

**RSPO PRINCIPLE AND CRITERIA  
PUBLIC SUMMARY REPORT**

- Initial Assessment**
- Annual Surveillance Assessment (1\_2)**
- Recertification Assessment** (Choose an item.)
- Extension of Scope**

<b>Client Company name (Parent Company):</b> <b>TDM Plantation Sdn Bhd</b>
Client company Address: Level 3, Bangunan UMNO Terengganu, Lot 3224 Jalan Masjid Abidin, 20100 Kuala Terengganu, Malaysia
Certification Unit: <b>Kemaman Palm Oil Mill</b>  Location of Certification Unit: KM 121, Jerangau – Jabor Highway 24101 Kemaman Terengganu, Malaysia
Date of Final Report: 22/12/2020

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## Section 1: Scope of the Certification Assessment

1. Company Details			
<b>Parent Company</b>	TDM Plantation Sdn. Bhd.		
<b>RSPO Membership Number</b>	1-0095-11-000-00	<b>Membership Approval Date</b>	1-0095-11-000-00
<b>Address</b>	Level 3, Bangunan UMNO Terengganu, Lot 3224, Jalan Masjid Abidin, 20100 Kuala Terengganu, Malaysia		
<b>Palm Oil Mill / Group Manager / Estate (Certification Unit)</b>	Kemaman Palm Oil Mill		
<b>Location / Address</b>	KM 121, Jerangau – Jabor Highway 24101 Kemaman, Terengganu, Malaysia		
<b>Website</b>	<a href="http://www.tdmberhad.com.my">www.tdmberhad.com.my</a>		
<b>Management Representative</b>	Hj Hassan Osman	<b>E-mail</b>	Hj Hassan Osman
<b>Telephone</b>	+609 822 6566	<b>Facsimile</b>	+609 822 6566

2. Certification Information			
<b>Certificate Number</b>	RSPO 587626	<b>Date of First Certification</b>	01/11/2013
		<b>Certificate Start Date</b>	01/11/2018
		<b>Certificate Expiry Date</b>	31/10/2023
<b>Scope of Certification</b>	Palm Oil and Palm Kernel Production		
<b>Visit Objectives</b>	<ul style="list-style-type: none"> <li>Determination of the conformity of the client's management system, or parts of it, with audit criteria.</li> </ul> Evaluation of the ability of the management system to ensure the client organization meets applicable statutory, regulatory and contractual requirements.		
<b>Assessment Cycle</b>	<input type="checkbox"/> Initial Assessment <input type="checkbox"/> Recertification Assessment (Choose an item.) <input checked="" type="checkbox"/> Annual Surveillance Assessment (RA 1 ; ASA 2) <input type="checkbox"/> Scope Extension		
<b>Applicable Standards</b>	<input type="checkbox"/> RSPO P&C 2018 for the Production of Sustainable Palm Oil <input checked="" type="checkbox"/> Malaysian National Interpretation 2019 for RSPO P&C 2018 for the Production of Sustainable Palm Oil <input type="checkbox"/> Group Certification 2016 <input type="checkbox"/> RSPO Independent Smallholders Standard 2019		
<b>Supply Chain Module</b>	<input checked="" type="checkbox"/> Identity Preserved <input type="checkbox"/> Mass Balance		

3. Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
MSPO 678572	MSPO MS 2530-4:2013 – General Principles for Palm Oil Mills	BSI Services Malaysia Sdn Bhd	27/09/2023
MSPO 686877	MSPO MS 2530-3:2013 – General Principles for Oil Palm Plantations and Organized Smallholders		27/09/2023

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base)	Location	GPS Coordinates	
		Latitude	Longitude
Kemaman Palm Oil Mill	KM 121, Jerangau – Jabor Highway 24101 Kemaman, Terengganu, Malaysia	4° 24' 10.80" N	103° 14' 52.80" E
Tebak Estate	KM 121, Jerangau – Jabor Highway 24101 Kemaman, Terengganu, Malaysia	4° 25' 48.61" N	103° 13' 35.40" E
Pelantoh Estate	KM 121, Jerangau – Jabor Highway 24101 Kemaman, Terengganu, Malaysia	4° 24' 19.23" N	103° 14' 59.64" E
Jernih Estate	KM 121, Jerangau – Jabor Highway 24101 Kemaman, Terengganu, Malaysia	4° 26' 24" N	103° 12' 39.59" E
Air Putih Estate	KM 121, Jerangau – Jabor Highway 24101 Kemaman, Terengganu, Malaysia	4° 8' 23.99" N	103° 7' 47.99" E
Gajah Mati Estate	Bukit Besi, 23000 Dungun, Terengganu, Malaysia	4° 41' 45.05" N	103° 12' 23.30" E
MAIDAM Estate	Bukit Besi, 23000 Dungun, Terengganu, Malaysia	4° 37' 39.58" N	103° 12' 24.42" E

(Note for Auditors: Deg °; Minutes' ; Seconds". The format must be two decimal points) (Eg. 3° 51' 14.01" N)

5. Description of Supply Base					
Estate	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Tebak Estate	2,922.33	30.46	340.84	3,293.63	88.73
Pelantoh Estate	3,153.27	0.25	138.08	3,291.60	95.80
Jernih Estate	2,822.07	65.46	248.07	3,135.60	90.00
Air Putih Estate	4,042.70	187.70	121.58	4,351.98	94.00
Gajah Mati Estate	3,520.87	153.13	208.78	3,882.78	90.68

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MAIDAM Estate	755.96	6.74	151.38	914.08	83.32
<b>Total</b>	17,217.20	443.74	1,208.73	18,869.67	91.24

### 6. Plantings & Cycle

Estate	Age (Years)					Mature**	Immature
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		
Tebak Estate	564.39	87.39	227.29	1,684.45	358.81	2,357.94	564.39
Pelantoh Estate	1,335.84	-	-	-	1,817.43	1,817.43	1,335.84
Jernih Estate	688.15	82.20	1,517.17	534.55	-	2,133.92	688.15
Air Putih Estate	-	2,517.73	-	1,524.97	-	4,042.70	-
Gajah Mati Estate	1,087.91	1,524.31	207.12	701.53	-	2,432.96	1,087.91
MAIDAM Estate	379.70	-	-	376.26	-	376.26	379.70
<b>Total</b>	4,055.99	4,211.63	1,951.58	4,821.76	2,176.24	13,161.21	4,055.99

### 7. Certified Tonnage of FFB (Own Certified Scope)

Estate	Tonnage / year			
	Estimated (Nov 2019-Oct 2020)	Actual (Sep 2019-Aug 2020)		Forecast (Nov 2020-Oct 2021)
		Previous license period (Sept 2019-Oct 2019)	Current license period (Nov 2019-Aug 2020)	
Tebak Estate	69,795.00	8,951.91	44,759.56	68,246.00
Pelantoh Estate	25,700.00	5,495.73	27,478.66	24,151.00
Jernih Estate	85,900.00	11,531.25	57,656.27	84,351.00
Air Putih Estate	61,300.00	9,157.65	45,788.25	59,751.00
Gajah Mati Estate	24,970.00	4,648.63	23,243.13	23,421.00
MAIDAM Estate	7,280.00	412.13	2,060.65	5,731.00
<b>Total</b>	274,945.00	241,183.82		265,651.00

### 8. Certified Tonnage of FFB (from other certified unit(s))

Estate	Tonnage / year		
	Estimated	Actual (Sep 2019-Aug 2020)	Forecast

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	(Nov 2019-Oct 2020)			(Nov 2020-Oct 2021)
		<i>Previous license period (Sept 2019-Oct 2019)</i>	<i>Current license period (Nov 2019-Aug 2020)</i>	
Pinang Emas Estate	N/A	4,663.75	23,318.76	N/A
Jerangau Estate	N/A	565.14	2,825.70	N/A
Tayor Estate	N/A	30.22	151.12	N/A
Bari/Jaya Estate	N/A	68.97	344.87	N/A
Fikri Estate	N/A	31.74	158.70	N/A
Tabung Tentera Estate	N/A	57.75	288.76	N/A
<b>Total</b>	<b>N/A</b>	32,505.48		<b>N/A</b>

\* Note:

- Pinang Emas Estate, Jerangau Estate, Tayor Estate, Bari/Jaya Estate & Fikri Estate RSPO Certificate # RSPO 595564; Validity period: 27/12/2018 - 26/12/2023
- Tabung Tentera Estate RSPO Certificate # RSPO-PC 00121; Validity period: 12/9/2016 - 11/9/2021

9. Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)				
Independent FFB Supplier	Tonnage / year			Forecast (Nov 2020-Oct 2021)
	Estimated (Nov 2019-Oct 2020)	Actual (Sep 2019-Aug 2020)		
		<i>Previous license period (Sept 2019-Oct 2019)</i>	<i>Current license period (Nov 2019-Aug 2020)</i>	
Nil	N/A	N/A	N/A	N/A
<b>Total</b>	<b>N/A</b>	<b>N/A</b>		<b>N/A</b>

10. Certified Tonnage					
Mill Capacity: 60 MT/hr	Estimated (Nov 2019-Oct 2020)	Actual (Sep 2019-Aug 2020)		Forecast (Nov 2020-Oct 2021)	
	FFB	FFB		FFB	
SCC Model: IP	274,945.00	<i>Previous license period (Sept 2019-Oct 2019)</i>	<i>Current license period (Nov 2019-Aug 2020)</i>	265,651.00	
		45,614.88	228,074.42		
		273,689.30			

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	CPO (OER: 20.50%)	CPO (OER: 20.01 %)		CPO (OER: 20.20 %)
	56,363.73	9,127.54	45,637.69	53,661.50
		54,765.23		
	PK (KER: 5.00 %)	PK (KER: 4.87 %)		PK (KER: 4.75 %)
	13,747.25	2,221.45	11,107.23	12,618.42
		13,328.67		

11. Actual Sold Volume (CPO) (Nov 2019-Aug 2020)					
Current License period					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
CPO (MT)	20,994.71	-	-	12,183.30	33,178.01
Previous License period (Sep 2019-Oct 2019)					
CPO (MT)	5,511.00	-	-	3,697.26	9,208.26
Total	26,505.71	-	-	15,880.56	42,386.27

12. Actual Sold Volume (PK) (Nov 2019-Aug 2020)					
Current License period					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
PK (MT)	6,984.33	-	-	1,674.89	8,659.22
Previous License period (Sep 2019-Oct 2019)					
PK (MT)	1,647.61	-	-	381.16	2,028.77
Total	8,631.94	-	-	2,056.05	10,687.99

13. Independent Smallholders Certification Claims		
	Credit	Physical Volume (MT)
IS-CSPO	-	-
IS-CSPKO	-	-
IS-CSPKE	-	-



## Section 2: Assessment Process

### Certification Body:

BSI Services Malaysia Sdn. Bhd. (ASI Accreditation Number: ASI-ACC-067)  
Suite 29.01 Level 29, The Gardens North Tower,  
Mid Valley City, Lingkaran Syed Putra,  
59200 Kuala Lumpur, Malaysia.  
Tel +60 (3) 9212 9638 Fax +60 (3) 9212 9639  
Representative: Nicholas Cheong ([Nicholas.Cheong@bsigroup.com](mailto:Nicholas.Cheong@bsigroup.com))  
Website: [www.bsigroup.com](http://www.bsigroup.com)

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### 2.1 Assessment Methodology, Programme, Site Visits

The on-site assessment was conducted on 2-4/9/2020. The audit programme is included as Section 2.3.

The approach to the audit was to treat the mill and supply base as an RSPO Certification Unit. A range of occupational health and safety, environmental, best practice management, and social factors were covered. This includes consideration of topography, palm age, proximity to areas with HCVs, declared conservation areas, local communities engagement and workers welfare and safety.

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 2018 for the Production of Sustainable Palm Oil (**RSPO P&C MYNI 2019**) was used to guide the assessment 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 (and 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.

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.

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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 (Recertification)</b>	<b>Year 2 (ASA 1_1)</b>	<b>Year 3 (ASA 1_2)</b>	<b>Year 4 (ASA 1_3)</b>	<b>Year 5 (ASA 1_4)</b>
Kemaman Palm Oil Mill	✓	✓	✓	✓	✓
Tebak Estate	✓	-	-	✓	-
Pelantoh Estate	✓	-	-	✓	-
Jernih Estate	-	✓	-	-	✓
Air Putih Estate	-	-	✓	-	-
Gajah Mati Estate	-	✓	-	-	✓
MAIDAM Estate	-	-	✓	-	-

**Tentative Date of Next Visit:** September 1, 2021 - September 3, 2021

**Total No. of Mandays:** 9 man days

**2.2 BSI Assessment Team:**

<b>Team Member Name</b>	<b>Role</b> <i>(Team Leader or Team member)</i>	<b>Qualifications</b> <i>(Short description of the team members)</i>
Hafriazhar Mohd Mokhtar	Team Leader	Hafriazhar Mohd. Mokhtar is a Chemical Engineer by qualification. He has more than five years of direct work experience in the upstream processes of palm oil within the plantation industry. He is a qualified Lead Auditor for CDM, ISO 9001, ISO 14001, ISO 45001 and ISO 50001 and has accumulated more than 1000 audit days throughout his current career as the auditor for multiple disciplines covering Malaysia, Indonesia and Thailand. He has been trained in the RSPO P&C and SCCS standards since 2011 and completed his RSPO P&C and SCCS Lead Assessor courses successfully. He has been involved in RSPO audits within Malaysia, Papua New Guinea, Solomon Islands, Gabon, Nigeria and Pakistan. During this assessment, he assessed on the aspects of

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		legal, social and stakeholder engagement as well as the RSPO supply chain requirements. Able to communicate in Bahasa Malaysia and English
Muhammad Fadzli Masran	Team Member	Fadzli graduated in Bachelor of Forestry Science at University Putra Malaysia. He started his career as Assistant Manager at Kulim Plantations Sdn. Bhd. managing the day to day plantation operations. In his career at Kulim Plantation, Fadzli had accumulated more than 10 years of sustainability implementation experience including workers' welfare, workers' occupational, health & safety, environment conservation and protection at buffer areas and continuous improvement management plans. Fadzli had accumulated auditing experience when he was the internal auditor for ISO9001 and ISO14001 at Kulim Plantations. He has completed ISO IMS 9001, 14001, 45001(OHS 18001) Lead Auditor Course in April 2018 and endorsed RSPO Lead Auditor Course in July 2018. During this assessment, he assessed the aspects of Occupational, Health & Safety and mill best practises. Able to communicate in Bahasa Malaysia and English.
Amir Bahari	Team Member	He obtained qualification in B.Sc. (Hons) Chemistry USM 1985 & Diploma in Palm Oil Milling Tech/Management MPOB 1996. He has been in the plantations industry for 30 years, among others managing rubber factories, palm oil mills and estates. During the tenure of employment he has been trained as an auditor in ISO 9001, ISO 14001, OHSAS 18001 & also RSPO. He has accumulated 38 man-days in the auditing profession after ending career in the plantation industry. During the assessment he covered mills and estates best practices, environmental, HCV and GHG. He is fluent in both verbal/written in Bahasa Malaysia and English.

**Accompanying Persons:** *Not applicable*

Name	Role
Nil	N/A

### 2.3 Assessment Plan

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

Date	Time	Subjects	HMM	MFM	AB
Tuesday, 1/9/2020	PM	Audit team travel to Kemaman	✓	✓	✓
Wednesday, 2/9/2020 <b>Kemaman Palm Oil Mill</b>	0830 – 0900	Opening Meeting (@ <b>Pelantoh Estate</b> Clubhouse): <ul style="list-style-type: none"> <li>• Opening Presentation by Audit team leader</li> <li>• Confirmation of assessment scope and finalize Audit plan (including stakeholder's consultation)</li> <li>• Verification on previous audit findings</li> </ul>	✓	✓	✓

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/ <b>Pelantoh Estate Club</b>	0900 – 1230	<b>Kemaman Palm Oil Mill:</b> Inspection of FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment, staff, workers and contractor interview, housing and facility inspection, clinic, meeting stakeholders etc.	✓	✓	✓
	1000 – 1230	Stakeholder consultation	✓	-	-
	1230 – 1330	Lunch	✓	✓	✓
	1330 – 1630	<b>Kemaman Palm Oil Mill:</b> Lab, weighbridge and palm product storage area. Document Review P1 – P8: SOPs, Supply chain for CPO mill, Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation	✓	✓	✓
	1630 – 1700	Interim briefing	✓	✓	✓
Thursday 3/9/2020 <b>Air Putih Estate</b>	0830 - 1230	<b>Air Putih Estate:</b> Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill & etc.	✓	✓	✓
	1000 – 1230	Stakeholder consultation	✓	-	-
	1230 – 1330	Lunch	✓	✓	✓
	1330 - 1630	<b>Air Putih Estate:</b> Document review P1 – P8: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation & etc.)	✓	✓	✓
	1630 - 1700	Interim briefing	✓	✓	✓

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Friday 4/9/2020  <b>MAIDAM Estate</b>	0830 - 1230	<b>MAIDAM Estate:</b> Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, Schedule waste management, worker housing, clinic, Landfill & etc.	✓	✓	✓
	1230 – 1430	Lunch & Friday Prayer	✓	✓	✓
	1430 - 1630	<b>MAIDAM Estate:</b> Document review P1 – P8: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation & etc.)	✓	✓	✓
	1630 – 1700	Closing meeting	✓	✓	✓

### Section 3: Assessment Findings

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

- € TDM Plantation Sdn. Bhd. Multiple Management Units / Time Bound Plan
- RSPO Principle and Criteria (P&C) 2018 for the Production of Sustainable Palm Oil
- RSPO Group Certification Standard 2016
- (Malaysia) National Interpretation (2019) for RSPO P&C 2018
- Independent Smallholder Standard 2019

#### 3.2 Multiple Management Units and Time Bound Plan

Requirement	Assessment	Compliance
Does the plan include all current subsidiaries, estates and mills that is under the control of the holding company?	Yes. Please refer to appendix B for details on the mills and estates of TDM Plantations Sdn. Bhd. Group. There's a newly acquired estate (Bukit Bidong Estate) since 1 <sup>st</sup> August 2020 to be included in the plan.	Yes
Have all the estates and mills certified within five years after obtaining RSPO membership?	Except for the newly acquired Bukit Bidong Estate, all estates and mills in Malaysia has been certified within five years. Certification for in Indonesia has been put on hold pending divest of properties there.	Yes

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Have there been any new acquisitions? If yes, the new acquisitions shall be certified within three-year from the date of acquisition. Certification plan for the new acquisition shall be available.	Yes there's newly acquired estate from Tabung Haji Plantations. The newly acquired Bukit Bidong Estate planned to be audited and certified by 2023.	Yes
Have there been any changes to the time-bound plan since the last audit (both new acquisition and existing)? If yes, justification is required. Is this consistent with the ACOP reporting?	Yes, changes involved the inclusion of Bukit Bidong Estate which was completed its acquisition on 1 <sup>st</sup> August 2020.	Yes
Have there been any isolated lapses in implementation of the plan? If yes a <b>Minor</b> non-compliance shall be raised	No, there has not been any isolated lapses.	Yes
Have there been any fundamental failure (e.g. unable to justify delay in planning the assessments) to proceed with implementation of the plan? If yes a <b>Major</b> non-compliance shall be raised	No, there is no fundamental failure.	Yes
<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>	No replacement after dates defined in Nis Criterion 7.3 involving primary forest. Newly acquired Bukit Bidong Estate was in progress of arrangement for assessment to determine any requirement to maintain or enhance HCVs in accordance with RSPO P&C criterion 7.3.	Yes
Any new plantings since January 1 <sup>st</sup> 2010 shall comply with the RSPO New Plantings Procedure.	No new plantings since 1 <sup>st</sup> January 2010 that requires compliance with the RSPO New Plantings Procedure.	Yes
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.	Based on RSPO RACP tracker, there's 0 case of Management Units with potential liability, LUCA and Concept Note requirements.	Yes
Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 6.3.	No labour dispute reported in the uncertified units.	Yes
Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO	No legal non-compliance reported in the uncertified units.	Yes

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P&C criteria 2.1		
Did the company conduct internal audit against the uncertified management units requirement? If yes, a positive assurance statement shall be available.	Yes. As part of the RSPO P&C compliance, internal audit has been conducted at the uncertified units. Report of improvement was provided for site's further improvement.	Yes
Have there been any stakeholder (including NGO) consultation conducted?	Yes. Stakeholders including NGO were consulted in the uncertified units.	Yes

### 3.3 Progress of scheme smallholders and/or out-growers

Progress of scheme smallholders or outgrowers towards compliance with relevant standards		
Requirement	Remarks	Compliance
Has 100% of scheme smallholders and/or scheme out-growers comply with the standard within three years of the mill's initial certification?  OFI shall be raised if after one year where 100% of the scheme smallholders and scheme out-growers are not in compliance, a minor NC after two years, and a major NC if this requirement is not met after three years.	Not applicable	

### 3.4 Details of Nonconformities

The nonconformities are listed below. The findings summary of the assessment by criteria are listed in Appendix A. During this Assessment there were five (5) Minor nonconformities raised. The Kemaman Palm Oil Mill Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

The implementation of the corrective action plans to address the minor nonconformity will be followed up during the next surveillance assessment. The below is the summary of the non-conformity raised during this assessment.

Non-conformity			
<b>NCR Ref #</b>	1949922-202009-N1	<b>Clause &amp; Category (Major / Minor)</b>	RSPO P&C MYNI 2019 Indicator 2.2.2 (Minor)
<b>Date Issued</b>	4/9/2020	<b>Due Date</b>	3/9/2021
<b>Closed (Yes / No)</b>	No	<b>Date of nonconformity Closure</b>	N/A
<b>Statement of Nonconformity:</b>	<ul style="list-style-type: none"> <li>- No specific clause on meeting applicable legal requirements stated in the sampled agreement</li> <li>- No evidence of legal due diligence of recruitment agencies (licensed/accredited) for migrant workers recruitment been conducted</li> </ul>		

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<p><b>Requirement Reference:</b></p>	<p>All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party. Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/ accredited) for migrant workers, service providers and labour contractors, is available.</p>
<p><b>Objective Evidence:</b></p>	<p>KPOM: Noted during document review of FFB Purchase Contract Agreement between TDM Plantation Sdn. Bhd. and Boustead Estates Agency Sdn. Bhd. dated 24/2/2020, there was no specific clause on meeting applicable legal requirements stated in the agreement.</p> <p>Estates: Documented information of legal due diligence been conducted for migrant workers recruitment agencies (licensed/accredited) not available in estates visited</p>
<p><b>Corrections:</b></p>	<p>KPOM: - For immediate action, the agreement include the clause on applicable legal requirement.</p> <p>Estates: - All incoming foreign workers intake to be given agreement to agree for legal due diligence for both parties.</p> <p>Contents of the agreement will have;- - Wages - Age of employee - Facilities - Rules of working hours and other related items.</p>
<p><b>Root Cause Analysis:</b></p>	<p>KPOM: The agreement already include the clause on meeting applicable legal requirement. However, for FFB purchase contract agreement for Boustead Estates Agency S/B was missed out due to short time period (emergency case ) which the mill ( Boustead ) have a problem in processing the FFB.</p> <p>Estate : The contract agreement between migrant workers recruitment agencies and TDM Plantation Sdn. Bhd. has been kept in HQ.</p>
<p><b>Corrective Actions:</b></p>	<p>KPOM: To register the new source of certified in system to avoid being miss out</p> <p>Estates: A copy of the agreement has been kept in estate for reference purposes</p>
<p><b>Assessment Conclusion:</b></p>	<p>The submitted CAP detailing on proposed actions to be taken to address the nonconformity based on the root cause determined were being reviewed by auditors deemed to be appropriate. Thus, the evidence of effectiveness of CAP will be verify during next coming surveillance assessment.</p>



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Non-conformity			
<b>NCR Ref #</b>	1949922-202009-N2	<b>Clause &amp; Category (Major / Minor)</b>	RSPO P&C MYNI 2019 Indicator 2.2.3 (Minor)
<b>Date Issued</b>	4/9/2020	<b>Due Date</b>	3/9/2021
<b>Closed (Yes / No)</b>	No	<b>Date of nonconformity Closure</b>	N/A
<b>Statement of Nonconformity:</b>	No specific clause in contract containing disallowing child, forced and trafficked labour.		
<b>Requirement Reference:</b>	All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour. Where young workers are employed, the contracts include a clause for their protection.		
<b>Objective Evidence:</b>	KPOM: Noted during document review of FFB Purchase Contract Agreement between TDM Plantation Sdn. Bhd. and Boustead Estates Agency Sdn. Bhd. dated 24/2/2020, there was no specific clause containing clauses disallowing child, forced and trafficked labour stated in the agreement.		
<b>Corrections:</b>	To include clause on contain disallowing child, forced and trafficked labour in all contract agreement.		
<b>Root Cause Analysis:</b>	The agreement already include the clause on meeting applicable legal requirement. However, there was no specific clause containing clauses disallowing child, forced and trafficked labour stated in the agreement for FFB purchase contract agreement for Boustead Estates Agency S/B due to additional clause based on the RSPO P&C MYNI 2019.		
<b>Corrective Actions:</b>	<ul style="list-style-type: none"> <li>- All contract will be updated and monitored accordingly.</li> <li>- All contractor or third party will be briefed and explained regarding this matter.</li> </ul>		
<b>Assessment Conclusion:</b>	The submitted CAP detailing on proposed actions to be taken to address the nonconformity based on the root cause determined were being reviewed by auditors deemed to be appropriate. Thus, the evidence of effectiveness of CAP will be verify during next coming surveillance assessment.		

Non-conformity			
<b>NCR Ref #</b>	1949922-202009-N3	<b>Clause &amp; Category (Major / Minor)</b>	RSPO P&C MYNI 2019 Indicator 3.1.3 (Minor)
<b>Date Issued</b>	4/9/2020	<b>Due Date</b>	3/9/2021
<b>Closed (Yes / No)</b>	No	<b>Date of nonconformity Closure</b>	N/A
<b>Statement of Nonconformity:</b>	HCV declaration differences was not discussed in the Management review		
<b>Requirement Reference:</b>	The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertake		

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<b>Objective Evidence:</b>	<p>The HCV Assessment made by SRA Consultancy in Nov 2011 identified Ladang Air Putih having HCV 3 of 10 ha. The estates declared the following HCV in addition to the report.</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th>#</th> <th>HCV/Estate</th> <th>Air Putih</th> <th>Maidam</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>HCV 4 Water catchment P96B</td> <td style="text-align: center;">✓</td> <td></td> </tr> <tr> <td>2</td> <td>HCV 4 Pond P96B</td> <td style="text-align: center;">✓</td> <td></td> </tr> <tr> <td>3</td> <td>HCV 3 Hutan Tabung F</td> <td style="text-align: center;">✓</td> <td></td> </tr> <tr> <td>4</td> <td>HCV 6 Mosque</td> <td style="text-align: center;">✓</td> <td></td> </tr> <tr> <td>5</td> <td>HCV 1 Sg Angka P18</td> <td></td> <td style="text-align: center;">✓</td> </tr> <tr> <td>6</td> <td>HCV 2 Sg Buluh Nipis</td> <td></td> <td style="text-align: center;">✓</td> </tr> </tbody> </table>	#	HCV/Estate	Air Putih	Maidam	1	HCV 4 Water catchment P96B	✓		2	HCV 4 Pond P96B	✓		3	HCV 3 Hutan Tabung F	✓		4	HCV 6 Mosque	✓		5	HCV 1 Sg Angka P18		✓	6	HCV 2 Sg Buluh Nipis		✓
#	HCV/Estate	Air Putih	Maidam																										
1	HCV 4 Water catchment P96B	✓																											
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4	HCV 6 Mosque	✓																											
5	HCV 1 Sg Angka P18		✓																										
6	HCV 2 Sg Buluh Nipis		✓																										
<b>Corrections:</b>	To include in the management review meeting on changes occurred																												
<b>Root Cause Analysis:</b>	There was reassessment of HCV that was not captured in the declaration of the areas concerned.																												
<b>Corrective Actions:</b>	<p>To re-classify the areas concerned as following:</p> <p>MAIDAM Estate: The previous HCV areas in MAIDAM Estate (6.74 ha) will be re-classified as Conservation Value (CV) areas. The decision will be finalised during next coming SZ Sustainability Committee Meeting</p> <p>Air Putih: To stick as per SRA Consultancy HCV Assessment on Nov 2011 that identified 10 Ha of HCV 3 and that visited areas we considered as Conservation Value</p> <p>Areas that previously visited needs to be reviewed by management whether it is possible for development or cultivation and that issue will be raised up during upcoming management meeting in October 2020.</p>																												
<b>Assessment Conclusion:</b>	The submitted CAP detailing on proposed actions to be taken to address the nonconformity based on the root cause determined were being reviewed by auditors deemed to be appropriate. Thus, the evidence of effectiveness of CAP will be verify during next coming surveillance assessment.																												

Non-conformity			
<b>NCR Ref #</b>	1949922-202009-N4	<b>Clause &amp; Category (Major / Minor)</b>	RSPO P&C MYNI 2019 Indicator 7.3.1 (Minor)
<b>Date Issued</b>	4/9/2020	<b>Due Date</b>	3/9/2021
<b>Closed (Yes / No)</b>	No	<b>Date of nonconformity Closure</b>	N/A

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<b>Statement of Nonconformity:</b>	The source of waste was not fully identified and documented
<b>Requirement Reference:</b>	A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.
<b>Objective Evidence:</b>	The Waste Management Action Plan 2020 for the Mill and the Estates have not identified sewage as part of the waste produced.
<b>Corrections:</b>	To include source of waste (sewage) as one of the waste component has been included in Waste Management Plan 2020 (reviewed on 09/09/2020)
<b>Root Cause Analysis:</b>	The sewage was previously included as part of water management by the mill and estate.
<b>Corrective Actions:</b>	To correctly identify the source of waste during assessment to differentiate with source of water
<b>Assessment Conclusion:</b>	The submitted CAP detailing on proposed actions to be taken to address the nonconformity based on the root cause determined were being reviewed by auditors deemed to be appropriate. Thus, the evidence of effectiveness of CAP will be verify during next coming surveillance assessment.

Non-conformity			
<b>NCR Ref #</b>	1949922-202009-N5	<b>Clause &amp; Category (Major / Minor)</b>	RSPO P&C MYNI 2019 Indicator 4.2.3 (Minor)
<b>Date Issued</b>	4/9/2020	<b>Due Date</b>	3/9/2021
<b>Closed (Yes / No)</b>	No	<b>Date of nonconformity Closure</b>	N/A
<b>Statement of Nonconformity:</b>	No evidence that a grievance parties been informed of progress of their grief issues		
<b>Requirement Reference:</b>	The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders.		
<b>Objective Evidence:</b>	Based on the on-site stakeholder consultation with contractors and suppliers/vendors, most of them complaining on late payment issues where some payment delayed for almost one year. Trailing of related records of complain/grievance shown no records of such complain however verification with consulted contractors and suppliers/vendors confirmed that they were not been informed on the actual progress by relevant operating units.		
<b>Corrections:</b>	This issue has been highlighted in monthly Operation/ Management Meeting. Estate and mill management will be notified on the grief issues (payment progress) to the related contractors, vendors and suppliers.		
<b>Root Cause Analysis:</b>	There is no clear mechanism/ timeline regarding the grief issues (payment progress) to suppliers, vendors or contractors as it is arranged by HQ		

<b>Corrective Actions:</b>	To establish a clear mechanism/timeline regarding grief issues (payment progress)
<b>Assessment Conclusion:</b>	The submitted CAP detailing on proposed actions to be taken to address the nonconformity based on the root cause determined were being reviewed by auditors deemed to be appropriate. Thus, the evidence of effectiveness of CAP will be verify during next coming surveillance assessment.

Opportunity for Improvements	
OFI #	Description
Nil	n/a

Positive Findings	
PF #	Description
PF 1	Good continuous improvement program implementation
PF 2	Good social contributions as per external stakeholders' feedbacks
PF 3	Good documents retrieval

### 3.4.1 Status of Nonconformities Previously Identified and Observations

Non-conformity			
<b>NCR Ref #</b>	1820535-201903-M1	<b>Clause &amp; Category (Major / Minor)</b>	RSPO P&C MYNI 2014: 4.6.11 (Major) New indicator: 7.2.10 (Critical)
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	3/12/2019
<b>Statement of Nonconformity:</b>	Specific annual medical surveillance for pesticide operators (organophosphate) was not effectively demonstrated		
<b>Requirement Reference:</b>	Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, shall be demonstrated.		
<b>Objective Evidence:</b>	Based on form I, the last medical surveillance was 19/4/2018, application date: 3/5/18. Latest medical surveillance dated 10/7/19 did not include 8 trunk injector operators and only cover normal (glyphosate) spraying operator.		
<b>Correction/containment</b>	To do the Medical Surveillance for pesticide operator (Organophosphate) which involved trunk injection (Bagworm treatment) programme (Done on 5th Sept 2019)		

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<b>Cause</b>	Medical surveillance not fully implemented and not include trunk injection workers.
<b>Corrective Actions:</b>	<ul style="list-style-type: none"> <li>- To implement the Medical Surveillance before and after treatment trunk injection (Organophosphate).</li> <li>- To review and perform regular checking for the related worker.</li> <li>- Annually internal inspection to cross check with the related the document.</li> </ul>
<b>Assessment Conclusion:</b>	<p>Major NC close out verification: Medical surveillance for 6 workers was carried out on 5/9/19 at Klinik Medic Bestari. All workers found to be fit with no detrimental of health based on USECHH4 from. List of sprayers that fit to work is maintained to ensure only active list of sprayers is used for future application. The NC is found to be effective thus the major NC is closed on 3/12/19.</p> <p>ASA 1_2 verification: The annual medical surveillance was conducted on annually basis as per CHRA recommendation. The surveillance involved all employee exposed with chemicals.</p> <p>MAIDAM Estate: Annual medical surveillance was conducted by OHD with reg. no. HQ/08/DOC/00/352 on 18/8/2020. The report has yet to be received by the estate.</p> <p>Air Putih Estate: Annual medical surveillance was conducted by OHD with reg. no. HQ/08/DOC/00/601 on 16/6/2020. 14 workers were sent for surveillance and found fit to work as chemical handlers.</p> <p>Corrective action found to be effective, based on-site verification and supported with sufficient documented evidence. CAP implementations were effectively evidence. Hence, Major NC remained closed.</p>

Non-conformity			
<b>NCR Ref #</b>	1820535-201903-M2	<b>Clause &amp; Category (Major / Minor)</b>	RSPO P&C MYNI 2014: 4.7.2 (Major) New indicator: 3.6.1 (Critical)
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	3/12/2019
<b>Statement of Nonconformity:</b>	Risk assessment for operation was not effectively implemented.		
<b>Requirement Reference:</b>	All operations where health and safety is an issue shall be risk assessed, and procedures and actions shall be documented and implemented to address the identified issues. All precautions attached to products shall be properly observed and applied to the workers.		
<b>Objective Evidence:</b>	Kemaman POM: HIRARC register dated 13 Jan 2019 did not include compost plant operation.		

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<b>Correction/containment</b>	HIRARC for new item and updated machine will be established and implemented accordingly
<b>Cause</b>	HIRARC was already reviewed and implemented. However, HIRARC for new item or any updated machine related to operation was not fully covered
<b>Corrective Actions:</b>	<ul style="list-style-type: none"> <li>- HIRARC will be reviewed annually related to any updated of operation in Compost plant.</li> <li>- Annually internal inspection ( internal audit ) to cross check with the related the document. Any updated will be discuss on SHC ( safety and health committee) meeting</li> </ul>
<b>Assessment Conclusion:</b>	<p>Major NC close out verification: HIRARC for composting plant has been updated to include all activities in the operation starting from dumping of EFB until harvesting of composting material. Refer to HIRARC register dated 1/9/19. Any changes and review required in HIRARC will be discussed in the safety committee meeting. The corrective action implemented is found to be effective, thus the major NC is closed effectively on 3/12/19. Continuous implementation will be further verified in the next assessment.</p> <p>ASA 1_2 verification: The mill has established HIRARC Team lead by the Estate Manager. The team reviewed the HIRARC as per SOP established. FY 2020, the annual HIRARC review was conducted on 13/1/2020 with no changes in the HIRARC register. Latest HIRARC review due to accident occurrence was conducted on 12/7/2020 for weeding operation, 10/6/2020 for transporting workers and 19/4/2020 in harvesting operation.</p> <p>Corrective action found to be effective, based on-site verification and supported with sufficient documented evidence. CAP implementations were effectively evidence. Hence, Major NC remained closed.</p>

Non-conformity			
<b>NCR Ref #</b>	1820535-201903-M3	<b>Clause &amp; Category (Major / Minor)</b>	RSPO P&C MYNI 2014: 2.1.1 (Major) New indicator: 2.1.1 (Critical)
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	3/12/2019
<b>Statement of Nonconformity:</b>	Some of the legal compliance are not effectively implemented.		
<b>Requirement Reference:</b>	1) Evidence of compliance with relevant legal requirements shall be available. 2) WORKERS' MINIMUM STANDARDS OF HOUSING AND AMENITIES ACT 1990: Weekly inspection of workers' housing: 23. (1) It shall be the duty of the employer of a place of employment where workers and their dependents are provided with housing accommodation to ensure that— (a) the area surrounding the workers'		

	<p>housing is kept clear of undergrowth and maintained in a clean and sanitary condition; (b) the perimeter drains around each dwelling or block of dwellings including all outlet drains are kept in a good state of repair and clear of refuse or undergrowth to permit free flow of water; (c) all refuse in the housing site is collected daily and disposed of satisfactorily; and (d) all communal latrines and bathrooms are kept in a clean, sanitary and working condition.</p> <p>2) AKTA PEMBANTU PERUBATAN (PENDAFTARAN) 1977: 11. (1) Tertakluk kepada subseksyen 18(1), sesuatu perakuan pendaftaran hendaklah tamat tempohnya pada 31 haribulan Disember tahun ia dikeluarkan tetapi Lembaga boleh membaharui perakuan itu tiap-tiap tahun mengikut boring yang ditetapkan setelah dibayar bayaran yang ditetapkan. (2) Sesuatu permohonan untuk membaharui perakuan itu hendaklah dibuat tidak lewat daripada 30 haribulan September tiap-tiap satu tahun dan Lembaga hendaklah memberikan keputusan mengenainya dan membaharui atau enggan membaharui perakuan itu dan hendaklah dalam salah satu hal menyampaikan keputusannya kepada orang yang berkenaan itu tidak lewat daripada 30 haribulan November dalam tahun yang sama.</p>
<p><b>Objective Evidence:</b></p>	<p>Jernih Estate: The effectiveness of line site inspection is not demonstrated where during the site visit, it was found that in Zone A (end of the row of Ashraf's house) has blockage drainage and domestic waste near the housing area.</p> <p>Gajah Mati Estate:  <ul style="list-style-type: none"> <li>- The effectiveness of line site inspection is not demonstrated where during the site visit, it was found that in Block G-05 blockage drain and domestic waste near the housing area.</li> <li>- The latest "Perakuan Pembaharuan Tahunan" (No: 9961/2013) was expired on 31.12.2013 for Medical Assistant.</li> </ul> </p>
<p><b>Correction/containment</b></p>	<p>Jernih Estate:            1) Gotong-royong in line site area zone A, B and C involving all Ladang Jernih workers (5 &amp; 6 Sept 2019).</p> <p>Gajah Mati Estate:            1) Block G-5 blockage drain already been cleared from rubbish also water flow already improved into main drain.            2) To have a valid yearly "Perakuan Pembaharuan Tahunan" certificate.            3) Medical Assistant already passed the exam on 1/08/2019 for renewing the license and already got approval to renew annual certificate – Business Licensing Electronic Support System (BLESS) website for medical assistant</p>
<p><b>Cause</b></p>	<p>Jernih Estate:            1) Frequent flash flood and heavy raining occurred lead to blockage drainage. The small size of the drainage also contribute to the blockage.            2) The inspection for housing not fully covered outside and inside house.</p> <p>Gajah Mati :            1) Drainage were collapsed due to land erosion.            2) Neglecton for Medical Assistant Annual Renewal Certificate.</p>
<p><b>Corrective Actions:</b></p>	<p>Jernih Estate:            1) Briefing and training on schedule waste disposal system during Muster Call (8 Sept 2019)</p>

	<p>2) To construct a new drainage system in the line site area.</p> <p>3) Weekly inspection by staff in charge according to respective zone (A, B&amp; C) with proper record.</p> <p>4) Site inspection by VMO (outsourced) will be carried out with supporting documents and cross checked by management.</p> <p>Gajah Mati Estate:</p> <p>1) To do proper drainage by replacing collapsed drain and channel waterflow to main drain.</p> <p>2) To review and annually check for any certificate related to this matter</p>
<p><b>Assessment Conclusion:</b></p>	<p>Major NC close out verification:</p> <p>i) Verified during on-site verification, surrounding area at zone A, B and C has been cleaned and blockage drain has been cleared. New drain has been constructed at zone A to replace all damaged drain and realign gradient for drain system. Verified records of line site inspection by person in charge and VMO dated 20/11/19. Sanitation and drainage system was found to be good.</p> <p>ii) Block G5 collapse drain is still in progress of repair. Verified quotation, "perjanjian pesanan kerja, LGM053/19 dated 17/11/19" to contractor SDM Maju Bina Enterprise.</p> <p>iii) Verified the new "Perakuan Pembaharuan Tahunan" dated 16/9/19, and valid until 31/12/19. Ref. no. 17681/2019. Perakuan Pembaharuan Tahunan" has been updated in the list of license and being monitored using estate's dashboard. The corrective action is found to be effective thus the major NC is closed on 3/12/19. Continuous implementation will be further verified in the next assessment.</p> <p>ASA 1_2 verification:</p> <p>Compliance to each applicable law and regulation is monitored by the operating units and sustainability team. Estate had obtained and renewed license and permits as required by the law. Sample of licenses or permit viewed were:</p> <p>Kemaman POM:</p> <ol style="list-style-type: none"> <li>1. MPOB License no. 600041904000 valid till 31/3/2021</li> <li>2. DOE Contradiction License no. 004055 with Compliance schedule no. AS(B)T:31/152/000/001 valid till 5/6/2021</li> <li>3. DOE Contradiction License no. 004082 with Compliance schedule no. JPLP(UB)/2020/004082 valid till 5/6/2021</li> <li>4. Fire Certificate no. JPBM:TR/7/049/2019 valid till 5/7/2021</li> <li>5. Private Installation license, no. 2019/03524 valid till 21/11/2020</li> <li>6. Weighbridge permit for equipment no. B849884850 with security sticker no. 2.1KQ.018332 dated 15/3/2020</li> <li>7. Unfired pressured vessel permit no.:             <ol style="list-style-type: none"> <li>a. TG PMT 85 valid till 7/4/2021</li> <li>b. TG PMT 86 valid till 7/4/2021</li> <li>c. PMT 107391 TG valid till 7/4/2021</li> </ol> </li> <li>8. AESP for Confined Space             <ol style="list-style-type: none"> <li>a. NW-NCT-AE-R-2285-R valid till 20/4/2021</li> <li>b. NW-NCT-AE-R-2384-R valid till 27/4/2021</li> </ol> </li> </ol>



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	<p>9. AGTES permit no.:</p> <p style="padding-left: 40px;">a. HQ/19/AGTES/01/04181 valid till 13/10/2022</p> <p>10. CePSWaM certificate no. CePSWaM/209338 valid till 22/12/2020</p> <p>MAIDAM Estate:</p> <ol style="list-style-type: none"> <li>1. MPOB License no. 503576002000, valid till 31/8/2021</li> <li>2. Diesel permit no. T 000018 valid till 9/10/2020</li> </ol> <p>Air Putih Estate:</p> <ol style="list-style-type: none"> <li>1. MPOB License no. 503322802000, valid till 30/7/2021</li> <li>2. MPOB License no. 503558102000, valid till 30/7/2021</li> <li>3. MPOB Nursery License no. 56087011000, valid till 30/7/2021</li> <li>4. Certificate of fitness (CF) no. for air receiver no. TG PMT 5473 valid till 17/11/2020</li> <li>5. Diesel permit no. T 001566 valid till 12/10/2020</li> </ol> <p>Corrective action found to be effective, based on-site verification and supported with sufficient documented evidence. CAP implementations were effectively evidence. Hence, Major NC remained closed.</p>
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Non-conformity			
<b>NCR Ref #</b>	1820535-201903-M4	<b>Clause &amp; Category (Major / Minor)</b>	RSPO SCCS 2017: 5.5.1 (Major) New indicator: 3.8.9 (Critical)
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	3/12/2019
<b>Statement of Nonconformity:</b>	Evidence of transporter to comply with the requirements of the RSPO Supply Chain Certification Standard is not available.		
<b>Requirement Reference:</b>	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 independent mil cannot outsource processing activities like refining or crushing. 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).		
<b>Objective Evidence:</b>	Sampled agreement between TDM Plantation – Kemaman POM dated 01 January 2019 and Koperasi Ladang Kelapa Sawit Kemaman Terengganu Berhad valid from 01.01.2019 – 31.12.2019, there is no evidence of transporter to comply with the requirements of the RSPO Supply Chain Certification Standard		
<b>Correction/containment</b>	1) To conduct meeting /briefing / training to the transporter or any outsources to ensure their understanding on all the RSPO Supply chain requirement.		

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	2) Perjanjian Kerja will be clearly stated " The contractor/ transporter shall be comply with the requirement of the RSPO Supply Chain Certification Standard
<b>Cause</b>	Mill have already organized stakeholder meeting for any outsources or third party. However, no representative from the mentioned transporter and the evidence which " Surat pengesahan kehadiran " by transporter cannot provided and the confirmation make only by phone
<b>Corrective Actions:</b>	Any related document will be reviewed annually include of training, briefing and communication with the transporter will be recorded. Internal audit for transporter will be conducted as per annual audit plan and the representative should be attend for any meeting/briefing related to RSPO requirement.
<b>Assessment Conclusion:</b>	<p>Major NC close out verification: New contract was issued to the contractor, DS Rezki Trading for the CPO and PK transport to buyer. The contract is temporary and effective from 1/9/19 to 31/12/19. Additional requirements under clause 12 has been clearly spell out in the contract. Corrective action is found to be effective thus the major NC is closed on 3/12/19. Continuous implementation will be further verified in the next audit</p> <p>ASA 1_2 verification: TDM has managed the outsourced activities as per SOP established and documented in Standard Operating Procedure RSPO Supply Chain SOP – Identity Preserved and Mass Balance Module, edition TDM/MILLS/02, rev. MILL-01/2018 dated July 2018 under section 8. CPO and PK dispatch where the outsource activities involved transportation of CPO and PK only.</p> <p>Sighted the sampled contracts between TDM and transporter as following samples:</p> <ul style="list-style-type: none"> <li>- <i>Perjanjian Mengangkut Minyak Sawit Mentah Dan Isirong Di Antara TDM Plantation Sdn. Bhd. Dan Sidhu Brothers Transport Sdn. Bhd. Pada 24 September 2019</i></li> <li>- <i>Perjanjian Mengangkut Minyak Sawit Mentah Dan Isirong Di Antara TDM Plantation Sdn. Bhd. Dan Koperasi Ladang Sawit Kemaman Terengganu Berhad Pada 1 Januari 2019</i></li> </ul> <p>The contract agreements specified that all transporters are required to fulfil and comply with applicable legal requirements as well as TDM own requirements which include the RSPO and MSPO standard.</p> <p>Corrective action found to be effective, based on-site verification and supported with sufficient documented evidence. CAP implementations were effectively evidence. Hence, Major NC remained closed.</p>

<b>Non-conformity</b>			
<b>NCR Ref #</b>	1820535-201903-M5	<b>Clause &amp; Category (Major / Minor)</b>	RSPO SCCS 2017: D5.1 (Major) New indicator: 3.8.12 (Critical)

<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	3/12/2019
<b>Statement of Nonconformity:</b>	Record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK was not consistently monitored on a real-time basis		
<b>Requirement Reference:</b>	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. IP Mill must report on real time basis.		
<b>Objective Evidence:</b>	Real time monitoring was not effectively demonstrated based on quarterly records and balance from July 2018 to August 2019, it was found that: i) July 2018 : delivery of RSPO CPO (+295.50 mt) and PK (+167 mt) more than stock. ii) September 2018 : delivery of RSPO PK (+165 mt) more than stock iii) December 2018 : delivery of RSPO PK (+65 mt) more than stock		
<b>Correction/containment</b>	The record for all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK will be updated and monitored accordingly		
<b>Cause</b>	All document related to RSPO supply chain standard already implemented. However, monitoring and recording for deliveries of RSPO certified CPO and PK was not consistently monitored on a real- time basis due to no person in charge direct to monitor the record delivery.		
<b>Corrective Actions:</b>	To appoint person in charge to monitor and record all mentioned item on a real time basis		
<b>Assessment Conclusion:</b>	<p>Major NC close out verification: Verified monitoring records for all transactions (in and out). Record of FFB received and deliveries were updated and recorded until November 2019 to ensure positive stock prior to delivery. Noted the appointment of person in charge dated 10/9/19 to ensure effective implementation of RPSO SCCS. Corrective action is found to be effective thus the major NC is closed on 3/12/19. Continuous implementation will be further verified in the next audit.</p> <p>ASA 1_2 verification:</p> <p>i) a. KPOM has established the SCCS Mass balance sheet document to records and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.</p> <p>b. All volumes of certified CPO and PK that were delivered were deducted from the material accounting system according to conversion ratios of OER and KER as per sample records of Mill production report Sep 2019 – Aug 2020 and FFB summary Sep 2019 – Aug 2020.</p> <p>c. Positive stock deliveries maintained through the SCCS Mass balance sheet document to records and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis. No short selling made by KPOM. Corrective action found to be effective, based on-site verification and supported with sufficient documented evidence. CAP implementations were effectively evidence. Hence, Major NC remained closed.</p>		

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Non-conformity					
<b>NCR Ref #</b>	1820535-201903-M6	<b>Clause &amp; Category (Major / Minor)</b>	RSPO SCCS 2017: D4.2 (Major) New indicator: 3.8.7 (Critical)		
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	3/12/2019		
<b>Statement of Nonconformity:</b>	CB has not been informed for the projected overproduction of certified tonnage.				
<b>Requirement Reference:</b>	The site shall inform the CB immediately if there is a projected overproduction of certified tonnage.				
<b>Objective Evidence:</b>	Overproduction of certified tonnage recorded from July 2018 - August 2019 for FFB actual : 259,645.28 mt vs certificate volume: 215,614.64 mt (+44,030.64 mt)				
<b>Correction/containment</b>	To monitor and provide proper recording regarding this matter accordingly.				
<b>Cause</b>	Based on record, overproduction of certified tonnage occurred when KPOM has received certified FFB from STPOM. However, no person in charge direct to monitor the record delivery				
<b>Corrective Actions:</b>	To appoint person in charge to monitor, update and record all mentioned item				
<b>Assessment Conclusion:</b>	<p>Major NC close out verification:            FFB deliveries monitored on daily and monthly basis to ensure no overproduction of FFB based on forecast month. Based on actual FFB data, total FFB received is less and forecast until November 2019. Noted the appointment of person in charge dated 10/9/19 to ensure effective implementation of RPSO SCCS. Corrective action is found to be effective thus the major NC is closed on 3/12/19. Continuous implementation will be further verified in the next audit.</p> <p>ASA 1_2 verification:            Addressed in SOP established and documented in Standard Operating Procedure RSPO Supply Chain SOP – Identity Preserved and Mass Balance Module, edition TDM/MILLS/02, rev. MILL-01/2018 dated July 2018 under section 5 - Delivery FFB from estate and 6 - Receiving FFB at the mill.</p> <p>The mill have system to verify at the weighbridge. Information for RSPO certified FFB were recorded in FFB Consignment notes and weighbridge tickets. Records verified during the audit as follow:</p> <p>Sighted the sampled delivery off FFB as follows:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%; padding: 5px;">           i. Gajah Mati Estate            Date: 11/7/2020            C/N no.: 46437            RSPO Cert. no.: RSPO 587626            W. Ticket no.: P027083            Net Weight: 34420 kg         </td> <td style="width: 50%; padding: 5px;">           i. MAIDAM Estate            Date: 11/7/2020            C/N no.:02857            RSPO Cert. no.: RSPO 587626            W. Ticket no.: P027068            Net Weight: 6400 kg         </td> </tr> </table>			i. Gajah Mati Estate Date: 11/7/2020 C/N no.: 46437 RSPO Cert. no.: RSPO 587626 W. Ticket no.: P027083 Net Weight: 34420 kg	i. MAIDAM Estate Date: 11/7/2020 C/N no.:02857 RSPO Cert. no.: RSPO 587626 W. Ticket no.: P027068 Net Weight: 6400 kg
i. Gajah Mati Estate Date: 11/7/2020 C/N no.: 46437 RSPO Cert. no.: RSPO 587626 W. Ticket no.: P027083 Net Weight: 34420 kg	i. MAIDAM Estate Date: 11/7/2020 C/N no.:02857 RSPO Cert. no.: RSPO 587626 W. Ticket no.: P027068 Net Weight: 6400 kg				

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	i. Tebak Estate Date: 11/7/2020 C/N no.: 22751 RSPO Cert. no.: RSPO 587626 W. Ticket no.: P0270967 Net Weight: 7860 kg	i. Pinang Emas Estate Date: 11/7/2020 C/N no.: 00502 RSPO Cert. no.: RSPO 595564 W. Ticket no.: P02700984 Net Weight: 35350 kg	
<p>Records of mill production report for the period since last audit shown no overproduction of FFB as well as CPO and PK products.</p> <p>Corrective action found to be effective, based on-site verification and supported with sufficient documented evidence. CAP implementations were effectively evidence. Hence, Major NC remained closed.</p>			

Non-conformity			
<b>NCR Ref #</b>	1820535-201903-N1	<b>Clause &amp; Category (Major / Minor)</b>	RSPO P&C MYNI 2014 Indicator 5.6.3 (Minor) New indicator: 6.7.3 (Critical)
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	02/09/2020
<b>Statement of Nonconformity:</b>	Input data for GHG calculation was not accurately reported.		
<b>Requirement Reference:</b>	A monitoring system shall be in place, with regular reporting on progress for these significant pollutants and emissions from estate and mill operations, using appropriate tools.		
<b>Objective Evidence:</b>	Inconsistent data input for GHG calculation compared with actual data for: i) Kemaman POM : GHG data input -184,000 mt vs actual FFB process for 2018 - 209,783 mt ii) Jernih Estate : GHG data input - 109,249 liter vs actual usage - 108,211 liter		
<b>Correction/containment</b>	To revised and resubmit the GHG Calculation based on annual period.		
<b>Cause</b>	Based on record, we found that, the data input for GHG calculation have different time of periods.		
<b>Corrective Actions:</b>	i) To appoint person in charge to monitor the recording and monitoring of data for GHG. ii) To perform weekly checking / inspection for the consistency of data input for GHG from mill and estates.		
<b>Assessment Conclusion:</b>	ASA 1_2 verification: The GHG emissions that were produced in 2019 for Kemaman Palm Oil Mill and supply base was calculated using the PalmGHG Calculator version 4.0. 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:		

	<ul style="list-style-type: none"> <li>i. Estates area planted data</li> <li>ii. Fuel consumed</li> <li>iii. Mill datas include CPO produced, PKO Produced and FFB Processed</li> <li>iv. Fertilizer consumed data for both estates and smallholders.</li> </ul> <p>The summary of the Net GHG emitted in 2019 for Kemaman Palm Oil Mill and supply base are found to be accurate and accepted.</p> <p>Corrective action found to be effective, based on-site verification and supported with sufficient documented evidence. CAP implementations were effectively evidence. Hence, Minor NC has been closed on 2/9/2020.</p>
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Non-conformity			
<b>NCR Ref #</b>	1820535-201903-N2	<b>Clause &amp; Category (Major / Minor)</b>	RSPO P&C MYNI 2014 Indicator 5.2.4 (Minor) New indicator: 6.7.3 (Critical)
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	02/09/2020
<b>Statement of Nonconformity:</b>	Management plan and ongoing monitoring was not effectively implemented		
<b>Requirement Reference:</b>	Where a management plan has been created there shall be ongoing monitoring: <ul style="list-style-type: none"> <li>• The status of HCV and RTE species that are affected by plantation or mill operations shall be documented and reported;</li> <li>• Outcomes of monitoring shall be fed back into the management plan.</li> </ul>		
<b>Objective Evidence:</b>	Management plan established did not specifically included HCV area identified at Jernih Estate. Further verification of monitoring record dated 28/8/19, no specific monitoring on HCV 4 area reported and only focus on conservation area.		
<b>Correction/containment</b>	1) The buffer zone area will be clearly marked and maintenance will be performed according to the TDMP's policy on Slope Protection (7th Sept 2019). 2) A refreshment training for sprayer and manuring gang and monitoring record will be provided to ensure no activity at buffer zone area. (7th Sept 2019).		
<b>Cause</b>	The document was already recorded based on Bio- Diversity Assessment Report. However, no specific monitoring on HCV 4 area reported and only focus on conservation area. HCV 4 refer to the river area. The river area have found that no clear demarcation of the buffer zone was marked and maintenance due to lack of monitoring by person in charge.		
<b>Corrective Actions:</b>	i) A regular training and monitoring record will be provided. ii) The management plan will be reviewed, update and proper recording. iii) Annually internal inspection ( internal audit ) will be conducted as per internal audit plan.		
<b>Assessment Conclusion:</b>	ASA 1_2 verification: The audit findings have confirmed that there is no new HCVs, HCS forests peatland and other conservation areas been identified after 15 Nov 2018 in KPOM Complex estates (refer 7.3.1 to 7.4.2). Monitoring of these areas are made through the		

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	<p>daily field supervision by the field staff and executives. There were also visits by the PA/GM and also personnel from the Sustainability unit. Sighting of RTE are made and recorded during the AP rounds in the estates if any.</p> <p>Corrective action found to be effective, based on-site verification and supported with sufficient documented evidence. CAP implementations were effectively evidence. Hence, Minor NC has been closed on 2/9/2020.</p>
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Opportunity for Improvement	
OFI#	Description
OFI 1	Nil

**3.4.2 Summary of the Nonconformities and Status**

CAR Ref.	Category (Major / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
1664201-201807 M1	Major	6.5.1	26/07/2018	Closed out on 18/10/2018
1664201-201807 M2	Major	4.4.2	26/07/2018	Closed out on 18/10/2018
1664201-201807 M3	Major	5.3.2	26/07/2018	Closed out on 18/10/2018
1664201-201807 M4	Major	SCCS 5.3.2	26/07/2018	Closed out on 18/10/2018
1664201-201807 M5	Major	SCCS 5.13.1	26/07/2018	Closed out on 18/10/2018
1664201-201807 M6	Major	SCCS 5.13.2	26/07/2018	Closed out on 18/10/2018
1664201-201807 M7	Major	SCCS 5.13.3	26/07/2018	Closed out on 18/10/2018
1820535-201903 M1	Major	4.6.11	06/09/2019	Closed out on 03/12/2019
1820535-201903 M2	Major	4.7.2	06/09/2019	Closed out on 03/12/2019
1820535-201903 M3	Major	2.1.1	06/09/2019	Closed out on 03/12/2019
1820535-201903 M4	Major	5.5.1	06/09/2019	Closed out on 03/12/2019
1820535-201903 M5	Major	SCCS D 5.1	06/09/2019	Closed out on 03/12/2019
1820535-201903 M6	Major	SCCS D 4.2	06/09/2019	Closed out on 03/12/2019
1820535-201903 N1	Minor	5.6.3	06/09/2019	Closed out on 02/09/2020
1820535-201903 N2	Minor	5.2.4	06/09/2019	Closed out on 02/09/2020
1949922-202009-N1	Minor	2.2.2	04/09/2020	Open
1949922-202009-N2	Minor	2.2.3	04/09/2020	Open
1949922-202009-N3	Minor	3.1.3	04/09/2020	Open
1949922-202009-N4	Minor	7.3.1	04/09/2020	Open



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1949922-202009-N5	Minor	4.2.3	04/09/2020	Open
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**3.5 Stakeholders and previous land owner / user 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 Kemaman Palm Oil Mill and supply base (U.I. E Palm Oil Mill) 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> <p>General workers            Mill operators            Harvesters            Sprayers            Gender committee representative            Foreign workers representatives</p>	<p><b>Local communities/Union/Contractors</b></p> <p>Village representative – Padang Kubu            Estate &amp; mill vendors (contractors &amp; suppliers)            Air Putih Estate NUPW representatives            Kemaman Palm Oil Mill NUPW representatives            Biogas plant operator</p>
<p><b>Government Departments</b></p> <p>Klinik Kesihatan Padang Kubu</p>	<p><b>NGO</b></p> <p>Nil</p>

<b>Stakeholders comment</b>	
<b>1</b>	<p><b>Feedbacks:</b> <u>Klinik Kesihatan Padang Kubu</u>            Receives and treats patients among TDM mill and estate workers without any issue</p>
	<p><b>Management Responses:</b> Noted on the information.</p>
	<p><b>Audit Team Findings:</b> No other issue.</p>
	<p><b>Feedbacks:</b> <u>Estate &amp; mill vendors (contractors &amp; suppliers)</u></p>



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2	Having good relationship since being TDM vendors for more than 5 years. However experiencing payment issues from TDM mill and estates with delay for almost one year since mid-2019. Seek information often by follow-up visit at the office but mill and estates kept giving excuses delay cause from TDM HQ.
	<b>Management Responses:</b> Delay of payment due to prioritization practices by TDM HQ since the CPO and FFB price drop in mid-2019 towards early 2020. Some of the vendors being partially paid due to the practices.
	<b>Audit Team Findings:</b> Consultation with contractors and suppliers/vendors reveal a quite consistent complain on late payment issues where some payment delayed for almost one year. Trailing of related records of complain/grievance shown no records of such complain however verification with consulted contractors and suppliers/vendors confirmed that they were not been informed on the actual progress by relevant operating units. Hence, a Minor NC has been raised on the matter. Refer indicator 4.2.3 in the checklist.
3	<b>Feedbacks:</b> <u>Biogas Plant Operator</u> Having Built, Operate, Own, Transfer (BOOT) contract agreement with TDM for operation of biogas plant. Having no issue with TDM on contractual terms and conditions. Understand on the requirement of certification (RSPO & MSPO) by TDM.
	<b>Management Responses:</b> Noted on the information.
	<b>Audit Team Findings:</b> No other issue.
4	<b>Feedbacks:</b> <u>Head of Village – Padang Kubu</u> Having good relationship with company’s personnel. The location of village is just adjacent to the mill and Pelantoh Estate’s border. No encroachment or dispute case so far.
	<b>Management Responses:</b> Noted on the information.
	<b>Audit Team Findings:</b> No other issue.
5	<b>Feedbacks:</b> <u>NUPW Representatives (Kemaman POM &amp; Air Putih Estate)</u> The election for NUPW were made through vote. Most of the employee joined NUPW and no restriction from the company. No serious complaint from the workers, mainly for the housing maintenance.
	<b>Management Responses:</b> Noted on the information.
	<b>Audit Team Findings:</b> No other issue.
6	<b>Feedbacks:</b> <u>Foreign Workers (Air Putih Estate &amp; MAIDAM Estate)</u> Housing were provided free with subside of 35 gallons of clean water. There is retention bonus given to the long-time service workers. Employee can keep their own passport or keep in office. No discrimination practiced.
	<b>Management Responses:</b> Noted on the information.
	<b>Audit Team Findings:</b> No other issue.
	<b>Feedbacks:</b> <u>Gender Committee (Kemaman POM, Air Putih Estate &amp; MAIDAM Estate)</u> No case of sexual harassment reported in the certification unit. New mothers in the certification units were assessed on their needs and no restriction to have a breastfeeding time, check-up session, etc. the gender committee meeting was conducted regularly with active participation and activities among the female employees.
	<b>Management Responses:</b> Noted on the information.
	<b>Audit Team Findings:</b> No other issue.

**List of land owner / user contacted**

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Name	Years of ownership / used	Land area (ha)	Agreement (Yes / No)	Agreement base on FPIC (Yes/No)	Compliance on the agreement terms and conditions
Kumpulan Ladang-Ladang Terengganu Berhad (Terengganu State Government Incorporated Company)	Current	18,869.67	n/a	n/a	All estates within Kemaman POM complex belongs to the Terengganu State Government Incorporated Company that owns 100% stake in TDM.

Previous land owner / user comment	
<b>1</b>	<b>Feedbacks:</b> N/A
	<b>Management Responses:</b> N/A
	<b>Audit Team Findings:</b> N/A


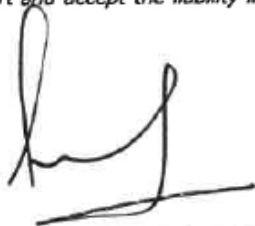
**3.6 Impartiality and conflict of interest**

During this assessment there *was no* circumstances or pressure that had influenced the independence or confidentiality of the assessment team.

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**Formal Signing-off of Assessment Conclusion and Recommendation**

The audit objectives have been achieved and the certificate scope remains appropriate. Based on the results of this audit, it is concluded that Kemaman Palm Oil Mill and Supply Base has complied with the RSPO P&C MYNI 2019, 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 Kemaman Palm Oil Mill and Supply Base is continued.

Report prepared by	Acceptance of Assessment Conclusion
<b>Name:</b> <b>Hafriazhar Mohd. Mokhtar</b>	<b>Name:</b> HJ. HASSAN BIN OSMAN
<b>Company Name:</b> <b>BSI Services Malaysia Sdn. Bhd.</b>	<b>Company Name:</b> KEMAMAN PALM OIL MILL TDM PLANTATION SDN. BHD.
<b>Title:</b> <b>Lead Auditor</b>	<b>Title:</b> MILL MANAGER
<b>Signature:</b> 	<b>Signature:</b> <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> 
<b>Date:</b> 22/11/2020	<b>Date:</b> 24hb. November, 2020

**Appendix A: Summary of Findings**

Criterion / Indicator	Assessment Findings	Compliance
<p><b>Principle 1: Behave ethically and transparently</b>            Drive ethical business behaviour, build trust and transparency with stakeholders to ensure strong and healthy relationships.</p>		
<p><b>Criteria 1.1</b>            The unit of certification provides 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.</p>		
<p>1.1.1</p>	<p><b>(C)</b> Documents that are specified in the RSPO P&amp;C are made available to the public.</p>	<p>Documents that specified in the standard are publicly available such as social and environment impact assessment, action plan, meeting minutes and audit reports.</p> <p>Besides, policies were also displayed at various locations including the main notice boards of the estates, mill offices and muster ground notice boards for employees and visitors to view.</p> <p>As per Memorandum by Group Chief Executive Officer; Ref. # TDM/CC/01; Date: 8/4/2018 from Corporate Communication Department to Heads of Subsidiaries, Heads of Department and All Staff of TDM Berhad Group on Sustainability Policies for the new policies approved by the Board on 27/3/2018 as following:</p> <ul style="list-style-type: none"> <li>• Sustainability Policy</li> <li>• Environment &amp; Biodiversity Policy</li> <li>• Social &amp; Humanity Policy</li> <li>• Occupational safety &amp; health Policy</li> <li>• Gender &amp; Diversity Policy</li> </ul> <p>Information relevant to RSPO Criteria and stakeholders also shared through the website: <a href="http://www.tdemberhad.com.my/#2">http://www.tdemberhad.com.my/#2</a>.</p>

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1.1.2	Information is provided in appropriate languages and accessible to relevant stakeholders.	Information provided in both local Bahasa Malaysia and English for stakeholders such as minutes of meeting records # 01/2020 for the stakeholder consultation meeting conducted on 19/8/2020. The meeting involved all Kemaman mill and estates management personnel with relevant stakeholders among contractors, vendors/suppliers, local communities' heads and government agencies.	Complied
1.1.3	<b>(C)</b> Records of requests for information and responses are maintained.	Records of request for information and responses are maintained as per sample as following: - Kemaman POM inspection visit records by DOSH; Visit date: 10/6/2020 - Kemaman POM DOE field citation form # T010F000025; Visit date: 18/5/2020	Complied
1.1.4	<b>(C)</b> Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by a nominated management official.	Consultation and communication procedures documented as per developed a Social Issue Communication Flowchart version 2.0/2017. Nominated personnel are the mil & estate managers as well as regional compliance executives.	Complied
1.1.5	There is a current list of contact and details of stakeholders and their nominated representatives.	Current list of contact and details of stakeholders 2020 sighted available among contractors, vendors/suppliers, government agencies and local communities' heads.	Complied
<b>Criteria 1.2</b>			
The unit of certification commits to ethical conduct in all business operations and transactions.			
1.2.1	A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts.	HMM Policy for ethical conduct is in place as per available Polisi Etika Kerja; approved by CEO; dated 1/7/2020. Briefing and training of previous version of policy were conducted on 2/1/2020 for all Air Putih Estate employees. Latest briefing was conducted on 5/7/2020.	Complied
1.2.2	A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice.	Monitoring included inspection visit by mill advisors as well as internal audit conducted. Compliance executive, compliance officer and compliance clerk at each operating unit were appointed to assist in monitoring unit's compliance against applicable legal and certification requirement.	Complied

<p><b>Principle 2: Operate legally and respect rights</b>          Implement legal requirements as the basic principles of operation in any jurisdiction.</p>			
<p><b>Criteria 2.1:</b>          There is compliance with all applicable local, national and ratified international laws and regulations.</p>			
2.1.1	<p><b>(C)</b> The unit of certification complies with applicable legal requirements.</p>	<p>The C.U had continued to comply with the legal requirements as per indicator. Compliance to each applicable law and regulation is monitored by the operating units and sustainability team. Estate had obtained and renewed license and permits as required by the law. Sample of licenses or permit viewed were:</p> <p>KPOM</p> <p>11.MPOB License no. 600041904000 valid till 31/3/2021</p> <p>12.DOE Contradiction License no. 004055 with Compliance schedule no. AS(B)T:31/152/000/001 valid till 5/6/2021</p> <p>13.DOE Contradiction License no. 004082 with Compliance schedule no. JPLP(UB)/2020/004082 valid till 5/6/2021</p> <p>14.Fire Certificate no. JPBM:TR/7/049/2019 valid till 5/7/2021</p> <p>15.Private Installation license, no. 2019/03524 valid till 21/11/2020</p> <p>16.Weighbridge permit for equipment no. B849884850 with security sticker no. 2.1KQ.018332 dated 15/3/2020</p> <p>17.Unfired pressured vessel permit no.:</p> <ul style="list-style-type: none"> <li>a. TG PMT 85 valid till 7/4/2021</li> <li>b. TG PMT 86 valid till 7/4/2021</li> <li>c. PMT 107391 TG valid till 7/4/2021</li> </ul> <p>18.AESP for Confined Space</p> <ul style="list-style-type: none"> <li>a. NW-NCT-AE-R-2285-R valid till 20/4/2021</li> </ul>	Complied

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		<p>b. NW-NCT-AE-R-2384-R valid till 27/4/2021</p> <p>19.AGTES permit no.:</p> <p>a. HQ/19/AGTES/01/04181 valid till 13/10/2022</p> <p>20.CePSWaM certificate no. CePSWaM/209338 valid till 22/12/2020</p> <p>ME</p> <p>3. MPOB License no. 503576002000, valid till 31/8/2021</p> <p>4. Diesel permit no. T 000018 valid till 9/10/2020</p> <p>APE</p> <p>6. MPOB License no. 503322802000, valid till 30/7/2021</p> <p>7. MPOB License no. 503558102000, valid till 30/7/2021</p> <p>8. MPOB Nursery License no. 56087011000, valid till 30/7/2021</p> <p>9. Certificate of fitness (CF) no. for air receiver no. TG PMT 5473 valid till 17/11/2020</p> <p>10. Diesel permit no. T 001566 valid till 12/10/2020</p>	
2.1.2	<p>A documented system for ensuring legal compliance is in place. This system has a means to track changes to the law and regulations.</p>	<p>The relevant laws were listed in Estate/Mill Legal Requirement Register. Latest review was conducted on 6/8/2020. Latest additional legal requirement include Prevention and Control. of Infectious Diseases 1988 (Act 342), Minimum Standards of Housing and Amenities (Act 446 Amendment 2019) and Minimum Wages Order 2020.</p> <p>A mechanism for tracking changes in law is guided by Standard Operating Procedure – Legal and Other Requirements edition TDMP/02, rev. TDMP – 01/2017 dated 1/1/2017.</p> <p>Generally the mechanism is by monitoring or consultation with various sources (e.g. government agencies, electronic &amp; non-electronic media, legal firms, professional bodies, industry association/organization and NGO).</p>	Complied

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		The Sustainability Team in the Head Office were responsible to track any changes to the laws and regulations and communicated to all the CU.																													
2.1.3	Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries.	Both the estates have maps showing the locations of boundary stones that have been physically located and marked. Inspection of boundary stones/markers/trenching at the 2 estates, during the field inspection confirmed that they were clearly marked and maintained.	Complied																												
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<b>Criteria 2.2</b>																															
All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.																															
2.2.1	A list of contracted parties is maintained.	The CU maintained all contracted parties and documented in the stakeholders list 2020 as parts of their stakeholders includes internal such as employee and workers union and external stakeholders such as FFB suppliers, contractors, transporters and government department.	Complied																												
2.2.2	All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party.	Generic clause related to disallowing child, forced and trafficked labour written in additional requirement which stated as follows: <ul style="list-style-type: none"> <li>i. Compliance to laws and regulations</li> <li>ii. Compliance to RSPO/MSPO standard requirement</li> </ul>	Non compliance																												



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	<p>Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/ accredited) for migrant workers, service providers and labour contractors, is available.</p>	<p>iii. The company have rights to conduct compliance inspection (audit) from time to time.</p> <p>Sighted the contract agreement (works order agreement) between the CU and contractors as follows:</p> <ul style="list-style-type: none"> <li>i. Works Order ref. no. 101/05 dated 3/5/2020 for Tuan Mohd Shaimi bin Tuan Lah.</li> <li>ii. Works Order ref. no. IP 17/20 dated 1/9/2020 for Akram Enterprise</li> </ul> <p>Noted during document review of FFB Purchase Contract Agreement between TDM Plantation Sdn. Bhd. and Boustead Estates Agency Sdn. Bhd. dated 24/2/2020, there was no specific clause on meeting applicable legal requirements stated in the agreement.</p> <p>Thus, minor NC were raised.</p>	
<p>2.2.3</p>	<p>All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour. Where young workers are employed, the contracts include a clause for their protection.</p>	<p>Noted during document review of FFB Purchase Contract Agreement between TDM Plantation Sdn. Bhd. and Boustead Estates Agency Sdn. Bhd. dated 24/2/2020, there was no specific clause on contain clauses disallowing child, forced and trafficked labour. Where young workers are employed, the contracts include a clause for their protection.</p> <p>Thus, minor NC were raised.</p>	<p>Non compliance</p>
<p><b>Criteria 2.3</b> All FFB supplies from outside the unit of certification are from legal sources.</p>			
<p>2.3.1</p>	<p><b>(C)</b> For all directly sourced FFB, the mill requires:</p> <ul style="list-style-type: none"> <li>• Information on geo-location of FFB origins</li> <li>• Evidence of the ownership status or the right/ claim to the land, or valid use of land by the grower/ smallholder</li> <li>• One or more supporting documents for claims</li> <li>• Valid MPOB license</li> </ul>	<p>The mill only received FFB from RSPO certified plantations. For directly sources FFB, the mill maintained the information such as a valid copy of RSPO Certificate, MPOB license and summary of land title. The mill received RSPO certified FFB from sister estates and from one RSPO certified outside FFB supplier which is Tabung Tentera Terengganu Estate. Sighted the details as follows:</p> <ul style="list-style-type: none"> <li>• Geolocation: 4° 12' 10" N, 103° 13' 59" E</li> </ul>	<p>Complied</p>

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		<ul style="list-style-type: none"> <li>• RSPO Certificate no.: RSPO-PC 00121</li> <li>• MPOB License: 504807102000</li> </ul>																													
2.3.2	For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in Indicator 2.3.1.	The mill received RSPO certified FFB from sister estates and from one RSPO certified outside FFB supplier which is Tabung Tentera Terengganu Estate.	N/A																												
<p><b>PROCEDURAL NOTE:</b> For Implementation Procedure for 2.3.2 refer to Annex 4.</p>																															
<p><b>Principle 3: Optimise productivity, efficiency, positive impact and resilience</b> Implement plans, procedures and systems for continuous improvement.</p>																															
<p><b>Criteria 3.1</b> There is an implemented management plan for the unit of certification that aims to achieve long-term economic and financial viability.</p>																															
3.1.1	<p><b>(C)</b> A business or management plan (minimum three years) is documented that includes, where applicable, a jointly developed business case for Scheme Smallholders.</p>	<p>Both the estates, i.e Air Putih and Maidam Estates continued to commit to long term economic and financial viability. The annual budgets for 2020 to 2025 were sighted. The budget covers activities for upkeep, cultivation, harvesting &amp; evacuation, welfare, capital expenditure, RSPO compliance etc. The budget also included projections on yield/ha, and total cost of production per m ton &amp; per ha and CAPEX - capital expenditure mainly for buildings, furniture and others asset related expenses. The estates adopted the following format for the annual budget.</p> <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th>Year</th> <th>2020</th> <th>2021</th> <th>2022</th> <th>2023</th> <th>2024</th> <th>2025</th> </tr> </thead> <tbody> <tr> <td>Mature Ha</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> </tr> <tr> <td>Immature Ha</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> </tr> <tr> <td>Total Ha</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> <td>x</td> </tr> </tbody> </table>	Year	2020	2021	2022	2023	2024	2025	Mature Ha	x	x	x	x	x	x	Immature Ha	x	x	x	x	x	x	Total Ha	x	x	x	x	x	x	Complied
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			Administration	x	x	x	x	x	x	.	
			Processing cost	x	x	x	x	x	x		
			Depreciation	x	x	x	x	x	x		
			H Q charges	x	x	x	x	x	x		
			RM/mt FFB	x	x	x	x	x	x		
			RM/mt CPO	x	x	x	x	x	x		
3.1.2	An annual replanting programme projected for a minimum of five years with yearly review, is available.	The long-range replanting programs (LRRP) until 2025 were sighted on all the Estates. The program is reviewed annually and incorporated into their annual financial budget. The program sighted for the next 5 years in hectares was as follows:									Complied
			Year	2021	2022	2023	2024	2025			
			Air Putih Estate	0	188.7	445.7	665.0	224.61			
			Maidam Estate	180.0	0	222.8	0	138.3			
3.1.3	The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertaken.	The management review was held on a Group basis chaired by the Plantation CEO incorporating all estates and mill in the region.									Complied
				Estate/Mill	Date of meeting	Attendees					
			1	Kemaman POM	22/9/20	26					
			2	Air Putih Estate	22/9/20	26					
			3	Maidam Estate	22/9/20	26					

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		<p>The agenda discussed among others includes the following;</p> <ul style="list-style-type: none"> <li>a) Results of internal audits</li> <li>b) Customer feedback</li> <li>c) Process performance and product conformity</li> <li>d) Status of preventive &amp; corrective actions</li> <li>e) Follow up action from management review</li> <li>f) Changes that could affect the management system</li> <li>g) Recommendation for improvement</li> <li>h) Human Resources</li> </ul> <p>Minutes of meeting for all units were sighted and verified. The HCV Assessment made by SRA Consultancy in Nov 2011 identified Ladang Air Putih having HCV 3 of 10 ha. The estates declared the following HCV in addition to the report. The HCV declaration differences was not discussed in the Management review, hence a minor nonconformance was raised.</p> <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 10px;"> <thead> <tr> <th style="width: 5%;"></th> <th style="width: 60%;">Estate</th> <th style="width: 20%;">Air Putih Estate</th> <th style="width: 15%;">Maidam Estate</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>HCV 4 Water catchment P96B</td> <td style="text-align: center;">/</td> <td></td> </tr> <tr> <td>2</td> <td>HCV 4 Pond P96B</td> <td style="text-align: center;">/</td> <td></td> </tr> <tr> <td>3</td> <td>HCV 3 Hutan Tabung F</td> <td style="text-align: center;">/</td> <td></td> </tr> <tr> <td>4</td> <td>HCV 6 Mosque</td> <td style="text-align: center;">/</td> <td></td> </tr> <tr> <td>5</td> <td>HCV 1 Sg Angka P18</td> <td></td> <td style="text-align: center;">/</td> </tr> <tr> <td>6</td> <td>HCV 2 Sg Buluh Nipis</td> <td></td> <td style="text-align: center;">/</td> </tr> </tbody> </table>		Estate	Air Putih Estate	Maidam Estate	1	HCV 4 Water catchment P96B	/		2	HCV 4 Pond P96B	/		3	HCV 3 Hutan Tabung F	/		4	HCV 6 Mosque	/		5	HCV 1 Sg Angka P18		/	6	HCV 2 Sg Buluh Nipis		/
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**Criteria 3.2**  
The unit of certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable continuous improvement in key operations.

<p>3.2.1</p>	<p><b>(C)</b> The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification.</p>	<p>The estates and the mill had stated their intentions towards continuous improvement through the following action. The plans were similar and monitored through the regional compilation.</p> <table border="1" data-bbox="1016 507 1744 1361"> <thead> <tr> <th colspan="3"><b><i>Estates</i></b></th> </tr> <tr> <th></th> <th>Description/Issue</th> <th>Action Plan</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Enhancement of beneficial plant for the IPM management</td> <td>To develop beneficial plant nursery - Turnera subulata, Cassia cobanensis, Antigonon leptopus</td> </tr> <tr> <td>2</td> <td>Enhancement of HCV /biodiversity management</td> <td>An education and awareness programme to train the SOU biodiversity, flora/fauna and about biodiversity management.</td> </tr> <tr> <td>3</td> <td>Enhancement of facilities - rain harvest</td> <td>Implementation of rain harvest for cleaning and general upkeep purposes.</td> </tr> <tr> <td>4</td> <td>Work place facilities</td> <td>Upgrading of tractor washing Installation of Elephant Encroachment Laser Project.</td> </tr> <tr> <td>5</td> <td>Mechanisation</td> <td>FFB evacuation using grabber</td> </tr> <tr> <td>6</td> <td>Precision Farming</td> <td>Drone equipment adoption in the monitoring of area.</td> </tr> <tr> <th colspan="3"><b><i>Kemaman Mill</i></b></th> </tr> <tr> <th></th> <th>Description/Issue</th> <th>Action Plan</th> </tr> <tr> <td>1</td> <td>Mill Operation</td> <td>Bio Gas plant - of 23M expected to run in Mac 2021</td> </tr> </tbody> </table>	<b><i>Estates</i></b>				Description/Issue	Action Plan	1	Enhancement of beneficial plant for the IPM management	To develop beneficial plant nursery - Turnera subulata, Cassia cobanensis, Antigonon leptopus	2	Enhancement of HCV /biodiversity management	An education and awareness programme to train the SOU biodiversity, flora/fauna and about biodiversity management.	3	Enhancement of facilities - rain harvest	Implementation of rain harvest for cleaning and general upkeep purposes.	4	Work place facilities	Upgrading of tractor washing Installation of Elephant Encroachment Laser Project.	5	Mechanisation	FFB evacuation using grabber	6	Precision Farming	Drone equipment adoption in the monitoring of area.	<b><i>Kemaman Mill</i></b>				Description/Issue	Action Plan	1	Mill Operation	Bio Gas plant - of 23M expected to run in Mac 2021	<p>Complied</p>
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				ESP forecast to commission in Dec 2021. Project to be awarded. Post heater cooker - improved sterilization.	
3.2.2	As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the RSPO metrics template.	There's no submission made by TDM of RSPO metrics template yet, pending its availability by RSPO secretariat. Latest submission of Annual Communications of Progress (ACOP) done for year 2019 available as in RSPO website link as following: <a href="https://rspo.org/members/765/about/sustainable-palm-oil">https://rspo.org/members/765/about/sustainable-palm-oil</a>			Complied
<p><b>PROCEDURAL NOTE</b> for 3.2.2: THE RSPO metrics template is awaiting decision/ agreement by RSPO and the issue is still being discussed. Until such metrics is agreed and developed, companies will carry on with existing reporting e.g. PalmGHG, Annual communication of Progress (ACOP) reporting, and information provided to Certification Body and feedback via RSPO Secretariat is required.</p>					
<p><b>Criteria 3.3</b> Operating procedures are appropriately documented, consistently implemented and monitored.</p>					
3.3.1	<b>(C)</b> Standard Operating Procedures (SOPs) for the unit of certification are in place.	<p>The mill processing system is documented in the Standard Operating Procedure SOP - Plantation Management System TDM Plantation Sdn Bhd - Kemaman Palm Oil Mill effective 01/2011 which includes;</p> <ul style="list-style-type: none"> <li>a) The mill SOP,</li> <li>b) The Mill Quality Management Manual</li> </ul> <p>These documents provide guidelines and standards in the mill operations. The Standard Operating procedure (SOP) described details from;</p> <ul style="list-style-type: none"> <li>a) the reception, sterilization, threshing, pressing,</li> <li>b) clarification, depericarping (nut polishing) station,</li> <li>c) effluent, laboratory, workshop, dispatches etc.</li> </ul> <p>In addition, there are also manuals available within the industry and MPOB that are used as guidelines.</p>			Complied

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		<p>The standard operation procedure SOP for the estates operations is available which is prepared on Group basis. There are levels of the documentation identified as follows;</p> <ul style="list-style-type: none"> <li>a) Level 1 standard operating procedure</li> <li>b) Level 2 work instruction</li> <li>c) Level 3 records.</li> </ul> <p>Amendments are made should there be requirement to suit the local issues/situation.</p>																								
3.3.2	A mechanism to check consistent implementation of procedures is in place.	<p>The Agronomy and Advisory Department, Sustainability Unit, Plantation Controller and relevant Head Office personnel including the CEO inspect and report to ensure compliance against company policy and procedure with regards to operation, finance as well as safety, health and welfare requirements. Other mechanism as described below.</p> <table border="1" data-bbox="1032 855 1709 1391"> <thead> <tr> <th colspan="3">Estates</th> </tr> <tr> <th></th> <th>Areas</th> <th>Action/Activities</th> </tr> </thead> <tbody> <tr> <td rowspan="3">1</td> <td rowspan="3">Daily</td> <td>Supervision by field staff/Assist/Manager</td> </tr> <tr> <td>Report of daily activities/costings/variation</td> </tr> <tr> <td>WA group - digital supervision</td> </tr> <tr> <td rowspan="6">2</td> <td rowspan="6">Schedule</td> <td>Quarterly ESH meeting</td> </tr> <tr> <td>SU visits on field activities</td> </tr> <tr> <td>Internal audits by GCAD/AAD</td> </tr> <tr> <td>Annual EPMC</td> </tr> <tr> <td>External audit RSPO /MSPO</td> </tr> <tr> <td>PA visits / Agronomist visits</td> </tr> <tr> <td rowspan="2">3</td> <td rowspan="2">Medical /health</td> <td>Monthly check by HA/MA</td> </tr> <tr> <td>Annual medical surveillance.</td> </tr> </tbody> </table>	Estates				Areas	Action/Activities	1	Daily	Supervision by field staff/Assist/Manager	Report of daily activities/costings/variation	WA group - digital supervision	2	Schedule	Quarterly ESH meeting	SU visits on field activities	Internal audits by GCAD/AAD	Annual EPMC	External audit RSPO /MSPO	PA visits / Agronomist visits	3	Medical /health	Monthly check by HA/MA	Annual medical surveillance.	Complied
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		Kemaman POM			
		Areas	Action/Activities		
		1	Daily	Supervision by staff/Assist/Manager Report of daily activities/costings/variation	
		2	Schedule	Quarterly ESH meeting Internal audits by GCAD / SU External audit RSPO /MSPO CEO / AAD visit.	
		3	Annual	Annual EPMC Medical surveillance	
3.3.3	Records of monitoring and any actions taken are maintained and available.	Operating units visited maintained all records of monitoring and available for review. There are several levels of records beginning from the field/mill supervisors to executives and the Managers. The Plantation Controller (PC) are accountable to monitor the estates compliance towards the SOP, Budget and Productivity among others. Estates / Mill performances are reviewed during the monthly meeting with PC/CEO.			Complied
<b>Criteria 3.4</b>					
A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.					
3.4.1	<b>(C)</b> In new plantings or operations including mills, an independent SEIA, undertaken through a participatory methodology involving the affected stakeholders and including the impacts of any smallholder/outgrower scheme, is documented.	No new planting in estates within Kemaman POM supply base. The last SIA was conducted on 23/10/2011 to 1/11/2011 as per report prepared by SRA Consultancy dated November 2011. The Internal SEIA report for RSPO-New Planting Procedure at OP81R1 (previous field), P2011A (current field) area of 15.00 Ha in expected month pf felling is Nov 2018. The social aspect sighted were: - Security to surrounding - Safety and health			Complied

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		<ul style="list-style-type: none"> <li>- Communication</li> <li>- Economic livelihood</li> </ul> <p>MAIDAM Estate SEIA plan was updated on 11/2/2020. The mill had established Environmental Impact Assessment (EIA) procedure and has been documented as per KPOM Environmental Aspect and Impact Identification (TDM/KPOM/01 rev. KPOM-01-2011). All significant impacts have been determined and mitigation plan was developed thereafter as per document KPOM Environmental Improvement Plan/Pollution Prevention Plan reviewed in Jan 2020. Kemaman Palm Oil Mill The environmental management plan are reviewed annually and documented in KPOM Environmental Aspect and Impact Identification (TDM/KPOM/01 rev. KPOM-01-2011). The latest document review being dated Jan 2020. there was NIL changes made.</p> <p>Similarly for the estates the EAI and EIE was available for each activity reviewed dated reviewed Jan 2020. This aspect and impact include activities among others</p> <ul style="list-style-type: none"> <li>a) Construction / building maintenance</li> <li>b) power station / workshop activity</li> <li>c) Harvesting / spraying</li> <li>d) Fertilizer / Compost application</li> <li>e) Replanting</li> </ul> <p>The Estates have established Environmental Management Plan 2020 with identification to the the mitigation plan for negative impacts, time plan and the PIC stated therein.</p> <p>All sites and the reports were visited and sighted respectively by the auditors in presence of the SU, estates and mill personnel.</p>	
3.4.2	For the unit of certification, a SEIA is available and social and environmental management and monitoring	<p>The development of both Social and Environmental Management Plan activities involved discussion with the following parties among others;</p> <ul style="list-style-type: none"> <li>a) estate management,</li> </ul>	Complied

	plans have been developed with participation of affected stakeholders.	<ul style="list-style-type: none"> <li>b) Workers and staff as the internal stakeholders</li> <li>c) External stakeholders compiled from issues raised during the meetings.</li> <li>d) Management meetings identifying issues in relation to social and environmental</li> <li>e) observation on sites and surrounding,</li> <li>f) The assessment in aspect of boundary control, water resources (if any), protection of river (if any), soil erosion and sedimentation of silt, planning of replanting program, protection of sensitive area, waste (oil, toxic soil and biomass) and air quality control.</li> </ul> <p>As per minutes of meeting records of stakeholder consultation meeting # 01/2020; Date: 19/8/2020; Venue: Training Room, Pelantoh Estate. Meeting attended by local communities (MPKK), Fire Department Cheneh, SATU, Kemaman Police Station, Land Office Kemaman, Wildlife Kemaman, Neighbouring Estate, contractor and supplier/vendor.</p>	
3.4.3	<b>(C)</b> The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.	<p>The Social/Environmental Action Plan available for each units were available having information i.e. issues, management plan, PIC and time frame. The input are gathered from the meeting minutes</p> <ul style="list-style-type: none"> <li>a) Gender Committee, NUPW,</li> <li>b) Safety Meeting,</li> <li>c) Complaint &amp; Request from internal &amp; external stakeholders and muster briefing).</li> </ul>	Complied
<b>Criteria 3.5</b>			
A system for managing human resources is in place.			
3.5.1	Employment procedures for recruitment, selection, hiring, promotion, retirement and/or termination are documented and made available to the workers and their representatives where applicable.	Employment procedures for recruitment, selection, hiring, promotion, retirement and/or termination are documented as per Mill & Estate Workers Employment Procedure; Ref. # TDMP/SMP/3/01.01; Dated 2/11/2016 for local employees appointment. For foreign workers employment, the procedure documented as per SOP B6: Foreign Workers Recruitment; Rev. dated May 2017. The documented	Complied

		procedures also being displayed on the notice boards at strategic area within offices of mill and estates for viewing.	
3.5.2	Employment procedures are implemented and records are maintained.	Employment procedures been explained to worker during the induction training on their first time arrival.  Seen the training certificates for the workers who has attended the induction training records during early employment kept in workers' personnel files.	Complied
<b>Criteria 3.6</b> An Occupational health and safety (H&S) plan is documented, effectively communicated and implemented.			
3.6.1	<b>C)</b> All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented.	<p>TDM Plantations has established the SOP for risk assessment to identify H&amp;S issue documented in the Standard Operating Procedure (HIRARC) edition TDMP/01, rev. no. TDMP-02/2018 dated 22/10/2018.</p> <p>The risk assessment process has been describe in the SOP accordingly. As per SOP, HIRARC review to be conducted as follows:</p> <ul style="list-style-type: none"> <li>i. At least once a year</li> <li>ii. Immediately whenever there is an accident, near miss or dangerous occurrence</li> <li>iii. When there is changes in the work method</li> <li>iv. When new machines and technology are introduced</li> <li>v. When there is new activity, process or operations</li> </ul> <p>KPOM</p> <p>The mill has established HIRARC Team lead by the Mill Manager. The team reviewed the HIRARC as per SOP established. FY 2020, the annual HIRARC review was conducted in February 2020 with no changes in the HIRARC register. Latest HIRARC review was conducted on 10/6/2020 due to accident occur on 7/6/2020 at boiler station.</p>	Complied

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		<p>ME</p> <p>The mill has established HIRARC Team lead by the Estate Manager. The team reviewed the HIRARC as per SOP established. FY 2020, the annual HIRARC review was conducted on 13/1/2020 with no changes in the HIRARC register. Latest HIRARC review due to accident occurrence was conducted on 12/7/2020 for weeding operation, 10/6/2020 for transporting workers and 19/4/2020 in harvesting operation.</p> <p>APE</p> <p>The mill has established HIRARC Team lead by the Estate Manager. The team reviewed the HIRARC as per SOP established. FY 2020, the annual HIRARC review was conducted on 19/1/2020 with no changes in the HIRARC register. Latest HIRARC review due to accident occurrence was conducted on 9/6/2020 for workshop operation.</p>	
<p>3.6.2</p>	<p><b>(C)</b> The effectiveness of the H&amp;S plan to address health and safety risks to people is monitored.</p>	<p>The CU has established the H&amp;S plan documented in OSH Plan 2020. The plan cover on OSH legal compliance, emergency response plan, OSH management system, risk management and safety committee. Sighted the implementation as follows:</p> <p>KPOM</p> <ul style="list-style-type: none"> <li>i. The mill conducted CHRA every 5 years. Latest CHRA was conducted on 12/7/2020 by registered assessor with reg. no. HQ/08/ASS/00/259. Refer report no. HQ/08/ASS/00/259-2020/009.</li> <li>ii. LEV test was conducted on annually basis. Latest review was conducted on 21/4/2020 by registered hygiene technician with reg. no. HQ/08/JHII/00/76. Recommendation in the report has been addressed by the mill.</li> <li>iii. Medical surveillance was conducted on annually basis as recommended in CHRA. Latest medical surveillance was conducted on 22-23/7/2020. 11 employee who exposed with chemical were sent for surveillance and found fit to work as chemical handler.</li> </ul>	<p>Complied</p>

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		<p>iv. Latest audiometric test was conducted on 1-2/3/2020 by OHD with reg. no. HQ/08/DOC/00/272. 124 employee were sent test. A total of 47 employee were found to have hearing impairment and 28 of them having temporary STS. Repeat test was conducted in 11/8/2020. The result has yet to be received by the mill.</p> <p>ME</p> <p>i. Chemical register were reviewed on annually basis. Latest review was conducted on 2/1/2020. No class Ia and Ib chemical was used in the estate as per chemical register.</p> <p>ii. Annual medical surveillance was conducted by OHD with reg. no. HQ/08/DOC/00/352 on 18/8/2020. The report has yet to be received by the estate.</p> <p>iii. Workplace inspection was conducted on monthly basis. Sighted the inspection records dated 27/8/2020, 20/8/2020, 6/8/2020 and 4/8/2020. The result of workplace inspection were discussed in the Safety committee meeting.</p> <p>APE</p> <p>i. First aid box monitoring was conducted on monthly basis and recorded in First Aid box monitoring logbook. Sighted the monitoring records of monitoring for the month of April, May and June 2020.</p> <p>ii. Workplace inspection was conducted on monthly basis. Sighted the inspection records dated 5/8/2020, 18/7/2020, 7/6/2020 and 9/5/2020. The result of workplace inspection were discussed in the Safety committee meeting.</p>	
<p><b>Criteria 3.7</b> All staff, workers, Scheme Smallholders, outgrowers, and contract workers are appropriately trained.</p>			
3.7.1	<b>(C)</b> A documented programme that provides training is in place, which is accessible to all staff, workers,	The mill and estate conducted training need analysis to identify training required for the employee and documented in Training Matrix FY 2020.	Complied

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	<p>Scheme Smallholders and outgrowers, taking into account gender-specific needs, and which covers applicable aspects of the RSPO P&amp;C, in a form they understand, and which includes assessments of training.</p>	<p>The mill and estate has established training schedule FY 2020 base on training need analysis conducted. The training program covers Policy, operation and OSH/others.</p> <p>The program involve the executive, staff/field supervisor, workers and contractors. The identified training was programmed throughout the year.</p> <p>The mill and estate has also conducted assessment to the training attendees to assess the training efficiency.</p>	
<p>3.7.2</p>	<p>Records of training are maintained.</p>	<p>The mill and estate maintain the training records for all employees. Sighted the training records as follows:</p> <p>KPOM</p> <ol style="list-style-type: none"> <li>1. SOP for receiving and issuing item from store training dated 4/2/2020</li> <li>2. SOP for office training dated 23/1/2020</li> <li>3. Audiometric test result briefing dated 11/8/2020</li> <li>4. Chemical handling for water treatment plan training dated 9/8/2020</li> <li>5. LEV inspection result briefing dated 27/7/2020</li> <li>6. First aid training dated 20/7/2020</li> <li>7. Fire drill and ERP training with Kuala Terengganu Fire Department dated 29/6/2020</li> <li>8. RSPO and MSPO supply chain standard training dated 13/8/2020</li> </ol> <p>ME</p> <ol style="list-style-type: none"> <li>1. Safety and health policy training dated 5/1/2020</li> <li>2. SOP for palm supply training dated 21/1/2020</li> <li>3. Foreign workers policy training dated 16/2/2020</li> <li>4. SOP for spraying training dated 18/2/2020</li> <li>5. Biodiversity and environmental policy training dated 23/2/2020</li> <li>6. Skid tank operator training dated 3/3/2020</li> </ol>	<p>Complied</p>

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		<ol style="list-style-type: none"> <li>7. Palm manuring SOP training dated 11/3/2020</li> <li>8. Slope protection and river riparian bufferzone training dated 15/3/2020</li> <li>9. Agrochemical management policy training dated 22/3/2020</li> <li>10. Human rights policy training dated 5/4/2020</li> <li>11. Boundary marking SOP training dated 12/4/2020</li> <li>12. Replanting OP to OP training dated 3/5/2020</li> <li>13. Soil conservation SOP training dated 31/5/2020</li> <li>14. Water Management training dated 7/6/2020</li> <li>15. Palm manuring SOP training dated 14/6/2020</li> <li>16. Chemical calibration training dated 1/7/2020</li> <li>17. Weeding SOP training dated 12/7/2020</li> <li>18. Rat baiting SOP training dated 9/8/2020</li> <li>19. Chemical handling training dated 10/8/2020</li> </ol> <p>APE</p> <ol style="list-style-type: none"> <li>1. Environmental and Occupational Safety and Health training dated 1/1/2020</li> <li>2. Company SOP and Policy training dated 2/1/2020</li> <li>3. 5's housekeeping training dated 5/1/2020</li> <li>4. First aid kit training dated 12/1/1020</li> <li>5. Security Guard SOP training dated 3/2/2020</li> <li>6. USECHH training dated 3/2/2020</li> <li>7. FFB quality training dated 5/2/2020</li> <li>8. Inter pump sprayer equipment training dated 15/1/2020</li> <li>9. Safety work procedure for workshop training dated 20/2/2020</li> <li>10. COVID-19 briefing dated 15/3/2020</li> </ol>	
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		<ul style="list-style-type: none"> <li>11. Safety Data Sheet training dated 20/2/2020</li> <li>12. Creech Ayah's and first aid training dated 22/2/2020</li> <li>13. Spraying SOP training dated 11/3/2020</li> <li>14. Palm manuring SOP training dated 11/3/2020</li> <li>15. Rat baiting SOP training dated 8/4/2020</li> <li>16. Lorry, tractor and trailer driver training dated 22/7/2020</li> <li>17. RSPO/MSPO, safety awareness for workers training dated 26/7/2020</li> <li>18. RSPO/MSPO, safety awareness for contractors training dated 10/8/2020</li> <li>19. Firefighting training dated 12/8/2020</li> </ul>	
3.7.3	Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed.	<p>The mill continuously provided training to the personnel involved in SCCS such as Compliance Executive, supervisor, lab assistant, storekeeper, chief clerk, clerk, weighbridge clerk and security. Sighted the training material and training records dated 13/8/2020.</p> <p>The compliance Executive has been appointed as the person responsible for SCCS and has undergone and completed RSPO endorsed RSPO SCC training course in Jan 2019.</p>	Complied
<b>Criterion 3.8</b>			
Supply chain requirement for mills ( <b>note: all supply chain requirements are considered as critical (C). However it will not contribute to suspension if there is more than 5 non-compliance within a principle</b> )			
<b>Definition</b>			
3.8.1	<p>Definition Identity Preserved Mill D.1:</p> <p>A mill is deemed to be Identity Preserved (IP) if the FFB used by the mill are sourced from plantation/estates that are certified against the RSPO Principles and Criteria (RSPO P&amp;C), or against the Group Certification scheme. Certification for CPO mills is necessary to verify the volumes and sources of</p>	As per SOP established and documented in Standard Operating Procedure RSPO Supply Chain SOP – Identity Preserved and Mass Balance Module, edition TDM/MILLS/02, rev. MILL-01/2018 dated July 2018 under Glossary section define the meaning of RSPO Identity preserved as supply chain model assured that the RSPO certified oil palm product delivered to the end user uniquely identifiable to a single RSPO certified supply base.	Complied

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	certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. If a mill processes certified and uncertified FFB without physically separating them, then only Module E is applicable.		
3.8.2	<p>Definition Mass Balance Mill E.1</p> <p>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 3<sup>rd</sup> 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</p>	<p>As per SOP established and documented in Standard Operating Procedure RSPO Supply Chain SOP – Identity Preserved and Mass Balance Module, edition TDM/MILLS/02, rev. MILL-01/2018 under Glossary section define the meaning of RSPO Identity preserved as supply chain model that allows certified claim to be transferred from one palm oil products to another through physical blending or administratively under strictly control circumstances.</p> <p>As the Kemaman POM is using Identity Preserve, the criteria is non-applicable.</p>	Complied
3.8.3	The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall be recorded by the certification body (CB) in the public summary of the P&C certification report. This figure represents the total volume of certified 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 estimated tonnage of CPO and PK products that could potentially be produced by the certified mill is recorded in this public summary report.	Complied
3.8.4	The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.	The mill has met all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization (RSPO IT platform or book and claim). Seen the Member ID: RSPO_PO1000001053 and license ID no. CB95914 valid until 31/10/2020.	Complied

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		<p>Total 117 sales of certified product (CSPO and CSPK) were recorded from September 2019 to August 2020 sampled the transaction ID as below:</p> <table border="1" data-bbox="992 459 1686 1153"> <thead> <tr> <th>Transaction ID</th> <th>Date</th> <th>Product</th> <th>Volume</th> </tr> </thead> <tbody> <tr> <td>TR-319163ad-b9f5</td> <td>27/8/2020</td> <td>CSPK</td> <td>734.78</td> </tr> <tr> <td>TR-16c9f3b1-bc10</td> <td>27/8/2020</td> <td>CSPO</td> <td>200.00</td> </tr> <tr> <td>TR-dda12b65-81ad</td> <td>27/8/2020</td> <td>CSPO</td> <td>200.00</td> </tr> <tr> <td>TR-3ce771e9-9f6a</td> <td>15/7/2020</td> <td>CSPO</td> <td>222.00</td> </tr> <tr> <td>TR-ec0011a9-8526</td> <td>15/7/2020</td> <td>CSPO</td> <td>18.38</td> </tr> <tr> <td>TR-bc7ff4c0-16dd</td> <td>15/7/2020</td> <td>CSPO</td> <td>81.62</td> </tr> </tbody> </table>	Transaction ID	Date	Product	Volume	TR-319163ad-b9f5	27/8/2020	CSPK	734.78	TR-16c9f3b1-bc10	27/8/2020	CSPO	200.00	TR-dda12b65-81ad	27/8/2020	CSPO	200.00	TR-3ce771e9-9f6a	15/7/2020	CSPO	222.00	TR-ec0011a9-8526	15/7/2020	CSPO	18.38	TR-bc7ff4c0-16dd	15/7/2020	CSPO	81.62	
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TR-bc7ff4c0-16dd	15/7/2020	CSPO	81.62																												
3.8.5	<p>Documented procedures          The mill 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:</p>	<p>Addressed in SOP established and documented in Standard Operating Procedure RSPO Supply Chain SOP – Identity Preserved and Mass Balance Module, edition TDM/MILLS/02, rev. MILL-01/2018 dated July 2018.          Among the subjects covered in the procedure are:</p> <ol style="list-style-type: none"> <li>1. Introduction</li> </ol>	Complied																												

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	<p>a) Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements.</p> <p>b) Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records).</p> <p>c) 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 mill's procedures for the implementation of this standard.</p> <p>The mill shall have documented procedures for receiving and processing certified and non-certified FFBs including ensuring no contamination in the IP mill.</p>	<ol style="list-style-type: none"> <li>2. Objectives</li> <li>3. Responsibilities</li> <li>4. Control of documents and records</li> <li>5. Delivery FFB from estate</li> <li>6. Receiving FFB at the mill</li> <li>7. Process monitoring</li> <li>8. CPO and PK dispatch</li> <li>9. Non-conforming products and/or documents</li> <li>10. Products claims</li> <li>11. Outsourced contractor</li> <li>12. Training</li> <li>13. Reclassification of mill's supply chain models</li> <li>14. Production line</li> <li>15. Conversion factors</li> <li>16. Internal audit</li> <li>17. Complaints</li> <li>18. Management review</li> </ol>	
3.8.6	<p>Internal Audit</p> <p>i) The mill shall have a written procedure to conduct annual internal audit to determine whether the mill:</p>	<p>Addressed in SOP established and documented in Standard Operating Procedure RSPO Supply Chain SOP – Identity Preserved and Mass Balance Module, edition TDM/MILLS/02, rev. MILL-01/2018 dated July 2018 under section 16 – Internal Audit.</p>	Complied

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	<p>a. Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</p> <p>b. Effectively implements and maintains the standard requirements within its organisation.</p> <p>Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non-conformities shall be subject to management review at least annually. The mill shall maintain the internal audit records and reports.</p>	<p>RSPO supply chain internal audit has been conducted on 2/8/2020. 2 issue raised during the audit and has been addressed by the mill as per report dated 8/8/2020. The results of Internal Audit were discussed in the Management Review Meeting.</p>			
<p>3.8.7</p>	<p>Purchasing and Goods In</p> <p>i) The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBS received.</p> <p>ii) The mill shall inform the CB immediately if there is a projected overproduction of certified tonnage.</p> <p>The mill shall have a mechanism in place for handling non-conforming FFB and/or documents.</p>	<p>Addressed in SOP established and documented in Standard Operating Procedure RSPO Supply Chain SOP – Identity Preserved and Mass Balance Module, edition TDM/MILLS/02, rev. MILL-01/2018 dated July 2018 under section 5 - Delivery FFB from estate and 6 - Receiving FFB at the mill.</p> <p>The mill have system to verify at the weighbridge. Information for RSPO certified FFB were recorded in FFB Consignment notes and weighbridge tickets. Records verified during the audit as follow:</p> <p>Sighted the sampled delivery off FFB as follows:</p> <table border="1" data-bbox="994 1094 1767 1398"> <tr> <td data-bbox="994 1094 1382 1398"> <p>i. Gajah Mati Estate Date: 11/7/2020 C/N no.: 46437 RSPO Cert. no.: RSPO 587626 W. Ticket no.: P027083 Net Weight: 34420 kg</p> </td> <td data-bbox="1382 1094 1767 1398"> <p>i. MAIDAM Estate Date: 11/7/2020 C/N no.:02857 RSPO Cert. no.: RSPO 587626 W. Ticket no.: P027068 Net Weight: 6400 kg</p> </td> </tr> </table>	<p>i. Gajah Mati Estate Date: 11/7/2020 C/N no.: 46437 RSPO Cert. no.: RSPO 587626 W. Ticket no.: P027083 Net Weight: 34420 kg</p>	<p>i. MAIDAM Estate Date: 11/7/2020 C/N no.:02857 RSPO Cert. no.: RSPO 587626 W. Ticket no.: P027068 Net Weight: 6400 kg</p>	<p>Complied</p>
<p>i. Gajah Mati Estate Date: 11/7/2020 C/N no.: 46437 RSPO Cert. no.: RSPO 587626 W. Ticket no.: P027083 Net Weight: 34420 kg</p>	<p>i. MAIDAM Estate Date: 11/7/2020 C/N no.:02857 RSPO Cert. no.: RSPO 587626 W. Ticket no.: P027068 Net Weight: 6400 kg</p>				

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		<p>i. Tebak Estate Date: 11/7/2020 C/N no.: 22751 RSPO Cert. no.: RSPO 587626 W. Ticket no.: P0270967 Net Weight: 7860 kg</p>	<p>i. Pinang Emas Estate Date: 11/7/2020 C/N no.: 00502 RSPO Cert. no.: RSPO 595564 W. Ticket no.: P02700984 Net Weight: 35350 kg</p>		
		<p>Records of mill production report for the period since last audit shown no overproduction of FFB as well as CPO and PK products.</p>			
<p>3.8.8</p>	<p>Sales and Goods Out The supplying mill shall ensure that the following minimum information for RSPO certified products is made available in document form. The 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):</p> <ol style="list-style-type: none"> <li>a) The name and address of the buyer;</li> <li>b) The name and address of the seller;</li> <li>c) The loading or shipment / delivery date;</li> <li>d) The date on which the documents were issued;</li> <li>e) RSPO certificate number;</li> <li>f) A description of the product, including the applicable supply chain model (Identity</li> </ol>	<p>Addressed in SOP established and documented in Standard Operating Procedure RSPO Supply Chain SOP – Identity Preserved and Mass Balance Module, edition TDM/MILLS/02, rev. MILL-01/2018 dated July 2018 under section 8. CPO and PK dispatch.</p> <p>Sampled of the sales and goods out delivery records as below:</p> <p>CSPO</p> <ol style="list-style-type: none"> <li>a. The name and address of the buyer: Cargill Palm Products Sdn. Bhd</li> <li>b. The name and address of the seller: Kemaman POM</li> <li>c. The loading or shipment / delivery date: 23/8/2020</li> <li>d. The date on which the documents were issued: 23/8/2020</li> <li>e. RSPO certificate number: RSPO 587626</li> <li>f. A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations): CSPO SG</li> <li>g. The quantity of the products delivered: 43,110 kg, 40,450 kg, 41,150 kg</li> <li>h. Any related transport documentation: Weighbridge Ticket no. S0108669, S0108974, S0108998</li> </ol>			<p>Complied</p>

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	<p>Preserved or Mass Balance or the approved abbreviations);</p> <p>g) The quantity of the products delivered;</p> <p>h) Any related transport documentation;</p> <p>A unique identification number.</p>	<p>i. A unique identification number: Contract Ref.: SGPO-200818</p> <p>CSPK</p> <p>a. The name and address of the buyer: Hup Lee Oil Mill Sdn. Bhd</p> <p>b. The name and address of the seller: Kemaman POM</p> <p>c. The loading or shipment / delivery date: 24/8/2020</p> <p>d. The date on which the documents were issued: 24/8/2020</p> <p>e. RSPO certificate number: RSPO 587626</p> <p>f. A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations): CSPK-SG</p> <p>g. The quantity of the products delivered: 44,850 kg, 45,190 kg, 45,160 kg.</p> <p>h. Any related transport documentation: Weighbridge Ticket no.: S0108758, S0108838, S010846</p> <p>i. A unique identification number: Contract Ref.: SGPK-200801</p> <p>j. The RSPO certificate number has been rectified from RSPO 587626.</p>	
<p>3.8.9</p>	<p>Outsourcing Activities</p> <p>i) The mill shall not outsource its milling activities. In cases where he mill outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the mill holding the certificate shall ensure that the independent third party complies with relevant requirements of this RSPO Supply Chain Certification</p> <p>ii) The mill shall ensure the following:</p>	<p>TDM has managed the outsourced activities as per SOP established and documented in Standard Operating Procedure RSPO Supply Chain SOP – Identity Preserved and Mass Balance Module, edition TDM/MILLS/02, rev. MILL-01/2018 dated July 2018 under section 8. CPO and PK dispatch where the outsource activities involved transportation of CPO and PK only.</p> <p>Sighted the sampled contracts between TDM and transporter as following samples:</p> <p>- <i>Perjanjian Mengangkut Minyak Sawit Mentah Dan Isirong Di Antara TDM Plantation Sdn. Bhd. Dan Sidhu Brothers Transport Sdn. Bhd. Pada 24 September 2019</i></p>	<p>Complied</p>

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	<p>a) The mill has legal ownership of all input material to be included in outsourced processes</p> <p>b) The mill 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 mill to ensure that certification body (CB) has access to the outsourcing contractor or operation if an audit is deemed necessary.</p> <p>c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</p> <p>The mill 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 all information, when this is announced in advance.</p>	<p>- <i>Perjanjian Mengangkut Minyak Sawit Mentah Dan Isirong Di Antara TDM Plantation Sdn. Bhd. Dan Koperasi Ladang Sawit Kemaman Terengganu Berhad Pada 1 Januari 2019</i></p> <p>The contract agreements specified that all transporters are required to fulfil and comply with applicable legal requirements as well as TDM own requirements which include the RSPO and MSPO standard.</p>	
<p>3.8.10</p>	<p>The mill shall record the names and contact details of all contractors used for the physical handling of RSPO certified oil palm products.</p>	<p>Stated in the contract agreement between TDM with Sidhu Brothers and Koperasi Ladang, mentioned the site has legal ownership of all input material to be included in outsourced processes as per RSPO Supply Chain Certification Standard.</p> <p>The mill ensures that an outsourced activity (transportation) is not contaminated with non-certified materials as per agreement. There is no outsourced process within Kemaman Palm Oil Mill, hence this requirement is not applicable.</p>	<p>Complied</p>
<p>3.8.11</p>	<p>The mill shall inform its CB in advance prior to conduct of its next audit of the names and contact details of</p>	<p>TDM has stated in the agreements that the contractors have to comply as follows;</p> <p>i. Comply with local legal requirements</p>	<p>Complied</p>



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	<p>any new contractor used for the physical handling of RSPO certified oil palm products.</p>	<ul style="list-style-type: none"> <li>ii. Attend the RSPO/ISCC/MSPO/SCCS briefing or training organized by the company</li> <li>iii. Having signed and enforceable agreement with the company</li> <li>iv. Provide access to the auditors to contractors' operation site(s) and employees whenever deemed necessary</li> <li>v. Having related working permits</li> <li>vi. Ensure PPE utilization by contractors' employee while being in the company premise.</li> </ul> <p>Sighted that both contract agreements were signed by both transporters respectively.</p>	
<p>3.8.12</p>	<p>Record keeping</p> <ul style="list-style-type: none"> <li>i) The mill shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements.</li> <li>ii) Retention times for all records and reports shall be a minimum of two (2) years and shall comply with relevant legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock.</li> <li>iii) For Identity Preserved Module, the mill shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.</li> <li>iv) For Mass Balance Module, the mill:             <ul style="list-style-type: none"> <li>a) Shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>ii) TDM has established Standard Operating Procedure to maintain all records of evidence on the implementation of RSPO SCCS. The SOP was documented in Standard Operating Procedure RSPO Supply Chain SOP – Identity Preserved and Mass Balance Module, edition TDM/MILLS/02, rev. MILL-01/2018 dated July 2018 under section 5.0: Control of Documents and Records.</li> <li>iii) As stated in SOP under section 5.0: Control of Documents and Records all traceability records should be maintained at minimum period of 3 years.</li> <li>iv) KPOM receives and process only certified FFB. Therefore, it uses the Identity Preserve supply chain system and module.</li> <li>v)             <ul style="list-style-type: none"> <li>a. KPOM has established the SCCS Mass balance sheet document to records and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.</li> <li>b. All volumes of certified CPO and PK that were delivered were deducted from the material accounting system according to conversion ratios of OER and KER</li> </ul> </li> </ul>	<p>Complied</p>

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	<p>CPO and PK on a real-time basis and / or three-monthly basis.</p> <p>b) All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO.</p> <ul style="list-style-type: none"> <li>The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock).</li> </ul>	<p>as per sample records of Mill production report Sep 2019 – Aug 2020 and FFB summary Sep 2019 – Aug 2020.</p> <p>c. Positive stock deliveries maintained through the SCCS Mass balance sheet document to records and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis. No short selling made by KPOM.</p>	
3.8.13	<p><b>Extraction Rate</b></p> <p>The oil extraction rate (OER) and the kernel extraction rate (KER) shall be applied to provide a reliable estimate of the amount of certified CPO and PK from the associated inputs. Mill shall determine and set their own extraction rates based upon past experience, documented and applied it consistently.</p>	<p>Addressed in the Standard Operating Procedure RSPO Supply Chain SOP – Identity Preserved and Mass Balance Module, edition TDM/MILLS/02, rev. MILL-01/2018 dated July 2018 under section 17.0 Conversion Factor.</p> <p>Extraction rates were derived from actual production output that were measured daily by the mill and recorded in the daily production report. Actual rates for the period since last audit were available in the Mill production report Sep 2019 – Aug 2020.</p> <p>Volume estimates for next period were based on historical extractions and FFB projection from estates.</p>	Complied
3.8.14	<p>Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.</p>	<p>Extraction rates updated daily based on actual measurement of production output. Projected rates were based on historical extractions and FFB projection from estates.</p>	Complied
3.8.15	<p><b>Processing</b></p> <p>For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-certified oil palm products,</p>	<p>Addressed in the Standard Operating Procedure RSPO Supply Chain SOP – Identity Preserved and Mass Balance Module, edition TDM/MILLS/02, rev. MILL-01/2018 dated July 2018 under section 7.0 receiving FFB at the mill and 9.0 Process Monitoring.</p>	Complied

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	including during transport and storage to strive for 100% separation.	KPOM received only certified FFB. Therefore qualifies for the Identity Preserved supply chain system and module. During the P&C assessment, the audit team verified the volumes and sources of certified FFB entering the mill, the implementation of processing controls and volume sales of RSPO certified products.	
3.8.16	<p>Registration of Transactions</p> <p>i) Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date.</p> <p>Remove: RSPO certified volumes sold under different scheme or as conventional, or in case of underproduction, loss or damage shall be removed in the RSPO IT platform.</p>	<p>i. Based on the downloaded transactions register from the certification unit's Palmtrace, the company was able to demonstrate that it has been registering its transactions in the Palmtrace accordingly.</p> <p>ii. Based on the announcement (transaction) summary, all the registrations were found to be in order.</p>	Complied
3.8.17	<p>Claims</p> <p>The mill shall only make claims regarding the production of RSPO certified oil that are in compliance with the RSPO Rules on Market Communications and Claims.</p>	RSPO trademark was not use. Nonetheless, the facility is aware with the requirements of the RSPO Rules on Market Communications and Claims.	Complied
<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.	No off-product claim made by KPOM and verified through document and site review (notice board, business card, shipping documentation, procurement/purchasing document and promotional material etc). Thus, this indicator is not applicable	Complied
4.2	In corporate communications a member is allowed to:	Not applicable as no off-product claim made by KPOM as to date.	Not Applicable

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	<p>a. Display its RSPO membership status</p> <p>b. Display the RSPO web address (www.rspo.org)</p> <p>c. State that the member supports the work of the RSPO</p> <p>d. State the member’s history with regard to the RSPO.</p> <p>e. Use the RSPO trademark to promote its membership of the RSPO.</p> <p>Additionally, where an RSPO member displays the RSPO trademark in digital format this must be accompanied by the text ‘Check our progress at www.rspo.org’ where the link must lead to the member’s profile page.</p>		
4.3	In corporate communications RSPO members must not make any statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products.	Not applicable as no off-product claim made by KPOM as to date.	Not Applicable
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.	Not applicable as no off-product claim made by KPOM as to date.	Not Applicable
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 evidence of RSPO corporate logo used by KPOM as verified through documentations and websites.	Complied
<b>Business to business communications</b>			

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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.	Business to business communication is demonstrated via shipping documentation and invoices to the next supply chain actor or buyer.	Complied
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.	Shipping documentation verified and conformance with the requirements of RSPO SCCS. In the weighbridge ticket, it stated that i.e. product/commodity with SCC model (CPO/Palm Kernel RSPO IP) and RSPO certificate number; RSPO 587626.	Complied
5.3	<p>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:</p> <p>a. 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 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>If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2.</p>	KPOM is not under distributor or wholesaler category. Thus, this requirement is not applicable	Not Applicable

<b>Business to consumer communication</b>			
6.1	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.	Business to Business communication were made through the CSPO and CSPK trading contractual and transactions documentations between the mill and buyers. No further communications made by Kemaman POM for its raw products beyond its refinery and oleochemical plants buyers.	Not Applicable
6.2	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.	No business to consumer communication on product specific claim made. Kemaman POM only producing crude and unfinished product. This is not applicable for Kemaman POM.	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.	No business to consumer communication on product specific claim made. Kemaman POM only producing crude and unfinished product. This is not applicable for Kemaman POM.	Not Applicable
6.4	Business to consumer communication shall not include information about the claimant's RSPO membership status.	No business to consumer communication on product specific claim made. Kemaman POM only producing crude and unfinished product. This is not applicable for Kemaman POM.	Not Applicable
6.5	Members shall not communicate to consumers' information about their suppliers' RSPO membership status.	No business to consumer communication on product specific claim made. Kemaman POM only producing crude and unfinished product. This is not applicable for Kemaman POM.	Not Applicable
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.	No business to consumer communication on product specific claim made. Kemaman POM only producing crude and unfinished product. This is not applicable for Kemaman POM.	Not Applicable
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.	No business to consumer communication on product specific claim made. Kemaman POM only producing crude and unfinished product. This is not applicable for Kemaman POM.	Not Applicable

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6.8	<p>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 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>.</p>	<p>No business to consumer communication on product specific claim made. Kemaman POM only producing crude and unfinished product. This is not applicable for Kemaman POM.</p>	Not Applicable
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**MODULE A – IDENTITY PRESERVED & SEGREGATED SPECIFIC RULES**

**Certified oil palm content (IP)**

	<p>For IP, 95% or above of the oil palm content must be RSPO IP-certified.</p>	<p>Kemaman POM is producing crude palm product and does not involved in any labelling of end product.</p>	Not Applicable
	<p>For SG, 95% or above of the oil palm content must be SG, or a combination of SG and IP.</p>	<p>Kemaman POM is producing crude palm product and does not involved in any labelling of end product.</p>	Not Applicable

	<p>Where there is any percentage of non-certified oil palm within the product, the reason for this must be fully justified and an action plan for moving to fully certified oil palm must be in place, in accordance with the requirements of the RSPO SCCS. In addition, the volume of non-certified oil palm products must be covered by the purchase of RSPO Credits of equivalent volume.</p>	<p>Kemaman POM is producing crude palm product and does not involved in any labelling of end product.</p>	<p>Not Applicable</p>
<p><b>Labelling and trademark (IP)</b></p>			
	<p>Members are allowed to use the RSPO label in one of the following ways:</p> <ul style="list-style-type: none"> <li>• RSPO trademark which includes the tag 'CERTIFIED' or</li> </ul> <p>RSPO trademark which includes the tag 'This product contains certified sustainable palm oil'. Wherever a RSPO trademark is displayed, the applicable trademark license number must be shown immediately under or next to the trademark or the 'statement'. Font must be Calibri, font size must be at least 4pt (1.4 mm or 0.06 inch). In on-pack communications, the RSPO trademark can be printed anywhere on the pack.</p>	<p>Kemaman POM is producing crude palm product and does not involved in any labelling of end product.</p>	<p>Not Applicable</p>
<p><b>Messaging (IP)</b></p>			
	<p>Messaging ALLOWED in storytelling in product-related communications may include some or all of the following elements:</p>	<p>Kemaman POM is producing crude palm product and does not involved in any labelling of end product.</p>	<p>Not Applicable</p>



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	<ul style="list-style-type: none"> <li>• The oil palm products contained in this product have been certified to come from RSPO sources. <a href="http://www.rspo.org">www.rspo.org</a></li> <li>• By choosing this product, you are sure it contains RSPO-certified palm oil. For more information: <a href="http://www.rspo.org">www.rspo.org</a></li> <li>• RSPO-certified sustainable oil palm products were kept apart from other oil palm products throughout the supply chain. <a href="http://www.rspo.org">www.rspo.org</a></li> <li>• Certified sustainable oil palm products can be traced back to RSPO-certified mills and plantations. <a href="http://www.rspo.org">www.rspo.org</a></li> <li>• The entire supply chain is monitored by independent, RSPO-accredited auditors. <a href="http://www.rspo.org">www.rspo.org</a></li> <li>• RSPO-certified sustainable palm oil has been produced to stringent environmental and social criteria. <a href="http://www.rspo.org">www.rspo.org</a></li> </ul> <p>References to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown by company records.</p>		
<p><b>Principle 4: Respect community and human rights and deliver benefit</b>          Respect community rights, provide equal opportunities, maximise benefits from engagement and ensure remediation where needed.</p>			
<p><b>Criteria 4.1</b>          The unit of certification respects human rights, which includes respecting the rights of Human Rights Defenders.</p>			
4.1.1	<p><b>(C)</b> A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRD), is documented and communicated</p>	<p>KPOM has the implemented TDM’s Human Rights Policy; Signed by Haji Mohd. Ghazali Bon Yahaya; Chief Executive Officer (CEO); Dated on 1/7/2020 where they committed to recognizing the role of Human Rights Defenders in accordance</p>	Complied

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	to all levels of the workforce, operations, supply chain and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.	with the United Nations Guiding Principles On Business And Human Rights as well as convention standards of International Labour Organization and local acts.  Policy was communicated and briefed to all workers in order for them to understand their responsibility in respect of human rights and displayed on strategic locations within all KPOM operating units.	
4.1.2	The unit of certification does not instigate violence or use any form of harassment in their operations.	KPOM has the implemented TDM’s Human Rights Policy; Signed by Haji Mohd. Ghozali Bon Yahaya; Chief Executive Officer (CEO); Dated on 1/7/2020 where the management is committed to contributing to a better society.  TDM also has established flowchart for handling Sexual Harassment complaint in workplace. The management is required to investigate within 2 days from the date of receiving the complaints. This is demonstrated by the certification unit where no harassment or violence occurred or reported by the workers.	Complied
<b>Criteria 4.2</b>			
There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties.			
4.2.1	<b>(C)</b> The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistleblowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.	TDM has established a flowchart on handling social issue. Two-way communication was the method been utilized by the management. The management has to discuss the issue raised by stakeholders within 2 weeks for the first meeting and full timeframe is within 30 days.	Complied
4.2.2	Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.	Verification with stakeholders confirmed that the procedures were well understood in case of any necessary.	Complied
4.2.3	The unit of certification keeps parties to a grievance informed of its progress, including against agreed	Consultation with contractors and suppliers/vendors reveal a quite consistent complain on late payment issues where some payment delayed for almost one year. Trailing of related records of complain/grievance shown no records of such	Non compliance

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	timeframe and the outcome is available and communicated to relevant stakeholders.	complain however verification with consulted contractors and suppliers/vendors confirmed that they were not been informed on the actual progress by relevant operating units. Hence, a Minor NC has been raised on the matter.	
4.2.4	The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator.	TDM has established a flowchart on handling social issue. Two-way communication was the method been utilized by the management. The management has to discuss the issue raised by stakeholders within 2 weeks for the first meeting and full timeframe is within 30 days. The negotiation process involving the estate management, representatives from the disputed parties, zone heads, third parties and stakeholders shall be carried out. Upon failure of the negotiation process, legal proceedings may follow.	Complied
<b>Criteria 4.3</b>			
The unit of certification contributes to local sustainable development as agreed by local communities.			
4.3.1	Contributions to community development that are based on the results of consultation with local communities are demonstrated.	Kemaman CU demonstrated participation in community development towards local communities through various contributions as per sample sighted as following: - APE: Permohonan menggunakan lori untuk kerja-kerja penurapan jalan kubur orang Islam Kampung Teladas Air Putih; 23/8/2020 - APE: Memohon khidmat van ladang Sekolah Kebangsaan Ayer Putih; 8/3/2020 -	Complied
<b>Criteria 4.4</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.			
4.4.1	<b>(C)</b> Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed Consent (FPIC) process. Documents related to the history of land tenure and the actual legal or customary use of the land are available.	Kemaman POM located within Pelantoh Estate; Mukim Tebak; Lot/PT # L.O.28 land area as per records of Official Search Acknowledgement by Land Office.  MAIDAM Estate total land titles = 17 as per sample: - Grant # PN 10770; HSD # 583; Lot # 1083; District: Dugun; Sub-District: Jengai; Area: 179.80 ha	Complied

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		<p>- Grant # PN 10771; HSD # 704; Lot # 1097; District: Dugun; Sub-District: Jengai; Area: 68.75 ha</p> <p>- Grant # PN 3933; HSD # 499; Lot # 971; District: Dugun; Sub-District: Jengai; Area: 93.28 ha</p>	
4.4.2	<p>Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:</p> <p>a) Evidence that a plan has been developed through consultation and discussion in good faith with all affected groups in the communities, with particular assurance that vulnerable, minorities' and gender groups are consulted, and that information has been provided to all affected groups, including information on the steps that are taken to involve them in decision making</p>	<p>There is no land dispute recorded. This was verified through stakeholders' consultation.</p> <p>In order to deal with future arising land dispute (if applicable), the established Flowchart Social Issue Communication Flowchart version 2.0/2017 for Handling Social Issue and Procedures for External and Internal Communication to handle any communication, consultation and complaints from stakeholders as well as boundaries disputes.</p>	Complied
	<p>b) Evidence that the unit of certification has respected communities' decisions to give or withhold their consent to the operation at the time that these decisions were taken</p>	<p>There is no land dispute recorded. This was verified through stakeholders' consultation.</p> <p>In order to deal with future arising land dispute (if applicable), the established Flowchart Social Issue Communication Flowchart version 2.0/2017 for Handling Social Issue and Procedures for External and Internal Communication to handle any communication, consultation and complaints from stakeholders as well as boundaries disputes.</p>	
	<p>c) Evidence that the legal, economic, environmental and social implications of permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal status of their land at the expiry of the unit of certification's title, concession or lease on the land.</p>	<p>There is no land dispute recorded. This was verified through stakeholders' consultation.</p> <p>In order to deal with future arising land dispute (if applicable), the established Flowchart Social Issue Communication Flowchart version 2.0/2017 for Handling Social Issue and Procedures for External and Internal Communication to handle any communication, consultation and complaints from stakeholders as well as boundaries disputes.</p>	

4.4.3	<b>(C)</b> Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities).	There is no land dispute recorded. This was verified through stakeholders' consultation. In order to deal with future arising land dispute (if applicable), the established Flowchart Social Issue Communication Flowchart version 2.0/2017 for Handling Social Issue and Procedures for External and Internal Communication to handle any communication, consultation and complaints from stakeholders as well as boundaries disputes.	Complied
4.4.4	All relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements.	There is no land dispute recorded. This was verified through stakeholders' consultation. In order to deal with future arising land dispute (if applicable), the established Flowchart Social Issue Communication Flowchart version 2.0/2017 for Handling Social Issue and Procedures for External and Internal Communication to handle any communication, consultation and complaints from stakeholders as well as boundaries disputes.	Complied
4.4.5	<b>(C)</b> Evidence is available to show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose.	There is no land dispute recorded. This was verified through stakeholders' consultation. In order to deal with future arising land dispute (if applicable), the established Flowchart Social Issue Communication Flowchart version 2.0/2017 for Handling Social Issue and Procedures for External and Internal Communication to handle any communication, consultation and complaints from stakeholders as well as boundaries disputes.	N/A
4.4.6	There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties.	There is no land dispute recorded. This was verified through stakeholders' consultation. In order to deal with future arising land dispute (if applicable), the established Flowchart Social Issue Communication Flowchart version 2.0/2017 for Handling Social Issue and Procedures for External and Internal Communication to handle any communication, consultation and complaints from stakeholders as well as boundaries disputes.	N/A
<b>Criteria 4.5</b>			

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<p>No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.</p>			
4.5.1	<p><b>(C)</b> Documents showing identification and assessment of demonstrable legal, customary and user rights are available.</p>	<p>Kemaman POM located within Pelantoh Estate; Mukim Tebak; Lot/PT # L.O.28 land area as per records of Official Search Acknowledgement by Land Office.</p> <p>MAIDAM Estate total land titles = 17 as per sample:</p> <ul style="list-style-type: none"> <li>- Grant # PN 10770; HSD # 583; Lot # 1083; District: Dugun; Sub-District: Jengai; Area: 179.80 ha</li> <li>- Grant # PN 10771; HSD # 704; Lot # 1097; District: Dugun; Sub-District: Jengai; Area: 68.75 ha</li> <li>- Grant # PN 3933; HSD # 499; Lot # 971; District: Dugun; Sub-District: Jengai; Area: 93.28 ha</li> </ul> <p>In Air Putih Estate, there are a total of 5 land titles with overall estate area was 4,933.26 ha</p>	Complied
4.5.2	<p><b>(C)</b> FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions, with all the relevant information and documents made available, with option of resourced access to independent advice through a documented, long-term and two-way process of consultation and negotiation.</p>	<p>It has been verified during documentation review, interviews held with management and field observations, that there is no evidence of any new planting within the KPOM Complex. The estate lands are legally owned by TDM. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available.</p>	Complied
4.5.3	<p>Evidence is available that affected local peoples understand they have the right to say 'no' to operations planned on their lands before and during initial discussions, during the stage of information</p>	<p>It has been verified during documentation review, interviews held with management and field observations, that there is no evidence of any new planting within the KPOM Complex. The estate lands are legally owned by TDM. The</p>	Complied

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	gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples. Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations.	existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available.	
4.5.4	To ensure local food and water security, as part of the FPIC process, participatory SEIA and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of the land allocation process.	It has been verified during documentation review, interviews held with management and field observations, that there is no evidence of any new planting within the KPOM Complex. The estate lands are legally owned by TDM. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available.	Complied
4.5.5	Evidence is available that the affected communities and rights holders have had the option to 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.	It has been verified during documentation review, interviews held with management and field observations, that there is no evidence of any new planting within the KPOM Complex. The estate lands are legally owned by TDM. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available.	Complied
4.5.6	Evidence is available that the communities (or their representatives) gave consent to the initial planning phases of the operations prior to the issuance of anew concession or land title to the operator.	It has been verified during documentation review, interviews held with management and field observations, that there is no evidence of any new planting within the KPOM Complex. The estate lands are legally owned by TDM. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available.	Complied
4.5.7	New lands are not acquired for plantations and mills after 15 November 2018 as a result of recent (2005 or later) expropriations without consent under the right of eminent domain of the federal and state land acquisition legislations.	It has been verified during documentation review, interviews held with management and field observations, that there is no evidence of any new planting within the KPOM Complex. The estate lands are legally owned by TDM. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available.	Complied
4.5.8	<b>(C)</b> Newlands are not acquired in areas inhabited by communities in voluntary isolation.	It has been verified during documentation review, interviews held with management and field observations, that there is no evidence of any new planting	Complied

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		within the KPOM Complex. The estate lands are legally owned by TDM. The existing estates are not encumbered by any legal, customary and user rights. Land titles and ownerships of the lands were available.	
<b>Criteria 4.6</b>			
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.			
4.6.1	(C) A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place.	There is no customary rights within KPOM Complex. Land belonged to TDM since the first planting year.	Complied
4.6.2	(C) A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.	There is no customary rights within KPOM Complex. Land belonged to TDM since the first planting year.	Complied
4.6.3	Evidence is available that equal opportunities are provided to both men and women to hold land titles for small holdings.	There is no customary rights within KPOM Complex. Land belonged to TDM since the first planting year.	Complied
4.6.4	The process and outcomes of any negotiated agreements, compensation and payments are documented, with evidence of the participation of affected parties, and made publicly available to them.	There is no customary rights within KPOM Complex. Land belonged to TDM since the first planting year.	Complied
<b>Criteria 4.7</b>			
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 FPIC and negotiated agreements.			



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4.7.1	<b>(C)</b> A mutually agreed procedure for identifying people entitled to compensation is in place.	TDM has established Flowchart Social Issue Communication Flowchart version 2.0/2017 for Handling Social Issue and Procedures for External and Internal Communication to handle any communication, consultation and complaints from stakeholders as well as boundaries disputes. Compensation procedure has been clearly stated in the procedure as well.	Complied
4.7.2	<b>(C)</b> A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is in place and documented and made available to affected parties.	There have been no issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders.	Complied
4.7.3	Communities that have lost access and rights to land for plantation expansion are given opportunities to benefit from plantation development.	TDM has established Flowchart Social Issue Communication Flowchart version 2.0/2017 for Handling Social Issue and Procedures for External and Internal Communication to handle any communication, consultation and complaints from stakeholders as well as boundaries disputes. Compensation procedure has been clearly stated in the procedure as well.	Complied
<b>Criteria 4.8</b>			
The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrated that they have legal customary, or user rights.			
4.8.1	Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed compensation has been made to all people who held legal, customary, or user rights at the time of acquisition is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC.	TDM has established Flowchart Social Issue Communication Flowchart version 2.0/2017 for Handling Social Issue and Procedures for External and Internal Communication to handle any communication, consultation and complaints from stakeholders as well as boundaries disputes. Compensation procedure has been clearly stated in the procedure as well.	Complied
4.8.2	<b>(C)</b> Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of	There have been no issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders.	Complied

	certification addresses any unresolved conflict through appropriate conflict resolution mechanisms.		
4.8.3	Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use right, there claims will be settled using the relevant requirements (Indicator 4.4.2, 4.4.3 and 4.4.4)	TDM has established Flowchart Social Issue Communication Flowchart version 2.0/2017 for Handling Social Issue and Procedures for External and Internal Communication to handle any communication, consultation and complaints from stakeholders as well as boundaries disputes. Compensation procedure has been clearly stated in the procedure as well.	Complied
4.8.4	For any conflict or dispute over the land, the extent of the disputed area is mapped out in participatory way with involvement of affected parties (including neighbouring communities where applicable)	There have been no issues related to loss of legal customary rights with indigenous peoples, local communities and other stakeholders.	Complied
<b>Principle 5: Support smallholder inclusion</b> Include smallholders in RSPO supply chains and improve their livelihoods through fair and transparent partnerships.			
<b>Criteria 5.1</b> The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.			
5.1.1	Current and previous period prices paid for FFB are publicly available and accessible by smallholders.	Current and previous FFB prices available as per MPOB Daily FFB Reference Price Summary by Region. The mill received FFB from sister estate from Kemaman CU and FFB diversion from other certified Group mill. The FFB supplier were listed in the Kemaman POM FFB Supplier list.	Complied
5.1.2	<b>(C)</b> Evidence is available that the unit of certification regularly explains the FFB pricing to smallholders (at least once a year or upon request).	The mill received FFB from sister estate from Kemaman CU and FFB diversion from other certified Group mill. The FFB supplier were listed in the Kemaman POM FFB Supplier list.	Complied
5.1.3	<b>(C)</b> Fair pricing, including premium pricing, when applicable, is agreed with smallholders in the supply base and documented.	The mill received FFB from sister estate from Kemaman CU and FFB diversion from other certified Group mill. The FFB supplier were listed in the Kemaman POM FFB Supplier list.	Complied

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5.1.4	<b>(C)</b> Evidence is available that all parties, including women and independent representative organisations assisting smallholders where requested, are involved in decision-making processes and understand the contracts. These include those involving finance, loans/credits, and repayments through FFB price reductions for replanting and or other support mechanisms where applicable.	The mill received FFB from sister estate from Kemaman CU and FFB diversion from other certified Group mill. The FFB supplier were listed in the Kemaman POM FFB Supplier list.	Complied
5.1.5	Contracts are fair, legal and transparent and have an agreed timeframe.	The mill received FFB from sister estate from Kemaman CU and FFB diversion from other certified Group mill. The FFB supplier were listed in the Kemaman POM FFB Supplier list.	Complied
5.1.6	<b>(C)</b> Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given.	Payment made within 30 days upon receipt of supplier's. Payment was made through the financial department at head office. Sampled payment sighted as per sample payment for contractors and suppliers on 27/8/2020 as following: <ul style="list-style-type: none"> <li>- Westari Corporation Sdn. Bhd.; Invoice date: Jan 2020; Payment voucher # PV0772</li> <li>- Ainmanna Enterprise; Invoice date: Apr 2020; Payment voucher # PV2297</li> </ul>	Complied
5.1.7	Weighing equipment is verified by an independent third party on a regular basis (this can be government).	Weighbridge conducted 14/1/2020 by Teras Integrasi Sdn Bhd as per sighted records of latest calibration by Metrology Corporation Malaysia Sdn. Bhd. refer certificate no. B1566289 and safety sticker no. 2.1K QC04982.	Complied
5.1.8	The unit of certification supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material.	No independent smallholders within Kemaman POM certification unit.	Complied

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5.1.9	<b>(C)</b> The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner.	TDM has established Flowchart Social Issue Communication Flowchart version 2.0/2017 for Handling Social Issue and Procedures for External and Internal Communication to handle any communication, consultation and complaints from stakeholders as well as boundaries disputes. Compensation procedure has been clearly stated in the procedure as well. No independent smallholders within Kemaman POM certification unit	Complied
<b>Criteria 5.2</b>			
The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.			
5.2.1	The unit of certification consults with interested smallholders (irrespective of type) including women or other partners in their supply base to assess their needs for support to improve their livelihoods and their interest in RSPO certification.	Kemaman POM processed own crops only and no FFB sourced from third party. All FFB sent to Kemaman POM are from own supply base. In case necessary, Outside Crop Purchaser (OCP) upstream are responsible to source potential external suppliers.	Complied
5.2.2	The unit of certification develops and implements livelihood improvement programmes, including at least capacity building to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Standard for Independent Smallholder or RSIS).	Kemaman POM processed own crops only and no FFB sourced from third party. All FFB sent to Kemaman POM are from own supply base. In case necessary, Outside Crop Purchaser (OCP) upstream are responsible to source potential external suppliers.	Complied
5.2.3	Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production.	Kemaman POM processed own crops only and no FFB sourced from third party. All FFB sent to Kemaman POM are from own supply base. In case necessary, Outside Crop Purchaser (OCP) upstream are responsible to source potential external suppliers.	Complied
5.2.4	<b>(C)</b> Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling.	Kemaman POM processed own crops only and no FFB sourced from third party. All FFB sent to Kemaman POM are from own supply base. In case necessary, Outside Crop Purchaser (OCP) upstream are responsible to source potential external suppliers.	Complied

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5.2.5	The unit of certification regularly reviews and publicly reports on the progress of the smallholder support programme.	Kemaman POM processed own crops only and no FFB sourced from third party. All FFB sent to Kemaman POM are from own supply base. In case necessary, Outside Crop Purchaser (OCP) upstream are responsible to source potential external suppliers.	Complied
<p><b>Principle 6: respect workers' rights and conditions</b>          Protect workers' rights and ensure safe and decent working conditions.</p>			
<p><b>Criteria 6.1</b>          Any form of discrimination is prohibited.</p>			
6.1.1	<b>(C)</b> A publicly available non-discrimination and equal opportunity policy is implemented in such a way to prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age.	<p>KPOM has the implemented TDM's Human Rights Policy; Signed by Haji Mohd. Ghozali Bon Yahaya; Chief Executive Officer (CEO); Dated on 1/7/2020 where they committed to recognizing the role of Human Rights Defenders in accordance with the United Nations Guiding Principles On Business And Human Rights as well as convention standards of International Labour Organization and local acts. The management is committed to treat all employees fairly in terms of recruitment, progression, terms and conditions of work and representation regardless of race, caste, nationality, gender, sexual orientation, union membership, political view, religion and/or age.</p> <p>Policy was communicated and briefed to all workers in order for them to understand their responsibility in respect of human rights and displayed on strategic locations within all KPOM operating units.</p>	Complied
6.1.2	<b>(C)</b> Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against including charging of recruitment fees for foreign workers.	Migrant workers are recruited with (2 +1) and 3 years contract. Local workers are on a long-term employment. No any kind of discrimination was noted. Job opportunities and amenities such as free housing, subsidized water and electric supplier (connect to national water and electricity supply) and medical care (panel clinic) are given to all employees without discrimination.	Complied

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		Foreign migrant workers. Refer to Letter of Employment, Employment Contract para" 14 – Annual leave: 14 days for < 5 years and 16 days for > 5 years. Overtime paid as per Employment Act 1995 (EA). Sampled workers are as 6.5.1.	
6.1.3	The unit of certification demonstrates that recruitment selection, hiring, access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available.	There is no any discrimination based on religion, gender, nationality and etc. during their recruitment. The recruitment process is based on skills, capabilities, medical fitness necessary and etc. This was confirmed during stakeholder's consultation, worker's interview, complaint book and trade union meeting.  Sighted the job description of each workers mention the same regardless of skin colour, religion, race or caste as per sample new recruitment sighted.	Complied
6.1.4	Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women.	There is no pregnancy test conducted in SOU 18. Confirmed through the interview session to workers, Medical Assistant and Gender Committee Minute of Meeting.	Complied
6.1.5	<b>(C)</b> A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.	Kemaman POM Gender Committee Chairperson is Pn. Suriati Abu Bakar for period from 2019-2021. Latest gender committee meeting was conducted on 2/2/2020 as per minutes of meeting ref. # P/GC/001/2020. Subsequent meeting conducted on 28/6/2020 as per minutes of meeting # 02/2020 for Air Putih Estate.	Complied
6.1.6	There is evidence of equal pay for the same work scope.	There is no any discrimination based on religion, gender, nationality and etc. during their recruitment. The recruitment process is based on skills, capabilities, medical fitness necessary and etc. This was confirmed during stakeholder's consultation, worker's interview, complaint book and trade union meeting.  Sighted the job description of each workers mention the same regardless of skin colour, religion, race or caste.	Complied
<b>Criteria 6.2</b>			
Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).			

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6.2.1	<p><b>(C)</b> Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions are available to the workers in national languages (English or Bahasa Malaysia) and explained to them in language they understand.</p>	<p>All the workers are under direct employment and some contractor workers. The pay slip has included basic income, allowance pay, working days, medical leave, deduction of salary and etc. as per employment contract in compliance with permits as following:</p> <ul style="list-style-type: none"> <li>- JTKSM permit for KETENGAH rent &amp; purchase from the salary; Serial # PMT.2010/020; Valid from 15/6/2010</li> <li>- JTKSM permit for Kemaman POM overtime maximum of 130 hours; Ref. # BHG.PU/9/134 Jld 17 (38); Dated: 02/01/2019 (2 years of validity)</li> <li>- JTKSM Salary deduction permit for Tebak Estate; Serial # PMT.2009/0015; Effective date: 25/9/2018</li> </ul>	Complied
6.2.2	<p><b>(C)</b> Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed. This includes a form of record for work done by family members.</p>	<p>Employment contracts and related documents detailing payments and conditions of employment including regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements sighted available as per sample KPOM workers as following:</p> <ul style="list-style-type: none"> <li>- Employee ID # KM0900154; Shift A; Oil Room</li> <li>- Contract 940719-11-6021; Shift A; EFB Press</li> <li>- Employee ID # KM1200176; General</li> <li>- Employee ID # KM1200175; Shift B; Continuous Sterilizer</li> <li>- Employee ID # 211; Shift B; Boiler</li> <li>- Contract 850729-03-6149; Shift B; Mixer Operator</li> <li>- Employee ID # KM1800213; Security</li> <li>- Contract 010628-06-0519; Workshop</li> <li>- Employee ID # KM1200178; General; Grading</li> <li>- Contract 990222-11-5010; Office</li> </ul>	Complied

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		<p>Sample MAIDAM Estate workers (Daftar Pekerja dan Syarat-syarat Perjanjian Kerja Dibawah Peraturan-peraturan 5a Peraturan-peraturan Kerja 1957):</p> <ul style="list-style-type: none"> <li>- Employee ID: MA1300294; Gang 5 (Line Sweeper); Date join: 22/7/2013; Nationality: Malaysia</li> <li>- Employee ID: MA1700397; Gang 6 (General Weeder); Date join: 14/10/2017; Nationality: Malaysia</li> <li>- Employee ID: MA2000522; Gang 7 (General Worker); Date join: 1/7/2020; Nationality: Malaysia</li> <li>- Employee ID: MA1800488; Gang 4 (Harvester); Date join: 20/12/2018; Nationality: Indonesia</li> <li>- Employee ID: MA1900501; Gang 6 (Sprayer); Date join: 10/3/2019; Nationality: Indonesia</li> <li>- Employee ID: MA1900514; Gang 4 (Harvester); Date join: 22/1/2020; Nationality: Indonesia</li> </ul> <p>Sample for Air Putih Estate as following:</p> <ul style="list-style-type: none"> <li>- Employee ID: AP1801261; Security Assistant; Date join: 1/6/2018; Nationality: Malaysia</li> <li>- Employee ID: AP1801329; Tractor Driver; Date join: 19/11/2018; Nationality: Malaysia</li> <li>- Employee ID: AP1901401; General Worker; Date join: 1/6/2019; Nationality: Malaysia</li> <li>- Employee ID: AP1801354; Harvester; Date join: 20/1/2019; Nationality: Indonesia</li> </ul>	
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		<ul style="list-style-type: none"> <li>- Employee ID: AP1400951; Harvester; Date join: 17/4/2014; Nationality: Indonesia</li> <li>- Employee ID: AP0900562; Sprayer; Date join: 5/10/2010; Nationality: Indonesia</li> <li>- Employee ID: AP1400872; Nursery; Date join: 16/1/2014; Nationality: Bangladesh</li> <li>- Employee ID: AP1801233; Loader; Date join: 6/2/2018; Nationality: Bangladesh</li> <li>- Employee ID: AP1801248; Harvester; Date join: 16/3/2018; Nationality: Bangladesh</li> </ul>	
6.2.3	<b>(C)</b> There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements.	There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements as per samples sighted in criterion 6.2.2 above.	Complied
6.2.4	<b>(C)</b> The unit of certification provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. National laws or in their absence the ILO Guidance on Workers’ Housing Recommendation No. 115, are used. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5years)is allowed to upgrade the infrastructure.	<p>The basic amenities and facilities at the quarters provided by the company to the workers includes electricity, water and domestic waste disposal. Electricity and water were connected with the national infrastructure facilities. The us age of electricity and water is provided with subsidize rate as per employment contract. Seen the Budget for housing repairs, sanitation, garden upkeep and CAPEX from all operating units.</p> <p>Seen the record for weekly linesite inspection done by Medical Assisant in Weekly basis. For local workers with family, each will be given a house while for foreign workers for single workers, it will be given shared house of 2 people per room. For foreign workers, all foreign workers will be given a starter kit which includes basis amenities (e.g. mattress, cooking utilizes).</p> <p>During the field assessment, it was observed that the housing area in favourable sanitation condition as reflected in the line-site inspection.</p>	Complied

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		MAIDAM Estate VMO visit latest dated: 17/8/2020; Klinik Bestari Sdn. Bhd.; OHD DOSH Reg. # HQ/08/DOC/00/352.  Air Putih Estate latest housing inspection conducted on 24/8/2020 by HA.	
6.2.5	The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.	The housing area were located near the main road where the accessibility to the grocery and shops is available in housing area.	Complied
6.2.6	A DLW is paid to all workers, including those on piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours.	KPOM Complex conducted the Prevailing Wage Assessment and calculated individual local and foreign workers current salary including non-monetary benefit given average for local worker RM: 1,769.50; FW: RM1,920.41. DLW assessment conducted by Sustainability Team of TDM.	Complied

**PROCEDURAL NOTE:**

RSPO STANDARD STANDING COMMITTEE  
14th of October 2019

**STATEMENT FROM THE RSPO STANDARD STANDING COMMITTEE REGARDING THE INDICATOR 6.2.6 ON DECENT LIVING WAGE**

With reference to procedural note of indicator 6.2.6, the RSPO has published a guidance on the DLW calculation in June 2019. The RSPO Secretariat will endeavor to carry out DLW country benchmarks for palm oil producing countries in which RSPO members operate and for which no Global Living Wage Coalition (GLWC) benchmarks exist<sup>1</sup>

***Where a GLWC living wage standard (benchmark), or one that fulfills the basic requirements of the RSPO-endorsed living wage methodology, has been established in the country or region of operation, the same should be used as benchmarks.***

In the absence of such benchmarks, the RSPO will collaborate with the GLWC and/or local experts on developing oil palm industry benchmarks<sup>1</sup>. These benchmarks will be developed in collaboration and consultation with relevant stakeholders such as palm oil industry members, workers' union, authorities and/or relevant organisations.

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***For countries where no living wage standard is established, until such time that an RSPO endorsed benchmark for the country is in place, national minimum wages shall be paid to all workers. In addition to the payment of minimum wages, the Unit of Certification (UoC) shall conduct an assessment of the prevailing wages and in-kind benefits provided to workers in the Unit of Certification aligned with the RSPO Guidance for Implementing a Decent Living Wage<sup>1</sup>.***

Once the benchmarks are available, this procedural note is no longer applicable. UoC shall have an implementation plan towards the payment of a DLW with specific targets, and a phased implementation process including:

- Updated assessment on prevailing wages and in-kind benefits
- There is annual progress on the implementation of living wages
- Where a minimum wage, based on equivalent of baskets of goods, is stipulated in Collective Bargaining Agreements (CBAs), this should be used as the foundation for the gradual implementation of the living wage payment
- The UoC may choose to implement the living wage payment in specific section as a pilot project; the pilot will then be evaluated and adapted before eventual scale up of the living wage implementation.

<sup>1</sup> As of September 2019, GLWC has developed national benchmarks in Bangladesh, Belize, Brazil, China, Colombia, Costa Rica, Dominican Republic, Ecuador, Ethiopia, Ghana, Guatemala, India, Kenya, Malawi, Mexico, Nicaragua, Pakistan, South Africa, Sri Lanka, Uganda and Vietnam. These benchmarks are developed based on banana, coffee, floriculture, textile, manufacturing, seafood processing and tea industry. The RSPO is in the process of commissioning benchmarks for Malaysia and Indonesia for the palm oil sector and will develop methods to calculate and/or define DLW applicability for all palm oil producing countries in which RSPO members operate.

<sup>2</sup> Benchmark in this context may include other approaches and/or methods to calculate the applicability of DLW in the country or region in accordance to the RSPO endorsed method for determining a DLW. Local applicability for benchmarks is important and it may differ based on the needs of each locality or country.

<sup>3</sup> RSPO Guidance for Implementing a Decent Living Wage. The RSPO will also develop further guidance and tools to calculate DLW in line with the RSPO endorsed methodology which may include independent studies by local experts in their respective region or country.

6.2.7	Permanent, full-time employment is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal.	There are no casual workers hired in mill and estates within KPOM Complex. All employees are permanent employee (for locals) and contracted employee (for foreign workers). All permanent and full time employment or contract workers	Complied
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		used as the general worker, mandore, staff, etc. based on their employment contract sighted in clause 6.2.2	
<b>Criteria 6.3</b>			
The unit of certification 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.			
6.3.1	(C) A published statement recognising freedom of association and right to collective bargaining in national languages (English and/or Bahasa Malaysia) is available and is explained to all workers, in language that they understand, and is demonstrably implemented.	<p>The Social Policy signed by Haji Mohd. Ghazali Bin Yahaya; Chief Executive Officer (CEO) on 1/7/2020 stated that TDM committed to comply with principles as following:</p> <ul style="list-style-type: none"> <li>- Fair treatment to everyone without discrimination</li> <li>- Freedom of association to everyone</li> <li>- Strongly opposed force labour and child labor</li> </ul> <p>Company respect the rights of all personnel to form and join trade unions of their choice to bargain collectively.</p> <p>During the interview with workers, there are no evidence received that there are restriction from the company to allow workers to join trade union. The workers have their freedom to join the NUPW/MAPA union.</p>	Complied
6.3.2	Minutes of meetings between the unit of certification with trade unions or workers representatives, who are freely elected, are documented in national languages (English and/or Bahasa Malaysia) and made available upon request.	<p>Meetings conducted as per sample minutes of meeting as following:</p> <ol style="list-style-type: none"> <li>1. As per minutes of meeting for workers' representative meeting with management # 01/2020; Date: 20/8/2020 for Kemaman POM.</li> <li>2. Air Putih Estate NUPW representative's 22<sup>nd</sup> Triennial Delegates Conference; Date: 30/12/2019 @ Grand Riverview Hotel Kota Bharu, Kelantan and subsequent meeting with estate management dated 6/8/2020; minutes of meeting ref. # LAP/RSPO/001/2020.</li> </ol>	Complied
6.3.3	Management does not interfere with the formation or operation of registered unions/ labour organisations or	Based on the worker's interview, the selection of NUPW representative made from the election among the NUPW member without management interference. Foreign	Complied

	associations, or other freely elected representatives for all workers including migrant and contract workers.	workers included in the committee formation and appointment letter sighted. The selection also based on the election meeting.	
<b>Criteria 6.4:</b> Children are not employed or exploited.			
6.4.1	A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements.	<p>The Social Policy signed by Haji Mohd. Ghazali Bin Yahaya; Chief Executive Officer (CEO) on 1/7/2020 stated that TDM committed to comply with principles as following:</p> <ul style="list-style-type: none"> <li>- Fair treatment to everyone without discrimination</li> <li>- Freedom of association to everyone</li> <li>- Strongly opposed force labour and child labor</li> </ul> <p>Field observation, interviewing with workers and verification of workers master list confirmed that there is no child labour hired.</p> <p>For contractors, the clause has been included in either contract agreements of purchase orders issued to them.</p>	Complied
6.4.2	<b>(C)</b> There is evidence that minimum age requirements are met. Personnel files show that all workers are above the national minimum age or above company policy minimum age, whichever is higher. There is a documented age screening verification procedure.	<p>The Social Policy signed by Haji Mohd. Ghazali Bin Yahaya; Chief Executive Officer (CEO) on 1/7/2020 stated that TDM committed to comply with principles as following:</p> <ul style="list-style-type: none"> <li>- Fair treatment to everyone without discrimination</li> <li>- Freedom of association to everyone</li> <li>- Strongly opposed force labour and child labor</li> </ul> <p>Field observation, interviewing with workers and verification of workers master list confirmed that there is no child labour hired.</p> <p>For contractors, the clause has been included in either contract agreements of purchase orders issued to them.</p>	Complied

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6.4.3	<b>(C)</b> Young persons may be employed only for non-hazardous work, with protective restrictions in place for that work.	There is no young worker employed in Kemaman POM certification unit.	Complied
6.4.4	The unit of certification demonstrates communication about its 'no child labour' policy and the negative effects of child labour, and promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live.	<p>The Social Policy signed by Haji Mohd. Ghazali Bin Yahaya; Chief Executive Officer (CEO) on 1/7/2020 stated that TDM committed to comply with principles as following:</p> <ul style="list-style-type: none"> <li>- Fair treatment to everyone without discrimination</li> <li>- Freedom of association to everyone</li> <li>- Strongly opposed force labour and child labor</li> </ul> <p>Field observation, interviewing with workers and verification of workers master list confirmed that there is no child labour hired.</p> <p>For contractors, the clause has been included in either contract agreements of purchase orders issued to them.</p>	Complied
<p><b>Criteria 6.5:</b> There is no harassment or abuse in the workplace, and reproductive rights are protected.</p>			
6.5.1	<b>(C)</b> A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce.	<p>KPOM has the implemented TDM's Human Rights Policy; Signed by Haji Mohd. Ghazali Bon Yahaya; Chief Executive Officer (CEO); Dated on 1/7/2020 where the management is committed to contributing to a better society.</p> <p>TDM also has established flowchart for handling Sexual Harassment complaint in workplace. The management is required to investigate within 2 days from the date of receiving the complaints. This is demonstrated by the certification unit where no harassment or violence occurred or reported by the workers.</p>	Complied
6.5.2	<b>(C)</b> A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce.	KPOM has the implemented TDM's Reproductive Policy; Signed by Haji Mohd. Ghazali Bon Yahaya; Chief Executive Officer (CEO); Dated on 1/7/2020 where the management is committed respect the reproductive rights of all especially women.	Complied

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6.5.3	Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified.	New mothers assessment were conducted mainly to determine their needs for proper action to be taken by management including allowing time for breastfeeding and/or other motherly needs.	Complied
6.5.4	A grievance mechanism, which respects anonymity and protects complainants where requested, is established, implemented and communicated to all levels of the workforce.	Gender committee has been formed in each unit for the medium of sexual harassment grievances by female.	Complied
<b>Criteria 6.6:</b>			
No forms of forced or trafficked labour are used.			
6.6.1	<p><b>(C)</b> All workers have entered into employment voluntarily and the following are prohibited:</p> <ul style="list-style-type: none"> <li>• Retention of identity documents or passports (except for administration purposes including legalisation and renewal processes)</li> <li>• Charging the workers for recruitment fees</li> <li>• Contract substitution</li> <li>• Involuntary overtime</li> <li>• Lack of freedom of workers to resign</li> <li>• Penalty to the workers for termination of employment</li> <li>• Debt bondage</li> <li>• Withholding of wages</li> </ul>	<p>KPOM has the implemented TDM’s Human Rights Policy; Signed by Haji Mohd. Ghozali Bon Yahaya; Chief Executive Officer (CEO); Dated on 1/7/2020 where they committed to recognizing the role of Human Rights Defenders in accordance with the United Nations Guiding Principles On Business And Human Rights as well as convention standards of International Labour Organization and local acts.</p> <p>Policy was communicated and briefed to all workers in order for them to understand their responsibility in respect of human rights and displayed on strategic locations within all KPOM operating units. Interview conducted with both local and foreign workers confirmed that no force labour employment within TDM.</p>	Complied
6.6.2	<b>(C)</b> Where temporary or migrant workers are employed, a specific labour policy and procedures are established and implemented.	There are no casual or temporary workers hired in mill and estates within KPOM Complex. All employees are permanent employee (for locals) and contracted employee (for foreign workers). All permanent and full time employment or	Complied

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		contract workers used as the general worker, mandore, staff, etc. based on their employment contract sighted in clause 6.2.2	
<b>Criteria 6.7:</b> The unit of certification ensures that the working environment under its control is safe and without undue risk to health.			
6.7.1	<p><b>(C)</b> The responsible person(s) for H&amp;S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.</p>	<p>The mill and estates manager has been appointed as person responsible for safety and health cum chairman for safety and health committee in the CU.</p> <p>The management has established Safety Committee Member consist of Secretary, representatives from Employer and representatives from Employee.</p> <p>The OSH committee discussed regarding the safety and health of the workers on quarterly basis during the OSH committee meeting. In the meeting discussed on matters arising, OSH objective and program, compliance to legal and requirement, Accident statistic and report, external and internal compliant, training and competency, workplace inspection report and other matters.</p> <p>KPOM</p> <p>The mill manager has appointed the Compliance Executive as safety coordinator in the mill as per appointment letter dated 1/1/2018 signed by the mill manager.</p> <p>The management has established Safety Committee Member consist of Secretary, representatives from Employer and representatives from Employee as per appointment letter by the signed mill Manager on 31/12/2018. The OSH committee discussed regarding the safety and health of the workers on quarterly basis during the OSH committee meeting. In the meeting discussed on matters arising, OSH objective and program, compliance to legal and requirement, Accident statistic and report, external and internal compliant, training and competency, workplace inspection report and other matters.</p> <p>Sighted the minutes meeting dated 10/6/2020, 19/12/2019, 17/9/2019, 18/6/2019 and 19/3/2019.</p>	Complied



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		<p>ME  The estate management has established Safety Committee Member consist of Secretary, representatives from Employer and representatives from Employee.  Sighted the minutes meeting conducted on 12/7/2020 (accident investigation), 15/6/2020 and 15/3/2020 and 24/12/2019.</p> <p>APE  The estate management has appointed the Cadet Asst. manager as person responsible for safety as per appointment letter dated 1/8/2020  The management has established Safety Committee Member consist of Secretary, representatives from Employer and representatives from Employee.  Sighted the minutes meeting conducted on 16/8/2020, 24/6/2020, 8/3/2020 and 27/12/2019.</p>	
6.7.2	<p>Accident and emergency procedures are in place and instructions are clearly understood by all workers. Accident procedures are available in national languages (English and/or Bahasa Malaysia) and explained in the language understandable to the workforce. Assigned operatives trained in first aid are present in both field and other operations, and first aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.</p>	<p>TDM Plantations has established the SOP for Accident and emergency procedures documented in the Standard Operating Procedure – Emergency Preparedness and Response edition TDM/01, rev. no. TDMP-02/2018 dated 1/1/2018. In the SOP, the emergency plan and ERT to be activated according to the emergency situations as follows:</p> <ul style="list-style-type: none"> <li>i. Fig. 4.0 – Event of environmental and OSH emergencies including accident/incident</li> <li>ii. Fig. 4.4a – Event of fire</li> <li>iii. Fig. 4.4b – Event of Explosion</li> <li>iv. Fig. 4.4c – Event of Oil Spillage</li> <li>v. Fig. 4.4d – Event of Effluent Spillage (mills).</li> </ul> <p>The Emergency Response Plan Flow Chart has been displayed at strategic places in the mill and estates.</p>	Complied

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		<p>The mill and estates visited has established Emergency response team. Training has been conducted regularly to ensure the awareness on the ERP. Sighted the training records of the ERP as follows:</p> <p>KPOM</p> <ul style="list-style-type: none"> <li>i. First aid training dated 20/7/2020</li> <li>ii. Fire drill and ERP training with Kuala Terengganu Fire Department dated 29/6/2020</li> </ul> <p>Noted during interview with workers, the workers were aware regarding the location of firefighting equipment, first aid box and the competent first aider in the mill.</p> <p>ME</p> <ul style="list-style-type: none"> <li>i. ERP for chemical spillage dated 27/1/2020</li> <li>ii. ERP for wild animal intrusion dated 4/2/2020</li> <li>iii. ERP for workplace accident dated 9/3/2020</li> </ul> <p>APE</p> <ul style="list-style-type: none"> <li>i. Firefighting management training dated 12/8/2020</li> <li>ii. First aid training dated 12/1/2020</li> <li>iii. Children Nursery management and first aid training dated 22/2/2020</li> </ul>	
6.7.3	<p><b>(C)</b> Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.</p>	<p>The management provide appropriate PPE to the employee's base on the job type. The PPE given as per HIRARC and Standard Operating Procedure. PPE issuance was recorded in '<i>Borang Penyerahan Peralatan kerja dan Pengambilan Barang</i>' PPE by individual basis. Sighted the PPE issuance records for employees as follows:</p> <p>KPOM (Workshop and Labratory)</p> <ul style="list-style-type: none"> <li>i. KM1400200</li> </ul>	Complied

		<ul style="list-style-type: none"> <li>ii. KM00083</li> <li>iii. KM0900131</li> </ul> <p>ME</p> <ul style="list-style-type: none"> <li>i. MA1700402</li> <li>ii. MA1700404</li> <li>iii. MA1700396</li> <li>iv. MA1700403</li> </ul> <p>APE</p> <ul style="list-style-type: none"> <li>i. AP1801237</li> <li>ii. AP1401092</li> <li>iii. AP0900562</li> </ul>	
6.7.4	All workers are provided with medical care and covered by accident insurance. Costs incurred from work-related incidents leading to injury or sickness are covered in accordance with Malaysian law.	<p>Local and foreign workers covered by SOCSO or Perkeso (Pertubuhan Keselamatan Sosial).</p> <p>For workers involved in accident and eligible for medical benefit from SOCSO, the claim form was submitted to SOCSO through 'Borang 34 – Butir Notis dan Tuntutan Faedah'.</p> <p>KPOM</p> <p>Sighted the SOCSO Acknowledgement Contribution Received (ACR) for the month of July 2020 for a total of 107 workers dated 5/8/2020. Sighted the payment evidence to SOCSO as per payment voucher no. PV08/11/20 dated 13/8/2020.</p>	Complied

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		<p>ME Sighted the SOCSO Acknowledgement Contribution Received (ACR) for the month of May and June 2020 for a total of 58 and 55 workers dated 3/6/2020 and 4/7/2020 respectively.</p> <p>APE Sighted the SOCSO Acknowledgement Contribution Received (ACR) for the month of February and March 2020 for a total of 329 and 332 workers dated 3/3/2020 and 5/4/2020 respectively.</p>													
6.7.5	Occupational injuries are recorded using Lost Time Accident (LTA) metrics.	<p>Records of all accidents are kept. Accident incidences are reviewed during the safety meetings. Records on Lost Time Accident (LTA) metrics was maintained. Accident records are found to be updated. JKPP 8 form were submitted to DOE through MyKKP systems. Sighted the samples of accident statistic FY 2019 as reported to DOSH as follows:</p> <table border="1"> <thead> <tr> <th>Operating units</th> <th>Accident Cases</th> <th>LTA</th> </tr> </thead> <tbody> <tr> <td>KPOM</td> <td>2</td> <td>52</td> </tr> <tr> <td>ME</td> <td>0</td> <td>0</td> </tr> <tr> <td>APE</td> <td>0</td> <td>0</td> </tr> </tbody> </table>	Operating units	Accident Cases	LTA	KPOM	2	52	ME	0	0	APE	0	0	Complied
Operating units	Accident Cases	LTA													
KPOM	2	52													
ME	0	0													
APE	0	0													

**Principle 7:**

Protect, conserve and enhance ecosystem and the environment.

**Criteria 7.1:**

Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.

7.1.1	<b>(C)</b> IPM plans are implemented and monitored to ensure effective pest control.	<p>IPM Plan were documented in the 15 Best Agricultural practices. Sighted the implementation of the plan as follows:</p> <p>ME</p> <ul style="list-style-type: none"> <li>i. Latest barn owl census was conducted on 25/7/2020. The barn owl box ratio was at 1:45 ha with occupancy of 100%</li> <li>ii. Rat baiting was conducted at 2 campaign per year. Latest campaign was conducted in March and April 2020 with average of 3 rounds and acceptance level at 12% - 19%.</li> <li>iii. Sighted during site visit at P98A-1, beneficial plant such as <i>Cassia cobanensis</i>, and <i>Antigonon leptopus</i>, were planted along the main road.</li> </ul> <p>APE</p> <ul style="list-style-type: none"> <li>i. Latest barn owl census was conducted bimonthly basis. The barn owl box ratio was at 1:19 ha with occupancy of 84.40% as per latest census result conducted in Jul and Aug 2020</li> <li>ii. Sighted during site visit at P96B, O97A and P13A, beneficial plant such as <i>Cassia cobanensis</i>, <i>Turnera subulata</i> and <i>Antigonon leptopus</i>, were planted along the main road</li> </ul>	Complied
7.1.2	Species referenced in the Global Invasive Species Database and CABI.org are not to be used in managed areas, unless plans to prevent and monitor their spread are implemented.	<p>There were no species referenced in the Global invasive Species database and CABI.org sighted within the estate and POM premises.</p> <p>The flora species used in the IPM such as <i>Cassia cobanensis</i>, <i>Antigonon leptopus</i>, and <i>Turnera subulata</i>.</p> <p>The fauna species used in the IPM such as <i>Tyto alba</i></p>	Complied
7.1.3	There is no use of fire for pest control unless in exceptional circumstances, i.e. where no other effective methods exist, and with prior approval of government authorities.	It was identified that there is no use of fire for the pest control at the estates during the visit to the fields.	Complied
<b>Criteria 7.2:</b>			

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Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.																											
7.2.1	<b>(C)</b> Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised.	TDM Plantation has established the Agrochemical Management Policy dated 1/7/2020 signed by the CEO. The written justification in Standard Operating Procedure (SOP) of all agrochemical are available the Standard Operating Procedure A12: Weeding – Immature, A13 – Mature, A14 – Lallang Eradication, rev. 2, May 2017.	Complied																								
7.2.2	<b>(C)</b> Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) are provided.	Records of pesticides use (including active ingredients used and their LD 50, area treated, amount of a.i. applied per ha and number of applications) had been maintained and kept by the estate. Sighted the sampled records of pesticides usage per ha at estate visited as follows: <table border="1" data-bbox="994 743 1464 1142"> <thead> <tr> <th>Month</th> <th>ME</th> <th>SE</th> </tr> </thead> <tbody> <tr> <td>Jan 20</td> <td>0.99</td> <td>0.008</td> </tr> <tr> <td>Feb 20</td> <td>0.07</td> <td>0.008</td> </tr> <tr> <td>Mar 20</td> <td>0.19</td> <td>0.009</td> </tr> <tr> <td>Apr 20</td> <td>0.22</td> <td>0.007</td> </tr> <tr> <td>May 20</td> <td>0.15</td> <td>0.005</td> </tr> <tr> <td>Jun 20</td> <td>0.13</td> <td>0.008</td> </tr> <tr> <td>Jul 20</td> <td>0.16</td> <td>0.009</td> </tr> </tbody> </table>	Month	ME	SE	Jan 20	0.99	0.008	Feb 20	0.07	0.008	Mar 20	0.19	0.009	Apr 20	0.22	0.007	May 20	0.15	0.005	Jun 20	0.13	0.008	Jul 20	0.16	0.009	Complied
Month	ME	SE																									
Jan 20	0.99	0.008																									
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May 20	0.15	0.005																									
Jun 20	0.13	0.008																									
Jul 20	0.16	0.009																									
7.2.3	<b>(C)</b> Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.	The quantity of agrochemicals required for various field conditions are documented and justified in Standard Operating Procedure A12: Weeding – Immature, A13 – Mature, A14 – Lallang Eradication, rev. 2, May 2017.	Complied																								

7.2.4	There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines.	No prophylactic use of pesticide were identified in the estates	Complied
7.2.5	<p>Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, are not used, unless in exceptional circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks.</p> <p>The due diligence refers to:</p> <ul style="list-style-type: none"> <li>a) Judgment of the threat and verify why this is a major threat</li> <li>b) Why there is no other alternative which can be used</li> <li>c) Which process was applied to verify why there is no other less hazardous alternative</li> <li>d) What is the process to limit the negative impacts of the application</li> <li>e) Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.</li> </ul>	Paraquat was eliminated. Alternatives such as Glyphosate were used with the elimination of Paraquat. Based on the latest chemical register only class II, III & IV chemical used at visited estates.	Complied
7.2.6	<b>(C)</b> Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criterion 3.6). Personnel applying	<p>The pesticides operators have been given training regarding the usage safety and health issue and proper way for chemical application. Sighted the sampled training records as follows:</p> <p>ME</p> <ul style="list-style-type: none"> <li>i. SOP for spraying training dated 18/2/2020</li> </ul>	Complied

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	pesticides must show evidence of regular updates on the knowledge about the activity they carry out.	<ul style="list-style-type: none"> <li>ii. Agrochemical management policy training dated 22/3/2020</li> <li>iii. Chemical calibration training dated 1/7/2020</li> <li>iv. Chemical handling training dated 10/8/2020</li> </ul> <p>APE</p> <ul style="list-style-type: none"> <li>i. Use and Standard of Exposure Chemical Hazardous to Health) Regulations 2000 training dated 3/2/2020</li> <li>ii. Safety briefing and SOP for Inter pump spraying equipment training dated 15/1/2020</li> <li>iii. Safety data sheet training dated 20/2/2020</li> </ul> <p>SOP for rat baiting training dated 8/4/2020</p>	
7.2.7	<b>(C)</b> Storage of all pesticides is in accordance with recognised best practices.	The operating units comply with Regulation 9 of the Pesticides Act 1974 requiring balance of remaining solution to be kept under lock and key. During visit it was noted that all the remaining pesticides are kept in the store and securely locked and comply with regulation.	Complied
7.2.8	All pesticide containers are properly disposed of and/or handled responsibly if used for other purposes.	<p>The estate maintain the inventory records of empty pesticides containers and recorded in scheduled Waste Recorded book.. Sighted the records for FY todate 2020.</p> <p>Empty pesticides container were identified as scheduled waste in waste identification.</p> <p>All empty pesticides containers were triple rinse, puncture and stored at designated stored before disposed to licensed contractors.</p> <p>Latest disposal was conducted on 27/8/2020 as per consignment note no. 2020082715JWAUVN.</p>	Complied
7.2.9	<b>(C)</b> Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant	No evidence of aerial spray conducted at the estate visited.	Complied



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	information is provided to affected local communities at least 48 hours prior to application of aerial spraying.		
7.2.10	<b>(C)</b> Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.	The annual medical surveillance was conducted on annually basis as per CHRA recommendation. The surveillance involved all employee exposed with chemicals. ME i. Annual medical surveillance was conducted by OHD with reg. no. HQ/08/DOC/00/352 on 18/8/2020. The report has yet to be received by the estate. APE - Annual medical surveillance was conducted by OHD with reg. no. HQ/08/DOC/00/601 on 16/6/2020. 14 workers were sent for surveillance and found fit to work as chemical handlers.	Complied
7.2.11	<b>(C)</b> No work with pesticides is undertaken by persons under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions and they are offered alternative equivalent work.	The estates visited has issued Internal Memorandum on prohibition of pregnant or breastfeeding women or other people that have medical restrictions to work as pesticides operator. The memorandum has been displayed at several information board in the estate and communicated to the workers during training and morning briefing. Noted during interview with the female workers, the understanding on the prohibition pregnant or breastfeeding women to work as chemical handlers is acceptable.	Complied
Criteria 7.3: Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.			
7.3.1	A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.	Kemaman Mill and the 2 estates had identified all wastes and sources of pollution. The Waste Management Action Plan 2020 were established to mitigate and control the identified wastes and source of pollution. The most significant environmental receptors for the estates and mill operations were:	Non-compliance

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Receptor	Sources	
1 Air	Sources from boiler stack (smoke and particulate), vehicle & generator (smoke and gases), anaerobic processes (ETP, EFB dumping)-GHG	
2 Water	Cleaning water/run-off/process station waters (hydro-cyclone /sterilizer condensate/clarification waste) & boiler quenching water and blow down	
3 Land	Scheduled waste, clinical waste, Industrial waste, domestic waste and industrial/process waste.	

All waste and pollution are identified and documented in the Waste Management Plan and Pollution Prevention Plan Financial Year 2020. The waste generated from the mill/estates operations as shown below:

	Type of waste	Details
1	Scheduled waste	Spent IPA, hexane, filter, lubricants, hydraulic oil, grease, used batteries
2	Domestic waste	rubbish from the mill/estate complex and employees' quarters
3	Industrial waste	Fiber, palm kernel shell, boiler ash, scrap iron

The pollution identified from the mill/estates activities:

	Type of waste	Details
1	Black smoke	Emission from Boilers/vehicles/engines

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		<table border="1" style="width: 100%;"> <tr> <td style="width: 5%;">2</td> <td style="width: 30%;">Odor &amp; gases</td> <td style="width: 65%;">Activities from the effluent treatment</td> </tr> <tr> <td>3</td> <td>Leakage of lubricant</td> <td>Storage &amp; vehicle maintenance</td> </tr> </table> <p>The Waste Management Action Plan 2020 for the Mill and the Estates have not identified sewage as part of the waste produced hence minor nonconformance was raised.</p>	2	Odor & gases	Activities from the effluent treatment	3	Leakage of lubricant	Storage & vehicle maintenance											
2	Odor & gases	Activities from the effluent treatment																	
3	Leakage of lubricant	Storage & vehicle maintenance																	
7.3.2	Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.	<p>Kemaman POM and the estates in the SOU South Zone, procedure TDM Section B Ref no 89 – Scheduled Wastes (Hazardous Waste) Management has been established.</p> <p>a) Waste Management Plan 2020 has been established in Jan 2020.</p> <p>b) Based on Environmental Impact Evaluation and Environment Aspect and Impact Identification improper disposal of clinical items will be impact on community, depletion of natural resources and land contamination.</p> <p>c) Interview with staffs and workers i.e. storekeepers and chemical mixer were trained and they had understood the hazards involved and how the chemicals should be used and disposed in a safe manner.</p> <p>d) Among the identified wastes include empty chemical containers including pesticides containers. Empty pesticides containers were washed at washing station prior to disposal. Disposals were carried out in compliance with relevant regulation of scheduled waste. Inventory and consignment documents verified for confirmation of proper management and disposal. The Mill/Estates scheduled waste are disposed to licensed contractor M/s Pentas Flora (Kelantan) Sdn Bhd registration no 004878 valid effective 21/01/20. Dispatches details as shown below; prior delivery was in Mac and Feb 2020. Hence compliance to the 180 days max storage. Clinical waste SW 404 are despatched to Kualiti Alam Sdn Bhd.</p> <table border="1" style="width: 100%; margin-top: 10px;"> <thead> <tr> <th>Estate/ Mill</th> <th>Date</th> <th>SW 305</th> <th>SW 410</th> <th>SW 306</th> <th>SW 322</th> <th>SW 409</th> <th>SW 404</th> </tr> </thead> <tbody> <tr> <td>KPOM</td> <td>19/8/20</td> <td>0.200</td> <td>0.049</td> <td>-</td> <td>0.035</td> <td>0.051</td> <td>-</td> </tr> </tbody> </table>	Estate/ Mill	Date	SW 305	SW 410	SW 306	SW 322	SW 409	SW 404	KPOM	19/8/20	0.200	0.049	-	0.035	0.051	-	Complied
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7.3.3	The unit of certification does not use open fire for waste disposal.	<p>There was no land preparation in SOU South Zone Mill and Estates by burning ever since TDM practiced zero burning as per the Environmental policy in:</p> <p>a) Under felling/clearing &amp; land preparation  b) Carbon Policy</p> <p>TDM has a policy of no open burning. As advocated, the estates practiced zero burning. In the replants visited during the audit in the Estates, it was evident that all palms were felled, shredded, windrowed and left to decompose. There was no evidence that fire had been used to prepare land for replanting in the estate No fire was used for waste disposal.</p>	Complied																												
<p><b>Criteria 7.4:</b>  Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.</p>																															
7.4.1	Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts.	<p>Estates within KPOM Complex continued to use and implement SOP for each of the processes. Brief version of the SOP was displayed at the appropriate locations. Copies of the documented SOP were presented to the audit team. It was observed that activities being implemented which involved safety, health, environmental, quality, employees, etc. had followed the established SOP.</p> <p>a) Standard Operating Procedures (SOP) 2011</p>	Complied																												

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		<ul style="list-style-type: none"> <li>b) "Guidelines On River Management"</li> <li>c) Pictorial Safety Standards and Security Guidelines (PSS).</li> <li>d) Laboratory Process Control Manual</li> <li>e) Security Guidelines</li> <li>f) SOP - Manuring 14 pages Rev 2017</li> </ul> <p>All the estates and mill operations were guided through the manuals and SOP. The procedures as documented in the manual and SOP were disseminated to the staff/workers through morning briefings and training. The Manuals are kept in the main office for references of employees particularly for the supervisory personnel. The SOP included all operations in the estates from seedlings in nursery to planting of young palms and plantation upkeep to mill FFB receipt, grading, processing, quality analysis and security. Site inspection and interview with workers confirmed that the SOP had been implemented and they understood the requirements of the SOP, the bottom-line of which is Good Agricultural Practice and the care for their safety and health and the environment.</p>													
7.4.2	<p>Periodic tissue and soil sampling is carried out to monitor and manage changes in soil fertility and plant health.</p>	<p>Periodic tissue and soil sampling were carried out in the Estates to monitor changes in nutrient status and its results formed the basis for the fertilizers input recommendation. The 5-year period soil analysis provided the indication of soil health and monitors the changes in the organic carbon and total nitrogen. The annual foliar tissue agronomic assessment and fertilizer recommendation was conducted by AAD (Agronomy and Advisory Dept of Head Office to formulate the FY2020 manuring programme and to suggest relevant agronomic practices for oil palm yield and growth improvement. Annual foliar sampling for Ash, N, P, K, Mg, Ca &amp; B had been were carried out in all estates. The latest being :</p> <table border="1" data-bbox="1106 1246 1733 1374"> <thead> <tr> <th></th> <th><i>Estate</i></th> <th><i>Report Date</i></th> <th><i>Report No</i></th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Maidam</td> <td>16/8/2020</td> <td>Maidam 08/20</td> </tr> <tr> <td>2</td> <td>Air Putih</td> <td>28/5/2020</td> <td>LAP 05/20</td> </tr> </tbody> </table>		<i>Estate</i>	<i>Report Date</i>	<i>Report No</i>	1	Maidam	16/8/2020	Maidam 08/20	2	Air Putih	28/5/2020	LAP 05/20	Complied
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		<p>Soil analysis for PH, Org C, Total N, Total P, Avail P, Exch K, Exch Ca &amp; Exch Mg was carried out on a year cycle in batches basis with latest made on the following date:</p> <table border="1" data-bbox="1106 523 1733 655"> <thead> <tr> <th></th> <th><i>Estate</i></th> <th><i>Report Date</i></th> <th><i>Report No</i></th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Maidam</td> <td>25/10/18</td> <td>SE/1810/377-380</td> </tr> <tr> <td>2</td> <td>Air Putih</td> <td>30/9/2019</td> <td>LAP/SS/05/09-19</td> </tr> </tbody> </table> <p>All foliar and soil sampling &amp; analysis was conducted by UTCL of Mahamurni Plantations Sdn Bhd. Reports were sighted and verified.</p>		<i>Estate</i>	<i>Report Date</i>	<i>Report No</i>	1	Maidam	25/10/18	SE/1810/377-380	2	Air Putih	30/9/2019	LAP/SS/05/09-19														
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7.4.3	<p>A nutrient recycling strategy is in place, which includes the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers.</p>	<p>All the estates visited had a nutrient recycling strategy in place which included stacking pruned fronds in the respective fields to decompose, grass cutting harvesters paths and letting the cut mass to decompose in the field, EFB mulching and application of compost. In addition, during replanting, palms were felled, chipped, windowed and left to decompose. Records showed that the estates had applied records of compost (20kg/palm) application in mt in 2020 was as follows:</p> <table border="1" data-bbox="1099 999 1693 1246"> <thead> <tr> <th></th> <th><i>Estate</i></th> <th><i>Field no</i></th> <th><i>Ha</i></th> <th><i>Mt</i></th> </tr> </thead> <tbody> <tr> <td></td> <td><i>Compost</i></td> <td></td> <td></td> <td></td> </tr> <tr> <td>1</td> <td>Air Putih</td> <td>P15B1</td> <td>68.94</td> <td>197.2</td> </tr> <tr> <td>2</td> <td>Air Putih</td> <td>P16A1</td> <td>89.82</td> <td>255.1</td> </tr> <tr> <td>3</td> <td>Maidam</td> <td>PR18</td> <td>255.80</td> <td>665.10</td> </tr> </tbody> </table>		<i>Estate</i>	<i>Field no</i>	<i>Ha</i>	<i>Mt</i>		<i>Compost</i>				1	Air Putih	P15B1	68.94	197.2	2	Air Putih	P16A1	89.82	255.1	3	Maidam	PR18	255.80	665.10	Complied
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7.4.4	<p>Records of fertiliser inputs are maintained.</p>	<p>Fertilizer application program was monitored using records like program sheets, bin cards, field cost book, Fertilizer Application monitoring forms, etc. Records of programs and applications of fertilizers were reviewed by auditors. Review of the records revealed that the actual fertilizers applied in 2019/20 was in line with the</p>	Complied																									

		<p>program. The following fertilizers were applied in SOU estates subject to the recommendation by the Agronomist.</p> <table border="1"> <thead> <tr> <th></th> <th><i>Fertiizer</i></th> <th><i>Kg/palm</i></th> <th><i>application month</i></th> </tr> </thead> <tbody> <tr> <td>1</td> <td>AS-NK1</td> <td>2.50</td> <td>Feb</td> </tr> <tr> <td>2</td> <td>RRP</td> <td>2.00</td> <td>April</td> </tr> <tr> <td>3</td> <td>AS-NK2</td> <td>2.50</td> <td>June</td> </tr> <tr> <td>4</td> <td>AS-NK3</td> <td>2.50</td> <td>Sept</td> </tr> <tr> <td>5</td> <td>CPD25</td> <td>1.50</td> <td>Feb/May/July</td> </tr> <tr> <td>6</td> <td>CRF2</td> <td>1.50</td> <td>July / Sept</td> </tr> <tr> <td>7</td> <td>CPD50</td> <td>2.50</td> <td>Feb/July</td> </tr> <tr> <td>8</td> <td>AS</td> <td>2.50</td> <td>Feb/July</td> </tr> <tr> <td>9</td> <td>MOP</td> <td>2.00</td> <td>Mac / Aug</td> </tr> </tbody> </table>		<i>Fertiizer</i>	<i>Kg/palm</i>	<i>application month</i>	1	AS-NK1	2.50	Feb	2	RRP	2.00	April	3	AS-NK2	2.50	June	4	AS-NK3	2.50	Sept	5	CPD25	1.50	Feb/May/July	6	CRF2	1.50	July / Sept	7	CPD50	2.50	Feb/July	8	AS	2.50	Feb/July	9	MOP	2.00	Mac / Aug	
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**Criteria 7.5:**

Practices minimise and control erosion and degradation of soils.

7.5.1	<b>(C)</b> Maps identifying marginal and fragile soils, including steep terrain, are available.	<p>Description of the soil characteristics such as texture, depth, drainage, parent material and key aspect for management was also available. The soil series in the estates were classified as follows:</p> <table border="1"> <thead> <tr> <th>No</th> <th></th> <th>Air Putih</th> <th>Maidam</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Bkt Tuku</td> <td>-</td> <td>0.66</td> </tr> <tr> <td>2</td> <td>Chempaka</td> <td>0.44</td> <td>12.13</td> </tr> </tbody> </table>	No		Air Putih	Maidam	1	Bkt Tuku	-	0.66	2	Chempaka	0.44	12.13	Complied
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7.5.2	No replanting on steep slopes (above 25 degrees) unless approved by state governments. In case of replanting is permitted, no replanting in contiguous area of steep terrain (greater than 25 degrees) larger than 25 Ha within the Unit of Certification.	<p>Like all TDM Estates, the 2 estates visited continued to have a management strategy for planting on slopes in order to minimize and control erosion and degradation of soils. The plantings on slopes between 9 and 25 degrees was guided by:</p> <ul style="list-style-type: none"> <li>a) Slope &amp; River Protection Policy dated July 2020.</li> <li>b) Buffer Zone &amp; 25-degree slope SOP</li> <li>c) Land Preparation for Terracing in SOP Section A ref A4.</li> </ul>	Complied																																																



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		<p>It was observed that practices to minimize and control erosion and degradation of soils were in place through proper stacking of fronds, compost application, avoidance of blanket spraying, construction terraces, road maintenance and maintenance of soft vegetation in interlines. Cover crops were planted in the replants and in some mature areas. The cover crop mucuna bracteata had been planted along some slopes by management. Large areas with neprolepis biserrata in the inter rows were sighted during the visit. The slope maps were provided by the AAD Unit with details as follows:</p> <table border="1" data-bbox="1070 655 1574 890"> <thead> <tr> <th>No</th> <th>Topography</th> <th>Air Putih</th> <th>Maidam</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>0-13</td> <td>38</td> <td>55.82</td> </tr> <tr> <td>2</td> <td>14-20</td> <td>57.5</td> <td>27.76</td> </tr> <tr> <td>3</td> <td>21-25</td> <td>-</td> <td>9.61</td> </tr> <tr> <td>4</td> <td>&gt;25</td> <td>4.50</td> <td>6.81</td> </tr> <tr> <td></td> <td>Total</td> <td>100.00</td> <td>100.00</td> </tr> </tbody> </table>	No	Topography	Air Putih	Maidam	1	0-13	38	55.82	2	14-20	57.5	27.76	3	21-25	-	9.61	4	>25	4.50	6.81		Total	100.00	100.00	
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7.5.3	There is no new planting of oil palm on steep terrain.	<p>This compliance being addressed in the "<i>Slope and River Protection</i>" signed by the CEO dated July 2020 stating the following among others;          "Slope of &gt;25 degree to be excluded from any new plantation development and replanting program. For slope &lt;25 degree the existing crop all vegetative shall be maintained accordingly".</p>	Complied																								
<p><b>Criteria 7.6:</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.</p>																											
7.6.1	<b>(C)</b> To demonstrate the long-term suitability of land for palm oil cultivation, soil maps or soil surveys identifying marginal and fragile soils, including steep terrain, are taken into account in plans and operations.	Both soil and topography maps and information are available in the estates. Soil analysis is made on a 5 year cycle. However there is no peat soil or soil categorized as marginal or fragile soil at the estates visited.	Complied																								

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7.6.2	Extensive planting on marginal and fragile soils, is avoided, or, if necessary, done in accordance with the soil management plan for best practices.	There is no peat soil or soil categorized as marginal or fragile soil at all estates visited.	Complied
7.6.3	Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure.	Soil surveys are done and available in a soil map at all estates. Topographic contour map are also available which are both used to manage the drainage and road works in the estates.	Complied
<b>Criteria 7.7</b>			
No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.			
7.7.1	<b>(C)</b> There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas.	There is no new planting in both the estates visited. There is no peat soil or soil categorized as marginal or fragile soil all estates visited.	Complied
7.7.2	Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat.	There is no new planting in both the estates visited. There is no peat soil or soil categorized as marginal or fragile soil all estates visited.	Complied
<b>PROCEDURAL NOTE:</b> Maps and other documentation of peat soils are provided, prepared and shared in line with RSPO Peatland Working Group (PLWG) audit guidance.			
7.7.3	<b>(C)</b> Subsidence of peat is monitored, documented and minimised.	There is no peat soil or soil categorized as marginal or fragile soil at all estates visited.	Complied
7.7.4	<b>(C)</b> A documented water and ground cover management programme is in place.	The water and ground cover management programme is documented in the TDM Standard Operating Procedure Section A ref A22 Management in Coastal and Peat lands). Details are described in 7.8.1. individual estates and mill had their respective water management plan mainly to monitor among others the following; a) Monitor the quality of main water inlet/outlet for pollutants from estate's operations. b) Water management and drainage system in the fields. c) Contingency during water shortage. d) Monitor the usage of fresh water on monthly basis	Complied

		e) Reuse/recycle waste water.	
7.7.5	<p><b>(C)</b> For plantations planted on peat, drainability assessments are conducted following the RSPO Drainability Assessment Procedure, or other RSPO recognised methods, at least five years prior to replanting. The assessment result is used to set the timeframe for future replanting, as well as for phasing out of oil palm cultivation at least 40 years, or two cycles, whichever is greater, before reaching the natural gravity drainability limit for peat. When oil palm is phased out, it is replaced with crops suitable for a higher water table (paludiculture) or rehabilitated with natural vegetation.</p> <p>This is subject to transitional (5 years: 2019 to 2024) arrangement stated in the Drainability Assessment Procedure. Within 12 months initial implementation period, company could submit other alternate methodologies to be considered by RSPO for recognition.</p>	There is no peat soil or soil categorized as marginal or fragile soil at all estates visited.	Complied
7.7.6	<p><b>(C)</b> All existing plantings on peat are managed according to the RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat', version 2 (2018) and associated audit guidance.</p>	There is no peat soil or soil categorized as marginal or fragile soil at all estates visited.	Complied
7.7.7	<p><b>(C)</b> All areas of unplanted and set-aside peatlands in the managed area (regardless of depth) are protected as "peatland conservation areas"; new drainage, road building and power lines by the unit of certification on peat soils is prohibited; peatlands are managed in accordance with the 'RSPO BMPs for Management and</p>	There is no peat soil or soil categorized as marginal or fragile soil at all estates visited.	Complied

	Rehabilitation of Natural Vegetation Associated with Oil Palm Cultivation on Peat', version 2 (2018) and associated audit guidance.																
<b>Criteria 7.8</b>																	
Practices maintain the quality and availability of surface and groundwater.																	
7.8.1	<p>A water management plan is in place and implemented to promote more efficient use and continued availability of water sources and to avoid negative impacts on other users in the catchment. The plan addresses the following:</p> <p>a) The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities.</p> <p>b) Workers have adequate access to clean water.</p>	<p>The SOU Mill /estates had established its Water Management Plan for year 2020 which was developed to maintain the quality and availability of natural water resources. This is made by practicing efficient water consumption through various methods such as;</p> <p>a) Implementation of rain water harvest,  b) Construction of water gate and scheduled water pumping for effective management of field drains and field water level.  c) daily monitoring of bund / scheduled maintenance  d) Establishment of <i>mucuna bracteata</i> to prevent erosion,  e) Side drain at field road to control water, frond stacking,  f) Enhancement of ground vegetation at bare ground area.</p> <p>The water sources are as shown below:</p> <table border="1"> <thead> <tr> <th></th> <th>Water sources</th> <th>Usage</th> <th>Monitoring &amp; measurement</th> <th>Freq</th> <th>PIC</th> <th>Review status</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>SATU</td> <td>Purchased for domestic consumption</td> <td>Monitoring water supply</td> <td>Monthly</td> <td>AM Mgr</td> <td>Liaison with Authority</td> </tr> </tbody> </table>		Water sources	Usage	Monitoring & measurement	Freq	PIC	Review status	1	SATU	Purchased for domestic consumption	Monitoring water supply	Monthly	AM Mgr	Liaison with Authority	Complied
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		2	Rain water	Domestic use Workshop Chemical mixing	Rain fall data	On-going	AM Mgr	Water harvesting for general washing																	
		3	Water tank	Emergency water supply	-	-	AM Mgr	Request water supply from other estates																	
<p>The contingency plan during water shortage</p> <table border="1"> <thead> <tr> <th></th> <th>Area/ incident</th> <th>Action steps</th> <th>PIC</th> <th>Status</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Water shortage / prolonged dry season</td> <td>To obtain water from local authority /estate catchment To train/educate staff/workers to conserve water To seek assistance from local authority To obtain treated water supply from mill's WTP</td> <td>Manager AM/Mill Engineer</td> <td>As and when required</td> </tr> <tr> <td>2</td> <td>Severe water pollution / Contamination</td> <td>To obtain water from local authority To train/educate staff/workers to conserve water</td> <td>Manager AM//Mill Engineer</td> <td>As and when required</td> </tr> </tbody> </table>												Area/ incident	Action steps	PIC	Status	1	Water shortage / prolonged dry season	To obtain water from local authority /estate catchment To train/educate staff/workers to conserve water To seek assistance from local authority To obtain treated water supply from mill's WTP	Manager AM/Mill Engineer	As and when required	2	Severe water pollution / Contamination	To obtain water from local authority To train/educate staff/workers to conserve water	Manager AM//Mill Engineer	As and when required
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			<p>To seek assistance from local authority To obtain treated water supply from mill's WTP</p>																													
		<p>The Estates had implemented water managements plans which covered:</p> <ul style="list-style-type: none"> <li>a) Water shortage contingencies</li> <li>b) Water pollution prevention</li> <li>c) Reduce wastage</li> <li>d) Identification &amp; management of waste waters</li> <li>e) Monitoring rainfall</li> <li>f) Regular water quality analysis.</li> </ul> <p>Water management plan review date was sighted and verified with records as follows;.</p> <table border="1" data-bbox="1048 922 1700 1058"> <thead> <tr> <th></th> <th>Estate/Mill</th> <th>Review date</th> <th>Issues</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Air Putih</td> <td>01/2/2020</td> <td>Nil</td> </tr> <tr> <td>2</td> <td>Maidam Estate</td> <td>01/2/2020</td> <td>Nil</td> </tr> <tr> <td>3</td> <td>KPOM</td> <td>01/2/2020</td> <td>Nil</td> </tr> </tbody> </table> <p>The water reduction plan is shown below;</p> <table border="1" data-bbox="992 1155 1767 1351"> <thead> <tr> <th></th> <th>Issues/Areas</th> <th>Action Steps</th> <th>PIC</th> <th>Status</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Rain water collection</td> <td>Large containers are to be placed at strategic locations to collect rain water</td> <td>AM/Field staff</td> <td>On-going</td> </tr> </tbody> </table>						Estate/Mill	Review date	Issues	1	Air Putih	01/2/2020	Nil	2	Maidam Estate	01/2/2020	Nil	3	KPOM	01/2/2020	Nil		Issues/Areas	Action Steps	PIC	Status	1	Rain water collection	Large containers are to be placed at strategic locations to collect rain water	AM/Field staff	On-going
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			The rainwater shall be recycled for washing heavy machinery				
	2	Leakage on plumbing system	Frequent inspection to detect leakage Fix any leakage	AM/Field staff	On-going		
	3	Water compartmentalization	To conserve level of soil moisture To minimize water stress during dry season	AM/Field staff	On-going		
	4	Handling of chemicals	To recycle water spillage while mixing of chemical at mixing area	AM/Field staff	On-going		
	5	education	Avoid excessive usage during cleaning Close pipe to prevent water dripping	AM/Field staff	On-going		
	5	Re-streaming	Re stream from sterilizer condensate pit for dilution	Mill engineer	On-going		
The Mill Identification & Management of Waste Water							
		location	Waste produced water	Treatment/containment	Reuse/recycle/disposal method		
	1	Processing stations	Clarification condensate Sterilizer condensate	Oil recovery/ETP	Recover into system		

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			Hydro cyclone condensate Mill floor cleaning water				
	2	Boiler	Blow down, cleaning water	Sludge pit, ETP	Monsoon drain		
		Process ramp	Rainfall runoff	Sedimentation trap	Monsoon drain		
	3	Engine room	Steam condensate, turbine cooling water	Monsoon drain, recycled tank	Monsoon drain		
	4	Lab	Cleaning water	Process drain	Monsoon drain		
	5	Wash room	Toilet water, cleaning water	Septic tank	Collected by licensed contractor.		



<p>7.8.2</p>	<p><b>(C)</b> Water courses and wetlands are protected, including maintaining and restoring appropriate riparian and other buffer zones in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017).</p>	<p>The estates continued to protect the water courses, including maintaining and restoring appropriate riparian buffer zones along the natural waterways. The estates adopted the existing SDP policy to maintain the buffer by restricting agrochemical application and left undeveloped during replanting. Water courses and wetlands are protected including maintaining and restoring appropriate riparian buffer zones. The guidelines are detailed in the River Reserve Management (Management of River Reserve in TDM Plantation Sdn Bhd revised on 01/02/2020). The buffer zones established are as follows:</p> <table border="1" data-bbox="1048 678 1556 917"> <thead> <tr> <th>N</th> <th>River width</th> <th>Buffer zone</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>&gt; 40 meters</td> <td>50 meters</td> </tr> <tr> <td>2</td> <td>20 - 40 meters</td> <td>40 meters</td> </tr> <tr> <td>3</td> <td>10 - 20 meters</td> <td>20 meters</td> </tr> <tr> <td>4</td> <td>5 - 10 meters</td> <td>10 meters</td> </tr> <tr> <td>5</td> <td>&lt; 5 meters</td> <td>5 meters</td> </tr> </tbody> </table> <p>The signboards were displayed accordingly at the site where applicable. The guideline was issued by the SU. During the field visit there was no spraying activities or signs left in such an area. The buffer zones identified at the estates are as follows:</p> <table border="1" data-bbox="1037 1045 1556 1284"> <thead> <tr> <th></th> <th>Estate</th> <th>Area</th> <th>Area</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Maidam</td> <td>Sungai Angka</td> <td>PR18A</td> </tr> <tr> <td>2</td> <td>Maidam</td> <td>Sg Buloh Nipis</td> <td>PR18A</td> </tr> <tr> <td>3</td> <td>Air Putih</td> <td>Water catchment</td> <td>P96A</td> </tr> <tr> <td>4</td> <td>Air Putih</td> <td>Pond</td> <td>P96</td> </tr> </tbody> </table> <p>Samples are taken from the mill and estates for detection of any pollution arising from the mill and estates activities. Water samples from the intake point are taken for phosphate and nitrate</p>	N	River width	Buffer zone	1	> 40 meters	50 meters	2	20 - 40 meters	40 meters	3	10 - 20 meters	20 meters	4	5 - 10 meters	10 meters	5	< 5 meters	5 meters		Estate	Area	Area	1	Maidam	Sungai Angka	PR18A	2	Maidam	Sg Buloh Nipis	PR18A	3	Air Putih	Water catchment	P96A	4	Air Putih	Pond	P96	<p>Complied</p>
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		<p>analysis for detection of fertilizer application effect to the water courses. Extracted record of both the estates with details below; Among others management plan taken:</p> <ul style="list-style-type: none"> <li>a) Regular inspection at buffer/HCV areas</li> <li>b) Monitor water from surrounding areas</li> <li>c) Track, measure and report all activities around river</li> <li>d) Train and educate workers.</li> </ul> <table border="1" data-bbox="1043 627 1700 826"> <thead> <tr> <th>Estate</th> <th>Point A</th> <th>Point B</th> <th>Point C</th> <th>Point D</th> </tr> </thead> <tbody> <tr> <td>A Putih</td> <td colspan="4">Water and Pond</td> </tr> <tr> <td>Maidam</td> <td colspan="4">18/8/2020 - Sg Buloh Nipis / Sg Angka</td> </tr> <tr> <td>KPOM</td> <td>/</td> <td>/</td> <td>-</td> <td>-</td> </tr> </tbody> </table> <p>Water sampling was taken quarterly to test against the industrial effluent water analysis and pesticide analysis. Among others parameters as shown below: There were no issues on the water quality for the sampling points as per result as following:</p>	Estate	Point A	Point B	Point C	Point D	A Putih	Water and Pond				Maidam	18/8/2020 - Sg Buloh Nipis / Sg Angka				KPOM	/	/	-	-	
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7.8.3	Mill effluent is treated to be in compliance with national regulations. Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is regularly monitored.	The effluent treatment plant was made in accordance and interview with operator in charge revealed that the operation was in accordance with standard operation procedure and legal requirements. No over flow was observed, and flow meter reading was recorded daily. The mill monitoring the effluent and submits to DOE through 'Borang Penyata Suku Tahunan'. The Mill DOE license was for water discharge with the requirement of BOD less than 100 mg/l. The results from final discharge were compliance within parameter limit. <i>Jadual Pematuhan license no 004055</i> validity period of 01/7/20-30/6/21.	Complied																																																												

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7.8.4	Mill water use per tonne of FFB is monitored and recorded.	<p>The water usage for mill is monitored on monthly basis. The average water ratio to FFB from Jul 2019 till June 2020 is shown below. There is no issue encountered by the mill.</p> <table border="1"> <thead> <tr> <th>Month</th> <th>FFB processed</th> <th>Water/L</th> <th>Water/FF B</th> </tr> </thead> <tbody> <tr> <td>July 19</td> <td>18258</td> <td>38450</td> <td>2.11</td> </tr> <tr> <td>Aug 19</td> <td>18902</td> <td>39300</td> <td>2.08</td> </tr> <tr> <td>Sept 19</td> <td>19727</td> <td>41100</td> <td>2.08</td> </tr> <tr> <td>Oct 19</td> <td>19990</td> <td>42800</td> <td>2.14</td> </tr> <tr> <td>Nov 19</td> <td>19052</td> <td>40250</td> <td>2.11</td> </tr> <tr> <td>Dec 19</td> <td>18133</td> <td>40250</td> <td>2.16</td> </tr> <tr> <td>Jan 20</td> <td>10148</td> <td>21650</td> <td>2.13</td> </tr> <tr> <td>Feb 20</td> <td>14215</td> <td>30400</td> <td>2.14</td> </tr> <tr> <td>Mac 20</td> <td>19015</td> <td>41250</td> <td>2.17</td> </tr> <tr> <td>April 20</td> <td>20549</td> <td>44250</td> <td>2.15</td> </tr> <tr> <td>May 20</td> <td>15366</td> <td>33650</td> <td>2.19</td> </tr> </tbody> </table>	Month	FFB processed	Water/L	Water/FF B	July 19	18258	38450	2.11	Aug 19	18902	39300	2.08	Sept 19	19727	41100	2.08	Oct 19	19990	42800	2.14	Nov 19	19052	40250	2.11	Dec 19	18133	40250	2.16	Jan 20	10148	21650	2.13	Feb 20	14215	30400	2.14	Mac 20	19015	41250	2.17	April 20	20549	44250	2.15	May 20	15366	33650	2.19	Complied						
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<b>Criteria 7.9:</b> Efficiency of fossil fuel use and the use of renewable energy is optimised.																		
7.9.1	A plan for improving efficiency of the use of fossil fuels and to optimize renewable energy is implemented, monitored and documented.	<p>A plan for improving the efficiency of the use of fossil fuels is in place and has been incorporated into the Environmental Aspect and Impact activities report for 2020. The Environment Management Plan for efficiency of fossil fuel usage are detailed below:</p> <table border="1"> <thead> <tr> <th>No</th> <th>Target</th> <th>Objective</th> <th>Action plan</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Backhoe, tractor</td> <td>To reduce fossil fuel (diesel) consumption from company-owned vehicles and fuel using mobile equipment</td> <td>to ensure the vehicle engine is turn off during idle time  to record vehicle activity which consume fuel</td> </tr> <tr> <td>2</td> <td>Van / Supervisory vehicle</td> <td>To reduce fossil fuel (diesel) consumption from company-owned vehicles and fuel using mobile equipment</td> <td>to record vehicle activity in order to eliminate waste activity which consume fuel.  to turn off vehicle engine during idle time.</td> </tr> </tbody> </table> <p>The diesel utilization for the mill and estates is provided in the below table.</p>				No	Target	Objective	Action plan	1	Backhoe, tractor	To reduce fossil fuel (diesel) consumption from company-owned vehicles and fuel using mobile equipment	to ensure the vehicle engine is turn off during idle time  to record vehicle activity which consume fuel	2	Van / Supervisory vehicle	To reduce fossil fuel (diesel) consumption from company-owned vehicles and fuel using mobile equipment	to record vehicle activity in order to eliminate waste activity which consume fuel.  to turn off vehicle engine during idle time.	Complied
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No	Month	FFB processed	Diesel/ L	Diesel/FFB
1	July 19	18258	17164	0.94
2	Aug 19	18902	14530	0.77
3	Sept 19	19727	17042	0.86
4	Oct 19	19990	24601	1.23
5	Nov 19	19052	24922	1.31
6	Dec 19	18133	22260	1.23
7	Jan 20	10148	18111	1.78
8	Feb 20	14215	20059	1.41
9	Mac 20	19015	21250	1.06
10	April 20	20549	29920	1.03
11	May 20	15366	30180	1.95
12	Jun 20	21885	20600	1.38

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Site	<i>Maidam Estate 2019/20</i>			<i>Air Putih Estate 2019/20</i>		
	FFB mt	Diesel	Diesel/FFB	FFB mt	Diesel L	Diesel /FFB
July 19	237	3247	13.68	4731	18989	4.01
Aug 19	211	2640	12.51	4921	17554	3.57
Sept 19	238	2416	10.13	4931	15906	3.23
Oct 19	231	2845	12.30	4328	18740	4.33
Nov 19	207	2359	11.42	4062	16088	3.96
Dec 19	198	2776	13.95	3833	17687	4.61
Jan 20	177	2788	15.76	2703	14326	5.30
Feb 20	185	3092	16.72	3174	14800	4.66
Mac 20	256	3162	12.33	4693	18134	3.86

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		<table border="1" data-bbox="994 362 1774 528"> <tr> <td>April 20</td> <td>220</td> <td>2218</td> <td>10.07</td> <td>5038</td> <td>18289</td> <td>3.63</td> </tr> <tr> <td>May 20</td> <td>156</td> <td>2106</td> <td>13.54</td> <td>4607</td> <td>13767</td> <td>2.99</td> </tr> <tr> <td>Jun 20</td> <td>223</td> <td>2530</td> <td>11.36</td> <td>6544</td> <td>16194</td> <td>2.47</td> </tr> </table> <p>The estate and mill record and monitor the diesel utilization over the running hours of gen-set and other vehicles running.</p> <p>Performance variation in view of several factors i.e.</p> <ul style="list-style-type: none"> <li>e) Infrastructure of estates,</li> <li>f) Community size / no of gen-sets,</li> <li>g) No. of vehicles / age of machine.</li> <li>h) Weather interference / crop production volume</li> </ul> <p>There is no opportunity for the estates to capitalize the utilization of fibre/shell produced from the mill as part of their energy production in replacement of fossil fuel with the current technology limitation.</p>	April 20	220	2218	10.07	5038	18289	3.63	May 20	156	2106	13.54	4607	13767	2.99	Jun 20	223	2530	11.36	6544	16194	2.47	
April 20	220	2218	10.07	5038	18289	3.63																		
May 20	156	2106	13.54	4607	13767	2.99																		
Jun 20	223	2530	11.36	6544	16194	2.47																		
<p><b>Criteria 7.10:</b>  Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.</p>																								
7.10.1	<p><b>(C)</b> GHG emissions are identified and assessed for the unit of certification. Plans to reduce or minimize them are implemented, monitored through the Palm GHG calculator and publicly reported.</p>	<p>The Mill and Estates had identified emission of greenhouse gas (GHG) from their operations such as emission from their farm tractor and gen set operation.</p> <ul style="list-style-type: none"> <li>- The management from both estates and mill had planned to reduce emission by daily inspection and monitoring for their farm tractor and gen set to prevent any leakage and problem that could adverse impact the environment.</li> </ul>	Complied																					



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		- Fuel Consumption, Peat Oxidation, POME and reported in the Palm GHG Summary Report.										
7.10.2	<b>(C)</b> Starting 2014, the carbon stock of the proposed development area and major potential sources of emissions that may result directly from the development are estimated and a plan to minimize them prepared and implemented (following the RSPO GHG Assessment Procedure for New Development).	KPOM Complex have calculated the GHG using RSPO Palm GHG calculator and the calculation option used is Option 1.	N/A									
7.10.3	<b>(C)</b> Other significant pollutants are identified and plans to reduce or minimize them implemented and monitored.	<p>An assessment of all polluting activities has been conducted and monitored. This included the gaseous emissions, particulate / soot emissions and effluent. The CU has continued to maintain its environmental aspects/impacts register associated with their activities. Environmental aspect and impact (EAI) records i.e. (TDMP/5.2/EAI) and (SM/5.2/EIE) dated 01/1/2018 which covers estates and mill activities / operation. 'Pollution Identification Environmental Improvement Action Plan' is used to identify the waste products and sources of pollution, was in place and is reviewed accordingly. Among others the significant environmental receptors for the estates and mill operations were:</p> <table border="1"> <thead> <tr> <th>No</th> <th>Environmental Receptors</th> <th>Source</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Air</td> <td>Air emissions –from boiler stack (smoke &amp; particulate), vehicle &amp; generator (smoke and gases). GHG emission from anaerobic processes (ETP, EFB dumping).</td> </tr> <tr> <td>2</td> <td>Water</td> <td>Water discharges – Cleaning water/run-off/process station waters (hydro cyclone/sterilizer condensate/clarification waste) &amp; boiler quenching water and blow down</td> </tr> </tbody> </table>	No	Environmental Receptors	Source	1	Air	Air emissions –from boiler stack (smoke & particulate), vehicle & generator (smoke and gases). GHG emission from anaerobic processes (ETP, EFB dumping).	2	Water	Water discharges – Cleaning water/run-off/process station waters (hydro cyclone/sterilizer condensate/clarification waste) & boiler quenching water and blow down	Complied
No	Environmental Receptors	Source										
1	Air	Air emissions –from boiler stack (smoke & particulate), vehicle & generator (smoke and gases). GHG emission from anaerobic processes (ETP, EFB dumping).										
2	Water	Water discharges – Cleaning water/run-off/process station waters (hydro cyclone/sterilizer condensate/clarification waste) & boiler quenching water and blow down										

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		<table border="1" data-bbox="994 363 1756 475"> <tr> <td data-bbox="994 363 1057 475">3</td> <td data-bbox="1057 363 1263 475">land</td> <td data-bbox="1263 363 1756 475">Land – Scheduled waste, domestic waste and industrial / process waste. Clinical wastes – generated from clinics.</td> </tr> </table> <p data-bbox="994 529 1944 718">Kemaman Mill has conducted boiler stack sampling for each of the boiler stack. Results were within the acceptable limit. The mill was also equipped with a Continuous Emission Monitoring System (CEMS). The audit team has verified the condition of the CEMS during the audit. The system was found to be in functional condition. Data from the stack is connected online to DOE’s office. Boiler smoke emission data are within the DOE limit.</p> <p data-bbox="994 740 1944 801">An assessment of identified polluting activities is being conducted and monitored, inclusive of gaseous emissions, particulate / soot emissions and effluent.</p> <p data-bbox="994 823 1944 916">‘Pollution prevention plan and waste management action plan’ – is used to identify the waste products and sources of pollution – is in place and is being reviewed and implemented accordingly. Among of action has been taken by CU were:</p> <ul data-bbox="994 938 1944 1091" style="list-style-type: none"> <li>a) Scheduled wastes – were disposed through Pentas Flora (Kelantan) Sdn Bhd and Kualiti Alam Sdn Bhd (clinical waste).</li> <li>b) Domestic wastes are disposed to estates own disposal landfill area 2x/3x weekly located far from housing complexes and waterways.</li> <li>c) Full compliance to zero burning practices.</li> </ul>	3	land	Land – Scheduled waste, domestic waste and industrial / process waste. Clinical wastes – generated from clinics.	
3	land	Land – Scheduled waste, domestic waste and industrial / process waste. Clinical wastes – generated from clinics.				
<p><b>Criteria 7.11:</b>          Fire is not used for preparing land and is prevented in the managed area.</p>						
7.11.1	<b>(C)</b> Land for new planting or replanting is not prepared by burning.	<p data-bbox="994 1228 1944 1289">There was no land preparation of existence or new planting in SOU Estates by burning ever since TDM Plantation practiced zero burning as per the policy in:</p> <ul data-bbox="994 1311 1944 1364" style="list-style-type: none"> <li>a) Under felling/clearing &amp; land preparation</li> <li>b) Carbon Policy</li> </ul>	Complied			

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		TDM has a policy of no open burning. As advocated, the estates practiced zero burning. In the replants visited during the audit in the Estates, it was evident that all palms were felled, shredded, windrow-ed and left to decompose. There was no evidence that fire had been used to prepare land for replanting in the estate. No fire was used for waste disposal.	
7.11.2	The unit of certification establishes fire prevention and control measures for the areas under its direct management.	There was no land prepared through burning by estates within KPOM Complex. All estates had continued to adhere to the policy as per the Agricultural Manual and SOP on (Zero Burning) which advocates zero burning for land preparation and as per their Environmental Policy.	Complied
7.11.3	The unit of certification engages with adjacent stakeholders on fire prevention and control measures.	The management already approach the stakeholder during stakeholder consultation meeting regarding to fire prevention and control measure.	Complied
<p><b>Criteria 7.12:</b>  Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced.</p>			
7.12.1	<p><b>(C)</b> Land clearing since November 2005 has not damaged primary forest or any area required to protector enhance HCVs. Land clearing since 15 November 2018 has not damaged HCVs or HCS forests</p> <p>A historic Land Use Change Analysis (LUCA) is conducted prior to any new land clearing, in accordance with the RSPO LUCA guidance document.</p>	The audit findings have confirmed that there is no new planting (refer 7.3.1 to 7.4.2) affecting present HCV and primary forest.	Complied

7.12.2	<p><b>(C)</b> HCVs, HCS forests and other conservation areas are identified as follows:</p> <p>a) For existing plantations with an HCV assessment conducted by an RSPO-approved assessor and no new land clearing after 15 November 2018, the current HCV assessment of those plantations remains valid.</p> <p>b) Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the HCSA Toolkit and the HCV-HCSA Assessment Manual. This will include stakeholder consultation and take into account wider landscape-level considerations.</p>	<p>The audit findings have confirmed that there is no new planting (refer 7.3.1 to 7.4.2) affecting present HCV and primary forest</p> <p>Hence the current HCV assessment of the estates remains valid. The recent HCV assessment for the entire SOU Kemaman covering all the 6 estates and the mill was performed in Nov 2011 by SRA Consultancy. Methodology is through site observation, interviews, stakeholders consultation and desktop review on available secondary data. The assessment among others covers the following areas;</p> <p>a) Overview of HCV assessment.  b) Description of assessment areas.  c) Finding and discussion  d) - landscape context  e) - HCV criteria and application to agriculture  f)HCV monitoring and management</p> <p>The HCV areas presence as summarized in 7.12.2</p> <table border="1" data-bbox="1032 930 1639 1031"> <thead> <tr> <th></th> <th>Estate</th> <th>HCV area</th> <th>Area</th> <th>HCV</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Air Putih</td> <td>Hutan Tabung F</td> <td>10</td> <td>3</td> </tr> </tbody> </table>		Estate	HCV area	Area	HCV	1	Air Putih	Hutan Tabung F	10	3	Complied
	Estate	HCV area	Area	HCV									
1	Air Putih	Hutan Tabung F	10	3									
<p><b>PROCEDURAL NOTE</b> for 7.12.2:  Requirement is further clarified under the Interpretation of Indicator 7.12.2 and Annex 5 (approved by BOG on 12 June 2019).</p>													
7.12.3	<i>Indicator is not applicable in Malaysia context.</i>	Not applicable	N/A										
7.12.4	<p><b>(C)</b> Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An integrated management plan to protect and/or enhance HCVs, HCS forests, peatland and other conservation areas is developed, implemented and</p>	<p>The audit findings have confirmed that there is no new HCVs, HCS forests peatland and other conservation areas been identified after 15 Nov 2018 in KPOM Complex estates (refer 7.3.1 to 7.4.2).</p>	Complied										

	<p>adapted where necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan is developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified).</p>	<p>The last HCV Assessment made by SRA Consultancy in Nov 2011 identified Ladang Air Putih having HCV 3 of 10 ha.          The estates declared the following HCV in addition to the report.</p> <table border="1" data-bbox="994 475 1789 839"> <thead> <tr> <th>#</th> <th>HCV/Estate</th> <th>Air Putih</th> <th>Maidam</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>HCV 4 Water catchment P96B</td> <td>✓</td> <td></td> </tr> <tr> <td>2</td> <td>HCV 4 Pond P96B</td> <td>✓</td> <td></td> </tr> <tr> <td>3</td> <td>HCV 3 Hutan Tabung F</td> <td>✓</td> <td></td> </tr> <tr> <td>4</td> <td>HCV 6 Mosque</td> <td>✓</td> <td></td> </tr> <tr> <td>5</td> <td>HCV 1 Sg Angka P18</td> <td></td> <td>✓</td> </tr> <tr> <td>6</td> <td>HCV 2 Sg Buluh Nipis</td> <td></td> <td>✓</td> </tr> </tbody> </table> <p>As part of monitoring and continuous improvement programs for the enhancement of HCV /biodiversity management, action plan has been established through education and awareness programme to train the workers on biodiversity, flora/fauna and about biodiversity management. Among others actions included in the updated HCV 2020 management plan are as following:</p> <ul style="list-style-type: none"> <li>a) Regular inspection at buffer/HCV areas</li> <li>b) Monitor water from surrounding areas</li> <li>c) Track, measure and report all activities around river</li> </ul>	#	HCV/Estate	Air Putih	Maidam	1	HCV 4 Water catchment P96B	✓		2	HCV 4 Pond P96B	✓		3	HCV 3 Hutan Tabung F	✓		4	HCV 6 Mosque	✓		5	HCV 1 Sg Angka P18		✓	6	HCV 2 Sg Buluh Nipis		✓	
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5	HCV 1 Sg Angka P18		✓																												
6	HCV 2 Sg Buluh Nipis		✓																												
7.12.5	<p>Where rights of local communities have been identified in HCV areas, HCS forest after 15 November 2018, peatland and other conservation areas, there is no reduction of these rights without evidence of a negotiated agreement, obtained through FPIC,</p>	<p>There was no rights of local communities been identified in HCV areas, HCS forest after 15 November 2018, peat land and other conservation areas. The HCV Assessment report indicated that there is no threatened or endangered (RTE) species, or HCVs, are present or are affected by plantation or mill operations. There is only common bird, presence of wild boar, elephants and monkeys occasionally sighted. The appropriate measures that are expected to maintain</p>	N/A																												

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	encouraging their involvement in the maintenance and management of these conservation areas.	and/or enhance them were implemented through an action plan reviewed in Jan 2020.	
7.12.6	All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species.	The audit findings have confirmed that there is no new HCVs, HCS forests peatland and other conservation areas been identified after 15 Nov 2018 in KPOM Complex estates (refer 7.3.1 to 7.4.2).	Complied
7.12.7	The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan.	The audit findings have confirmed that there is no new HCVs, HCS forests peatland and other conservation areas been identified after 15 Nov 2018 in KPOM Complex estates (refer 7.3.1 to 7.4.2). Monitoring of these areas are made through the daily field supervision by the field staff and executives. There were also visits by the PA/GM and also personnel from the Sustainability unit. Sighting of RTE are made and recorded during the AP rounds in the estates if any.	Complied
7.12.8	<b>(C)</b> Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018, the Remediation and Compensation Procedure (RaCP) applies.	The audit findings have confirmed that there is no new HCVs, HCS forests peatland and other conservation areas been identified after 15 Nov 2018 in KPOM Complex estates (refer 7.3.1 to 7.4.2).	Complied

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**Appendix B: Approved Time Bound Plan**

 Details of Time Bound Plan as submitted by TDM Plantation Sdn. Bhd. (30<sup>th</sup> June 2020)

No.	Name of the Estate and Mills	TBP for certification	Status as at 30/6/2020	Any unresolved (Labour Disputes/Land conflicts / Legal Non-Compliance etc.)	
1	TDM Plantation Sdn. Bhd. Tebak Estate, Kemaman, Terengganu, Malaysia	Supply base for TDM Plantation Sdn. Bhd. Kemaman Palm Oil Mill, Kemaman, Terengganu, Malaysia.	November 2013	Certified	None
2	TDM Plantation Sdn. Bhd. Pelantoh Estate, Kemaman, Terengganu, Malaysia		November 2013	Certified	None
3	TDM Plantation Sdn. Bhd. Jernih Estate, Kemaman, Terengganu, Malaysia		November 2013	Certified	None
4	TDM Plantation Sdn. Bhd. Air Putih Estate, Kemaman, Terengganu, Malaysia		November 2013	Certified	None
5	TDM Plantation Sdn. Bhd. Gajah Mati Estate, Dungun, Terengganu, Malaysia		November 2013	Certified	None
6	TDM Plantation Sdn. Bhd. MAIDAM Estate, Dungun, Terengganu, Malaysia		November 2013	Certified	None
1	TDM Plantation Sdn. Bhd. Tayor Estate, Setiu,	Supply base for TDM Plantation Sdn. Bhd. Sungai	December 2013	Certified	None

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	Terengganu, Malaysia	Tong Palm Oil Mill, Setiu, Terengganu, Malaysia.			
2	TDM Plantation Sdn. Bhd. Pelong Estate, Setiu, Terengganu, Malaysia		December 2013	Certified	None
3	TDM Plantation Sdn. Bhd. Jaya Estate, Setiu, Terengganu, Malaysia		December 2013	Certified	None
4	TDM Plantation Sdn. Bhd. Fikri Estate, Setiu, Terengganu, Malaysia		December 2013	Certified	None
5	TDM Plantation Sdn. Bhd. Pinang Emas Estate, Dungun, Terengganu, Malaysia		December 2013	Certified	None
6	TDM Plantation Sdn. Bhd. Jerangau Estate, Ajil, Terengganu, Malaysia		December 2013	Certified	None
7	TDM Plantation Sdn. Bhd. Bukit Bidong Estate, Permaisuri, Terengganu, Malaysia		To be determined	Latest by December 2023	In progress



**Appendix C: GHG Reporting Executive Summary**

The GHG emissions that were produced in 2019 for Kemaman Palm Oil Mill and supply base was calculated using the PalmGHG Calculator version 4.0. 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:

- v. Estates area planted data
- vi. Fuel consumed
- vii. Mill datas include CPO produced, PKO Produced and FFB Processed
- viii. Fertilizer consumed data for both estates and smallholders.

The summary of the Net GHG emitted in 2019 for Kemaman Palm Oil Mill and supply base are as following:

Emission per product	tCO <sub>2</sub> e/tProduct	Extraction	%
CPO	1.25	OER	21.09
PKO	1.25	KER	5.12

Production	t/yr	Land Use	Ha
FFB Process	134,749.016	OP Planted Area	6,048.70
CPO Produced	28,418.57	OP Planted on peat	-
PKO Produced	6,899.15	Conservation (forested)	-
		Conservation (non-forested)	23.79
		<b>Total</b>	<b>6,072.49</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	61,233.22	0.52	-	-	-	-	61,233.22	0.52
CO <sub>2</sub> Emission from fertilizer	6,015.64	0.05	-	-	-	-	6,015.64	0.05
NO <sub>2</sub> Emission	4,934.16	0.04	-	-	-	-	4,934.16	0.04
Fuel Consumption	417.42	0.00	-	-	-	-	417.42	0.00
Peat Oxidation	-	-	-	-	-	-	-	-
<b>Sink</b>								
Crop Sequestration	- 58,040.96	- 0.49	-	-	-	-	58,040.96	- 0.49
Conservation Sequestration	-	-	-	-	-	-	-	-

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<b>Total</b>	14,559.49	0.12	-	-	-	-	14,559.49	0.12
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\*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	23,074.12	0.20
Fuel Consumption	109.13	0.00
Grid Electricity Utilization	757.32	0.01
<b>Credit</b>		
Export of Grid Electricity	-	-
Sales of PKS	-	-
Sales of EFB	-	-
<b>Total</b>	23,940.56	0.20

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

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

\*This mill has no kernel crusher operation.

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

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

**Appendix D: Supply Chain Declaration**

<b>A. Monthly Records of Certified and Uncertified FFB Received since the last audit</b>				
No.	Month - Year	Volume of FFB from certified supply bases (mt)	Volume of FFB from uncertified supply bases (mt)	Total FFB/Month (mt)
1	Sept 2019	23,881.10	-	23,881.10
2	Oct 2019	23,728.38	-	23,728.38
3	Nov 2019	23,028.69	-	23,028.69
4	Dec 2019	22,110.59	-	22,110.59
5	Jan 2020	16,126.88	-	16,126.88
6	Feb 2020	19,189.50	-	19,189.50
7	March 2020	23,601.23	-	23,601.23
8	April 2020	25,056.89	-	25,056.89
9	May 2020	21,348.68	-	21,348.68
10	June 2020	26,154.06	-	26,154.06
11	July 2020	24,337.18	-	24,337.18
12	August 2020	25,126.12	-	25,126.12
Total		273,689.30	-	273,689.30

<b>B. Monthly Records of Certified CPO &amp; PK since the last audit</b>			
No.	Month - Year	Certified CPO (mt)	Certified PK (mt)
1	Sept 2019	4,778.61	1,163.01
2	Oct 2019	4,748.05	1,155.57
3	Nov 2019	4,608.04	1,121.50
4	Dec 2019	4,424.33	1,076.79
5	Jan 2020	3,226.99	785.38
6	Feb 2020	3,839.82	934.53
7	March 2020	4,722.61	1,149.38
8	April 2020	5,013.88	1,220.27
9	May 2020	4,271.87	1,039.68
10	June 2020	5,233.43	1,273.70
11	July 2020	4,869.87	1,185.22
12	August 2020	5,027.74	1,223.64
Total		54,765.23	13,328.67

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<b>C. Records of Certified CPO &amp; PK Sold under PalmTrace 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>
1	A; B; C; D; E	TR-0846f31d-8810; TR-65a70bc1-8922	2,790.55	902.73
2	A; C; D; E	TR-f82e631f-db0a; TR-f60fee06-8f70	2,720.45	744.88
3	A; C; D; E	TR-856442b6-255b; TR-2a560cf8-9b17	2,277.43	651.98
4	A; C; D; E	TR-acdde171-fbb9; TR-91d7e02f-32f2	1,943.46	772.08
5	A; C; D; E	TR-b542aca2-cb9d; TR-39e5c930-8b2f	2,431.84	541.81
6	A; C; D; E	TR-d6f4432e-065e; TR-3b52ffef-7cb6	1,613.94	805.50
7	A; C; D; E	TR-00272de7-d56a; TR-59d45379-124e	2,189.54	802.50
8	A; C; D; E	TR-42de47ce-daa0; TR-b56be065-2134	1,906.26	421.25
9	A; C; D; E	TR-7bf732e1-143b; TR-8a1a3fdb-b703	2,085.33	448.46
10	A; C; D; E; F	TR-a01a0fdc-3cde; TR-7d97f4df-1463	2,508.96	718.56
11	A; C; D; E	TR-cb060e1c-573d; TR-8d8e5ba3-5bd2	2,169.42	822.53
12	A; C; D; E	TR-907ecac0-82f2; TR-70f5ad5e-0a10	1,868.53	999.66
			26,505.71	8,631.94

<b>D. Records of CPO &amp; PK Sold under other schemes 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>
	Nil			

<b>E. Records of CPO &amp; PK Sold as conventional since the last audit (if any)</b>				
<b>No.</b>	<b>Buyers Name</b>	<b>CPO Sold (mt)</b>	<b>PK Sold (mt)</b>	

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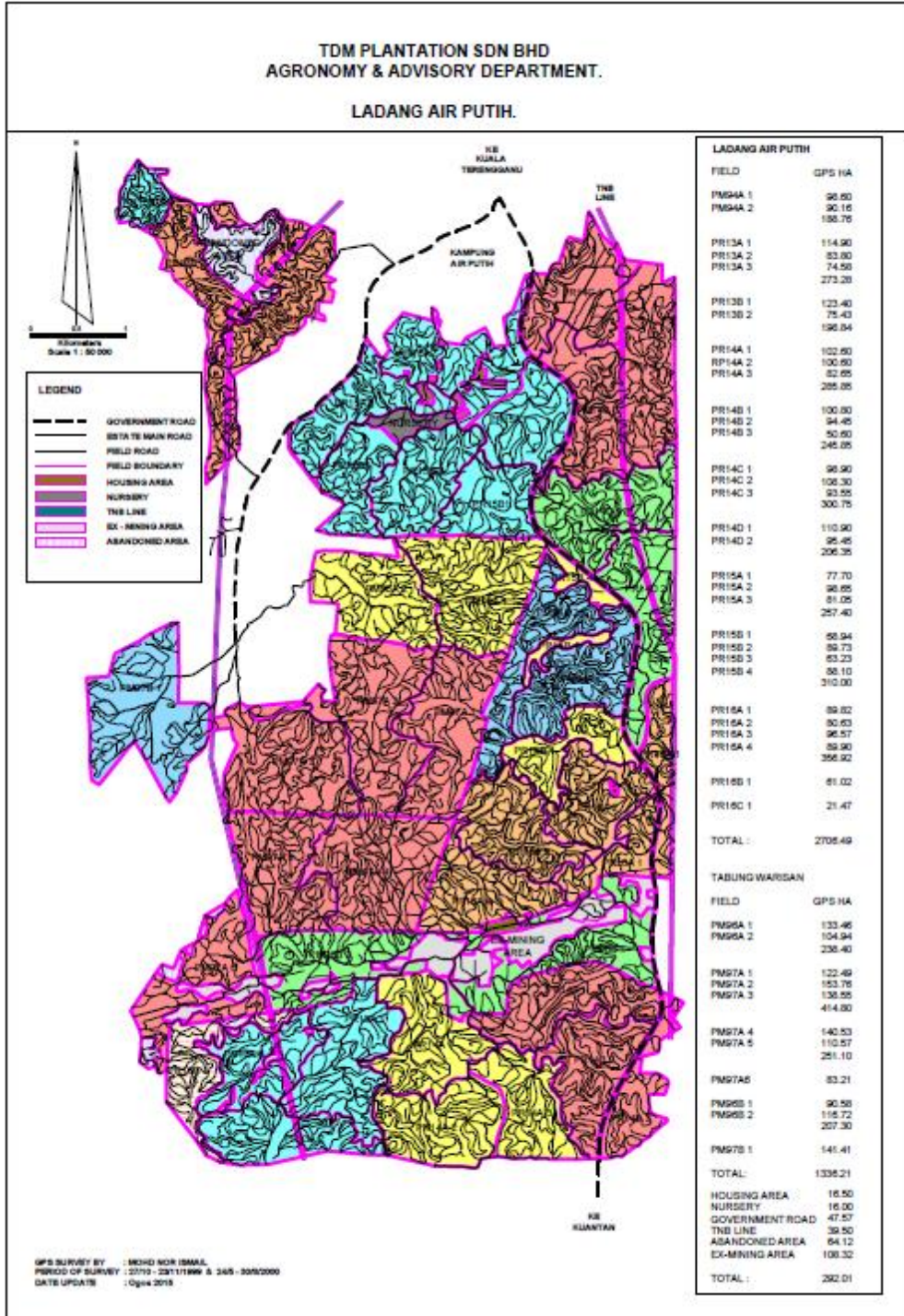
1	B; E	15,880.56	-
2	C; D	-	2,056.05
	Total	15,880.56	2,056.05

<b>F. Records of Certified CPO Sold under RSPO Credits 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		

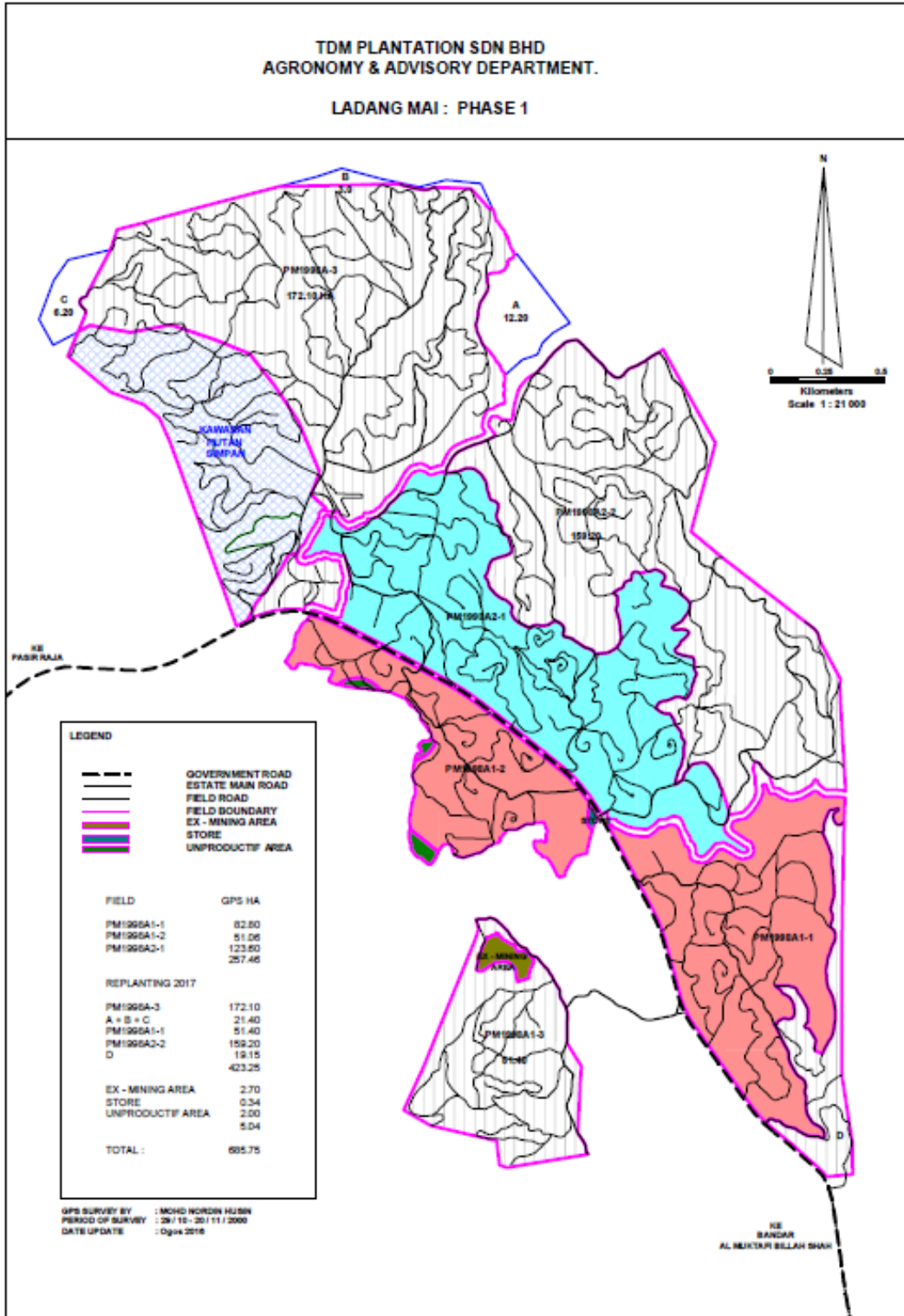




**Appendix F: Air Putih Estate Field Map**

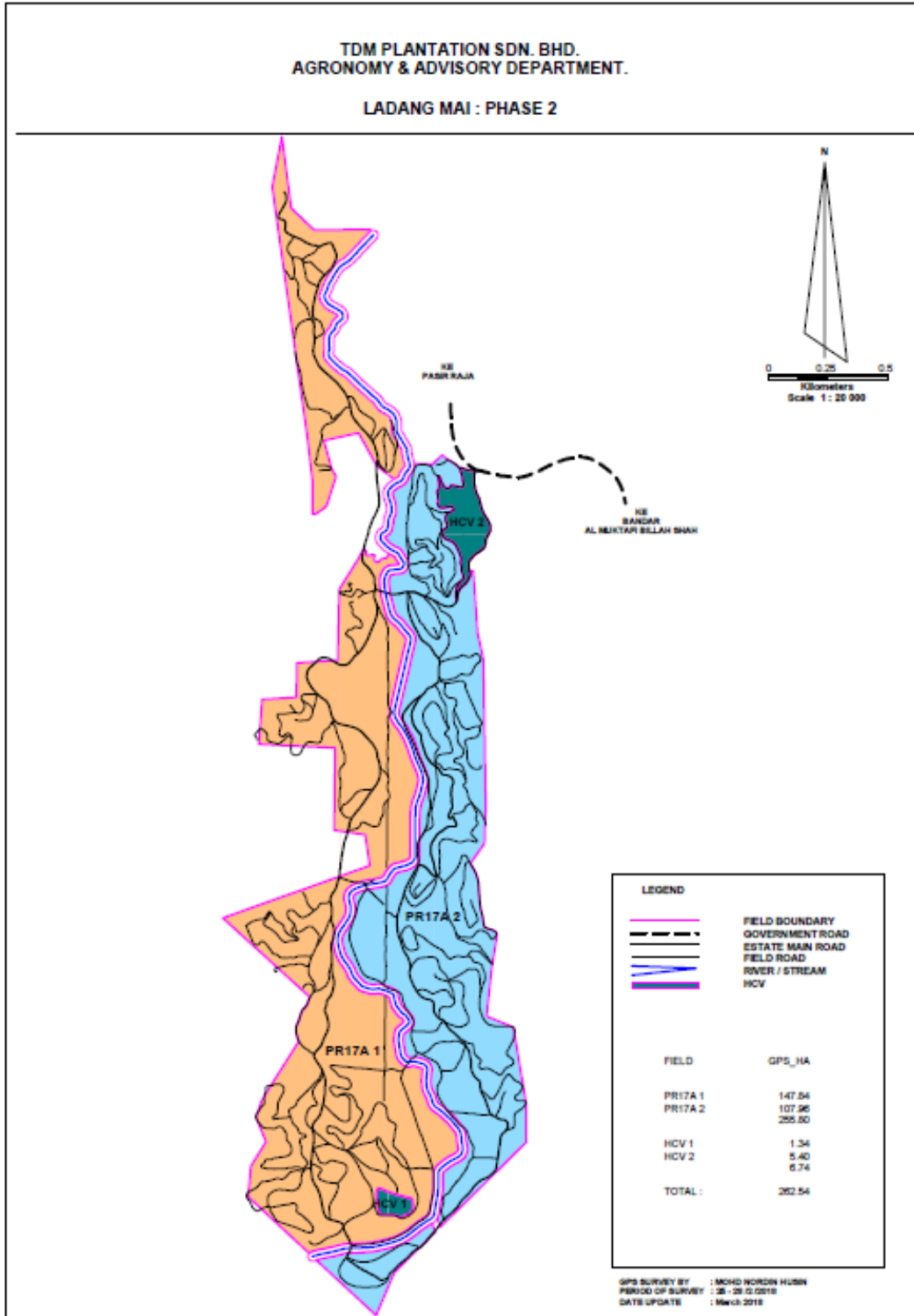


**Appendix G: MAIDAM Estate Field Map (Phase 1)**





**Appendix H: MAIDAM Estate Field Map (Phase 2)**



**Appendix I: List of Smallholder Sampled**

*Not Applicable*

## Appendix H: List of Abbreviations

a.i	Active Ingredient
APE	Air Putih Estate
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
CU	Certification Unit
DJPOM	Diamond Jubilee Palm Oil Mill
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
KPOM	Kemaman Palm Oil Mill
LD50	Lethal Dose for 50 sample
MB	Mass Balance
ME	MAIDAM Estate
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
SEJIA	Social & Environmental Jurisdiction Impact Assessment
SIA	Social Impact Assessment