rigunas Agri Utama – as nucleus estate.</p> <p>Training program for scheme smallholder was no different from PT. Rigunas’s training module for staff. Training to improve productivity, e.g:</p> <ul style="list-style-type: none"> <li>- KOPERASI Tani Mandiri – Training on harvesting conducted on 25<sup>th</sup> January 2018, was</li> </ul>	Comply

		<p>attended 12 smallholders members and training on application of fertilizer conducted on 31th July 2018</p> <ul style="list-style-type: none"> <li>- KOPERASI Sejahtera Tani – Training on harvesting conducted on 21th January 2018, was attended by 11 smalholder members,</li> <li>- KOPERASI Sejahtera Tani – Training on application of fertilizer conducted on 30<sup>th</sup> July 2018 and Training on intergared pest management was conducted on 11<sup>th</sup> April 2018</li> <li>- KOPERASI Tanjung Jaya Bersama – Training on harversing conducted on 16<sup>th</sup> May 2018 and training on integrated pest management was conducted on 17<sup>th</sup> May 2018</li> <li>- KOPERASI Tani Mandiri – Training on application of fertilizer was conducted on 16<sup>th</sup> April 2018</li> </ul>	
<p><b>Criterion 6.12</b>          No forms of forced or trafficked labor are used.</p>			
<p>6.12.1</p>	<p>There shall be evidence that no forms of forced or trafficked labor are used.</p> <p>- Major compliance -</p>	<p><b>Mill, Estate and Scheme smallholders</b> (KOPERASI Tani Mandiri (21), KOPERASI Tunas Harapan (19), KOPERASI Sejahtera Tani (12) dan KOPERASI Tanjung Jaya Bersama (9))</p> <p>Policy related forced or trafficked labour has been established in the company policy dated 1<sup>st</sup> December 2014. There are no foreign workers in Tebo Estate and Bungo Tebo Palm Oil Mill, based on evidences which has been reviewed such as "Daftar Karyawan Rigunas Agri Utama year 2018" updated August 2018, employee contract of PHL.</p> <p>Based on interview with labour union stated there were no forced labour hired by company/cooperative and/or scheme smallholder farmer. All work relation was made on mutual agreement. Work relation was based on mutual agreement. Interview with labour union</p> <p>Recruitment process was documented in Procedure: AA-HR-305.2-R0 dated 1<sup>st</sup> February 2009 – Recruitment and Selection stated that Staff recruitment conduct by Head Office in Jakarta. For workers in site, recruitment processes conduct by Site Management with approval from company management.</p> <p>Permanent worker based on "Perjanjian Kerja bersama (PKB) 2015 – 2017" agreed by</p>	<p>Not Comply</p>

		<p>company and worker union; acknowledge by Manpower Ministry dated 21 April 2017, validity 2 years.</p> <p><b>Smallholders:</b></p> <p>All work relation performed in scheme smallholder plantation was made on mutual agreement. Work relation was based on mutual agreement. Interview with harvester on smallholder in KOPERASI Tunas Harapan, KOPERASI Sejahtera Tani confirmed they work based on agreement between block owners and the harvester.</p> <p>NC Major:</p> <p>PT. Rigunas Agri Utama - Bungo Tebo has not established a policy on force and trafficked labour, as well as providing definition on force and trafficked labour.</p> <p>Objective Evidence:</p> <p>No policy on force and trafficked labour; and definition on force and trafficked labour.</p>	
6.12.2	<p>It shall be demonstrated that no contract substitution has occurred.</p> <p>- Minor compliance -</p>	<p><b>Mill and Estate:</b></p> <p>Based on observation of several employee contract and interview with employee could be demonstrated that there was no contract substitution occurred.</p> <p>There is no migrant worker in PT. Rigunas Agri Utama – Tebo Estate. It’s verified during audit documentation list of employee and interview with employee.</p> <p>Employees work based on contract labour agreement which contains agreements include: working time, dependents, payroll and consent of both parties. Workers was given a copy of their employment contracts and the contract was identical to the one signed at the time of recruitment.</p> <p>Evident seen:</p>	Comply

		<ul style="list-style-type: none"> <li>- List of Employees PT Rigunas Agri Utama, updated in August 2018</li> <li>- Work Agreement for Daily Worker nomor 002/KBT/RAU/SPKHL/09/2018, namely Mr HG (PHL – Tool Man) valid until 31<sup>st</sup> December 2018.</li> <li>- Work Agreement for Daily Worker nomor KBT/RAU/SPKHL/2018, namely Mr Hazairin, valid until 31<sup>st</sup> December 2018</li> <li>- Work Agreement for Daily Workers nomor 102/KBT/RAU/SPKPHL/05/2018 namely Mudawali - harvester), valid until 31<sup>st</sup> December 2018,</li> </ul> <p><b>Scheme smallholders</b> (KOPERASI Tani Mandiri (21), KOPERASI Tunas Harapan (19), KOPERASI Sejahtera Tani (12) dan KOPERASI Tanjung Jaya Bersama (9))</p> <p>No migrant worker. All worker was working under work agreement.</p> <p>Work agreement between cooperative and staff available in “Perjanjian dan Pengangkatan Karyawan Tetap KOPERASI”, s.g:</p> <ul style="list-style-type: none"> <li>- KOPERASI Tunas Harapan – Surat Perjanjian Kerja No 09/SPK/KUD-TJB/IV/2017 tentang Perjanjian dan Pengangkatan Karyawan Tetap KOPERASI Tunas Harapan, namely Mr Fauzi (Sekertaris KOPERASI Tunas Harapan), dated 11<sup>th</sup> June 2017.</li> <li>- KOPERASI Tani Mandiri – Surat Perjanjian Kerja No 09/SPK/KUD-TM/IV/2017 tentang Perjanjian dan Pengangkatan Karyawan Tetap KOPERASI Tani Mandiri, namely Mr Mukhlisin (Sekertaris KOPERASI Tani Mandiri), dated 15<sup>th</sup> April 2017.</li> <li>- KOPERASI Tanjung Jaya Bersama – Surat Perjanjian Kerja No 09/SPK/KUD-TH/IV/2017 tentang Perjanjian dan Pengangkatan Karyawan Tetap KOPERASI Tanjung Jaya Bersama, namely Mr Paisli (Sekertaris KOPERASI Tnjung Jaya Bersama), dated 11<sup>th</sup> April 20172017.</li> <li>- KOPERASI Sejahtera Tani – Surat Perjanjian Kerja No 09/SPK/KUD-ST/IV/2017 tentang Perjanjian</li> <li>- Pengangkatan Karyawan Tetap KOPERASI Sejahtera Tani, namely Mr Muzir (Sekertaris KOPERASI Sejahtera Tani), dated 11<sup>th</sup> June 2017.</li> </ul> <p>Inside the work contract, covers: employment status and task, salary, employee obligation,</p>	
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		<p>sanction, work termination, dispute settlement, and additional regulation. Contract was made available in Bahasa Indonesia and understood by both parties.</p> <p>Smallholder farmer was using temporary workers with piece rate payment. The agreement was not written. The work performed such as harvesting activity, pruning, and raking woodies.</p>	
6.12.3	<p>Where migrant/foreign/honorary workers are employed, a special worker policy and procedures and the evidence of implementation shall be available.</p> <p>- Major compliance -</p>	<p><b>Mill, Estate and Scheme smallholders</b> (KOPERASI Tani Mandiri (21), KOPERASI Tunas Harapan (19), KOPERASI Sejahtera Tani (12) dan KOPERASI Tanjung Jaya Bersama (9))</p> <p>Based on interview with management team of PT Rigunas Agri Utama and Smallholder Cooperative have informed that there were no migrant workers employed by company. Company has a policy with regards to worker’s right equality and non-discrimination to worker including if there is worker from different nationality.</p> <p>No migrant worker employed by cooperative or smallholder farmer. All worker was working under work agreement.</p>	Comply
<p><b>Criterion 6.13</b></p> <p>Growers and millers respect human rights.</p>			
6.13.1	<p>A policy to respect human rights shall be documented and communicated to all levels of the workforce and operations.</p> <p>- Major compliance -</p>	<p><b>Mill and Estate:</b></p> <p>Company has established a policy related to respecting human rights as documented under “Kebijakan Perusahaan Asian Agri” dated 1<sup>st</sup> December 2014. Chapter 13 stated “Perusahaan menghormati hak asasi manusia dengan memperlakukan seluruh karyawan secara adil baik dalam hal penerimaan, penilaian, kondisi dan lingkungan kerja, serta keterwakilan tanpa memandang suku, kasta, asal Negara, agama/kepercayaan, cacat, gender, orientasi seksual, keanggotaan serikat pekerja, afiliasi politik dan atau umur” – company respects human rights and treated all employees in equal manner, during recruitment, assessment, condition and work environment, and representation – without discrimination on tribe, caste, gender, sexual orientation, worker union, politic affiliation,</p>	Comply

		<p>and/or age.</p> <p>The company policy is available on notice board. Based on interview with workers, during stakeholder consultation, it was noted that worker has a basic understanding of company policy related to code of ethical conduct.</p> <p>List of attendance on refresh the socialization of Company Policy "Kebijakan Perusahaan", e.g:</p> <ul style="list-style-type: none"> <li>- On 23th March 2018 location in Division III was attended by 39 workers</li> <li>- On 17<sup>th</sup> June 2018 location in Nursery, was attended by 6 workers</li> <li>- On 16<sup>th</sup> July 2018 for workers in replanting, attended by 7 workers</li> </ul> <p>The appointed person in charge is managers and assistants, to communicating the policy internally. The policy have been communicated to all level of workers, verbally and through posters. While public relation officer was appointed to communicating the policy externally. Until now, there was no outstanding case regaring human rights violation.</p> <p><b>Scheme smallholders</b> (KOPERASI Tani Mandiri (21), KOPERASI Tunas Harapan (19), KOPERASI Sejahtera Tani (12) dan KOPERASI Tanjung Jaya Bersama (9))</p> <p>Cooperative has defined their policy for a policy to respect human rights in "Kebijakan Koperasi" issued 2<sup>nd</sup> January 2017, in point 9 mentioned that "Menghormati hak asasi manusia dengan memperlakukan seluruh karyawan KOPERASI maupun petani secara adil, baik dalam hal penerimaan, penilaian, kondisi dan lingkungan kerja serta keterwakilan tanpa memandang suku, kasta, asal negara, agama/kepercayaan, cacat, jender, orientasi seksual, keanggotaan serikat pekerja, afiliasi politik dan/atau umur"</p> <p>The policy has been disseminated to smallholder farmer/member, e.g:</p> <ul style="list-style-type: none"> <li>- In KOPERASI Tani Mandiri has conducted on 8<sup>th</sup> January 2018, was attended by 19</li> </ul>	
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<b>Principle 7: Responsible development of new plantings</b>			
<b>Criterion 7.1</b>			
A comprehensive and participatory independent social and environmental impact assessment is undertaken prior to establishing new plantings or operations, or expanding existing ones, and the results incorporated into planning, management and operations.			
7.1.1	<p>An independent social and environmental impact assessment (SEIA), undertaken through a participatory methodology including the relevant affected stakeholders, shall be documented.</p> <p>- Major compliance –</p>	<p>Principle 7 was not applicable. PT Rigunas Agri Utama Bungo Tebo has been planted since 1994, 1995 and 1996. Even though from the planting year, there was planting year 2008. Based on document verification, field visit and interview with stakeholders, it was known that the 512 Ha planted in 2008 was replanting oil palm. The replanting occurred due to low SPH (Stand per Hectare) caused by elephant attack, during early stage of planting. See related indicator 2.2.1.</p> <p>Replanting has been performed by Bungo Tebo Estate since 2016 and planned to finish in 2019. Total replanting in 2016 was 295 ha, in 2017 was 449 ha and in 2018 was 447 ha.</p>	N/A
7.1.2	<p>Appropriate management planning and operational procedures shall be developed and implemented to avoid or mitigate identified potential negative impacts.</p> <p>- Minor compliance -</p>	<p>Principle 7 was not applicable. PT Rigunas Agri Utama Bungo Tebo has been planted since 1994, 1995 and 1996. Even though from the planting year, there was planting year 2008. Based on document verification, field visit and interview with stakeholders, it was known that the 512 Ha planted in 2008 was replanting oil palm. The replanting occurred due to low SPH (Stand per Hectare) caused by elephant attack, during early stage of planting. See related indicator 2.2.1.</p>	N/A



		Replanting has been performed by Bungo Tebo Estate since 2016 and planed to finish in 2019. Total replanting in 2016 was 295 ha, in 2017 was 449 ha and in 2018 was 447 ha.	
7.1.3	Where the development includes an outgrower scheme ( <i>skema kemitraan</i> ), the impacts of the scheme and the implications of the way it is managed shall be given particular attention.  - Minor compliance -	Principle 7 was not applicable. PT Rigunas Agri Utama Bungo Tebo has been planted since 1994, 1995 and 1996. Even though from the planting year, there was planting year 2008. Based on document verification, field visit and interview with stakeholders, it was known that the 512 Ha planted in 2008 was replanting oil palm. The replanting occured due to low SPH (Stand per Hectare) caused by elephant attack, during early stage of planting. See related indicator 2.2.1.  Replanting has been performed by Bungo Tebo Estate since 2016 and planed to finish in 2019. Total replanting in 2016 was 295 ha, in 2017 was 449 ha and in 2018 was 447 ha.	N/A
<b>Criterion 7.2</b>			
Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.			
7.2.1	Soil suitability maps or soil surveys adequate to establish the long-term suitability of land for oil palm cultivation shall be available and taken into account in plans and operations.  - Major compliance –	Principle 7 was not applicable. PT Rigunas Agri Utama Bungo Tebo has been planted since 1994, 1995 and 1996. Even though from the planting year, there was planting year 2008. Based on document verification, field visit and interview with stakeholders, it was known that the 512 Ha planted in 2008 was replanting oil palm. The replanting occured due to low SPH (Stand per Hectare) caused by elephant attack, during early stage of planting. See related indicator 2.2.1.  Replanting has been performed by Bungo Tebo Estate since 2016 and planed to finish in 2019. Total replanting in 2016 was 295 ha, in 2017 was 449 ha and in 2018 was 447 ha.	N/A
7.2.2	Topographic information adequate to guide the planning of drainage and irrigation systems, roads and other infrastructure shall be available.  - Minor compliance -	Principle 7 was not applicable. PT Rigunas Agri Utama Bungo Tebo has been planted since 1994, 1995 and 1996. Even though from the planting year, there was planting year 2008. Based on document verification, field visit and interview with stakeholders, it was known that the 512 Ha planted in 2008 was replanting oil palm. The replanting occured due to low SPH (Stand per Hectare) caused by elephant attack, during early stage of planting. See related indicator 2.2.1.	N/A

		Replanting has been performed by Bungo Tebo Estate since 2016 and planed to finish in 2019. Total replanting in 2016 was 295 ha, in 2017 was 449 ha and in 2018 was 447 ha.	
<b>Criterion 7.3</b>			
New plantings since November 2005 have not replaced primary forest or any area required to maintain or enhance one or more High Conservation Values.			
7.3.1	There shall be evidence that no new plantings have replaced primary forest, or any area required to maintain or enhance one or more High Conservation Values (HCVs), since November 2005. New plantings shall be planned and managed to best ensure the HCVs identified are maintained and/or enhanced (see Criterion 5.2).  - Major compliance –	Principle 7 was not applicable. PT Rigunas Agri Utama Bungo Tebo has been planted since 1994, 1995 and 1996. Even though from the planting year, there was planting year 2008. Based on document verification, field visit and interview with stakeholders, it was known that the 512 Ha planted in 2008 was replanting oil palm. The replanting occured due to low SPH (Stand per Hectare) caused by elephant attack, during early stage of planting. See related indicator 2.2.1.  Replanting has been performed by Bungo Tebo Estate since 2016 and planed to finish in 2019. Total replanting in 2016 was 295 ha, in 2017 was 449 ha and in 2018 was 447 ha.	N/A
7.3.2	Reports of comprehensive HCV assessment, which involves stakeholder consultation and includes record of land-use change since November 2005, shall be available. This HCV assessment shall be conducted prior to any conversion or new planting.  - Major compliance –	Principle 7 was not applicable. PT Rigunas Agri Utama Bungo Tebo has been planted since 1994, 1995 and 1996. Even though from the planting year, there was planting year 2008. Based on document verification, field visit and interview with stakeholders, it was known that the 512 Ha planted in 2008 was replanting oil palm. The replanting occured due to low SPH (Stand per Hectare) caused by elephant attack, during early stage of planting. See related indicator 2.2.1.  Replanting has been performed by Bungo Tebo Estate since 2016 and planed to finish in 2019. Total replanting in 2016 was 295 ha, in 2017 was 449 ha and in 2018 was 447 ha.	N/A
7.3.3	Records of land preparation and clearing dates shall be available.  - Minor compliance –	Principle 7 was not applicable. PT Rigunas Agri Utama Bungo Tebo has been planted since 1994, 1995 and 1996. Even though from the planting year, there was planting year 2008. Based on document verification, field visit and interview with stakeholders, it was known that the 512 Ha planted in 2008 was replanting oil palm. The replanting occured due to low SPH (Stand per Hectare) caused by elephant attack, during early stage of planting. See related indicator 2.2.1.	N/A

		Replanting has been performed by Bungo Tebo Estate since 2016 and planed to finish in 2019. Total replanting in 2016 was 295 ha, in 2017 was 449 ha and in 2018 was 447 ha.	
7.3.4	An action plan shall be developed that describes operational actions consequent to the findings of the HCV assessment, and that references the grower’s relevant operational procedures. (see Criterion 5.2)  - Major compliance –	Principle 7 was not applicable. PT Rigunas Agri Utama Bungo Tebo has been planted since 1994, 1995 and 1996. Even though from the planting year, there was planting year 2008. Based on document verification, field visit and interview with stakeholders, it was known that the 512 Ha planted in 2008 was replanting oil palm. The replanting occured due to low SPH (Stand per Hectare) caused by elephant attack, during early stage of planting. See related indicator 2.2.1.  Replanting has been performed by Bungo Tebo Estate since 2016 and planed to finish in 2019. Total replanting in 2016 was 295 ha, in 2017 was 449 ha and in 2018 was 447 ha.	N/A
7.3.5	Evidence of consultation with the affected community shall be available in order to identify the area required by such community to fulfill its basic needs, by considering the positive and negative changes to the livelihood as a result of plantation operations. Such matters shall be included in the HCV analysis and management plan (see Criteria 5.2).  - Minor compliance –	Principle 7 was not applicable. PT Rigunas Agri Utama Bungo Tebo has been planted since 1994, 1995 and 1996. Even though from the planting year, there was planting year 2008. Based on document verification, field visit and interview with stakeholders, it was known that the 512 Ha planted in 2008 was replanting oil palm. The replanting occured due to low SPH (Stand per Hectare) caused by elephant attack, during early stage of planting. See related indicator 2.2.1.  Replanting has been performed by Bungo Tebo Estate since 2016 and planed to finish in 2019. Total replanting in 2016 was 295 ha, in 2017 was 449 ha and in 2018 was 447 ha.	N/A
<b>Criterion 7.4</b>			
Extensive planting on steep terrain, and/or marginal and fragile soils, including peat, is avoided.			
7.4.1	Indicative maps showing marginal and fragile soils, including excessive gradients and peat soils, shall be available and used to identify areas to be avoided.	Principle 7 was not applicable. PT Rigunas Agri Utama Bungo Tebo has been planted since 1994, 1995 and 1996. Even though from the planting year, there was planting year 2008. Based on document verification, field visit and interview with stakeholders, it was known that the 512 Ha planted in 2008 was replanting oil palm. The replanting occured due to low SPH (Stand per Hectare) caused by elephant attack, during early stage of planting.	N/A

	- Major compliance –	See related indicator 2.2.1.  Replanting has been performed by Bungo Tebo Estate since 2016 and planed to finish in 2019. Total replanting in 2016 was 295 ha, in 2017 was 449 ha and in 2018 was 447 ha.	
7.4.2	Where limited planting on fragile and marginal soils, including peat, is proposed, a documented plan shall be developed and implemented to protect them without incurring adverse impacts. - Major compliance –	Principle 7 was not applicable. PT Rigunas Agri Utama Bungo Tebo has been planted since 1994, 1995 and 1996. Even though from the planting year, there was planting year 2008. Based on document verification, field visit and interview with stakeholders, it was known that the 512 Ha planted in 2008 was replanting oil palm. The replanting occured due to low SPH (Stand per Hectare) caused by elephant attack, during early stage of planting. See related indicator 2.2.1.  Replanting has been performed by Bungo Tebo Estate since 2016 and planed to finish in 2019. Total replanting in 2016 was 295 ha, in 2017 was 449 ha and in 2018 was 447 ha.	N/A
<b>Criterion 7.5</b>			
No new plantings are established on local people’s land where it can be demonstrated that there are legal, customary or user rights, without their free, prior and informed consent. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.			
7.5.1	Evidence shall be available that affected local peoples understand they have the right to say ‘yes’ or ‘no’ to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the grower/miller is signed and ratified by these local peoples (see Criteria 2.2, 2.3, 6.2, 6.4 and 7.6)  - Major compliance –	<b>BUNGO TEBO ESTATE AND MILL</b>  Principle 7 was not applicable. PT Rigunas Agri Utama Bungo Tebo has been planted since 1994, 1995 and 1996. Even though from the planting year, there was planting year 2008. Based on document verification, field visit and interview with stakeholders, it was known that the 512 Ha planted in 2008 was replanting oil palm. The replanting occured due to low SPH (Stand per Hectare) caused by elephant attack, during early stage of planting. See related indicator 2.2.1.  Replanting has been performed by Bungo Tebo Estate since 2016 and planed to finish in 2019. Total replanting in 2016 was 295 ha, in 2017 was 449 ha and in 2018 was 447 ha.	N/A

		<p><b>SMALLHOLDERS: BUNGO TEBO PLASMA</b></p> <p>No replanting activities performed in Smallholders area.</p>	
<p><b>Criterion 7.6</b></p> <p>Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their free, prior and informed consent and negotiated agreements.</p>			
7.6.1	<p>Records of identification and assessment of legal, customary and user rights shall be available.</p> <p>- Major compliance –</p>	<p><b>BUNGO TEBO ESTATE AND MILL</b></p> <p>Principle 7 was not applicable. PT Rigunas Agri Utama Bungo Tebo has been planted since 1994, 1995 and 1996. Even though from the planting year, there was planting year 2008. Based on document verification, field visit and interview with stakeholders, it was known that the 512 Ha planted in 2008 was replanting oil palm. The replanting occurred due to low SPH (Stand per Hectare) caused by elephant attack, during early stage of planting. See related indicator 2.2.1.</p> <p>Replanting has been performed by Bungo Tebo Estate since 2016 and planned to finish in 2019. Total replanting in 2016 was 295 ha, in 2017 was 449 ha and in 2018 was 447 ha.</p> <p><b>SMALLHOLDERS: BUNGO TEBO PLASMA</b></p> <p>No replanting activities performed in Smallholders area.</p>	N/A
7.6.2	<p>A procedure for identifying people entitled to compensation shall be available.</p> <p>- Major compliance –</p>	<p><b>BUNGO TEBO ESTATE AND MILL</b></p> <p>Principle 7 was not applicable. PT Rigunas Agri Utama Bungo Tebo has been planted since 1994, 1995 and 1996. Even though from the planting year, there was planting year 2008. Based on document verification, field visit and interview with stakeholders, it was known that the 512 Ha planted in 2008 was replanting oil palm. The replanting occurred due to low SPH (Stand per Hectare) caused by elephant attack, during early stage of planting. See related indicator 2.2.1.</p>	N/A

		<p>Replanting has been performed by Bungo Tebo Estate since 2016 and planed to finish in 2019. Total replanting in 2016 was 295 ha, in 2017 was 449 ha and in 2018 was 447 ha.</p> <p><b>SMALLHOLDERS: BUNGO TEBO PLASMA</b></p> <p>No replanting activities performed in Smallholders area.</p>	
7.6.3	<p>Records of calculation system and distribution of fair compensation shall be available.</p> <p>- Major compliance –</p>	<p><b>BUNGO TEBO ESTATE AND MILL</b></p> <p>Principle 7 was not applicable. PT Rigunas Agri Utama Bungo Tebo has been planted since 1994, 1995 and 1996. Even though from the planting year, there was planting year 2008. Based on document verification, field visit and interview with stakeholders, it was known that the 512 Ha planted in 2008 was replanting oil palm. The replanting occured due to low SPH (Stand per Hectare) caused by elephant attack, during early stage of planting. See related indicator 2.2.1.</p> <p>Replanting has been performed by Bungo Tebo Estate since 2016 and planed to finish in 2019. Total replanting in 2016 was 295 ha, in 2017 was 449 ha and in 2018 was 447 ha.</p> <p><b>SMALLHOLDERS: BUNGO TEBO PLASMA</b></p> <p>No replanting activities performed in Smallholders area.</p>	N/A
7.6.4	<p>Communities that have lost access and rights to land for plantation expansion shall be given opportunities to benefit from plantation development.</p> <p>- Minor compliance –</p>	<p><b>BUNGO TEBO ESTATE AND MILL</b></p> <p>Principle 7 was not applicable. PT Rigunas Agri Utama Bungo Tebo has been planted since 1994, 1995 and 1996. Even though from the planting year, there was planting year 2008. Based on document verification, field visit and interview with stakeholders, it was known that the 512 Ha planted in 2008 was replanting oil palm. The replanting occured due to low SPH (Stand per Hectare) caused by elephant attack, during early stage of planting. See related indicator 2.2.1.</p>	N/A

		<p>Replanting has been performed by Bungo Tebo Estate since 2016 and planed to finish in 2019. Total replanting in 2016 was 295 ha, in 2017 was 449 ha and in 2018 was 447 ha.</p> <p><b>SMALLHOLDERS: BUNGO TEBO PLASMA</b></p> <p>No replanting activities performed in Smallholders area.</p>	
7.6.5	<p>The process and outcome of any compensation claims shall be documented and made available to the affected communities and their representatives.</p> <p>- Minor compliance –</p>	<p><b>BUNGO TEBO ESTATE AND MILL</b></p> <p>Principle 7 was not applicable. PT Rigunas Agri Utama Bungo Tebo has been planted since 1994, 1995 and 1996. Even though from the planting year, there was planting year 2008. Based on document verification, field visit and interview with stakeholders, it was known that the 512 Ha planted in 2008 was replanting oil palm. The replanting occured due to low SPH (Stand per Hectare) caused by elephant attack, during early stage of planting. See related indicator 2.2.1.</p> <p>Replanting has been performed by Bungo Tebo Estate since 2016 and planed to finish in 2019. Total replanting in 2016 was 295 ha, in 2017 was 449 ha and in 2018 was 447 ha.</p> <p><b>SMALLHOLDERS: BUNGO TEBO PLASMA</b></p> <p>No replanting activities performed in Smallholders area.</p>	N/A
7.6.6	<p>Evidence shall be available that the affected communities and rights holders have access to information and advice that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands.</p>	<p><b>BUNGO TEBO ESTATE AND MILL</b></p> <p>Principle 7 was not applicable. PT Rigunas Agri Utama Bungo Tebo has been planted since 1994, 1995 and 1996. Even though from the planting year, there was planting year 2008. Based on document verification, field visit and interview with stakeholders, it was known that the 512 Ha planted in 2008 was replanting oil palm. The replanting occured due to low SPH (Stand per Hectare) caused by elephant attack, during early stage of planting. See related indicator 2.2.1.</p>	N/A

	- Minor compliance –	Replanting has been performed by Bungo Tebo Estate since 2016 and planed to finish in 2019. Total replanting in 2016 was 295 ha, in 2017 was 449 ha and in 2018 was 447 ha.  <b>SMALLHOLDERS: BUNGO TEBO PLASMA</b>  No replanting activities performed in Smallholders area.	
<b>Criterion 7.7</b>			
No use of fire in the preparation of new plantings other than in specific situations, as identified in the ASEAN Guidelines or other regional best practice.			
7.7.1	Records of zero burning implementation on land clearing, referring to the ASEAN Policy on zero burning (2003) and recognised techniques based on the existing regulations shall be available.  - Major compliance –	Principle 7 was not applicable. Even though from the planting year, there was planting year 2008. Based on document verification, field visit and interview with stakeholders, it was known that the 512 Ha planted in 2008 was replanting oil palm. The replanting occured due to low SPH (Stand per Hectare) caused by elephant attack, during early stage of planting. See related indicator 2.2.1.	N/A
7.7.2	In exceptional cases where fire has to be used for preparing land for planting, there shall be evidence of prior approval of the controlled burning as specified in 'Guidelines for the Implementation of the ASEAN on Zero Burning' 2003, or comparable guidelines in other regions.  - Minor compliance –	Principle 7 was not applicable. Even though from the planting year, there was planting year 2008. Based on document verification, field visit and interview with stakeholders, it was known that the 512 Ha planted in 2008 was replanting oil palm. The replanting occured due to low SPH (Stand per Hectare) caused by elephant attack, during early stage of planting. See related indicator 2.2.1.	N/A
<b>Criterion 7.8</b>			
New plantation developments are designed to minimize net greenhouse gas emissions.			
7.8.1	The carbon stock of the proposed development area and major potential sources of emissions	Principle 7 was not applicable. PT Rigunas Agri Utama Bungo Tebo has been planted since 1994, 1995 and 1996. Even though from the planting year, there was planting year 2008.	N/A



	that may result directly from the development shall be identified and estimated. - Major compliance –	Based on document verification, field visit and interview with stakeholders, it was known that the 512 Ha planted in 2008 was replanting oil palm. The replanting occurred due to low SPH (Stand per Hectare) caused by elephant attack, during early stage of planting. See related indicator 2.2.1.  Replanting has been performed by Bungo Tebo Estate since 2016 and planned to finish in 2019. Total replanting in 2016 was 295 ha, in 2017 was 449 ha and in 2018 was 447 ha.	
7.8.2	Records of a plan to minimize net GHG emissions shall be available. - Minor compliance –	Principle 7 was not applicable. PT Rigunas Agri Utama Bungo Tebo has been planted since 1994, 1995 and 1996. Even though from the planting year, there was planting year 2008. Based on document verification, field visit and interview with stakeholders, it was known that the 512 Ha planted in 2008 was replanting oil palm. The replanting occurred due to low SPH (Stand per Hectare) caused by elephant attack, during early stage of planting. See related indicator 2.2.1.  Replanting has been performed by Bungo Tebo Estate since 2016 and planned to finish in 2019. Total replanting in 2016 was 295 ha, in 2017 was 449 ha and in 2018 was 447 ha.	N/A

**Principle 8: Commitment to continuous improvement in key areas of activity**

**Criterion 8.1**

Growers and millers regularly monitor and review their activities, and develop and implement action plans that allow demonstrable continual improvement in key operations.

8.1.1	The action plan for monitoring shall be available, based on a consideration of the social and environmental impacts and routine evaluation of the plantation and mill operations. As a minimum, these shall include, but are not necessarily be limited to:  <ul style="list-style-type: none"> <li>Reduction in use of certain chemicals (Criterion 4.6);</li> <li>Environmental impacts (Criteria 4.3, 5.1</li> </ul>	<b>Bungo Tebo POM and Estate:</b>  PT Rigunas Agri Utama – Bungo Tebo POM and Estate have performed continual improvements to optimizing the yield or FFB production, reduction in certain use of chemicals, environmental impact, waste reduction, pollution and greenhouse gas emission and social impact. The action plan are monitored and documented, e.g.:  - Bungo Tebo Estate has modify the fertilizing equipment by using Kaprot (Kap Semprot) to apply fertilizer for Mucuna sp to enhance the productivity. Before modification the output of fertilizing work for Mucuna is less, high cost, low quality and	Comply
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	<p>and 5.2);</p> <ul style="list-style-type: none"> <li>• Waste reduction (Criterion 5.3);</li> <li>• Pollution and greenhouse gas (GHG) emissions (Criteria 5.6 and 7.8);</li> <li>• Social impacts (Criterion 6.1);</li> <li>• Optimising the yield of FFB production (Criterion 4.2)</li> </ul> <p>- Major compliance –</p>	<p>uneven. After modification, the output is higher with lower cost, higher quality and consistent.</p> <ul style="list-style-type: none"> <li>- Bungo Tebo POM has minimize the water usage for process with target 1.3 m<sup>3</sup>/ton FFB. Minimize water usage by recycling the water from cooler turbin to water basin, recycling water condensate for sludge dillution and install the water pump to sludge tank to decrease the oil underflow CST.</li> <li>- Bungo Tebo Estate has modified the loose fruit picker tools to increase productivity of harvesting; continue dispose hazardous waste to the approval collector; Increasing planting beneficial plant (<i>Tunera subulata</i> and <i>Cassia Tora</i>) host plant for natural predato; Applied EFB as fertilizer; Controlling soil erosion in WTP plant area; Providing manuring programme and for scheme smallholder to increase the yields.</li> <li>- Bungo Tebo POM has decreased power consumption at kernel station.</li> <li>- Bungo Tebo POM has minimized FFB loses, by:             <ul style="list-style-type: none"> <li>○ Minimizing FFB unloading on the floor</li> <li>○ Ensure the pressure at sterilizing process is 3</li> <li>○ Ensure that bunch press is operated effectively</li> <li>○ Developing visual control or monitoring of oil loses at the station.</li> </ul> </li> <li>- Bungo Tebo POM has decreased FFA, by:             <ul style="list-style-type: none"> <li>○ Minimizing FFB unloading on the floor</li> <li>○ Emptying FFB from the conveyor after splitter at the end of process.</li> <li>○ Drain condensate water after stop press.</li> </ul> </li> </ul> <p><b>Scheme Smallholders:</b></p>	
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		<p>Smallholder manager has organized coordination meeting with all KOPERASI and KT as well as member of smallholder in quarterly basis or the meeting can be held if there is an urgent issue. The meeting conducted to review the work progress of each KOPERASI and action taken to improve their productivity. Continous improvement plant at Bungo Tebo Smallholders are as follows:</p> <ul style="list-style-type: none"> <li>• Planting Turnera subulatta and Cassia tora as host of leaf eater caterpillar.</li> <li>• Developing infrastructure of Soil and Water Conservation.</li> <li>• Increasing FFB quality.</li> <li>• Developing Pruning activity program</li> <li>• Create checklist of PPE monitoring</li> </ul> <p>The smallholder members have attended training provided by management of Bungo Tebo Smallholder, such as: OHS training, Best management practice training, HCV training, social policy training, environmental training, etc. Each training that attended by members recorded in their personal book "Buku Panduan dan Catatan Petani". During audit and interview with members indicated that they have an understanding against RSPO, best management practice standard, OHS, HCV and other relevant knowledge.</p>	
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**Appendix B: Approved Time Bound Plan**

Name of company	Name of Mill	Location	Supply Base	Time Bound Plan	Target Year for RSPO
PT Inti Indosawit Subur	Buatan I Mill	Delik & Pangkalan Kerinci Village, Bunut Langgam District, Pelalawan Regency, Riau	Buatan Estate	2010	Certified on 16 September 2010 Re-Certified on 16 September 2015
			Buatan (Plasma)	2011	
PT Inti Indosawit Subur	Buatan II Mill	Delik & Pangkalan Kerinci Village, Bunut Langgam District, Pelalawan Regency, Riau	Buatan Estate	2010	Certified on 16 September 2010 Re-Certified on 16 September 2015
				Buatan (Plasma)	
PT Inti Indosawit Subur	Ukui I Mill	Ukui Village, Ukui District, Pelalawan Regency, Riau	Ukui Estate	2010	Certified on 1 March 2011 Re-Certified on 1 March 2016
				Ukui (Plasma)	
PT Inti Indosawit Subur	Ukui II Mill	Ukui Village, Ukui District, Pelalawan Regency, Riau	Soga Estate	2010	Certified on 1 March 2011 Re-Certified on 1 March 2016
				Ukui (Plasma)	
PT Inti Indosawit Subur	Tungkal Ulu Mill	Pulau Pauh / Penyabungan / Merlung Village, Tungkal Ulu District, Tanjung Jabung Regency, Jambi	Tungkal Ulu Estate	2011	Certified on 15 August 2012 Re-Certification on August 2017
				Tungkal Ulu (Plasma)	
PT Inti Indosawit Subur	Muara Bulian Mill	Singoan / Bukit Sari / Bulian Jaya Village, Muara Bulian / Pematang Pauh District, Batang Hari Regency, Jambi	Muara Bulian Estate	2011	Certified on 28 August 2012 Re-Certification on August 2017
				Muara Bulian (Plasma)	
PT Tunggal Yunus Estate	Topaz Mill	Petapahan village, Tapung District, Kampar Regency, Riau	Topaz & Seed Garden Estate	2013	Certified on 30 March 2015
PT Dasa Anugrah Sejati	Taman Raja Mill	Lubuk Bernai / Kampung Baru / Pelabuhan Dagang / Pematang Pauh Village, Tungkal Ulu District, Tanjung Jabung Regency, Jambi	Taman Raja & Badang Estate	2013	Certified on 20 February 2015
PT Mitra Unggul Pusaka	Segati Mill	Langkan / Penarikan / Tambak / Sotol Village, Langgam District, Pelalawan Regency, Riau	Segati Estate	2014	Re-Audit 2018
			Penarikan & Gondai Estate	2014	Re-Audit 2018
			Penarikan (KKPA)	2018	-
			Gunung Sahilan (KKPA)	2018	-
PT Supra Matra Abadi	Tanah Datar Mill	Tanah Datar Petatal Village, Talawi District, Asahan Regency, North Sumatera	Tanah Datar Estate	2013	Certified on 18 May 2015
				Bahilang Estate	
PT Supra	Aek Nabara	S1-S3 / Sukadame Village, Bilah Hulu /	Aek Nabara Estate	2013	Certified on 21

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Matra Abadi	Mill	Kota Pinang District, Labuhan Batu Regency, North Sumatra			April 2015
PT Supra Matra Abadi	Teluk Panjie Mill	Teluk Panjie Village, Kampung Rakyat District, Labuhan Batu Regency, North Sumatra	Teluk Panjie Estate	2013	Certified on 21 April 2015
PT Rigunas Agri Utama	Peranap Mill	Simelinyang / Pauh Ranap / Sengkilo Village, Peranap District, Indragiri Hulu Regency, Ria	Peranap Estate	2013	Certified on 7 January 2015
			Peranap (Plasma)	2016	Certified on 18 August 2016
PT Rigunas Agri Utama	Bungo Tebo Mill	Tuo Sumai / Sungai Rambai Village, PWK Sumai / Tebo Ulu District, Bungo Tebo Regency, Jambi	Bungo Tebo Estate	2016	Certified on 3 December 2015
			Bungo Tebo (Plasma)	2017	Certified on 7 February 2017
PT Indo Sepadan Jaya	Tanjung Selamat Mill	Kampung Padang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra	Tanjung Selamat	2017	Certified on 26 May 2015
			Pangkalan	2017	Certified on 26 May 2015
PT Saudara Sejati Luhur	Gunung Melayu I	Rahuning Village, Bandar Pulau District, Asahan Regency, North Sumatra	Pulau Maria Estate	2017	Certified on 7 September 2015
PT Gunung Melayu	Gunung Melayu II	Gonting Mahala Village, Bandar Pulau District, Asahan Regency, North Sumatra	Sentral & Batu Anam Estate	2017	Certified on 8 July 2015
PT Hari Sawit Jaya	Negri Lama II	Negri Lama Seberang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra	Negeri Lama	2018	- Certified on 23 December 2016 as independent Mill - Audit in 2016 as Mill and Supply base
			Aek Kuo	2018	
PT Hari Sawit Jaya	Negri Lama I	Negri Lama Seberang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra	*3rd party which is excluded from scope of certification	2013	- Certified on 8 April 2015 - Audit in 2016 as independent Mill

**Appendix C: GHG Reporting Executive Summary**

The GHG emissions that were produced in **2017** for **Bungo Tebo POM** and supply base was calculated using the PalmGHG Calculator version 3.0.1. The assessment team had verified the data input in the PalmGHG Calculator against operations records. PalmGHG Calculation Options selected 'Full version' and 'Exclude LUC Emission' calculation option is not applied. The records verified includes:

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

The summary of the Net GHG emitted in **2017** for **Bungo Tebo POM** and supply base are as following:

Emission per product	tCO <sub>2</sub> e/tProduct
CPO	0.88
PKO	0.85

Extraction	%
OER	21.03
KER	5.39

Production	t/yr
FFB Process	268,110
CPO Produced	56,380
PKO Produced	14,463

Land Use	Ha
OP Planted Area	8,388.96
OP Planted on peat	0
Conservation (forested)	0
Conservation (non-forested)	69.63
<b>Total</b>	<b>8,458.59</b>

**Summary of Field Emission and Sink**

	Own Crop*		Group		3 <sup>rd</sup> Party		Total	
	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB
<b>Emission</b>								
Land Conversion	24,958.24	0.63	57,896.4	0.58	0	0	82,854.64	1.21
CO <sub>2</sub> Emission from fertilizer	1,814.71	0.05	4,586.78	0.05	0	0	6,401.49	0.1
NO <sub>2</sub> Emmission	2,502	0.06	2,956.43	0.03	0	0	5,458.43	0.09
Fuel Consumption	1,159.37	0.03	1,050.39	0.01	0	0	2,209.76	0.04
Peat Oxidation	0	0	0	0	0	0	0	0
<b>Sink</b>								
Crop Sequestration	-23,657.1	-0.6	-54,878.11	-0.55	0	0	-78,535.21	-0.15
Conservation	0	0	0	0	0	0	0	0

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Sequestration								
<b>Total</b>	<b>6,777.22</b>	<b>0.17</b>	<b>11,611.89</b>	<b>0.12</b>	0	0	<b>35,238.02</b>	<b>0.29</b>

*\*Note: Includes both estates and smallholders*

**Summary of Mill Emission and Credit**

	tCO <sub>2</sub> e	tCO <sub>2</sub> e/tFFB
<b>Emission</b>		
POME	55,741.4	0.21
Fuel Consumption	366.05	0
Grid Electricity Utilisation	0	0
<b>Credit</b>		
Export of Grid Electricity	-570.39	0
Sales of PKS	-28,261.2	-0.11
Sales of EFB	0	0
<b>Total</b>	<b>27,275.85</b>	<b>0.1</b>

**Summary of Kernel Crusher Emission and Credit (if applicable)**

Emissions	tCO <sub>2</sub> e
PK from own mill	12,762.56
PK from other source	0
Fuel Consumptions	0
<b>Total Crusher emissions</b>	<b>12,762.56</b>

\*This mill has no kernel crusher operation.

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

<b>POME Diverted to Anaerobic Digestion:</b>	
Divert to anaerobic pond (%)	100
Divert to methane captured (flaring) (%)	0
Divert to methane captured (energy generation) (%)	0

**Appendix D: General Chain of Custody Requirements for the Supply Chain**

<b>5.1 Applicability of the general chain of custody requirements for the supply chain</b>			
	<b>Requirement</b>	<b>Evidence</b> For any N/A raised, justification is required.	<b>Compliance</b> (Yes / No or N/A)
5.1.1	The General Chain of Custody requirements of the RSPO Supply Chain Standard shall apply to any organization throughout the supply chain that takes legal ownership and physically handles RSPO Certified Sustainable oil palm products at a location under the control of the organization including outsourced contractors. After the end product manufacturer, there is no further requirement for certification.	The General Chain of Custody requirements of the RSPO Supply Chain Standard is applicable for PT Rigunas Agri Utama – Bungo Tebo Palm Oil Mill. Bungo Tebo Mill physically process RSPO Certified FFB into Certified Sustainable Palm Oil (CSPO) and Palm Kernel (CSPK). Bungo Tebo Mill also process non-certified FFB into non-certified CPO and PK, therefore the applicable RSPO SCC model is Module E - CPO Mills: Mass Balance.  No change in the supply chain module since last assessment.	Yes
5.1.2	Traders and distributors require a licence obtained from RSPO Secretariat to sell RSPO certified product but do not themselves require certification. When selling RSPO certified products, a licensed trader and/or distributor shall pass on the certification number of the product manufacturer and the applicable supply chain model.	PT Rigunas Agri Utama – Bungo Tebo Palm Oil Mill is not a trader or distributors. The site physically handle and process Fresh Fruit Bunch (FFB) into CPO and PK. This clause is not applicable for the certification unit.	N/A
5.1.3	Either the operator at site level or its parent company seeking certification shall be a member of the RSPO and shall register on the RSPO IT platform.	PT Rigunas Agri Utama is a subsidiary of PT Inti Indosawit Subur, which is a member of RSPO with membership number 1-0022-06-000-00, since 6 February 2006.  PT Rigunas Agri Utama – Bungo Tebo Palm Oil Mill has been registered in RSPO IT Paltform with registered ID number RSPO_PO1000002913.	Yes
5.1.4	Processing aids do not need to be included within an organization’s scope of certification.	PT Rigunas Agri Utama – Bungo Tebo Palm Oil Mill does not include any processing aid into organization’s scope of certification.	Yes
<b>5.2 Supply chain model</b>			



5.2.1	The site can only use the same supply chain model as its supplier or go to a less strict system. Declassification/downgrading can only be done in the following order: Identity Preserved -> Segregated -> Mass Balance.	Bungo Tebo Palm Oil Mill is certified against RSPO P&C 2013 with Supply Chain model Mass Balance. Therefore the site can process FFB from certified and non-certified sources. Bungo Tebo POM received certified raw material (Fresh Fruit Bunch) from its own estate (Bungo Tebo Estate) and from the Scheme Smallholder (Kebun Plasma Bungo Tebo). The certification of Bungo Tebo Estate and Plasma are fall under PT Rigunas Agri Utama – Bungo Tebo POM with certificate number RSPO 620917, start on 3 December 2015 and expired on 2 December 2020  The non-certified FFB are coming from individual farmer or FFB collector.  Management of PT Rigunas Agri Utama - Bungo Tebo POM aware that they can only claim their product (CPO and PK) as Mass Balance (MB).	Yes
5.2.2	The site can use one (1) or a combination of supply chain models as audited and certified by the CB.	PT Rigunas Agri Utama - Bungo Tebo POM uses Mass Balance as their RSPO Supply Chain Certification model, therefore the site can only claim its product as Mass Balance (MB).	Yes
<b>5.3. Documented Procedures</b>			
5.3.1	The site shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:  <ul style="list-style-type: none"> <li>• Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements.</li> </ul>	During this 3 <sup>rd</sup> Annual Surveillance Assessment (ASA3) PT Rigunas Agri Utama - Bungo Tebo POM can demonstrates: <ol style="list-style-type: none"> <li>1. Standard Operating Procedures – Traceability (AA-MPM-OP-1400.17.R6) dated 1 September 2017. The procedures cover traceability of CPO and PK, since FFB receiving from Bungo Tebo Estate and Bungo Tebo Plasma, processing up to shipping of CPO and PK as well as daily production report. The procedure also regulates the internal audit by Sustainability Internal Audit Manager. Traceability records are to be kept for 10 years.</li> <li>2. Standard Operating Procedure – Book Keeping (AA-MPM-OP-1400.18-R4). The procedure explains method to check only certified product received. The book keeping mass balance stated every 3 months: January-March, April-June, July-September, and October-December each year. Head of Environment and Sustainability will inform to</li> </ol>	Yes

		<p>Certification Body in the case of projected overproduction.</p> <p>3. SOP of Palm Oil Mill operation:</p> <ul style="list-style-type: none"> <li>a. SOP AA-MPM-OP-1400.02.R2, dated 1 September 2011, Stasiun Penerimaan (FFB Receiving Station);</li> <li>b. SOP AA-MPM-OP-1400.03.R1, dated 1 February 2009, Stasiun Rebusan (Sterilizer);</li> <li>c. SOP AA-MPM-OP-1400.04.R1, dated 1 February 2009, Stasiun Pemisahan Berondolan (Loose Fruit Separation);</li> <li>d. SOP AA-MPM-OP-1400.05-R1, dated 1 February 2009, Stasiun Pengadukan dan Pengempaan (Pressing Station);</li> <li>e. SOP AA-MPM-OP-1400.06-R1, dated 1 February 2009, Stasiun Pemurnian (Clarification);</li> <li>f. SOP AA-MPM-OP-1400.07-R1, dated 1 February 2009, Stasiun Pemisahan Nut dan Fiber (Nut and Fiber separation);</li> <li>g. SOP AA-MPM-OP-1400.08-R1, dated 1 February 2009, Stasiun Kernel (Kernel Station);</li> <li>h. SOP AA-MPM-OP-1400.09-R1, dated 1 February 2009, Stasiun Boiler;</li> <li>i. SOP AA-MPM-OP-1400.10-R1, dated 1 February 2009, Stasiun Engine Room;</li> <li>j. SOP AA-MPM-OP-1400.11-R1, dated 1 February 2009, Stasiun Water Treatment;</li> <li>k. SOP AA-MPM-OP-1400.12-R1, dated 1 February 2009, Laboratorium;</li> <li>l. SOP AA-MPM-OP-1400.13-R1, dated 1 February 2009, Stasiun Pengelolaan Limbah (Palm Oil Mill Effluent Treatment);</li> <li>m. SOP AA-MPM-OP-1400.14-R2, dated 1 September 2011, Stasiun Penimbunan dan Pengiriman CPO dan Kernel (CPO and PK Storage and Despatch);</li> <li>n. SOP AA-MPM-OP-1400.15-R1, dated 1 February 2009, Perawatan (Preventive Maintenance and Repair).</li> </ul>	
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	<ul style="list-style-type: none"> <li>Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records).</li> </ul>	PT Rigunas Agri Utama - Bungo Tebo POM is able to demonstrate complete and up-to-date records and report demonstrating compliance with the supply chain's general requirement and modular requirement, including training records (see Clause 5.8 – Training).	Yes
	<ul style="list-style-type: none"> <li>Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the organization's procedures for the implementation of this standard.</li> </ul>	As per Procedure of Traceability (AA-MPM-OP-1400.17-R6), the responsible person in charge to the supply chain system is Mill Manager. During audit, the mill manager was able to demonstrate sufficient knowledge and understanding on RSPO supply chain implementation for palm oil mill.	Yes
5.3.2	The site shall have a written procedure to conduct annual internal audit to determine whether the organization; i) conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.	As per Procedure of Traceability (AA-MPM-OP-1400.17-R6) chapter 5.7, Sustainability Internal Audit Manager or Team conducted internal audit once in a year, to ensure all operational and documentation activities are comply to the requirement in RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims.	Yes
	ii) effectively implements and maintains the standard requirements within its organization	The site has effectively implements and maintains the standard requirement by performing internal audit. Latest RSPO SCC Internal audit in Bungo Tebo POM carried out on 2 August 2018 by Mr. Rico Santoso Pakpahan, against RSPO SCCS 2017 – RSPO General Chain of Custody requirements and Module E: Mass Balance. Audit results two non-conformities, findings can be demonstrated and the corrective action has been implemented to address issue found during audit. Other RSPO internal audit at Bungo Tebo POM has been performed at 2 – 3 May 2018, resulting 11 non conformities. Corrective action plan has been determined and implemented.	Yes

**5.4. Purchasing and goods in**

<p>5.4.1</p>	<p>The receiving site shall ensure that purchases of RSPO certified oil palm products are in compliance and the following minimum information for RSPO certified products is made available by the supplier in document form:</p> <ul style="list-style-type: none"> <li>• The name and address of the buyer;</li> <li>• The name and address of the seller;</li> <li>• The loading or shipment/delivery date;</li> <li>• The date on which the documents were issued;</li> <li>• A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations);</li> <li>• The quantity of the products delivered;</li> <li>• Any related transport documentation;</li> <li>• Supply Chain certificate number of the seller;</li> <li>• A unique identification number</li> </ul>	<p>PT Rigunas Agri Utama - Bungo Tebo POM has demonstrated SOP of Traceability (AA-MPM-OP-1400.7.R6), chapter 5.1 indicates the Weighbridge Clerk has responsibility to input data and print weighbridge card based on "Surat Pengantar TBS" (FFB Delivery Note), covering information e.g. estate name and block number, mill name, date of delivery, product description and quantity, RSPO certificate number, transporter identity and unique identification number.</p> <p>PT Rigunas Agri Utama - Bungo Tebo POM receive FFB from certified and non-certified source. Certified source consist of own estate, Bungo Tebo Estate and Scheme Smallholder (Kebun Bungo Tebo Plasma). Non-certified FFB sourced from third party supplier, consist of individual farmers and/or FFB collectors, e.g.: PD Asan Jaya, Pandawa 58, CV Asri Bersaudara, SDR, Koperasi Sawit Makmur, UD Royal, KOPERASI Sawit Tanduk Perkasa.</p> <p>Document "Surat Pengantar TBS" (FFB Delivery Note) and Kartu Timbangan (Weighbridge Card) described identity and location of FFB source and other item required e.g.</p> <p>Certified FFB:</p> <ul style="list-style-type: none"> <li>- Weighbridge Card #PBTA118204102 dated 15/08/2018, commodity: certified FFB; source: Bungo Tebo Estate; to Bungo Tebo Palm Oil Mill; net weight: 6,170 kg; Afdeling: 1; amount: 238 bunch; Block: A94g; RSPO Cert: RSPO620917; Transporter: Internal; Vehicle: BH 8328 ME; Driver: Hendra; Batch number: 13-100-16462017-41078810.</li> <li>- Weighbridge Card #PBTA118104099 dated 15/08/2018, commodity: certified FFB; source: Bungo Tebo Estate; to Bungo Tebo Palm Oil Mill; net weight: 3,590 kg; Afdeling: 2; amount: 150 bunch; Block: B95j; RSPO Cert: RSPO620917; Transporter: Internal; Vehicle: BK 8977 CR; Driver: Hakim; Batch number: 13-100-16462017-41078778.</li> <li>- Weighbridge Card #PBTA118104104 dated 15/08/2018, commodity: certified FFB; source: Bungo Tebo Estate; to Bungo Tebo Palm Oil Mill; net weight: 5,810 kg; Afdeling: 3; amount: 202 bunch; Block: C96g;</li> </ul>	<p>Yes</p>
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		<p>RSPO Cert: RSPO620917; Transporter: Internal; Vehicle: BM 8529 TE; Driver: Zulkarnain; Batch number: 13-100-16462017-41078828.</p> <ul style="list-style-type: none"> <li>- Weighbridge Card #PBTA118104097 dated 15/08/2018, commodity: certified FFB; source: Bungo Tebo Estate; to Bungo Tebo Palm Oil Mill; net weight: 2,940 kg; Afdeling: 4; amount: 154 bunch; Block: D08j; RSPO Cert: RSPO620917; Transporter: Internal; Vehicle: BH 6286 MG; Driver: Dedi G.; Batch number: 13-100-16462017-41078745.</li> <li>- Weighbridge Card #PBTA218215340 dated 22/09/2018, commodity: certified FFB; source: Plasma Bungo Tebo (KOPERASI Tani Mandiri); to Bungo Tebo Palm Oil Mill; net weight: 5,066 kg; location KT-105 (Harapan Sukses); amount: 250 bunch; Block: P5105; RSPO Cert: RSPO620917; Transporter: Plasma Transport; Vehicle: BH 8306 WJ; Driver: Ajo; Batch number: 13-100-34342017-41092404.</li> <li>- Weighbridge Card #PBTA218215356 dated 22/09/2018, commodity: certified FFB; source: Plasma Bungo Tebo (KOPERASI Tunas Harapan); to Bungo Tebo Palm Oil Mill; net weight: 5,587 kg; location KT-047 (Tunas Harapan); amount: 260 bunch; Block: P4041; RSPO Cert: RSPO620917; Transporter: Plasma Transport; Vehicle: BH 8912 WU; Driver: Bay; Batch number: 13-100-34342017-41092486.</li> <li>- Weighbridge Card #PBTA218215183 dated 10/09/2018, commodity: certified FFB; source: Plasma Bungo Tebo (KOPERASI Sejahtera Tani); to Bungo Tebo Palm Oil Mill; net weight: 4,709 kg; location KT-051 (Tani Sadar Sendiri); amount: 200 bunch; Block: P4051; RSPO Cert: RSPO620917; Transporter: Plasma Transport; Vehicle: BH 8141 MB; Driver: Aan; Batch number: 13-100-34342017-41091457.</li> <li>- Weighbridge Card #PBTA218215298 dated 20/09/2018, commodity: certified FFB; source: Plasma Bungo Tebo (KOPERASI Tanjung Jaya Bersama); to Bungo Tebo Palm Oil Mill; net weight: 4,976 kg; location KT-109 (Tanjung Jaya); amount: 200 bunch; Block: P5109; RSPO Cert: RSPO620917; Transporter: Plasma Transport; Vehicle: BH 8141 MB; Driver: Aan; Batch number: 13-100-34342017-41092118.</li> </ul>	
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		<p>Non-certified FFB:</p> <ul style="list-style-type: none"> <li>- Surat Pengantar TBS (FFB delivery note) dated 15/08/2018 from CV Asri Bersaudara to PT Rigunas Agri Utama - Bungo Tebo Palm Oil Mill; amount: 50 bunch. Weighbridge Card #PBTA518213679 dated 15/08/2017, commodity: outside FFB; source: CV Asri Bersaudara, ID: ST00062; to PT Rigunas Agri Utama - Bungo Tebo Palm Oil Mill; net weight: 1,501 kg; amount: 50 bunch; Transporter: general; Vehicle: BM 9717 NW; Driver: Boy.</li> <li>- Surat Pengantar TBS (FFB delivery note) dated 15/08/2018 from SDR to PT Rigunas Agri Utama - Bungo Tebo Palm Oil Mill; amount: 659 bunch. Weighbridge Card #PBTA518213673 dated 15/08/2017, commodity: outside FFB; source: SDR, ID: ST00063; to PT Rigunas Agri Utama - Bungo Tebo Palm Oil Mill; net weight: 9,814 kg; amount: 659 bunch; Transporter: general; Vehicle: BH 6367 UU; Driver: Amit.</li> </ul>	
	<ul style="list-style-type: none"> <li>• Information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation).</li> </ul>	<p>Informations are complete and presented in several document, e.g. Surat Pengantar TBS and Weighbridge Card. Report of FFB receiving are documented in Laporan Harian Pabrik (Mill Daily Report), Laporan Unit Kebun (Monthly Mill Report) and Mill Summary Report.</p>	
	<ul style="list-style-type: none"> <li>• The site receiving RSPO certified oil palm products shall ensure that the products are verified as being RSPO certified. For sites that are required to announce and confirm trades in the RSPO IT platform, this shall include making Shipping Announcements/Announcements and Confirmations on the RSPO IT platform per shipment or group shipments. Refer to section 5.7.1 of this document for further guidance.</li> </ul>	<p>PT Rigunas Agri Utama - Bungo Tebo Mill has ensured that certified FFB received are RSPO certified based on the source of FFB. Based on interview with weighbridge clerk and FFB receiving station, the Mill only received certified FFB from own estate (Bungo Tebo Estate) and Scheme Smallholder (Plasma Bungo Tebo) which have been certified as supply bases of Bungo Tebo POM. Other than that are non-certified FFB.</p>	<p>Yes</p>
	<ul style="list-style-type: none"> <li>• A check of the validity of the Supply Chain Certification of suppliers is required for all sites that are SC certified. This</li> </ul>	<p>The site does not need to check the certificate validity of the FFB source, because the certification of the FFB suppliers is fall under PT Rigunas Agri</p>	<p>N/A</p>

	shall be checked via the list of RSPO Supply Chain Certified sites on the RSPO website ( <a href="http://www.rspo.org">www.rspo.org</a> ) at least annually or through the RSPO IT Platform by confirmation of (shipping) announcements.	Utama - Bungo Tebo POM.	
	<ul style="list-style-type: none"> <li>The validity of licence for traders and distributors shall also be checked via the RSPO website at least annually or through the RSPO IT platform by confirmation of shipping announcements / announcements.</li> </ul>	The site has never purchased or sales any certified palm oil product from traders or distributors.	N/A
5.4.2	The site shall have a mechanism in place for handling non-conforming oil palm products and/or documents.	<p>In the case on non-conforming raw material entering the process, PT Rigunas Agri Utama - Bungo Tebo POM has the mechanism to handle non-conforming material and/or document. PT Rigunas Agri Utama - Bungo Tebo POM demonstrated the simulation on recall of non-conforming material.</p> <p>Until this 3<sup>rd</sup> annual surveillance assessment, there has been no case of non-conforming material entering the process.</p>	Yes
<b>5.5. Outsourcing activities</b>			
5.5.1	<p>In cases where an operation seeking or holding certification outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the operation seeking or holding certification shall ensure that the independent third party complies with the requirements of the RSPO Supply Chain Certification Standard. A CPO mill and independement mil cannot outsource processing activities like refining or crushing.</p> <p>This requirement is not applicable to outsourced storage facilities where the management of the oil palm product(s) and instructions for tank movements are controlled by the certified organization (not the tank farm manager).</p>	<p>The transport for RSPO certified sustainable CPO delivery was carried out by CV Teman Setia. This contractor was appointed, contracted and instructed by the buyer. The contract is between PT Sari Dumai Sejati (buyer) and the transporters. However, the Director of CV Teman Setia has issued Statement Letter dated 30 June 2018, that declare commitment to comply to RSPO Supply Chain requirements, during transport of RSPO certified material and allow Certification Body and/or RSPO Auditor to conduct audit to the company operation if it is deemed necessary.</p> <p>PT Rigunas Agri Utama – Bungo Tebo POM does not have control for shipping instruction/transport instruction. Audit team concluded that there is no outsources activities applicable in Bungo Tebo POM.</p> <p>Not applicable.</p>	N/A

5.5.2	<p>Sites which include outsourcing within the scope of their RSPO Supply Chain certificate shall ensure the following:</p> <p>a. The site has legal ownership of all input material to be included in outsourced processes;</p>	<p>PT Rigunas Agri Utama – Bungo Tebo POM does not have control for shipping instruction/transport instruction. Audit team concluded that there is no outsources activities applicable in Bungo Tebo POM. Not applicable.</p>	N/A
	<p>b. The site has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the site to ensure that certification bodies (CBs) have access to the outsourcing contractor or operation if an audit is deemed necessary.</p>	<p>PT Rigunas Agri Utama – Bungo Tebo POM does not have control for shipping instruction/transport instruction. Audit team concluded that there is no outsources activities applicable in Bungo Tebo POM. Not applicable.</p>	N/A
	<p>c. The site has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</p>	<p>PT Rigunas Agri Utama – Bungo Tebo POM does not have control for shipping instruction/transport instruction. Audit team concluded that there is no outsources activities applicable in Bungo Tebo POM. Not applicable.</p>	N/A
	<p>d. The site seeking or holding certification shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and any and all information, when this is announced in advance.</p>	<p>PT Rigunas Agri Utama – Bungo Tebo POM does not have control for shipping instruction/transport instruction. Audit team concluded that there is no outsources activities applicable in Bungo Tebo POM. Not applicable.</p>	N/A
5.5.3	<p>The site shall record the names and contact details of all contractors used for the processing or physical handling of RSPO certified oil palm products.</p>	<p>PT Rigunas Agri Utama – Bungo Tebo POM does not have control for shipping instruction/transport instruction. Audit team concluded that there is no outsources activities applicable in Bungo Tebo POM. Not applicable.</p>	N/A
5.5.4	<p>The site shall at its next audit inform its CB of the names and contact details of any new contractor used for the processing or physical handling of RSPO certified oil palm</p>	<p>PT Rigunas Agri Utama – Bungo Tebo POM does not have control for shipping instruction/transport instruction. Audit team concluded that there is no outsources activities applicable in Bungo Tebo POM.</p>	N/A



	products.	Not applicable.	
<b>5.6. Sales and goods out</b>			
5.6.1	<p>The supplying site shall ensure that the following minimum information for RSPO certified products is made available in document form.</p> <ul style="list-style-type: none"> <li>• The name and address of the buyer;</li> <li>• The name and address of the seller;</li> <li>• The loading or shipment/ delivery date;</li> <li>• The date on which the documents were issued;</li> <li>• A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations);</li> <li>• The quantity of the products delivered;</li> <li>• Any related transport documentation;</li> <li>• Supply chain certificate number of the seller;</li> <li>• A unique identification number</li> </ul>	<p>PT Rigunas Agri Utama - Bungo Tebo POM has demonstrated SOP of Traceability (AA-MPM-OP-1400.7.R6), chapter 5.2 indicates the Marketing Manager issued Delivery Order (DO) with information: name and address of production unit, name and address of buyer, contract number, type of product transportation (land/sea), distance, type of product (CPO or PK, certified or non-certified), quantity of product, delivery date, product qualification specification (CPO or PK: FFA, water content, dirt), Supply chain model (Mass Balance).</p> <p>At the Mill, weighbridge operator printed out CPO or PK weighbridge card, based on DO from marketing which indicates: type of commodity, CPO or PK certified or not-certified; source and destination address; Supply Chain model: (Mass Balance); Certificate number of the Mill; date of delivery, Product quality specification (moisture, FFA, dirt); Contract number/DO number; Quantity, Transport detail (driver name, vehicle number); Buyer address.</p> <p>Certified CPO delivered to PT Sari Dumai Sejati – Lubuk Gaung, whilst certified PK delivered to PT Rigunas Agri Utama – Bungo Tebo KCP. PT Sari Dumai Sejati hold RSPO SCC certificate CU-RSPO SCC-821960, issued CU; whilst PT Rigunas Agri Utama – Bungo Tebo KCP hold RSPO SCC certificate RSPO 661647 issued by BSI.</p> <p>Sampled document of Certified CPO delivery:</p> <ul style="list-style-type: none"> <li>- Delivery Order #08307/DC41/02/18 dated 16/08/2018; Seller is PT Rigunas Agri Utama - Bungo Tebo POM; Buyer is PT Sari Dumai Sejati – Lubuk Gaung; Commodity is RSPO certified CPO; Supply Chain Model is Mass Balance; Quantity is 500,000 kg; Supply Chain Certificate is RSPO 620917.</li> <li>- Weighbridge Card #PBTC118201446 dated 03/09/2018; Seller is PT</li> </ul>	Yes

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		<p>Rigunas Agri Utama - Bungo Tebo POM; Buyer is PT Sari Dumai Sejati, Lubuk Gaung; Delivery date is 03/09/2018; Commodity is CPO Certified RSPO; Supply Chain Model is Mass Balance; Quantity is 30,530 kg; based on DO #08307/DC41/02/18; Transporter is CV Teman Setia, BK 9347 VN; Supply Chain Certificate number RSPO 620917; FFA: 3.16%; water: 0.22%; dirt: 0.026%; Seal number 4405745 - 4405753.</p> <p>Sampled document of Non Certified CPO delivery:</p> <ul style="list-style-type: none"> <li>- Delivery Order #08312/DN41/02/18 dated 31/08/2018; Seller is PT Rigunas Agri Utama - Bungo Tebo POM; Buyer is PT Sari Dumai Sejati – Lubuk Gaung; Commodity is CPO; Quantity is 500,000 kg.</li> <li>- Weighbridge Card #PBTC118201344 dated 20/09/2018; Seller is PT Rigunas Agri Utama - Bungo Tebo POM; Buyer is PT Sari Dumai Sejati, Lubuk Gaung; Delivery date is 20/09/2018; Commodity is CPO; Quantity is 28,230 kg; based on DO #08304/DN41/02/18 and #08312/DN41/02/18; Transporter is CV Teman Setia, BK 9013 VN; FFA: 3.29%; water: 0.20%; dirt: 0.029%; Seal number 4404105 - 4404111.</li> </ul> <p>Certified PK are sent to Bungo Tebo Kernel Crushing Plant under PT Rigunas Agri Utama which located in the same facility with Bungo Tebo POM. Certified PK transfers are documented in Delivery Form.</p> <p>Sampled document of certified PK Delivery:</p> <ul style="list-style-type: none"> <li>- Delivery Form #KCP PBT 4104 SS dated 31 August 2018 from PT Rigunas Agri Utama - Bungo Tebo POM to PT Rigunas Agri Utama - Bungo Tebo KCP; commodity is certified Palm Kernel, Supply Chain Model is Mass Balance; RSPO certificate number is RSPO 620917; total quantity as per August 2018 is 743,590 MT; transporter is Conveyor/Pipe.</li> </ul> <p>Sampled document of Non Certified PK Delivery:</p>	
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		<ul style="list-style-type: none"> <li>- Delivery Form #KCP PBT 4104 N dated 31 August 2018 from PT Rigunas Agri Utama - Bungo Tebo POM to PT Rigunas Agri Utama - Bungo Tebo KCP; commodity is Palm Kernel; total quantity as per August 2018 is 645,300 MT; transporter is Conveyor/Pipe.</li> </ul>	
	<ul style="list-style-type: none"> <li>• Information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation).</li> </ul>	<p>Informations are complete and presented in several document, e.g. Delivery Order and Weighbridge Card. Report of CPO and PK deliveries are documented in Laporan Harian Pabrik (Mill Daily Report), Mill Operation Report and Book Keeping Mass Balance Report.</p>	<p>Yes</p>
	<ul style="list-style-type: none"> <li>• For sites that are required to announce and confirm trades in the RSPO IT platform, this shall include making Shipping Announcements / Announcements and Confirmations on the RSPO IT platform per shipment or group of shipments. Refer to section 5.7.1 of this document for further guidance.</li> </ul>	<p>PT Rigunas Agri Utama - Bungo Tebo POM has made Shipping Announcement in RSPO IT Platform to announce sales of RSPO certified CPO or PK per group of shipments (DO).</p> <p>For example:</p> <ul style="list-style-type: none"> <li>- Shipping Announcement, with transaction ID No. TR-020de73e- 5400 for 467.84 MT CSPK Mass Balance; from PT Rigunas Agri Utama - Bungo Tebo Mill (RSPO_PO1000002913) as Seller to Buyer PT Rigunas Agri Utama – Bungo Tebo KCP (RSPO_PO1000005127). Confirmation has been made by Buyer on 6 August 2018. Related DO: No. 03002/DC41/14/18; 03003/DC41/14/18; 04002/DC41/14/18;</li> <li>- Shipping Announcement, with transaction ID No. TR-f86bc63b- d2bd for 1,119.13 MT CSPK Mass Balance; from PT Rigunas Agri Utama - Bungo Tebo Mill (RSPO_PO1000002913) as Seller to Buyer PT Rigunas Agri Utama – Bungo Tebo KCP (RSPO_PO1000005127). Confirmation has been made by Buyer on 8 March 2018. Related DO: No. 10003/DC41/14/17; 11002/DC41/14/17; 12001/DC41/14/17; 12003/DC41/14/17; 01001/DC41/14/18.</li> <li>- Shipping Announcement, with transaction ID No. TR-10bd3b16- dff4 for 492.12 MT CSPO Mass Balance; from PT Rigunas Agri Utama - Bungo Tebo Mill (RSPO_PO1000002913) as Seller to Buyer PT Sari Dumai Sejati (RSPO_PO1000006430). Confirmation has been made by</li> </ul>	<p>Yes</p>

		Buyer on 16 January 2018. Related DO No. 09005/DC41/02/17.	
<b>5.7. Registration of transactions</b>			
5.7.1	<p>Supply chain actors who:</p> <ul style="list-style-type: none"> <li>are mills, traders, crushers and refineries and;</li> <li>take legal ownership and/or physically handle RSPO Certified Sustainable oil palm products that are available in the yield scheme of the RSPO IT Platform (Figure 2 and 3, Refer Annex 1) shall register their transaction in the RSPO IT platform and confirm upon receipt where applicable.</li> </ul>	<p>PT Riginas Agri Utama – Bungo Tebo POM is a palm oil mill which takes legal ownership and physically handled RSPO certified sustainable oil palm product (FFB, CSPO and CSPK), therefore the site has been registered in RSPO IT Platform with ID number RSPO_PO1000002913.</p>	Yes
5.7.2	<p>The involved supply chain actors mentioned in 5.7.1 shall do the following actions in the RSPO IT Platform:</p> <ul style="list-style-type: none"> <li>Shipping Announcement / Announcement: When RSPO certified volume is sold as certified, the volumes of products that are in the yield scheme (Figure 2 and 3, refer Annex 1) shall be registered as a Shipping Announcement / Announcement in the RSPO IT Platform. The declaration time to do Shipping announcement / Announcement is based on members' own standard operating procedures.</li> </ul>	<p>As a Palm Oil Mill which takes legal ownership and physically handled RSPO certified sustainable oil palm product, PT Rigunas Agri Utama – Bungo Tebo POM has made Shipping Announcement for certified CPO and PK sold.</p> <p>For example:</p> <ul style="list-style-type: none"> <li>Shipping Announcement, with transaction ID No. TR-020de73e-5400 for 467.84 MT CSPK Mass Balance; from PT Rigunas Agri Utama - Bungo Tebo Mill (RSPO_PO1000002913) as Seller to Buyer PT Rigunas Agri Utama – Bungo Tebo KCP (RSPO_PO1000005127). Confirmation has been made by Buyer on 6 August 2018.</li> <li>Shipping Announcement, with transaction ID No. TR-f86bc63b- d2bd for 1,119.13 MT CSPK Mass Balance; from PT Rigunas Agri Utama - Bungo Tebo Mill (RSPO_PO1000002913) as Seller to Buyer PT Rigunas Agri Utama – Bungo Tebo KCP (RSPO_PO1000005127). Confirmation has been made by Buyer on 8 March 2018.</li> <li>Shipping Announcement, with transaction ID No. TR-10bd3b16- dff4 for 492.12 MT CSPO Mass Balance; from PT Rigunas Agri Utama - Bungo Tebo Mill (RSPO_PO1000002913) as Seller to Buyer PT Sari Dumai Sejati (RSPO_PO1000006430). Confirmation has been made by</li> </ul>	Yes

		Buyer on 16 January 2018.	
	<ul style="list-style-type: none"> <li>Trace: When RSPO certified volumes are sold as RSPO certified to actors in the supply chain beyond the refinery, the volume shall be traced at least annually. Tracing triggers the generation of a trace document with a unique traceability number. Tracing can be done in a consolidated way at least annually.</li> </ul>	Until this 3 <sup>rd</sup> annual surveillance audit (ASA3), PT Rigunas Agri Utama - Bungo Tebo POM has not sold any certified CPO or certified PK to supply chain actor beyond the refinery.	N/A
	<ul style="list-style-type: none"> <li>Remove: RSPO certified volumes sold under other scheme or as conventional, or in case of underproduction, loss or damage shall be removed.</li> </ul>	PT Rigunas Agri Utama - Bungo Tebo POM has done "Remove" in the RSPO IT Platform for CSPO sold as other scheme (ISCC), volume 13,669.34 MT of CSPO period January to June 2018 as evident in transaction ID ST-TR-7036ba37-c3f7 dated 7 September 2018.	No
	<ul style="list-style-type: none"> <li>Confirm: Acknowledge the purchase of RSPO certified volume by confirming Shipping Announcements / Announcements.</li> </ul>	PT Rigunas Agri Utama - Bungo Tebo POM is a palm oil mill which does not need to confirm any purchase of FFB.	N/A
<b>5.8. Training</b>			
5.8.1	The organization shall have a training plan on RSPO Supply Chain Standards requirements, which is subject to on-going review and is supported by records of the training provided to staff.	PT Rigunas Agri Utama – Bungo Tebo POM has prepared a training program to staff, who are involved in RSPO Supply Chain Certification Standard implementation. As per training program, "Program Pelatihan Environmental & Sustainability Tahun 2018 PT Rigunas Agri Utama" the RSPO supply chain and traceability refreshment training is planed on 15 May 2018. The training program is subjected to on-going review.  Competency and training records of all staff involved in RSPO Supply Chain were able to be demonstrated.	Yes
5.8.2	Appropriate training shall be provided by the organization for personnel carrying out the tasks critical to the effective implementation of the supply chain certification standard requirements. Training shall be specific and relevant to the task(s) performed.	Latest training on "Supply Chain, Mass Balance and Traceability" performed on 21 May 2018 attended by Mill/KCP Assistant, production supervisor, production clerk, weighbridge operator and security officer. In total 6 personnel attending the training led by Sofianto (Mill/KCP KTU). Training module sighted.	Yes

		<p>Sample training record seen:</p> <ul style="list-style-type: none"> <li>- Ms. Dewi Anggraini (weighbridge operator) participated in training: "Training Traceability and Mass Balance Critical Control Point" dated 21 May 2018; "Traceability and Mass Balance" dated 13 April 2017; "First Aid Training" dated 18 February 2016;</li> <li>- Ms. Hesti Yunralita (weighbridge operator) participated in training: "Training Traceability and Mass Balance" dated 21 May 2018; "Training Traceability and Mass Balance" dated 13 April 2017; "First Aid Training" dated 18 February 2016; "SOP dissemination and Mass Balance Trainig" dated 19 March 2013;</li> <li>- Ms. Juprinal (security) participated in training: "Training Traceability and Mass Balance" dated 21 May 2018; "First Aid Training" dated 18 February 2016.</li> </ul>	
<p><b>5.9. Record Keeping</b></p>			
<p>5.9.1</p>	<p>The organization shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of these RSPO Supply Chain Certification Standard requirements.</p>	<p>Based on review of PT Rigunas Agri Utama – Bungo Tebo POM document and record, the Mill is able to demonstrate complete, up-to-date and accessible records and reports covering all aspects of RSPO Supply Chain Certification Standard requirements.</p> <p>Records and report verified are as follows:</p> <ul style="list-style-type: none"> <li>• Laporan Harian Pabrik (Mill Daily Report); dated 31/12/2017 and 31/08/2018.</li> <li>• Book Keeping – Mass Balance – CPO and PK period of January – March 2018, April – June 2018, July – September 2018;</li> <li>• Kartu Timbangan (Weighbridge Card) FFB;</li> <li>• Kartu Timbangan (Weighbridge Card) CPO;</li> <li>• Kartu Timbangan (Weighbridge Card) PK;</li> </ul> <p>Sampled verified are as follows:</p> <ol style="list-style-type: none"> <li>a. Laporan Harian Produksi/Daily Production Report dated 31 August 2018:</li> </ol>	

		<ul style="list-style-type: none"> <li>○ FFB received today: own estate 48,380 kg; plasma 35,429 kg; outside 52,844 kg; total 136,653 kg; total certified 83,809 kg; total non certified 52,844 kg.</li> <li>○ FFB received month todate: own estate 2,952,148 kg; plasma 11,567,620 kg; outside 11,626,816 kg; total 26,146,584 kg; total certified 14,519,768 kg; total non certified 11,626,816 kg.</li> <li>○ FFB received year todate: own estate 23,135,782 kg; plasma 71,700,962 kg; outside 83,915,173 kg; total 178,751,917 kg; total certified 94,836,744 kg; total non certified 83,915,173 kg.</li> </ul> <p>b. Laporan Harian Produksi/Daily Production Report dated 31 December 2017:</p> <ul style="list-style-type: none"> <li>○ FFB received today: own estate 30,250 kg; plasma 115,492 kg; outside 88,066 kg; total 233,808 kg; total certified 145,742 kg; total non certified 88,066 kg.</li> <li>○ FFB received month todate: own estate 2,835,910 kg; plasma 8,018,096 kg; outside 9,045,054 kg; total 19,899,060 kg; total certified 10,854,006 kg; total non certified 9,045,054 kg.</li> <li>○ FFB received year todate: own estate 39,447,374 kg; plasma 99,056,102 kg; outside 129,607,491 kg; total 268,110,967 kg; total certified 138,503,476 kg; total non certified 129,607,491 kg.</li> </ul> <p>c. Book Keeping Mass Balance Report, period April – June 2018:</p> <ul style="list-style-type: none"> <li>○ FFB received total: 69,399,346 kg; certified 36,392,514 kg; non-certified 33,006,832 kg.</li> <li>○ FFB processed total: 69,420,464 kg; certified 36,432,214 kg; non-certified 32,988,250 kg.</li> <li>○ CPO production total: 14,292,490 kg; certified 7,874,601 kg; non-certified 6,417,889 kg.</li> <li>○ PK production total: 3,683,720 kg; certified 1,932,540 kg; non-certified 1,751,180 kg.</li> <li>○ CPO delivery total: 13,580,070 kg; certified 7,527,320 kg; non-certified 6,052,750 kg.</li> </ul>	
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		<ul style="list-style-type: none"> <li>○ PK delivery total: 3,684,650 kg; certified 1,891,500 kg; non-certified 1,793,150 kg.</li> <li>d. Sampled record FFB receiving (certified):             <ul style="list-style-type: none"> <li>- Weighbridge Card #PBTA118204102 dated 15/08/2018, commodity: certified FFB; source: Bungo Tebo Estate; to Bungo Tebo Palm Oil Mill; net weight: 6,170 kg; Afdeling: 1; amount: 238 bunch; Block: A94g; RSPO Cert: RSPO620917; Transporter: Internal; Vehicle: BH 8328 ME; Driver: Hendra; Batch number: 13-100-16462017-41078810.</li> <li>- Weighbridge Card #PBTA118104099 dated 15/08/2018, commodity: certified FFB; source: Bungo Tebo Estate; to Bungo Tebo Palm Oil Mill; net weight: 3,590 kg; Afdeling: 2; amount: 150 bunch; Block: B95j; RSPO Cert: RSPO620917; Transporter: Internal; Vehicle: BK 8977 CR; Driver: Hakim; Batch number: 13-100-16462017-41078778.</li> <li>- Weighbridge Card #PBTA118104104 dated 15/08/2018, commodity: certified FFB; source: Bungo Tebo Estate; to Bungo Tebo Palm Oil Mill; net weight: 5,810 kg; Afdeling: 3; amount: 202 bunch; Block: C96g; RSPO Cert: RSPO620917; Transporter: Internal; Vehicle: BM 8529 TE; Driver: Zulkarnain; Batch number: 13-100-16462017-41078828.</li> <li>- Weighbridge Card #PBTA118104097 dated 15/08/2018, commodity: certified FFB; source: Bungo Tebo Estate; to Bungo Tebo Palm Oil Mill; net weight: 2,940 kg; Afdeling: 4; amount: 154 bunch; Block: D08j; RSPO Cert: RSPO620917; Transporter: Internal; Vehicle: BH 6286 MG; Driver: Dedi G.; Batch number: 13-100-16462017-41078745.</li> <li>- Weighbridge Card #PBTA218215340 dated 22/09/2018, commodity: certified FFB; source: Plasma Bungo Tebo (KOPERASI Tani Mandiri); to Bungo Tebo Palm Oil Mill; net weight: 5,066 kg; location KT-105 (Harapan Sukses); amount: 250 bunch; Block:</li> </ul> </li> </ul>	
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		<p>P5105; RSPO Cert: RSPO620917; Transporter: Plasma Transport; Vehicle: BH 8306 WJ; Driver: Ajo; Batch number: 13-100-34342017-41092404.</p> <ul style="list-style-type: none"> <li>- Weighbridge Card #PBTA218215356 dated 22/09/2018, commodity: certified FFB; source: Plasma Bungo Tebo (KOPERASI Tunas Harapan); to Bungo Tebo Palm Oil Mill; net weight: 5,587 kg; location KT-047 (Tunas Harapan); amount: 260 bunch; Block: P4041; RSPO Cert: RSPO620917; Transporter: Plasma Transport; Vehicle: BH 8912 WU; Driver: Bay; Batch number: 13-100-34342017-41092486.</li> <li>- Weighbridge Card #PBTA218215183 dated 10/09/2018, commodity: certified FFB; source: Plasma Bungo Tebo (KOPERASI Sejahtera Tani); to Bungo Tebo Palm Oil Mill; net weight: 4,709 kg; location KT-051 (Tani Sadar Sendiri); amount: 200 bunch; Block: P4051; RSPO Cert: RSPO620917; Transporter: Plasma Transport; Vehicle: BH 8141 MB; Driver: Aan; Batch number: 13-100-34342017-41091457.</li> <li>- Weighbridge Card #PBTA218215298 dated 20/09/2018, commodity: certified FFB; source: Plasma Bungo Tebo (KOPERASI Tanjung Jaya Bersama); to Bungo Tebo Palm Oil Mill; net weight: 4,976 kg; location KT-109 (Tanjung Jaya); amount: 200 bunch; Block: P5109; RSPO Cert: RSPO620917; Transporter: Plasma Transport; Vehicle: BH 8141 MB; Driver: Aan; Batch number: 13-100-34342017-41092118.</li> </ul> <p>e. Sampled record FFB Receiving (non-certified):</p> <ul style="list-style-type: none"> <li>- Surat Pengantar TBS (FFB delivery note) dated 15/08/2018 from CV Asri Bersaudara to PT Rigunas Agri Utama - Bungo Tebo Palm Oil Mill; amount: 50 bunch. Weighbridge Card #PBTA518213679 dated 15/08/2017, commodity: outside FFB; source: CV Asri Bersaudara, ID: ST00062; to PT Rigunas Agri Utama - Bungo Tebo Palm Oil Mill; net weight: 1,501 kg; amount: 50 bunch;</li> </ul>	
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		<p>Transporter: general; Vehicle: BM 9717 NW; Driver: Boy.</p> <ul style="list-style-type: none"> <li>- Surat Pengantar TBS (FFB delivery note) dated 15/08/2018 from SDR to PT Rigunas Agri Utama - Bungo Tebo Palm Oil Mill; amount: 659 bunch. Weighbridge Card #PBTA518213673 dated 15/08/2017, commodity: outside FFB; source: SDR, ID: ST00063; to PT Rigunas Agri Utama - Bungo Tebo Palm Oil Mill; net weight: 9,814 kg; amount: 659 bunch; Transporter: general; Vehicle: BH 6367 UU; Driver: Amit.</li> </ul> <p>f. Sampled document of Certified CPO delivery:</p> <ul style="list-style-type: none"> <li>- Delivery Order #08307/DC41/02/18 dated 16/08/2018; Seller is PT Rigunas Agri Utama - Bungo Tebo POM; Buyer is PT Sari Dumai Sejati – Lubuk Gaung; Commodity is RSPO certified CPO; Supply Chain Model is Mass Balance; Quantity is 500,000 kg; Supply Chain Certificate is RSPO 620917.</li> <li>- Weighbridge Card #PBTC118201446 dated 03/09/2018; Seller is PT Rigunas Agri Utama - Bungo Tebo POM; Buyer is PT Sari Dumai Sejati, Lubuk Gaung; Delivery date is 03/09/2018; Commodity is CPO Certified RSPO; Supply Chain Model is Mass Balance; Quantity is 30,530 kg; based on DO #08307/DC41/02/18; Transporter is CV Teman Setia, BK 9347 VN; Supply Chain Certificate number RSPO 620917; FFA: 3.16%; water: 0.22%; dirt: 0.026%; Seal number 4405745 - 4405753.</li> </ul> <p>g. Sampled document of Non Certified CPO delivery:</p> <ul style="list-style-type: none"> <li>- Delivery Order #08312/DN41/02/18 dated 31/08/2018; Seller is PT Rigunas Agri Utama - Bungo Tebo POM; Buyer is PT Sari Dumai Sejati – Lubuk Gaung; Commodity is CPO; Quantity is 500,000 kg.</li> <li>- Weighbridge Card #PBTC118201344 dated 20/09/2018; Seller is PT Rigunas Agri Utama - Bungo Tebo POM; Buyer is PT Sari Dumai Sejati, Lubuk Gaung; Delivery date is 20/20/2018; Commodity is</li> </ul>	
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		<p>CPO; Quantity is 28,230 kg; based on DO #08304/DN41/02/18 and #08312/DN41/02/18; Transporter is CV Teman Setia, BK 9013 VN; FFA: 3.29%; water: 0.20%; dirt: 0.029%; Seal number 4404105 - 4404111.</p> <p>h. Sampled document of certified PK Delivery:</p> <ul style="list-style-type: none"> <li>- Delivery Form #KCP PBT 4104 SS dated 31 August 2018 from PT Rigunas Agri Utama - Bungo Tebo POM to PT Rigunas Agri Utama - Bungo Tebo KCP; commodity is certified Palm Kernel, Supply Chain Model is Mass Balance; RSPO certificate number is RSPO 620917; total quantity as per August 2018 is 743,590 MT; transporter is Conveyor/Pipe.</li> </ul> <p>i. Sampled document of Non Certified PK Delivery:</p> <ul style="list-style-type: none"> <li>- Delivery Form #KCP PBT 4104 N dated 31 August 2018 from PT Rigunas Agri Utama - Bungo Tebo POM to PT Rigunas Agri Utama - Bungo Tebo KCP; commodity is Palm Kernel; total quantity as per August 2018 is 645,300 MT; transporter is Conveyor/Pipe.</li> </ul>	
5.9.2	Retention times for all records and reports shall be a minimum of two (2) years and shall comply with legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock.	The procedure of Traceability (AA-MPM-OP-1400.7.R6), requires that all records and reports related to traceability and book keeping are retained for a period of 10 years.	Yes
5.9.3	The organization shall be able to provide the estimate volume of palm oil/palm kernel oil content (separate categories) in the RSPO certified oil palm product and keep an up to date record of the volume purchased (input) and claimed (output) over a period of twelve (12) months.	<p>PT Rigunas Agri Utama – Bungo Tebo POM is able to provide estimate volume of CPO and PK in a year period as in “Distribusi Produksi Bulanan Anggaran Tahun 2018” consists estimate of FFB receiving from Bungo Tebo Estate, Bungo Tebo Plasma and Third Party supplier, Extraction rates, Processing capacity, working hour, utilisation.</p> <p>Estimate volume for 2018: FFB processed total 282,040 ton; CPO production total 58,666 ton; PK production total 15,106 ton; OER 21.04%; KER 5.35%.</p> <p>Estimate volume for 2019: FFB processed total 271,040 ton; CPO</p>	Yes

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		<p>production total 56,572 ton; PK production total 14,501 ton; OER 20.87%; KER 5.40%.</p> <p>Estimate volume for period September 2018 to August 2019: FFB processed total 280,939 ton; FFB sustainable processed 127,601 ton; FFB non-sustainable processed 153,338 ton; CPO production total 58,771 ton; CPO sustainable produced 28,403 ton; CPO non-sustainable produced 30,368 ton; PK production total 15,291 ton; PK sustainable produced 6,940 ton; PK non-sustainable produced 8,351 ton; OER 20.92%; KER 5.44%.</p> <p>The Mill also keep an up to date record of the FFB volume received, CPO and PK produced over a period of twelve (12) month, as in "Book Keeping Mass Balance Report". Actual volume from period September 2017 to August 2018: FFB processed total 272,039 ton; FFB sustainable processed 142,726 ton; FFB non-sustainable processed 129,313 ton; CPO production total 56,349 ton; CPO sustainable produced 31,087 ton; CPO non-sustainable produced 25,262 ton; PK production total 14,748 ton; PK sustainable produced 7,733 ton; PK non-sustainable produced 7,015 ton; OER 20.71%; KER 5.42%.</p> <p>Whilst actual volume from previous assessment period (November 2017) to August 2018: FFB processed total 222,077 ton; FFB sustainable processed 117,182 ton; FFB non-sustainable processed 104,895 ton; CPO production total 46,037 ton; CPO sustainable produced 25,539 ton; CPO non-sustainable produced 20,498 ton; PK production total 12,033 ton; PK sustainable produced 6,347 ton; PK non-sustainable produced 5,686 ton; OER 20.73%; KER 5.42%.</p>	
<b>5.10. Conversion factors</b>			
5.10.1	Where applicable a conversion rate shall be applied to provide a reliable estimate for the amount of certified output available from the associated inputs. Organizations may determine and set their own conversion rates which shall be	Conversion rate is applied to provide reliable estimation of CPO and PK produced. For year 2018, the budget for conversion from FFB into CPO are: a. For FFB from own estate: 25.00%	Yes

	<p>based upon past experience, documented and applied consistently. Guidance on conversion rates is published on the RSPO website (<a href="http://www.rspo.org">www.rspo.org</a>); RSPO Rules for Physical Transition of Oleochemicals and its Derivaties. This is relevant for derivatives of Palm Oil and Palm Kernel Oil, as used in the oleochemical and personal care industries.</p>	<p>b. For FFB from plasma: 22.00% c. For FFB from third-party: 20.35%</p> <p>For year 2018, the budget for conversion from FFB into PK are: a. For FFB from own estate: 5.35% b. For FFB from plasma: 5.35% c. For FFB from third-party: 5.35%</p> <p>For actual 2018 (data year todate 31 August 2018), actual conversion ratios from FFB into CPO are: a. For FFB from own estate: 23.99% b. For FFB from plasma: 21.07% c. For FFB from third-party: 19.54%</p> <p>Actual conversion ratios from FFB into PK are: a. For FFB from own estate: 5.41% b. For FFB from plasma: 5.40% c. For FFB from third-party: 5.41%</p>	
<p>5.10.2</p>	<p>Conversion rates shall be periodically updated to ensure accuracy against actual performance or industry average if appropriate.</p>	<p>The actual conversion ratio is monitored on daily basis through sounding result and documented in daily report. Bungo Tebo POM is able to demonstrate the work instruction for analysis of oil content.</p> <p>Based on Laporan Harian Produksi dated 22 September 2018, the sounding result and production report shows that actual conversion ratios from FFB into CPO are: a. For FFB from own estate: 23.41% b. For FFB from plasma: 20.58% c. For FFB from third-party: 19.10%</p> <p>And actual conversion ratios from FFB into PK are: a. For FFB from own estate: 5.33% b. For FFB from plasma: 5.32% c. For FFB from third-party: 5.33%</p>	<p>Yes</p>
<p><b>5.11. Claims</b></p>			

5.11.1	The site shall only make claims regarding the use of or support of RSPO certified oil palm products that are in compliance with the RSPO Rules on Market Communications and Claims.	PT Rigunas Agri Utama – Bungo Tebo has not made any claim regarding the use of or support of RSPO certified oil palm products. The organization has good understanding on the RSPO Rules on Market Communications and Claims.	Yes
<b>General corporate communications</b>			
4.1	A corporate communication is one made by any RSPO member that highlights its membership of the RSPO and/or its commitment to the principles of the RSPO. Corporate communication is an 'off-product' claim.	PT Rigunas Agri Utama is a subsidiary of RSPO registered member PT Inti Indosawit Subur. The corporate communication of PT Inti Indosawit Subur can be seen in the company website, under brand Asian Agri at the address <a href="http://www.asianagri.com">www.asianagri.com</a> .	Yes
4.2	<p>In corporate communications a member is allowed to:</p> <ul style="list-style-type: none"> <li>a. Display its RSPO membership status</li> <li>b. Display the RSPO web address (<a href="http://www.rspo.org">www.rspo.org</a>)</li> <li>c. State that the member supports the work of the RSPO</li> <li>d. State the member's history with regard to the RSPO.</li> <li>e. Use the RSPO trademark to promote its membership of the RSPO.</li> </ul> <p>Additionally, where an RSPO member displays the RSPO trademark in digital format this must be accompanied by the text 'Check our progress at <a href="http://www.rspo.org">www.rspo.org</a>' where the link must lead to the member's profile page.</p>	<p>Corporate communication in Asian Agri website:</p> <ul style="list-style-type: none"> <li>a. Display its RSPO membership status: In the website of Asian Agri, it was stated the company is RSPO Member since February 2006.</li> <li>b. Display the RSPO web address: Not in direct manner. In Asian Agri website, company made a link to RSPO website.</li> <li>c. State the member supports the work of the RSPO: Not in direct manner. In the website, Asian Agri wrote "In 2006, Asian Agri became a member of the Roundtable of Sustainable Palm Oil (RSPO), a global multi-stakeholder certification system to develop and implement global standards for sustainable palm oil production. We received our 1<sup>st</sup> RSPO certification for our estate in 2010, and in 2012, the certification for our smallholder scheme."</li> <li>d. State the member's history with regards to the RSPO: Yes. In the website of Asian Agri, it was stated the company is RSPO Member since February 2006.</li> <li>e. Use of RSPO Trademark to promote its membership of the RSPO: in the website, the company does not display RSPO Trademarks and corporate logo.</li> </ul>	Yes
4.3	In corporate communications RSPO members must not make any statement that may lead consumers to believe	Yes. In the Asian Agri website, stated that the company is RSPO Member since February 2006. However, it is clear that the statement did not lead	Yes

	that RSPO membership by itself implies the selling of RSPO-certified oil palm products.	consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products.	
4.4	Members must ensure that all communication is consistent, clear and cannot mislead consumers or other stakeholders as to the certified content of oil palm products in the member's own products.	Yes. In the Asian Agri website, stated that the company is RSPO Member since February 2006. However, it is clear that the statement are clear and did not mislead consumers or other stakeholders as to the certified content of oil palm products in their own products.	Yes
4.5	Members are not allowed to use the RSPO corporate logo as shown in the RSPO Rules on Market Communications & Claims document. This is for the sole use of the RSPO secretariat.	No, the Asian Agri website did not display the RSPO Corporate Logo.	Yes
<b>Business to business communications</b>			
5.1	Business to Business communication relates to RSPO members in the supply chain selling to and/or communicating with other organizations in the supply chain about the use of certified sustainable oil palm products.	PT Rigunas Agri Utama – Bungo Tebo POM stated in sales documents, e.g. Weighbridge Ticket that the product they sold is RSPO Certified CPO or PK model MB.	Yes
5.2	When confirming the sale of certified oil palm products, members must adhere to the requirements of the RSPO SCCS. This includes stating the supply chain model and certificate number under which the claim is being made.	It was verified that when selling certified oil palm product, PT Rigunas Agri Utama – Bungo Tebo POM stated the supply chain model and certificate number, e.g. in Delivery Order and Weighbridge Card.	Yes
5.3	Where a distributor or wholesaler takes title to products containing certified sustainable oil palm products, the requirements of the RSPO SCCS can follow either of two options: f. If the distributor or wholesaler holds only a Distributor license, it may only communicate RSPO-certified oil palm products by linking the product to the manufacturer using the manufacturer's SCCS certificate number. This covers both brand and own brand products. However, in	PT Rigunas Agri Utama – Bungo Tebo POM is not a distributor or wholesaler, the site is a Palm Oil Mill that process FFB into CPO and PK.	N/A

	<p>the case of own brand products it is essential that customers are aware that the product has been made on behalf of the distributor or wholesaler, with specific evidence either through on-pack claims or documentation.</p> <p>g. If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2.</p>		
5.4	<p>A certified member can provide information to its customers detailing the presence of certified palm oil contained within a product even if it is not eligible for a product-specific under RSPO rules. The end product must not be labelled as certified or sold in such a way that implies RSPO certification.</p> <p>For example, a retailer or food service company may require a breakdown of all palm based ingredients within an end product and the certified status of each. This information may be provided by a certified RSPO member without constituting a product-specific claim.</p>	<p>PT Rigunas Agri Utama – Bungo Tebo POM is a Palm Oil Mill that process FFB into CPO and PK. The site sold its product in bulk, no product label attached. Not applicable.</p>	N/A
<b>Business to consumer communication</b>			
6.1	<p>Only RSPO members that have supply chain certification are allowed to make business to consumer claims about the certified sustainable oil palm products contained within product(s), which are known as 'product-specific' claims. Product-specific claims are voluntary.</p>	<p>PT Rigunas Agri Utama – Bungo Tebo POM is an RSPO certificate holder with certificate number RSPO 620917 valid until 2 December 2020. The certificate holder sold its oil palm product in bulk, no product label attached. No 'product-specific' claims are used.</p> <p>Not applicable.</p>	N/A
6.2	<p>Only RSPO members who have supply chain certification are authorised to use the RSPO trademark and/or RSPO label, with the exception of RSPO Credits and of retailers in accordance with 6.8 below.</p>	<p>PT Rigunas Agri Utama – Bungo Tebo POM is an RSPO certificate holder with certificate number RSPO 620917 valid until 2 December 2020. The certificate holder sold its oil palm product in bulk, no product label attached. No RSPO trademark and/or RSPO label claims are used.</p>	N/A



		Not applicable.	
6.3	When on-pack claims on RSPO-certified sustainable oil palm products are used, the RSPO trademark and associated identification number must be present.	PT Rigunas Agri Utama – Bungo Tebo POM sold its oil palm product in bulk, no product pack are used. Not applicable.	N/A
6.4	Business to consumer communication shall not include information about the claimant’s RSPO membership status.	PT Rigunas Agri Utama – Bungo Tebo POM communication has not stated information about the claimant’s RSPO membership status.	Yes
6.5	Members shall not communicate to consumers information about their suppliers’ RSPO membership status.	The certification of PT Rigunas Agri Utama – Bungo Tebo POM suppliers, fall under PT Rigunas Agri Utama itself, it was the company estate (Bungo Tebo Estate) and scheme smallholder (Plasma Bungo Tebo). The CH communication has not mentioned to consumers information about their suppliers’ RSPO membership status.	Yes
6.6	Use of the RSPO trademark is restricted to claims about RSPO-certified sustainable palm oil products and it is not authorised for use in relation to any other ingredient.	The site sold its oil palm product in bulk, up to this moment, PT Rigunas Agri Utama – Bungo Tebo POM has not use RSPO trademark.	Yes
6.7	Use of any other trademark or logo to highlight the presence of RSPO-certified sustainable oil palm products is an unauthorised product-specific claim.	Up to this moment, PT Rigunas Agri Utama – Bungo Tebo POM has not use other trademark or logo to highlight the presence of RSPO-certified sustainable oil palm products.	Yes
6.8	RSPO members who are retailers or food service companies can apply for an RSPO trademark license for use in business to consumer communications, provided they can demonstrate the validity of these claims to an RSPO-accredited certification body (CB). This will be undertaken via a remote audit, prior to the trademark use, during which the retailer or food service company will need to demonstrate that the use of the trademark is in compliance with the rules contained within this document and that the claim itself can be supported through a certified supply chain. Any other palm oil claims, including those highlighting the absence of palm oil, must be highlighted to the CB	PT Rigunas Agri Utama – Bungo Tebo POM is not a retailer or food service company. Not applicable.	N/A

	during the audit to ensure that all claims comply with the requirements of these rules. The CB will confirm the outcome of these audits, to be conducted annually, to RSPO who may continue to grant a trademark license or withdraw permission based upon the audit findings. This is in keeping with the rules applying to RSPO supply chain certified members. The guidance document for audits is available on <a href="http://www.rspo.org">www.rspo.org</a> .		
<b>5.12. Complaints</b>			
5.12.1	The organization shall have in place and maintain documented procedures for collecting and resolving stakeholder complaints.	Based on document review, there has been no complaint from stakeholder related to certified CPO or PK from PT Rigunas Agri Utama – Bungo Tebo POM. In the case of any complaint, the mill provided procedure AA-GL-5.08-R1 related to information request from any stakeholders to resolving stakeholder complaints.	Yes
<b>5.13. Management Review</b>			
5.13.1	The organization is required to hold management reviews annually at planned intervals, appropriate to the scale and nature of the activities undertaken.	PT Rigunas Agri Utama – Bungo Tebo POM has Standard Operating Procedures for Internal Audit and Management Review (AA-SOP-ES-6001-R1). The management review and internal audit planned once a year at minimum, considering the critical area.	Yes
5.13.2	The input to management review shall include information on: <ul style="list-style-type: none"> <li>• Results of internal audits covering RSPO Supply Chain Certification Standard.</li> <li>• Customer feedback.</li> <li>• Status of preventive and corrective actions.</li> <li>• Follow-up actions from management reviews.</li> </ul>	The organization shows issues discussed during management review and attendance list, dated 23 August 2018. Management review was attended by key personnel involved in implementation of RSPO Supply Chain certification Standard, e.g. Mill Manager, Processing Assisstant, KTU, in total there was 7 participants attending the management review. Minute of management review meeting and attendance register were available.  The management review inputs include information on: <ul style="list-style-type: none"> <li>- The result of audits: based on the latest Internal audit of PT Rigunas Agri Utama – Gunung Melayu POM carried out on 2 August 2018 by</li> </ul>	Yes

	<ul style="list-style-type: none"> <li>• Changes that could affect the management system.</li> <li>• Recommendations for improvement.</li> </ul>	<p>Mr. Rico Santoso Pakpahan, against RSPO SCCS 2017 – RSPO General Chain of Custody requirements and Module E: Mass Balance.</p> <ul style="list-style-type: none"> <li>- Customer feedback: up to this moments there is no customer complaint;</li> <li>- Process performance and product conformity: Bungo Tebo POM has defined agenda for Visit Engineering to assess mill performance annually, if there is input from VE visit, CAP will be determined and implemented accordingly; Bungo Tebo POM get support from several department related to product conformity; R&amp;D Department periodically monitor production result of POM and KCP and give input and recommendation as well; Bungo Tebo POM periodically conducted sample test to ensure product quality prior to be sent to buyer;</li> <li>- Status of corrective and preventive action: followed up through regular traceability and mass balance refreshment training annually; coordination meeting scheduled in October 2018 to ensure implementation of RSPO SCC requirements;</li> <li>- Changes that could affect the management system: no changes;</li> <li>- Recommendation for improvement: Made and install cover in kernel conveyor under hydrocylcone no.1.</li> </ul>	
5.13.3	<p>The output from the management review shall include any decisions and actions related to:</p> <ul style="list-style-type: none"> <li>• Improvement of the effectiveness of the management system and its processes.</li> <li>• Resource needs.</li> </ul>	<p>The organization shows issues discussed during management review and attendance list, dated 23 August 2018. Management review was attended by key personnel involved in implementation of RSPO Supply Chain certification Standard, e.g. Mill Manager, Processing Assisstant, KTU, in total there was 7 participants attending the management review. Minute of management review meeting and attendance register were available.</p> <p>The management review output indicates decision and actions related to:</p> <ul style="list-style-type: none"> <li>- Improvement of the effectiveness of the management system and its processes: Made and install cover in kernel conveyor under hydrocylcone no.1.</li> </ul>	Yes

		<ul style="list-style-type: none"><li>- Resource needs: The organization will optimize the existing resources to achieve all indicators of performance defined. According to the minutes of management review meeting, it was noted that output of review has not required additional resources.</li></ul>	
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**Appendix E: CPO Mill Supply Chain Assessment Report (Module *E* - CPO Mills: *Mass Balance*)**

<b>E.1 Definition</b>			
	<b>Requirement</b>	<b>Evidence</b> For any N/A raised, justification is required.	<b>Compliance</b> (Yes / No or N/A)
E.1.1	Certification for CPO mills is necessary to verify the volumes of certified and uncertified FFB entering the mill and sales volume of RSPO certified products. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3rd party certified supply base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.	PT Rigunas Agri Utama – Bungo Tebo POM holds current RSPO P&C Certificate No. RSPO 620917. In the current certificate, PT Rigunas Agri Utama – Bungo Tebo POM uses Mass Balance supply chain system. The mill only claimed the FFB proportion from certified supply bases which comprise of company-own estate (Bungo Tebo Estate) and scheme smallholder (Plasma Bungo Tebo). The other supply base, were come from third party suppliers as non-certified FFB source.	Yes
<b>E.2 Explanation</b>			
E.2.1	The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill must be recorded by the CB in the public summary of the P&C certification report. For an independent mill, the estimated tonnage of CPO and PK products must be recorded in the RSPO IT platform, supply chain certificate and public summary audit report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.	The projection for certified FFB and production of certified CPO and PK in PT Rigunas Agri Utama – Bungo Tebo POM has been recorded in BSI’s public summary report and registered in RSPO IT Platform.  Estimate volume for period September 2018 to August 2019: FFB processed total 280,939 ton; FFB sustainable processed 127,601 ton; FFB non-sustainable processed 153,338 ton; CPO production total 58,771 ton; CPO sustainable produced 28,403 ton; CPO non-sustainable produced 30,368 ton; PK production total 15,291 ton; PK sustainable produced 6,940 ton; PK non-sustainable produced 8,351 ton; OER 20.92%; KER 5.44%.	Yes
E.2.2	The mill must also meet all registration and reporting requirements for the appropriate supply chain through the	PT Rigunas Agri Utama – Bungo Tebo POM has met registration and reporting requirement as it has been registered in RSPO IT Platform (PalmTrace) with	Yes

	RSPO supply chain managing organization (RSPO IT platform).	ID number RSPO_PO1000002913.	
<b>E.3 Documented procedures</b>			
E.3.1	<p>The site shall have written procedures and/or work instructions to ensure the implementation of all the elements specified in these requirements. This shall include at minimum the following:</p> <p>a. Complete and up to date procedures covering the implementation of all the elements in these requirements;</p>	<p>During this 3<sup>rd</sup> Annual Surveillance Assessment (ASA3) PT Rigunas Agri Utama - Bungo Tebo POM can demonstrates:</p> <ol style="list-style-type: none"> <li>1. Standard Operating Procedures – Traceability (AA-MPM-OP-1400.17.R6) dated 1 September 2017. The procedures cover traceability of CPO and PK, since FFB receiving from Bungo Tebo Estate and Bungo Tebo Plasma, processing up to shipping of CPO and PK as well as daily production report. The procedure also regulates the internal audit by Sustainability Internal Audit Manager. Traceability records are to be kept for 10 years.</li> <li>2. Standard Operating Procedure – Book Keeping (AA-MPM-OP-1400.18-R4). The procedure explains method to check only certified product received. The book keeping mass balance stated every 3 months: January-March, April-June, July-September, and October-December each year. Head of Environment and Sustainability will inform to Certification Body in the case of projected overproduction.</li> <li>3. SOP of Palm Oil Mill operation:             <ol style="list-style-type: none"> <li>a. SOP AA-MPM-OP-1400.02.R2, dated 1 September 2011, Stasiun Penerimaan (FFB Receiving Station);</li> <li>b. SOP AA-MPM-OP-1400.03.R1, dated 1 February 2009, Stasiun Rebusan (Sterilizer);</li> <li>c. SOP AA-MPM-OP-1400.04.R1, dated 1 February 2009, Stasiun Pemisahan Berondolan (Loose Fruit Separation);</li> <li>d. SOP AA-MPM-OP-1400.05-R1, dated 1 February 2009, Stasiun Pengadukan dan Pengempaan (Pressing Station);</li> <li>e. SOP AA-MPM-OP-1400.06-R1, dated 1 February 2009, Stasiun Pemurnian (Clarification);</li> <li>f. SOP AA-MPM-OP-1400.07-R1, dated 1 February 2009, Stasiun Pemisahan Nut dan Fiber (Nut and Fiber separation);</li> <li>g. SOP AA-MPM-OP-1400.08-R1, dated 1 February 2009, Stasiun Kernel</li> </ol> </li> </ol>	Yes

		<p>(Kernel Station);</p> <ul style="list-style-type: none"> <li>h. SOP AA-MPM-OP-1400.09-R1, dated 1 February 2009, Stasiun Boiler;</li> <li>i. SOP AA-MPM-OP-1400.10-R1, dated 1 February 2009, Stasiun Engine Room;</li> <li>j. SOP AA-MPM-OP-1400.11-R1, dated 1 February 2009, Stasiun Water Treatment;</li> <li>k. SOP AA-MPM-OP-1400.12-R1, dated 1 February 2009, Laboratorium;</li> <li>l. SOP AA-MPM-OP-1400.13-R1, dated 1 February 2009, Stasiun Pengelolaan Limbah (Palm Oil Mill Effluent Treatment);</li> <li>m. SOP AA-MPM-OP-1400.14-R2, dated 1 September 2011, Stasiun Penimbunan dan Pengiriman CPO dan Kernel (CPO and PK Storage and Despatch);</li> <li>n. SOP AA-MPM-OP-1400.15-R1, dated 1 February 2009, Perawatan (Preventive Maintenance and Repair).</li> </ul>	
	b. The name of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the site procedures for the implementation of this standard.	As per Procedure of Traceability (AA-MPM-OP-1400.17-R6), the responsible person in charge to the supply chain system is Mill Manager. During audit, the mill manager, Mr. Tatar Simanjuntak, was able to demonstrate sufficient knowledge and understanding on RSPO supply chain implementation for palm oil mill.	Yes
E.3.2	The site shall have documented procedures for receiving and processing certifies an non-certified FFBs.	The Mill has had documented procedures for receiving and processing of Certified and Non-certified FFBs in form of SOP AA-MPM-OP-1400.17-R6 "Traceability" and SOP for FFB Receiving Station (AA-MPM-OP-1400.02-R2). The Mill uses RSPO Supply Chain model Mass Balance, therefore does not required to separated receiving and processing of certified and non-certified FFB.	Yes
<b>E.4 Purchasing and goods in</b>			
E.4.1	The site shall verify and document the volumes of certified and non-certified FFBs received.	Responsible Person is able to demonstrate mechanism to verify and documented the volumes of Certified and Non-certified FFBs received, which contains:	Yes

		<ul style="list-style-type: none"> <li>• Name of Estate, Division and Block (Sources of certified FFB)</li> <li>• Date of harvesting</li> <li>• Certificate Number</li> </ul> <p>Document verified, i.e.:</p> <p>a. Laporan Harian Produksi/Daily Production Report dated 31 August 2018:</p> <ul style="list-style-type: none"> <li>○ FFB received today: own estate 48,380 kg; plasma 35,429 kg; outside 52,844 kg; total 136,653 kg; total certified 83,809 kg; total non certified 52,844 kg.</li> <li>○ FFB received month todate: own estate 2,952,148 kg; plasma 11,567,620 kg; outside 11,626,816 kg; total 26,146,584 kg; total certified 14,519,768 kg; total non certified 11,626,816 kg.</li> <li>○ FFB received year todate: own estate 23,135,782 kg; plasma 71,700,962 kg; outside 83,915,173 kg; total 178,751,917 kg; total certified 94,836,744 kg; total non certified 83,915,173 kg.</li> </ul> <p>b. Laporan Harian Produksi/Daily Production Report dated 31 December 2017:</p> <ul style="list-style-type: none"> <li>○ FFB received today: own estate 30,250 kg; plasma 115,492 kg; outside 88,066 kg; total 233,808 kg; total certified 145,742 kg; total non certified 88,066 kg.</li> <li>○ FFB received month todate: own estate 2,835,910 kg; plasma 8,018,096 kg; outside 9,045,054 kg; total 19,899,060 kg; total certified 10,854,006 kg; total non certified 9,045,054 kg.</li> <li>○ FFB received year todate: own estate 39,447,374 kg; plasma 99,056,102 kg; outside 129,607,491 kg; total 268,110,967 kg; total certified 138,503,476 kg; total non certified 129,607,491 kg.</li> </ul> <p>c. Book Keeping Mass Balance Report, period Arpil – June 2018:</p> <ul style="list-style-type: none"> <li>○ FFB received total: 69,399,346 kg; certified 36,392,514 kg; non-certified 33,006,832 kg.</li> <li>○ FFB processed total: 69,420,464 kg; certified 36,432,214 kg; non-</li> </ul>	
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		<p>certified 32,988,250 kg.</p> <ul style="list-style-type: none"> <li>o CPO production total: 14,292,490 kg; certified 7,874,601 kg; non-certified 6,417,889 kg.</li> <li>o PK production total: 3,683,720 kg; certified 1,932,540 kg; non-certified 1,751,180 kg.</li> <li>o CPO delivery total: 13,580,070 kg; certified 7,527,320 kg; non-certified 6,052,750 kg.</li> <li>o PK delivery total: 3,684,650 kg; certified 1,891,500 kg; non-certified 1,793,150 kg.</li> </ul> <p>d. Sampled document of Certified FFB:</p> <ul style="list-style-type: none"> <li>- Weighbridge Card #PBTA118204102 dated 15/08/2018, commodity: certified FFB; source: Bungo Tebo Estate; to Bungo Tebo Palm Oil Mill; net weight: 6,170 kg; Afdeling: 1; amount: 238 bunch; Block: A94g; RSPO Cert: RSPO620917; Transporter: Internal; Vehicle: BH 8328 ME; Driver: Hendra; Batch number: 13-100-16462017-41078810.</li> <li>- Weighbridge Card #PBTA118104099 dated 15/08/2018, commodity: certified FFB; source: Bungo Tebo Estate; to Bungo Tebo Palm Oil Mill; net weight: 3,590 kg; Afdeling: 2; amount: 150 bunch; Block: B95j; RSPO Cert: RSPO620917; Transporter: Internal; Vehicle: BK 8977 CR; Driver: Hakim; Batch number: 13-100-16462017-41078778.</li> <li>- Weighbridge Card #PBTA118104104 dated 15/08/2018, commodity: certified FFB; source: Bungo Tebo Estate; to Bungo Tebo Palm Oil Mill; net weight: 5,810 kg; Afdeling: 3; amount: 202 bunch; Block: C96g; RSPO Cert: RSPO620917; Transporter: Internal; Vehicle: BM 8529 TE; Driver: Zulkarnain; Batch number: 13-100-16462017-41078828.</li> <li>- Weighbridge Card #PBTA118104097 dated 15/08/2018, commodity: certified FFB; source: Bungo Tebo Estate; to Bungo Tebo Palm Oil Mill; net weight: 2,940 kg; Afdeling: 4; amount: 154 bunch; Block:</li> </ul>	
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		<p>D08j; RSPO Cert: RSPO620917; Transporter: Internal; Vehicle: BH 6286 MG; Driver: Dedi G.; Batch number: 13-100-16462017-41078745.</p> <ul style="list-style-type: none"> <li>- Weighbridge Card #PBTA218215340 dated 22/09/2018, commodity: certified FFB; source: Plasma Bungo Tebo (KOPERASI Tani Mandiri); to Bungo Tebo Palm Oil Mill; net weight: 5,066 kg; location KT-105 (Harapan Sukses); amount: 250 bunch; Block: P5105; RSPO Cert: RSPO620917; Transporter: Plasma Transport; Vehicle: BH 8306 WJ; Driver: Ajo; Batch number: 13-100-34342017-41092404.</li> <li>- Weighbridge Card #PBTA218215356 dated 22/09/2018, commodity: certified FFB; source: Plasma Bungo Tebo (KOPERASI Tunas Harapan); to Bungo Tebo Palm Oil Mill; net weight: 5,587 kg; location KT-047 (Tunas Harapan); amount: 260 bunch; Block: P4041; RSPO Cert: RSPO620917; Transporter: Plasma Transport; Vehicle: BH 8912 WU; Driver: Bay; Batch number: 13-100-34342017-41092486.</li> <li>- Weighbridge Card #PBTA218215183 dated 10/09/2018, commodity: certified FFB; source: Plasma Bungo Tebo (KOPERASI Sejahtera Tani); to Bungo Tebo Palm Oil Mill; net weight: 4,709 kg; location KT-051 (Tani Sadar Sendiri); amount: 200 bunch; Block: P4051; RSPO Cert: RSPO620917; Transporter: Plasma Transport; Vehicle: BH 8141 MB; Driver: Aan; Batch number: 13-100-34342017-41091457.</li> <li>- Weighbridge Card #PBTA218215298 dated 20/09/2018, commodity: certified FFB; source: Plasma Bungo Tebo (KOPERASI Tanjung Jaya Bersama); to Bungo Tebo Palm Oil Mill; net weight: 4,976 kg; location KT-109 (Tanjung Jaya); amount: 200 bunch; Block: P5109; RSPO Cert: RSPO620917; Transporter: Plasma Transport; Vehicle: BH 8141 MB; Driver: Aan; Batch number: 13-100-34342017-41092118.</li> </ul> <p>e. Sampled document of Non-certified FFB:</p> <ul style="list-style-type: none"> <li>- Surat Pengantar TBS (FFB delivery note) dated 15/08/2018 from CV Asri Bersaudara to PT Rigunas Agri Utama - Bungo Tebo Palm Oil</li> </ul>	
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		<p>Mill; amount: 50 bunch. Weighbridge Card #PBTA518213679 dated 15/08/2017, commodity: outside FFB; source: CV Asri Bersaudara, ID: ST00062; to PT Rigunas Agri Utama - Bungo Tebo Palm Oil Mill; net weight: 1,501 kg; amount: 50 bunch; Transporter: general; Vehicle: BM 9717 NW; Driver: Boy.</p> <ul style="list-style-type: none"> <li>- Surat Pengantar TBS (FFB delivery note) dated 15/08/2018 from SDR to PT Rigunas Agri Utama - Bungo Tebo Palm Oil Mill; amount: 659 bunch. Weighbridge Card #PBTA518213673 dated 15/08/2017, commodity: outside FFB; source: SDR, ID: ST00063; to PT Rigunas Agri Utama - Bungo Tebo Palm Oil Mill; net weight: 9,814 kg; amount: 659 bunch; Transporter: general; Vehicle: BH 6367 UU; Driver: Amit.</li> </ul>	
E.4.2	The site shall inform the CB immediately if there is a projected overproduction of certified tonnage.	<p>Standard Operating Procedure – Book Keeping (AA-MPM-OP-1400.18-R4). The procedure explains method to check certified product received. The book keeping mass balance stated every 3 months: January-March, April-June, July-September, and October-December each year. Head of Environment and Sustainability will inform to Certification Body in the case of projected overproduction. Until this 3<sup>rd</sup> annual surveillance audit, there is no overproduction happened.</p>	Yes
<b>E.5 Record keeping</b>			
E.5.1	a. The site shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis by RSPO.	<p>PT Rigunas Agri Utama – Bungo Tebo POM has record and balances all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on three-monthly basis, as shown in Book Keeping Mass Balance Report. Three monthly reports was generated from weighbridge card, summarized daily in mill daily report, summarized monthly in Mill Operation Summary, then summarized in Book Keeping Mass Balance Report.</p> <p>Records and report verified are as follows:</p> <ul style="list-style-type: none"> <li>• Laporan Harian Pabrik (Mill Daily Report); dated 31/12/2017 and 31/08/2018.</li> </ul>	Yes

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		<ul style="list-style-type: none"> <li>• Book Keeping – Mass Balance – CPO and PK period of January – March 2018, April – June 2018, July – September 2018;</li> <li>• Kartu Timbangan (Weighbridge Card) FFB;</li> <li>• Kartu Timbangan (Weighbridge Card) CPO;</li> <li>• Kartu Timbangan (Weighbridge Card) PK;</li> </ul>	
	b. All volumes of palm oil and palm kernel oil that are delivered are deducted from the material accounting system according to conversion ratios stated	Conversion rate is only applied to provide reliable estimation of CPO and PK produced for annual budget. The management of PT Rigunas Agri Utama – Bungo Tebo POM has mechanism and knowledge that all volumes of CPO and PK delivered are deducted from the material accounting system. All volume of CPO and PK are deducted from positive stock.	Yes
	c. The site can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a site is allowed to sell short. (i.e. product can be sold before it is in stock.) For further details refer to Module C.	PT Rigunas Agri Utama – Bungo Tebo POM only deliver certified CPO and PK sales from a positive stock. The volume of certified CPO and PK are deducted on three-monthly basis. Audit team verified there was no short-selling and/or negative stock at the end of three-monthly period.	Yes

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**Supply Chain Declaration** *(Applicable For Appendix E)*

<b>A. Monthly Records of Certified and Uncertified FFB Received since the last audit</b>				
<b>No.</b>	<b>Month - Year</b>	<b>Volume of FFB from certified supply bases (mt)</b>	<b>Volume of FFB from uncertified supply bases (mt)</b>	<b>Total FFB/Month (mt)</b>
1	November 2017	11,492	11,935	23,427
2	December 2017	10,854	9,045	19,899
3	January 2018	9,962	9,792	19,754
4	February 2018	8,688	12,565	21,253
5	March 2018	9,910	5,079	14,989
6	April 2018	10,549	9,581	20,130
7	May 2018	12,390	13,951	26,341
8	June 2018	13,453	9,475	22,928
9	July 2018	15,364	11,845	27,209
10	August 2018	14,520	11,627	26,147
<b>TOTAL</b>		<b>117,182</b>	<b>104,895</b>	<b>222,077</b>

**Note:**  
Notes for Auditor: The reporting shall be from the last assessment period until current period. The period of the volume reported can be more than 12 months or less than 12 months depending on the assessment period.  
Example:  
Certification date is 01/01/2017.  
ASA 1 conducted on 01/10/2017 – the volume to be verified and reported is from 01/01/2017 – 30/09/2017 (9 months)  
ASA 2 conducted on 14/12/2018 – the volume to be verified and reported is from 01/10/2017 – 30/11/2018 (13 months)

<b>B. Monthly Records of Certified CPO &amp; PK since the last audit</b>			
<b>No.</b>	<b>Month - Year</b>	<b>Certified CPO (mt)</b>	<b>Certified PK (mt)</b>
1	November 2017	2,528	626
2	December 2017	2,371	599
3	January 2018	2,169	547
4	February 2018	1,807	455
5	March 2018	2,141	544
6	April 2018	2,301	558
7	May 2018	2,703	658
8	June 2018	2,870	717
9	July 2018	3,432	847
10	August 2018	3,217	796
<b>TOTAL</b>		<b>25,539</b>	<b>6,347</b>

**Note:**  
Notes for Auditor: The reporting shall be from the last assessment period until current period. The period of the volume reported can be more than 12 months or less than 12 months depending on the assessment period.  
Example:  
Certification date is 01/01/2017.  
ASA 1 conducted on 01/10/2017 – the volume to be verified and reported is from 01/01/2017 – 30/09/2017 (9 months)  
ASA 2 conducted on 14/12/2018 – the volume to be verified and reported is from 01/10/2017 – 30/11/2018 (13 months)

<b>C. Records of Certified CPO &amp; PK Sold under PalmTrace to Buyers since the last audit (if any)</b>				
<b>No.</b>	<b>Buyers Name</b>	<b>Palmtrace Trading License Number</b>	<b>Certified CPO Sold (mt)</b>	<b>Certified PK Sold (mt)</b>
TR-5f1011cf-7f6e	PT Rigunas Agri Utama – Bungo Tebo KCP	RSPO_PO1000005127	0	317.50
TR-10bd3b16-dff4	PT Sari Dumai Sejati	RSPO_PO1000006430	492.12	0
TR-caacd6d6-bb26	PT Rigunas Agri Utama – Bungo Tebo KCP	RSPO_PO1000005127	0	609.22
TR-f86bc63b-d2bd	PT Rigunas Agri Utama – Bungo Tebo KCP	RSPO_PO1000005127	0	1,119.13
TR-31c69215-d56b	PT Rigunas Agri Utama – Bungo Tebo KCP	RSPO_PO1000005127	0	814.48
TR-62f3f820-3076	PT Rigunas Agri Utama – Bungo Tebo KCP	RSPO_PO1000005127	0	69.72
TR-020de73e-5400	PT Rigunas Agri Utama – Bungo Tebo KCP	RSPO_PO1000005127	0	467.84
<b>TOTAL</b>			<b>492.12</b>	<b>3,397.89</b>
<b>Note: Data collected from PalmTrace Transaction report period 30 Nov 2017 – 31 Aug 2018</b>				
Notes for Auditor: The reporting shall be from the last assessment period until current period. The period of the volume reported can be more than 12 months or less than 12 months depending on the assessment period.				
Example: Certification date is 01/01/2017. ASA 1 conducted on 01/10/2017 – the volume to be verified and reported is from 01/01/2017 – 30/09/2017 (9 months) ASA 2 conducted on 14/12/2018 – the volume to be verified and reported is from 01/10/2017 – 30/11/2018 (13 months)				

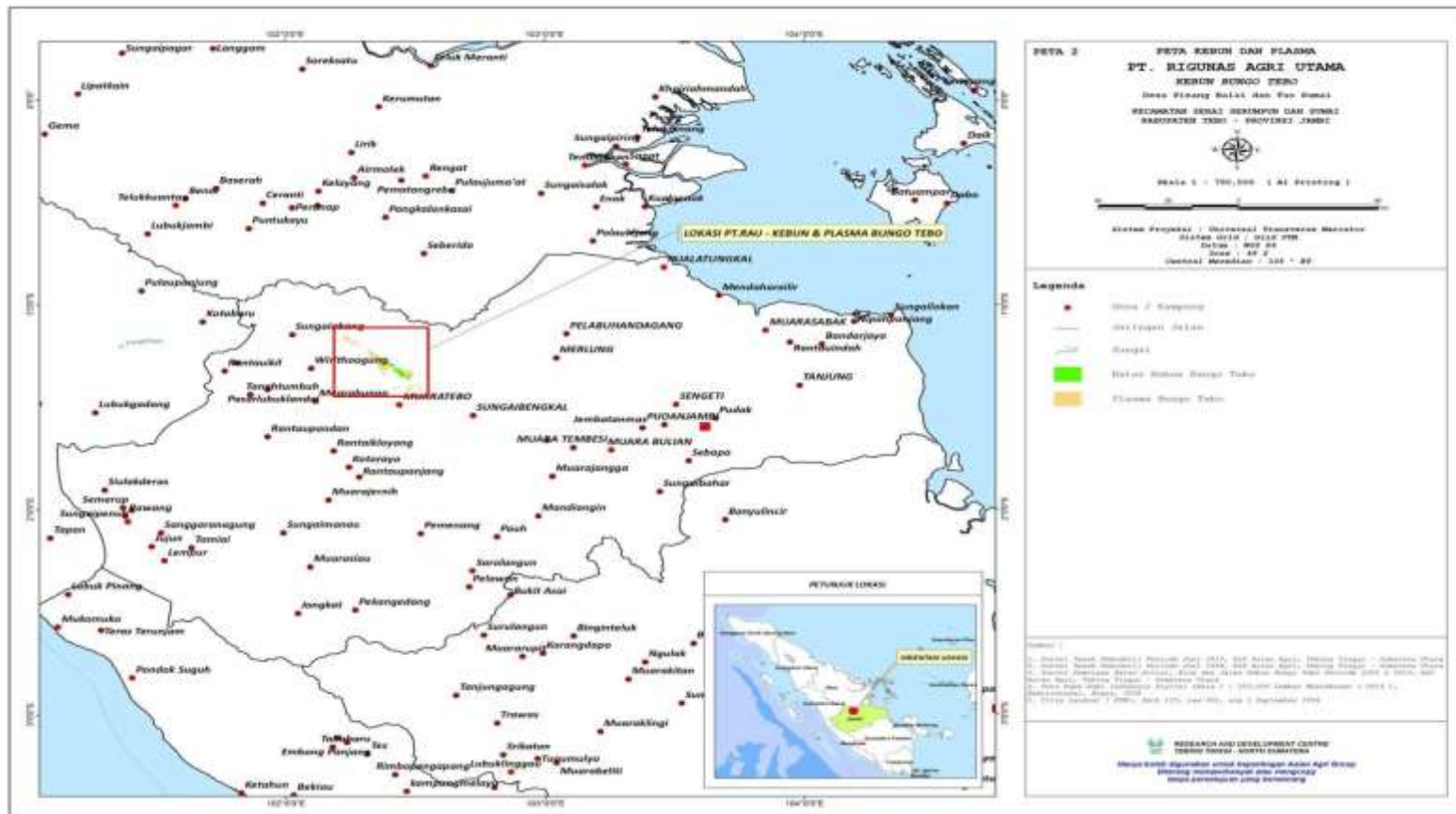
<b>D. Records of CPO &amp; PK Sold under other schemes to Buyers since the last audit (if any)</b>				
<b>No.</b>	<b>Buyers Name</b>	<b>Scheme Name</b>	<b>CPO Sold (mt)</b>	<b>PK Sold (mt)</b>
1	PT Sari Dumai Sejati	ISCC	11,088	-
2	PT Rigunas Agri Utama	ISCC	11,324	-
<b>TOTAL</b>			<b>22,412</b>	<b>-</b>
<b>Note: Data collected from PalmTrace Transaction report period 30 Nov 2017 – 31 Aug 2018</b>				
Notes for Auditor: The reporting shall be from the last assessment period until current period. The period of the volume reported can be more than 12 months or less than 12 months depending on the assessment period.				
Example: Certification date is 01/01/2017. ASA 1 conducted on 01/10/2017 – the volume to be verified and reported is from 01/01/2017 – 30/09/2017 (9 months) ASA 2 conducted on 14/12/2018 – the volume to be verified and reported is from 01/10/2017 – 30/11/2018 (13 months)				

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<b>E. Records of CPO &amp; PK Sold as conventional to Buyers since the last audit (if any)</b>			
<b>No.</b>	<b>Buyers Name</b>	<b>CPO Sold (mt)</b>	<b>PK Sold (mt)</b>
Nil	Nil	Nil	Nil
<p><b>Note:</b></p> <p>Notes for Auditor: The reporting shall be from the last assessment period until current period. The period of the volume reported can be more than 12 months or less than 12 months depending on the assessment period.</p> <p>Example:            Certification date is 01/01/2017.            ASA 1 conducted on 01/10/2017 – the volume to be verified and reported is from 01/01/2017 – 30/09/2017 (9 months)            ASA 2 conducted on 14/12/2018 – the volume to be verified and reported is from 01/10/2017 – 30/11/2018 (13 months)</p>			

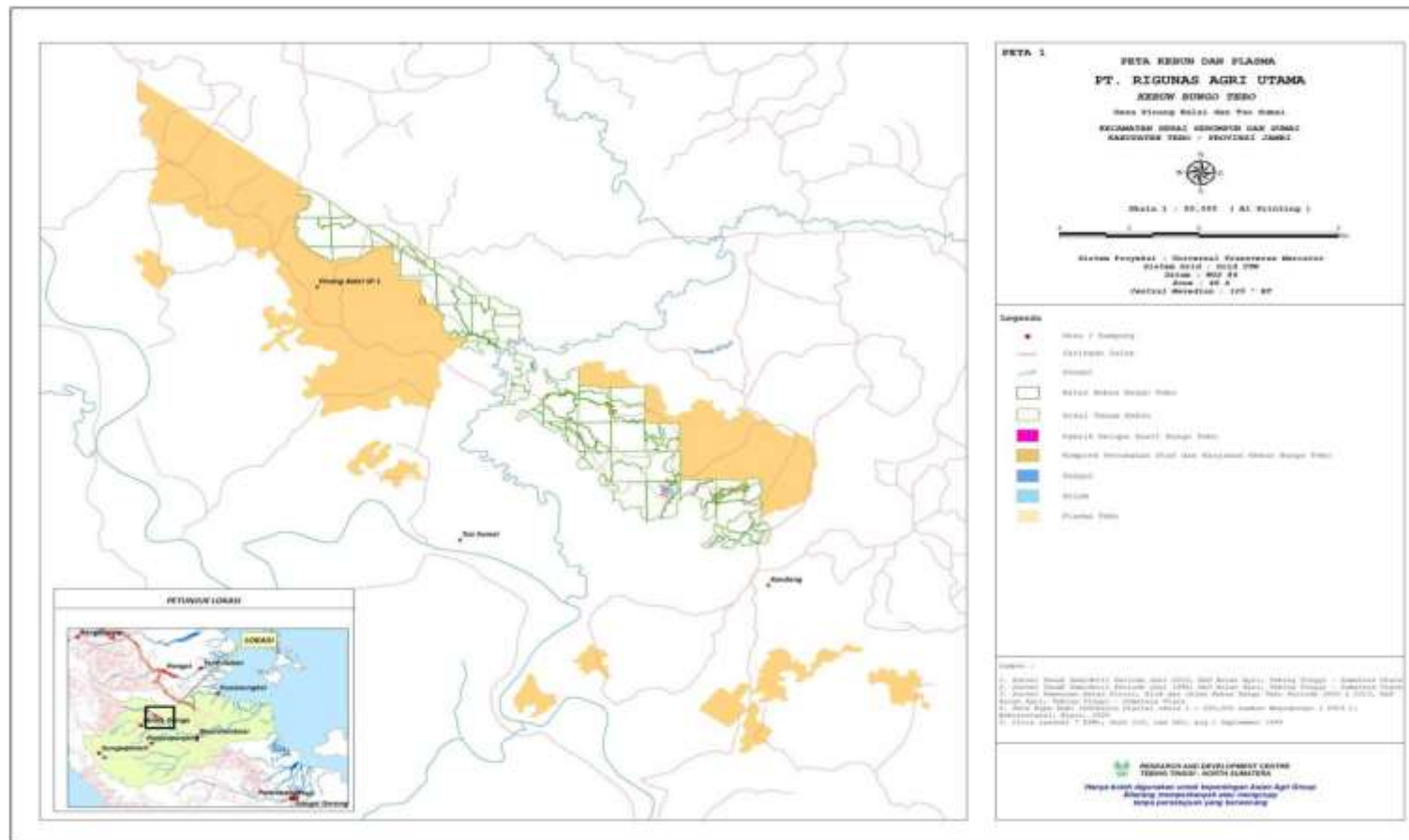
<b>F. Records of Certified CPO Sold under RSPO Credits to Buyers since the last audit (if any)</b>			
<b>No.</b>	<b>Buyers Name</b>	<b>PalmTrace Trading License Number</b>	<b>RSPO Credits of Certified CPO Sold (mt)</b>
Nil	Nil	Nil	Nil
<p><b>Note:</b></p> <p>Notes for Auditor: The reporting shall be from the last assessment period until current period. The period of the volume reported can be more than 12 months or less than 12 months depending on the assessment period.</p> <p>Example:            Certification date is 01/01/2017.            ASA 1 conducted on 01/10/2017 – the volume to be verified and reported is from 01/01/2017 – 30/09/2017 (9 months)            ASA 2 conducted on 14/12/2018 – the volume to be verified and reported is from 01/10/2017 – 30/11/2018 (13 months)</p>			

**Appendix F: Location Map of Certification Unit and Supply bases**





**Appendix G: Estate Field Map**



**Appendix H: List of Smallholder Sampled**

Name of Cooperative	Block / Hampanan	Smallholders Plot #	Land Owner		Total
			Dec-17	Jun-18	
TANI MANDIRI	88	2385	T. PURBA	T. PURBA	21
		2387	TAMPU	TAMPU	
		2389	KASMIR	KASMIR	
	89	2391	JUNAIDI	JUNAIDI	
		2402	PAK YAN	PAK YAN	
		2405	M. DAUD	M. DAUD	
		2407	PAK MASRI	MASRI	
		2409	ROHIMAN	ROHIMAN	
	90	2411	BARASA	BADRAN	
		2421	PARIONO	PARIONO	
		2425	PAHRI	BADRAN	
		2600	JUNTAK	JUNTAK	
		2605	ALYA	ALYA	
	105	2609	MAT NASIR	MAT NASIR	
		2615	SARONI	SARONI	
		2619	PAK IPEN	MUNAWAR	
		3213	PAK INDRA	INDRA	
3217		BALASMAN	BALASMAN		
		3219	MISNARDI	MISNARDI	
		3223	PONIRAN	PONIRAN	
		3227	SULARSO	A. TARIGAN	
SEJAHTERA TANI	51	2307	SAAD AMRI AZIS	SAAD AMRI AZIS	12
		2312	PAHRI	PAHRI	
		2317	ZAINAL ABIDIN / SUIT	ZAINAL ABIDIN	
	108	2340	UMAR / IBNU HAJAR	UMAR	
		2343	M. YUSUF / ALWI	M. YUSUF	
		2347	AL	AL	
		3161	ANI ASTUTI / AZWIR A	AZWIR A	
		3163	MUSHADI / SYAFI' I J	MUSHADI	
		3165	TABRI / M. AMIN H	TABRI	
		3167	SAYUTI / MUZIR	MUZIR	
		3169	MUBHADI	MUBHADI	
3171	JAMAL / USMAN. S	JAMAL			
TUNAS HARAPAN	48	2375	Dra. SISMAWATI	H. ABU HASAN	19
		2389	RASUL	RASUL	
		2370	JOHAN	JOHAN	
	49	2373	SUDARTI	SUDARTI	
		2376	Ir. DADANG. S	FAUZI	
		2381	HASAN. K	HASAN. K	
		2086	IMAS TUTI NURHAYATI	IMAS TUTI NURHAYATI	
		2059	FAUZI	FAUZI	
	50	2071	SYARIFUDIN	SYARIFUDIN	
		2073	LINDAWATI	LINDAWATI	
		2067	ABU HASAN	ABU HASAN	
		2009	SUDIYONO	SUDIYONO	
		2012	HUSNI THAMRIN	HUSNI THAMRIN	
	107	2030	FAUZI	FAUZI	
		2053	ASNAWI	ASNAWI	
		3155	M. FAUZI	FAUZI	
		3156	ZAINUDIN	ZAINUDIN	
3157		PAHRUL ROZI	PAHRUL ROZI		
		3158	MASHURI A.	MASHURI A.	
TANJUNG JAYA BERSAMA	109	3274	SARKANI	SARKANI	9
		3276	M ZAKI	M ZAKI	
		3279	SUMARDI	SUMARDI	
		3286	AHMAD HASATAN	M. TOHA	
		3293	ULUL AZMI	ULUL AZMI	
		3304	NAIROBI	DISMAWATI	
		3307	JUMRAH	JUMRAH	
		3309	EDI HARYANTO	DEDI	
		3314	BUK GADIS	BUK GADIS	
<b>TOTAL</b>					<b>61</b>

**Appendix I: List of Abbreviations**

a.i	Active Ingredient
BOD	Biochemical Oxygen Demand
CB	Certification Bodies
CHRA	Chemical Health Risk Assessment
COD	Chemical Oxygen Demand
CPO	Crude Palm Oil
CSPO	Certified Sustainable Palm Oil
CSPKO	Certified Sustainable Palm Kernel Oil
EFB	Empty Fruit Bunch
EHS	Environmental, Health and Safety
EIA	Environmental Impact Assessment
EMS	Environmental Management System
FFB	Fresh Fruit Bunch
FPIC	Free, Prior, Informed and Consent
GAP	Good Agricultural Practice
GHG	Greenhouse Gas
GMP	Good Manufacturing Practice
GPS	Global Positioning System
HCV	High Conservation Value
IPM	Integrated Pest Management
IP	Identity Preserved
IS - CSPO	Independent Smallholder Certified Sustainable Palm Oil
IS – CSPKO	Independent Smallholder Certified Sustainable Palm Kernel Oil
IS – CSPKE	Independent Smallholder Certified Sustainable Palm Kernel Expeller
ISCC	International Sustainable Carbon Certification
LD50	Lethal Dose for 50 sample
MB	Mass Balance
MSDS	Material Safety Data Sheet
MT	Metric Tonnes
OER	Oil Extraction Rate
OSH	Occupational Safety and Health
PK	Palm Kernel
PKO	Palm Kernel Oil
POM	Palm Oil Mill
POME	Palm Oil Mill Effluent
PPE	Personal Protective Equipment
RSPO	Roundtable on Sustainable Palm Oil
P&C	Principles & Criteria
RTE	Rare, Threatened or Endangered species
SCCS	Supply Chain Certification Standard
SEIA	Social & Environmental Impact Assessment
SIA	Social Impact Assessment
SOP	Standard Operating Procedure