

**RSPO PRINCIPLE AND CRITERIA
PUBLIC SUMMARY REPORT**

- Initial Assessment**
- Annual Surveillance Assessment (2_2)**
- Recertification Assessment** (Choose an item.)
- Extension of Scope**

<p>Client Company name (Parent Company): SIPEF Group</p>
<p>Client company Address: Kasteel Calesberg – Calesbergdreef 5 B-2900 SChoten – Belgium</p>
<p>Certification Unit: Hargy Oil Palms Limited Including Hargy Palm Oil Mill Barema Palm Oil Mill and Navo Palm Oil Mill (multi-mill certification)</p> <p>Location of Certification Unit: Portion 15 & 633, Milinch of Ulawun, Fourmil of Talasea West New Britain Province Papua New Guinea</p>
<p>Date of Final Report: 13/03/2021</p>

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Section 1: Scope of the Certification Assessment

1. Company Details			
Parent Company	SIPEF Group		
RSPO Membership Number	1-0021-05-000-00	Membership Approval Date	07/12/2005
Address	Kasteel Calesber – Calesbergdreef 5 B-2900 Schoten – Belgium		
Palm Oil Mill / Group Manager / Estate (Certification Unit)	Hargy Oil Palms Limited including Hargy Palm Oil Mill; Barema Palm Oil Mill and Navo Palm Oil Mill		
Location / Address	Portion 15 & 633, Milinch of Ulawun, Fourmil of Talasea West New Britain Province Papua New Guinea		
Website	http://www.sipef.com		
Management Representative	Mrs. Sophie Gett	E-mail	sgett@hargy.com.pg
Telephone	+675 9831005/71001604 Ext: 231	Facsimile	+675 983 1191

2. Certification Information			
Certificate Number	RSPO 535739	Date of First Certification	09/04/2009
		Certificate Start Date	08/10/2019
		Certificate Expiry Date	07/10/2023
Scope of Certification	Production of CPO and PK at Hargy Palm Oil Mill, Barema Palm Oil Mill and Navo palm Oil Mill and 3 Supply Estates, namely Hargy Estate, Navo Estate and Pandi Estate including smallholder growers and marketing activities through SIPEF N.V.		
Visit Objectives	<p>The objective of the assessment is to conduct Annual surveillance Audit (ASA 2_2):</p> <ul style="list-style-type: none"> To confirm that the elements of the proposed scope of registration and the management system are conforming the requirements of the assessment standard. To confirm that the organization has effectively implemented and addressed the management system. To confirm the ability of the management system is able to meet applicable statutory and regulatory, contractual requirements, organization policies and wherever are applicable. 		
Assessment Cycle	<input type="checkbox"/> Initial Assessment <input type="checkbox"/> Recertification Assessment (Choose an item.) <input checked="" type="checkbox"/> Annual Surveillance Assessment (RA 2 ; ASA 2) <input type="checkbox"/> Scope Extension		
Applicable Standards	<input type="checkbox"/> RSPO P&C 2018 for the Production of Sustainable Palm Oil		

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	<input checked="" type="checkbox"/> Papua New Guinea & Solomon Island 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
Supply Chain Module	<input checked="" type="checkbox"/> Identity Preserved <input type="checkbox"/> Mass Balance

3. Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
Nil			

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base)	Location	GPS Coordinates	
		Latitude	Longitude
Hargy Palm Oil Mill	Bialla, West New Britain Province, PNG	05° 18' 40.05" S	151° 00' 39.46" E
Barema Palm Oil Mill	30 km of Bialla, West New Britain Province, PNG	05° 12' 40.25" S	151° 07' 51.10" E
Navo Palm Oil Mill	60 km of Bialla, West New Britain Province, PNG	05° 05' 38.86" S	151° 13' 28.03" E
Hargy Estate	Bialla, West New Britain Province, PNG	05° 17' 47.77" S	151° 03' 28.03" E
Navo Estate	60 km of Bialla, West New Britain Province, PNG	05° 05' 38.41" S	151° 13' 30.01" E
Pandi Estate	80 km of Bialla, West New Britain Province, PNG	05° 00' 44.29" S	151° 25' 27.12" E
Smallholders*	Bialla, West New Britain Province, PNG	05° 18' 40.05" S	151° 00' 39.46" E

Note: *Smallholder office is located at Hargy Palm Oil Mill

5. Description of Supply Base					
Estate	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Hargy Estate	4,429.62	0	2,330.35	6,759.97	65.53
Navo Estate	6,593.88	0	1,252.23	7,846.11	84.04
Pandi Estate	2,584.13	0	3,264.57	5,848.70	44.18
Subtotal	13,607.63	0	6,847.15	20,454.78	66.53
Smallholders	13,874.73	0	18.00	13,892.73	99.87
Total	27,482.36	0	6,865.15	34,347.51	80.01

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Note: There is a slight difference in planted hectares for plantations (variance of 13.91 Ha) against previous report, due to migration of the certificate holder's databases from MapInfo database to ArcGIS database at the beginning of 2020.

6. Plantings & Cycle

Estate	Age (Years)					Mature**	Immature
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		
Hargy Estate	1,311.20*	434.69	2,412.98	270.75	0	3,714.63	714.99
Navo Estate	134.76*	3,420.36	2,591.60	447.16	0	6,459.12	134.76
Pandi Estate	94.74*	2,489.39	0	0	0	2,489.39	94.74
Subtotal	1,540.70	6,344.44	5,004.58	717.91	-	12,663.14	944.49
Smallholders	769.50	2,724.02	7,189.17	2,364.26	827.78	13,105.23	769.50
Total (ha)	2,310.20	9,068.45	12,193.75	3,082.18	827.78	25,768.37	1,713.99

Note:

* = Replanting

** = Only Mature area is considered as production area

7. Certified Tonnage of FFB (Own Certified Scope)

Estate	Tonnage / year			
	Estimated (Jan 2020-Dec2020)	Actual (Oct 2019 - Dec 2020)		Forecast (Jan 2021 -Dec 2021)
		Previous license period (Oct 2019)	Current license period (Nov 2019 - Dec 2020)	
Hargy Estate	117,677.13	6,530.00	120,111.72	116,189.67
Navo Estate	118,530.60	6,928.00	112,222.04	114,607.32
Pandi Estate	81,085.51	4,054.00	76,777.02	80,563.15
Subtotal	317,293.24	17,512.00	309,110.78	311,360.14
Smallholders	244,729.35	15,352.00	239,351.14	230,244.86
Total	562,022.58		581,325.92	541,605.00

Note:

8. Certified Tonnage of FFB (from other certified unit(s)) if applicable *

Estate	Tonnage / year		
	Estimated	Actual	Forecast

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	(Jan 2020-Dec2020)	(Oct 2019 - Dec 2020)		(Jan 2021 – Dec 2021)
	N/A	<i>Previous license period</i> (Oct 2019)	<i>Current license period</i> (Nov 2019 – Dec 2020)	N/A
Nil		Nil	Nil	
Total				

9. Non-Certified Tonnage of FFB (outside supplier – excluded from certificate) if applicable				
Independent FFB Supplier	Tonnage / year			
	Estimated (Jan 2020-Dec2020)	Actual (Oct 2019 - Dec 2020)		Forecast (Jan 2021 – Dec 2021)
		<i>Previous license period</i> (Oct 2019)	<i>Current license period</i> (Nov 2019 – Dec 2020)	
Nil	Nil	Nil	Nil	Nil
Total				

10. Certified Tonnage				
Hargy Palm Oil Mill Mill Capacity: 45 MT/hr SCC Model: IP	Estimated (Jan 2020-Dec2020)	Actual (Oct 2019 - Dec 2020)		Forecast (Jan 2021 – Dec 2021)
	FFB	FFB		FFB
	119,303.42	<i>Previous license period</i> (Oct 2019)	<i>Current license period</i> (Nov 2019 – Dec 2020)	149,623.00
		9,115.90	159,859.92	
	CPO (OER: 23.36%)	CPO (OER: 23.80%)		CPO (OER: 23.60%)
	27,874.61	2,210.04	37,998.35	35,311.00
	PK (KER: 5.15%)	PK (KER: 5.05%)		PK (KER: 5.15%)
6,144.13	458.54	8,081.59	7,705.00	
Barema Palm Oil Mill Mill Capacity: 45 MT/hr SCC Model: IP	Estimated (Jan 2020-Dec2020)	Actual (Oct 2019 - Dec 2020)		Forecast (Jan 2021 – Dec 2021)
	FFB	FFB		FFB
	227,062.13	<i>Previous license period</i> (Oct 2019)	<i>Current license period</i> (Nov 2019 – Dec 2020)	162,023.00
		11,818.66	205,006.78	
	CPO (OER: 24.62%)	CPO (OER: 25.28%)		CPO (OER: 25.10%)
55,901.44	2,884.98	51,919.81	40,669.00	

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	PK (KER: 5.15%)	PK (KER: 5.16%)		PK (KER: 5.15%)	
	11,683.21	583.36	10,594.18	8,347.00	
Navo Palm Oil Mill Mill Capacity: 45 MT/hr SCC Model: IP	Estimated <i>(Jan 2020-Dec2020)</i>	Actual <i>(Oct 2019 - Dec 2020)</i>		Forecast <i>(Jan 2021 – Dec 2021)</i>	
	FFB	FFB		FFB	
	215,657.02	<i>Previous license period</i> (Oct 2019)	<i>Current license period</i> (Nov 2019 – Dec 2020)		229,959.00
		11,411.99	184,112.67		
	CPO (OER: 24.14%)	CPO (OER: 24.57%)		CPO (OER: 24.50%)	
	52,052.17	2,696.42	45,347.02		56,342.00
	PK (KER: 4.70%)	PK (KER: 5.18%)		PK (KER: 5.15%)	
	10,146.12	546.76	9,589.17		11,842.00
Total FFB	562,022.57	581,325.92		541,605.00	
Total CPO	135,828.22	143,056.62		132,322.00	
Total PK	27,973.45	29,853.60		27,894.00	
Note: Last audit was in October 2019. The actual calculation period is October 2019 – December 2020.					

11. Actual Sold Volume (CPO)					
Current License period					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
CPO (MT)	127,595.17	0	0	0	127,595.17
- Hargy POM	53,064.24	0	0	0	53,064.24
- Barema POM	12,504.64	0	0	0	12,504.64
- Navo POM	62,026.29	0	0	0	62,026.29
Previous License period					
CPO (MT)	3,491.82	0	0	0	3,491.82
- Hargy POM	0	0	0	0	0
- Barema POM	3,491.82	0	0	0	3,491.82
- Navo POM	0	0	0	0	0

12. Actual Sold Volume (PK)					
Current License period					
	RSP0 Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
PK (MT)	21,681.88	0	0	0	21,681.88
- Hargy POM	12,021.27	0	0	0	12,021.27
- Barema POM	3,332.84	0	0	0	3,332.84
- Navo POM	6,327.77	0	0	0	6,327.77
Previous License period					
PK (MT)	1,022.62	0	0	0	1,022.62
- Hargy POM	1,022.62	0	0	0	1,022.62
- Barema POM	0	0	0	0	0
- Navo POM	0	0	0	0	0

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

Section 2: Assessment Process

Certification Body:

BSI Services Malaysia Sdn. Bhd. (ASI Accreditation Number: ASI-ACC-067)
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BSI is a leading global provider of management systems assessment and certification, with more than 84,000 certified locations and clients in over 180 countries. BSI Standards is the UK's National Standards Body. BSI provides independent, third-party certification of management systems. BSI is ASI Accredited (ASI-ACC-067) to conduct RSPO assessment since 31/10/2014 with accredited office located at Kuala Lumpur, Malaysia.

2.1 Assessment Methodology, Programme, Site Visits

The on-site annual surveillance assessment was conducted on 7 – 15 December 2020. The audit programme is included as Section 2.3. Due to the COVID-19 pandemic, this assessment involved a partial remote audit as allowed by RSPO Secretariat – RSPO P&C On-site & Remote Audits dated 24th March 2020. The remote audit was conducted on 28 – 30 July 2020.

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 Critical NC close out remote assessment was conducted on 23 February 2021. The audit programs are included in Section 2.3.

The methodology for collection of objective evidence included physical site inspections, observation of tasks and processes, interviews of staff, workers and their families and external stakeholders, review of documentation and monitoring data. Papua New Guinea & Solomon Island National Interpretation 2019 for RSPO P&C 2018 for the Production of Sustainable Palm Oil 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.

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

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

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

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

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

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

Assessment Program					
Name (Mill / Supply Base)	Year 1 (Recertification)	Year 2 (ASA2_1)	Year 3 (ASA2_2)	Year 4 (ASA2_3)	Year 5 (ASA2_4)
Hargy Palm Oil Mill	X	X	X	X	X
Barema Palm Oil Mill	X	X	X	X	X
Navo Palm Oil Mill	X	X	X	X	X
Hargy Estate	X	X	X	X	X
Navo Estate	X	X	X	X	X
Pandi Estate	X	X	X	X	X
Smallholders*	X	X	X	X	X

Tentative Date of Next Visit: August 1, 2021 – August 10, 2021

Total No. of Mandays: 32.

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2.2 BSI Assessment Team:

Team Member Name	Role <i>(Team Leader or Team member)</i>	Qualifications <i>(Short description of the team members)</i>
Eko Purwanto	Team Leader	Holds a Bachelor of Forestry from Forest Conservation Department, Faculty of Forestry, Bogor Institute of Agriculture (IPB) in 2001. He has working experience at Oil Palm Plantation in East Kalimantan since 2003 to 2012, the last position was Estate Manager. He has implementing good agricultural practice including integrated pest management and limited pesticides uses. He has completed lead auditor training courses for RSPO P&C (2013), RSPO SCC (2012), ISPO (2012), LAC ISO 9001 (2012), ISO 14001 (2013) and ISO 45001 (2019). Refreshment training have been completed for RSPO P&C in May 2018, RSPO SCC in March 2018. He has been involved in quality (ISO 9001) management system audits for very broad industrial and involved in RSPO and ISPO audit for several plantations and mills since October 2012. During this assessment, he assessed on the aspects of best management practice in palm oil mill and estate, business management plan and supply chain for palm oil mill.
Pratama A. Sedayu	Team member	Graduated from University of Jenderal Soedirman in 2008, majoring in Social Economic of Agriculture. He involved in RSPO certification since 2009 as a team member subsequently as a Lead Auditor, covering assessment against RSPO P&C in Indonesia, Malaysia, Thailand, Papua New Guinea, and Liberia. He completed the ISO 9001, ISO 14001, OHSAS 18001 Lead Auditor Course, HCV Identification and Management; ISPO Lead Auditor endorsed Course and RSPO P&C and RSPO SCCS Lead Auditor endorsed Courses. During this assessment, he assessed on the aspects of legal, supply chain for CPO Mills, environment management system, HCV, smallholder audits and stakeholder consultation. He is fluent in both verbal/written in English. During this assessment, he assessed on the aspects of environment management and monitoring, social and supply chain for palm oil mill.
Y. Wisnu Rahmanto	Team member	Bachelor of Forestry with Silviculture background. He worked at professional independent Certification Body as an Auditor for last 8 years and has involved in auditing activities with various certification schemes. Selected training which have been followed, such as RSPO Endorsed Lead Auditor Training Course, RSPO NEXT, ISPO Auditor/Lead Auditor Course, Quality Management System (QMS) ISO 9001:2008 Auditor/Lead Auditor Course, GIS-Basic Mapping and Spatial Analysis, Timber Legality Assurance System (SVLK), Verification Organization Training C.A.F.E Practices (Starbucks), UTZ Programme and others internal training programs. He has involved in auditing activities, such as Sustainable Forest Management by FSC FM/COC Scheme, Sustainable Palm Oil by RSPO and ISPO Scheme, Coffee And Farmer Equity (C.A.F.E Practices) Starbucks, Organic Standard (EU, NOP, JAS) for Coffee Farmers and Organic Exchange for Textile. During this assessment, he assessed on the aspects of Legal, Occupational Health and Safety aspect and HCV.

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Accompanying Persons:

Name	Role
Angelus Palik	Audit Facilitator
Eliuda Pilake	Audit Facilitator
Melinda Thom	Audit Facilitator

2.3 Assessment Plan

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

Date	Time	Subjects	Eko/ Angelus	Sedayu/ Melinda	Wisnu/ Eliuda	ICT Planned
Monday, 07/12/2020	09.00-10.00 (06.00 IDN)	Opening Meeting Opening Presentation by Audit team leader. Confirmation of assessment scope and finalize Audit plan	√	√	√	- Video conference through MS Team - Video call or voice call through Whatsapp - When interview, no management/staff present
	10.00-12.00 (7.00 IDN)	Audit to Hargy POM	√	√		
		Audit to smallholders (4 sample smallholder)			√	
	12.00-13.00 (09.00 IDN)	Break	√	√	√	
13.00-17.00 (10.00 IDN)	Audit to Hargy POM	√	√			
	Audit to smallholders (4 sample smallholder)			√		
Tuesday, 08/12/2020	09.00-12.00 (06.00 IDN)	Audit to Hargy Estate	√	√		
		Audit to smallholders (4 sample smallholder)			√	
	12.00-13.00 (09.00 IDN)	Break	√	√	√	
13.00-17.00 (10.00 IDN)	Audit to Hargy Estate	√	√			
	Audit to smallholders (4 sample smallholder)			√		
Wednesday 09/12/2020	09.00-12.00 (06.00 IDN)	Stakeholder Interview: Workers Union, Committee Leader, Women Representative, Suspended Smallholders (if any), Bialla Health Care, Village Representative, NGO, Bialla Oil Palm Grower Association (BOGA), Previous land owner		√	√	
		Audit to smallholders (4 sample smallholder)	√			
	12.00-13.00 (09.00 IDN)	Break	√	√	√	
	13.00-17.00 (10.00 IDN)	Audit to Barema POM			√	√
Audit to smallholders (4 sample smallholder)		√				
Thursday 10/12/2020	09.00-12.00 (06.00 IDN)	Audit to Navo Estate		√	√	
		Audit to smallholders (4 sample smallholder)	√			
	12.00-13.00 (09.00 IDN)	Break	√	√	√	
13.00-17.00 (10.00 IDN)	Audit to Navo Estate			√	√	
	Audit to smallholders (4 sample smallholder)	√				
Friday 11/12/2020	09.00-12.00 (06.00 IDN)	Audit to Navo POM	√		√	
		Audit to smallholders (4 sample smallholder)		√		
	12.00-13.00 (09.00 IDN)	Break	√	√	√	

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Date	Time	Subjects	Eko/ Angelus	Sedayu/ Melinda	Wisnu/ Eliuda	ICT Planned
	13.00-17.00 (10.00 IDN)	Audit to Navo POM	√		√	
		Audit to smallholders (4 sample smallholder)		√		
Saturday 12/12/2020		Break	√	√	√	
Sunday 13/12/2020		Break	√	√	√	
	09.00-12.00 (06.00 IDN)	Audit to Pandi Estate	√		√	
		Audit to smallholders (4 sample smallholder)		√		
Monday 14/12/2020	12.00-13.00 (09.00 IDN)	Break	√	√	√	
	13.00-17.00 (10.00 IDN)	Audit to Pandi Estate	√		√	
		Audit to smallholders (4 sample smallholder)		√		
	09.00-12.00 (06.00 IDN)	Audit to smallholders (4 sample smallholders for each auditors)	√	√	√	
Tuesday 15/12/2020	12.00-13.00 (09.00 IDN)	Break	√	√	√	
	13.00-16.00 (10.00 IDN)	Report Preparation	√	√	√	
	16.00-17.00	Closing Meeting	√	√	√	

Section 3: Assessment Findings

3.1 Normative requirement applied for this assessment:

- SIPEF Group 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
- Papua New Guinea & Solomon Island 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?	Hargy Palm Oil Mill Limited is a subsidiary of SIPEF Group. SIPEF Group has disclose all of its companies, mills and estates. The timebound plan including un-certified units/companies.	Yes
Have all the estates and mills certified within five years after obtaining RSPO membership?	No. Not all the estates and mills certified within five years after obtaining RSPO membership. New estates and mills are under progress to be RSPO certified after RSPO NPP carried out in 2014. The company plans to achieve 100% of RSPO certification for all its estates and mills in 2029.	Yes
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.	The latest acquisition noted for PT. Asri Rimba Wirabhakti in Bengkulu, announced end of 2018. Certification plan have been prepared, awaiting for RSPO LUC, RSPO RACP and RSPO NPP.	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, there is changes from the last audit to include PT. Asri Rimba into timebound plan. Waiting for HCV ALS review, LUC review for preparation into RSPO NPP. Based on ACOP reporting, target year to achive 100% RSPO certified FFB is 2029, therefore the timebound plan is still consistent with ACOP reporting.	Yes
Have there been any isolated lapses in implementation of the plan? If yes a Minor non-compliance shall be raised	No isolated lapse. SIPEF is able to demonstrate adequate evidence related to changes in implementation of the plan.	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 Major non-compliance shall be raised	The delay of not able to certify all the estate within the 5 years period from the day of RSPO membership is accepted by the assessment team.	Yes
Un-Certified Units or Holdings <i>(any non-compliance against the below shall be raised as Major Non-compliance)</i>		

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<p>No replacement after dates defined in NIs Criterion 7.3:</p> <ul style="list-style-type: none"> • Primary forest. • Any area required to maintain or enhance HCVs in accordance with RSPO P&C criterion 7.3. 	<p>Assessment team checked to confirm any land conflict/liabilities on RaCP tracker and found note "The compensation plans for PT. Umbul Mas Wisesa and PT. Toton Usaha Mandiri (SIPEF) have been approved by the Compensation Task Force during the staged implementation of the RaCP between May 2014 and November 2015".</p>	<p>Yes</p>
<p>Any new plantings since January 1st 2010 shall comply with the RSPO New Plantings Procedure.</p>	<p>All new planting after January 1st, 2010 have undergone and complies with RSPO New Planting Procedure.</p>	<p>Yes</p>
<p>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.</p> <p><i>Note:</i> <i>The RSPO RaCP tracker shall be checked to confirm for any land conflicts/Liabilities https://www.rspo.org/certification/remediation-and-compensation/racp-tracker. The progress on the Liabilities shall be verified and reported.</i> <i>Please refer to BSI-RSPO Secretariat approval.</i></p>	<p>The assessment team has conducted a search in internet to confirm that there is a lodged land conflict that was recorded as complaint under RSPO Case Tracker; raised by individual on those units that have not been certified.</p> <p>RSPO Case Tracker recorded complaint to PT. Agro Muara Rupit, dated 17 May 2017. The complainant brought forward the issue of fraudulent land title to RSPO. The complainant claimed that his land was fraudulently sold by his cousin to PT. Agro Muara Rupit, a subsidiary of SIPEF Group. The summary presented in the RSPO Case Tracker:</p> <p>On 25 July 2017 - Secretariat to write to the company and inform them on the complaint. On 24 August 2017 (CP Meeting) - Secretariat to wait for reply from the company. On 28 August 2017 - Secretariat received response from the company. On 5 September 2017 - Complainant failed to provide the document. On 11 September 2017 - Secretariat has sent an email to SIPEF. On 26 September 2017 (CP Meeting) - Secretariat to draft the decision letter. On 18 June 2018 – Complaint Panel to deliver a decision. On 25 July 2018 – Complaint Panel to deliver a decision. On 23 August 2018 – Draft decision letter to be reformatted. On 19 September 2018 – Decision Letter – Complaints Panel. On 26 September 2018 – The decision letter finalised and to be delivered to Parties. On 24 October 2018 – Complaint Panel Decision letter has been sent to parties. Deadline for submission of appeals is on 20 December 2018. On 20 December 2018 – The complaint is officially closed.</p>	<p>Yes</p>

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	<p>The case tracker available on link https://askrspo.force.com/Complaint/s/case/-50090000028Es1JAAS/detail</p> <p>Based on RaCP tracker in RSPO website there are 3 MU's which have potential liability, 2 of them are PT Umbul Mas Wisesa and PT Toton Usaha Mandiri (SIPEF) have been approved by the Compensation Task Force during the staged implementation of the RaCP between May 2014 and November 2015. Whilst the other one, PT Dendymarker Indah Lestari (DIL) have submitted CN to the RSPO Secretariat and have been approved. Last communication made by RSPO Biodiversity Manager on 19 October 2020, confirmed that PT DIL (ex Lippo) RaCP process is ongoing with SIPEF.</p>	
<p>Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 6.3.</p>	<p>No labor dispute noted. The assessment team has conducted a search in internet to confirm that there is no new comments or dispute raised by the communities on those units that have not been certified.</p>	<p>Yes</p>
<p>Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1</p>	<p>No legal non-compliance noted. The assessment team has conducted a search in internet to confirm that there is not new comments or dispute raised by the communities on those units that have not been certified.</p>	<p>Yes</p>
<p>Did the company conduct internal audit against the uncertified management units requirement? If yes, a positive assurance statement shall be available.</p>	<p>The internal audit has been conducted for all uncertified units:</p> <ul style="list-style-type: none"> • PT. Agro Rawas Ulu was conducted on 20-21 March 2019 – including assessment against criterion 2.1; 2.2; 2.3; 6.3; 6.4; 7.3; 7.5; 7.6; • PT. Agro Kati Lama was conducted on 4-6 March 2019 assessing criterion 2.1; 2.2; 2.3; 6.3; 6.4; 7.3; 7.5; 7.6; • PT. Agro Muara Rupit was conducted on 18-20 March 2019 – including assessment against criterion 2.1; 2.2; 2.3; 6.3; 6.4; 7.3; 7.5; 7.6; <p>Each company provide correction and corrective action on the base to ensure all RSPO P&C requirements are implemented.</p>	<p>Yes</p>
<p>Have there been any stakeholder (including NGO) consultation conducted?</p>	<p>No, there is no stakeholder comment related to uncertified units.</p>	<p>Yes</p>

3.3 Progress of scheme smallholders and/or outgrowers

Progress of scheme smallholders or outgrowers towards compliance with relevant standards		
Requirement	Remarks	Compliance
Has 100% of scheme smallholders and/or scheme outgrowers 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 outgrowers are not in compliance, a minor NC after two years, and a major NC if this requirement is not met after three years.	All of smallholders supplying FFB to Hargy Oil Palms Limited Palm Oil Mills are RSPO-certified.	Yes

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 four (4) Critical; three (3) Minor nonconformities and two (2) Opportunity For Improvement raised. The Hargy Oil Palms Limited Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

The implementation of the corrective action plans to address the minor nonconformity will be followed up during the next surveillance assessment. The implementation of the Corrective Actions for the Critical Nonconformity(ies) has been verified for it effectiveness and closed accordingly. The below is the summary of the non-conformity raised during this assessment.

Non-conformity			
NCR Ref #	1992828-202012-M1	Clause & Category (Critical / Minor)	6.7.3 (Critical)
Date Issued	15 December 2020	Due Date	14 March 2021
Closed (Yes / No)	Yes	Date of nonconformity Closure	23 February 2021
Statement of Nonconformity:	Harvester was not using appropriate PPE as required in Hazard and Risk Assessment for Plantations (REG-ESD-OHS-001-11) issue No. 11, dated 19 June 2019.		
Requirement Reference:	6.7.3 (C) Workers use appropriate personal protective equipment (PPE) as specified in Company procedures, 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.		
Objective Evidence:	According to onsite visit for harvesting activity at Atata Field 5, Block CCID 12K-26 and 11K-26, it is sighted two harvesters did not use safety footwear during to work, as required within company risk assessment and procedure.		

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	<ol style="list-style-type: none"> 1. Hazard and Risk Assessment for Plantations (REG-ESD-OHS-001-11) issue No. 11, dated 19 June 2019. <ul style="list-style-type: none"> • Hazard: Harvesting & Maintenance. • Risk: FFB & Fronds falling on workers causing injuries. • Proposed controls: PPE (Safety footwear). 2. Personal Protective Equipment (PPE) SOP (PRO-ESD-OHS-003-02, issue No.2, dated 28 June 2019). PPE matrix identify the minimum required PPE for Harvester is Gum Boot.
Corrections:	<ol style="list-style-type: none"> 1. Specific PPE awareness (Refresher) was conducted on the 14th December 2020 on the use of Gumboots by harvesters during work and the risk it involves and the consequences. 2. Disciplinary action taken on relevant workers and supervisor involved. 3. Refresher awareness conducted to All Field Staff to ensure "NO PPE – NO WORK" where required as per company PPE requirements. 4. Morning musters paperwork to include a PPE check.
Root Cause Analysis:	<ul style="list-style-type: none"> - Gumboots were issued on the 8.8.20, 8.6.20, and 18.10.20 to the 3 workers respectively as per PPE records. - Harvesters had boots at Musters, due to sore feet, workers were not wearing gumboots during work. As they did not advise their superiors about their sore feet earlier in the day, they hid their boots in rubbish row for fear of being penalized. When the auditors asked, they denied being issued gumboots. - Negligence and ignorance by worker and supervisor to comply with company PPE requirements.
Corrective Actions:	<ol style="list-style-type: none"> 1. Establish PPE Sign Boards at all Morning Muster/Check roll sites with the Slogan " NO PPE – NO WORK" and in Tok Pisin "NOGAT PPE-NOGAT WOK" 2. Conduct PPE Checks during morning muster with use of Rollover Form. This form includes a check on each employee to ensure they are in their required PPE for their jobs. Should a worker is found to be without the appropriate PPE, they shall not be allowed to work until they are in their proper PPE. This check shall be done by the supervisor for each section and documented records kept. 3. Revise the PPE SOP and related field procedures to align corrective actions 1 & 2.
Assessment Conclusion:	<p>During NCR Close Out Review, Audit team verified and sighted:</p> <ul style="list-style-type: none"> - HOPL has provided training on PPE usage dated 14 December 2020. The training attended by 7 wheelers, 34 harvesters, 1 harvest overseer, 1 Division Manager, 19 driver and loaders from Atata Plantation. - HOPL issued number of warning letters and not allows employee working without PPE. - HOPL install signboards indicating type of PPE to be use for each working activity. The selection of PPE consistent with OSH - HOPL monitors the use of PPE for each worker during morning muster, recorded under rollover form. Rollover form sighted from Hargy Plantation Division I harvesters; Hargy Plantation Division II sprayers; Hargy Plantation Division III; Atata Plantation's driver and loader; Ibana Plantation's sprayers; Sabalbala Plantation's harvesters; Kiba Plantation's harvesters; Kiba Plantation's upkeep workers.

	<p>- HOPL revised the "Personal Protective Equipment (PPE) SOP No. PRO-COM-EHS-003-04", revised the "Chemical Weeding SOP Chemical Application No.PRO-PLT-UPK-003-02", revised the "Chemical Weeding SOP Chemical Mixing No.PRO-PLT-UPK-006-02", revised the "Chemical Weeding SOP Selective Weeding No.PRO-PLT-UPK-004-02".</p> <p>All corrective action plan has been carried out. Audit team sighted the correction implemented by provides training for Atata harvesters. As corrective action, audit team sighted HOPL revise the SOP, Guidance, PPE use monitoring mechanism. This improvement has been carried out and effective. The Major NC can be closed out.</p>
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Non-conformity			
NCR Ref #	1992828-202012-M2	Clause & Category (Critical / Minor)	7.2.6 (Critical)
Date Issued	15 December 2020	Due Date	14 March 2021
Closed (Yes / No)	Yes	Date of nonconformity Closure	23 February 2021
Statement of Nonconformity:	Smallholder 111211 Jenny Pigirip has chemical spraying in her block. However, the person conducting spraying was not provided with training on chemical application.		
Requirement Reference:	<p>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 Criteria 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they carry out.</p> <p>Smallholder requirements: Smallholders using and/or storing pesticides must demonstrate knowledge of the correct handling, storage, application and disposal requirements.</p>		
Objective Evidence:	<p>Visit to smallholder Block 111211, Jenny Pigirip, audit team found:</p> <ul style="list-style-type: none"> - chemical spraying using glyphosate by Junior Onpi; - Junior Onpi cannot demonstrate certificate of training; <p>This was also not in line with HOPL documents:</p> <ul style="list-style-type: none"> - Hargy Oil Palms Limited SOP for Pesticide Management PRO-ESD-GEN-004-011; - Hargy Oil Palms Limited Integrated Pest Management Plan PLN-ESDSUS-001-05; 		
Corrections:	<ol style="list-style-type: none"> 1) Individual meeting to be done to explain herbicide use and storage requirements to grower and the importance of training prior to handling. 2) Grower and sprayers will attend HOPL Herbicide Training in January 2021 and will be then certified for Chemical use. No chemical to be issued to the block until then. 		

	<p>3) Document a procedure outlining the Internal Control System that ensures that compliance to all relevant RSPO Principles and Criteria are monitored on a regular basis.</p>
<p>Root Cause Analysis:</p>	<ol style="list-style-type: none"> 1) Grower and sprayers did not attend Herbicide training given by HOPL (latest training held in Kiava VOP in March 2020). 2) Grower is not purchasing chemical through HOPL but buying in Bialla/Kimbe stores making the control more difficult. 3) The current inspection checklist does not adequately cover the RSPO requirements for chemical handling in the smallholder blocks. 4) Staff conducting inspections are not trained adequately on the RSPO requirements for chemicals; to allow consistency in block inspection results. 5) There is inadequate monitoring on the current procedures and implementation of chemical handling in smallholder blocks to verify compliance.
<p>Corrective Actions:</p>	<ol style="list-style-type: none"> 1) Small Holders Herbicide use and Storage SOP will be designed by SHAAS Manager to document the RSPO chemical requirements in SH blocks. 2) Compliance department will compile a RSPO pamphlet for smallholder field days to include all relevant RSPO requirements for smallholders including chemical use and management on the blocks. 3) Review and revise the smallholders BIR (Block Inspection Report) form, to adequately include RSPO requirements for chemical handling. 4) Conduct training to relevant staff in SHAAS and Compliance teams on the revised procedures of the Internal Control System including relevant standards, block inspection and monitoring. 5) Training will continue over 2021 to train and give knowledge on herbicide handling to all interested growers, as per the revised SOPs in 1-3 above. Training will accompany the production improvement initiative, focusing on providing training to smallholders through the area committees & block inspections. 6) Review and revise current SHAAS block inspection schedule for 2021 to cover a certain number of blocks annually across the Bialla project area. 7) Review and revise the Compliance department's internal audit plan for 2021 to cover smallholders as per the SHAAS programs. The internal audits will focus on verification of RSPO compliance on the SHAAS programs in place. The number of blocks to be inspected and audited (in 6-7 above) shall be determined by a sample size calculator; providing a 95% confidence level, to justify and assure that the Internal Control System (ICS) covers an adequate sample of the certified smallholder supply base.
<p>Assessment Conclusion:</p>	<p>During NCR Close Out Review, Audit Team verified and sighted:</p> <ul style="list-style-type: none"> - Smallholder Block 111211, Jenny Pigirip received training on pesticide use, storage and disposal. The training also provided for Junior Honpi and Polas Jude (employee/sprayer). - HOPL and the smallholder extension officer provides Herbicide Spraying Training on 13 January 2021 for 55 smallholders in the Tiauru area. Training notes recorded. - Compliance Department prepared SOP Internal Control System – Smallholder Monitoring No.PRO-COM-SUS-003-01, Section Scope ensure smallholders comply with RSPO requirement. All correction action has been carried out.

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	<ul style="list-style-type: none"> - Smallholder Agricultural Advisory Services/SHAAS-Community Affairs Department prepared Pesticide Management Guide for Smallholder Growers. Compliance Department prepared Smallholder Chemical Usage and Storage Procedure No.PRO-CAD-SHA-002-01. The purpose was to have alignment between estate and smallholder’s chemical usage. - Smallholder brochure, explaining the RSPO requirements in simple manner. - HOPL revised the smallholder block inspection checklist under OMP application, online interface using smartphone. Some question related to chemical usage: “Is the user using chemical in his block?”; “Is the grower certified for herbicide use?” etc. Record of implementation sighted under Block Inspection Report. - HOPL provides training for their Smallholder Agricultural Advisory Services/SHAAS officer. Training carried out in 21 January 2021 and attended by 19 officers. They are given understanding on OHS and Environmental Policy including the revised smallholder block inspection report and application. Attendance list recorded. - HOPL prepares Training and Meeting Schedule with Smallholders for year 2021. Attendance list recorded. - HOPL revised the internal audit plan in smallholder block for year 2021. <p>All corrective action plan has been carried out. Audit team sighted the correction implemented by smallholder Jenny Pigirip and Junior Onpi. Furthermore, audit team sighted HOPL revise the SOP, Guidance, Internal Control System infrastructure, and monitoring mechanism in form of revised smallholder block inspection application, the internal audit plan. This improvement has been carried out and effective. The Major NC can be closed out.</p>
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Non-conformity			
NCR Ref #	1992828-202012-M3	Clause & Category (Critical / Minor)	7.2.7 (Critical)
Date Issued	15 December 2020	Due Date	14 March 2021
Closed (Yes / No)	Yes	Date of nonconformity Closure	23 February 2021
Statement of Nonconformity:	Smallholder 111211 Jenny Pigirip has chemical spraying in her block. However, the storage of chemical was not in accordance to recognize best practices and HOPL procedures.		
Requirement Reference:	(C) Storage of all pesticides is in accordance with recognised best practices.		
Objective Evidence:	Visit to smallholder Block 111211, Jenny Pigirip, audit team found: <ul style="list-style-type: none"> - chemical container (filled) stored inside chicken house; - empty chemical container stored inside chicken house, sometimes reused for chemical solution transport - no triple rinse, no visual identification; - knapsack were stored in worker’s room; - PPE: overall and gumboot stored inside house; This was also not in line with HOPL documents:		

	<ul style="list-style-type: none"> - Hargy Oil Palms Limited SOP for Pesticide Management PRO-ESD-GEN-004-011; - Hargy Oil Palms Limited Integrated Pest Management Plan PLN-ESDSUS-001-05;
Corrections:	<ol style="list-style-type: none"> 1) Individual meeting to be done to explain herbicide use and storage requirements to grower and the importance of training prior to handling. 2) Grower and sprayers will attend HOPL Herbicide Training in January 2021 and will be then certified for Chemical use. No chemical to be issued to the block until then. 3) Document a procedure outlining the Internal Control System that ensures that compliance to all relevant RSPO Principles and Criteria are monitored on a regular basis.
Root Cause Analysis:	<ol style="list-style-type: none"> 1) Grower and sprayers did not attend Herbicide training given by HOPL (latest training held in Kiava VOP in March 2020) 2) Grower is not purchasing chemical through HOPL but buying in Bialla/Kimbe stores making the control more difficult. 3) The current inspection checklist does not adequately cover the RSPO requirements for chemical handling in the smallholder blocks. 4) Staff conducting inspections are not trained adequately on the RSPO requirements for chemicals; to allow consistency in block inspection results. 5) There is inadequate monitoring on the current procedures and implementation of chemical handling in smallholder blocks to verify compliance.
Corrective Actions:	<ol style="list-style-type: none"> 1) Small Holders Herbicide use and Storage SOP will be designed by SHAAS Manager to document the RSPO chemical requirements in SH blocks. 2) Compliance department will compile a RSPO pamphlet for smallholder field days to include all relevant RSPO requirements for smallholders including chemical use and management on the blocks. 3) Review and revise the smallholders BIR (Block Inspection Report) form, to adequately include RSPO requirements for chemical handling. 4) Conduct training to relevant staff in SHAAS and Compliance teams on the revised procedures of the Internal Control System including relevant standards, block inspection and monitoring. 5) Training will continue over 2021 to train and give knowledge on herbicide handling to all interested growers, as per the revised SOPs in 1-3 above. Training will accompany the production improvement initiative, focusing on providing training to smallholders through the area committees & block inspections. 6) Review and revise current SHAAS block inspection schedule for 2021 to cover a certain number of blocks annually across the Bialla project area. 7) Review and revise the Compliance department's internal audit plan for 2021 to cover smallholders as per the SHAAS programs. The internal audits will focus on verification of RSPO compliance on the SHAAS programs in place. The number of blocks to be inspected and audited (in 6-7 above) shall be determined by a sample size calculator; providing a 95% confidence level, to justify and assure that the Internal Control System (ICS) covers an adequate sample of the certified smallholder supply base.
Assessment Conclusion:	<p>During NCR Close Out Review, Audit Team verified and sighted:</p> <ul style="list-style-type: none"> - Smallholder Block 111211, Jenny Pigirip received training on pesticide use, storage and disposal. The training also provided for Junior Honpi and Polas Jude (employee/sprayer).

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	<ul style="list-style-type: none"> - On 18 January 2021, Jenny Pigirip’s block re-inspected by John Ken (Extension Officer) and Mark Bunita (Extension Officer). The chemical shed built to requirement, all chemical and PPE are properly stored. - HOPL and the smallholder extension officer provides Herbicide Spraying Training on 13 January 2021 for 55 smallholders in the Tiauru area. Training notes recorded. - Compliance Department prepared SOP Internal Control System – Smallholder Monitoring No.PRO-COM-SUS-003-01, Section Scope ensure smallholders comply with RSPO requirement. All correction action has been carried out. - Smallholder Agricultural Advisory Services/SHAAS-Community Affairs Department prepared Pesticide Management Guide for Smallholder Growers. Compliance Department prepared Smallholder Chemical Usage and Storage Procedure No.PRO-CAD-SHA-002-01. The purpose was to have alignment between estate and smallholder’s chemical usage and storage. - Smallholder brochure, explaining the RSPO requirements in simple manner. - HOPL revised the smallholder block inspection checklist under OMP application, online interface using smartphone. Some question related to chemical usage: “Does the grower has a chemical shed that can close?”; Does the grower has a chemical pit for chemical waste disposal?”, etc. Record of implementation sighted under Block Inspection Report. - HOPL provides training for their Smallholder Agricultural Advisory Services/SHAAS officer. Training carried out in 21 January 2021 and attended by 19 officers. They are given understanding on OHS and Environmental Policy including the revised smallholder block inspection report and application. Attendance list recorded. - HOPL prepares Training and Meeting Schedule with Smallholders for year 2021. Attendance list recorded. Latest smallholder block inspection carried out on 23 February 2021, visiting and check the condition of chemical shed for smallholder Joshua Wapil No.216 (chemicalshed locked, chemical stored inside, PPE stored inside), Walter Mumure No.374 (chemical shed locked, chemical stored inside, PPE such as overall and gumboot stored inside), Dor Siune No.355 (chemical shed locked, chemical stored inside, PPE stored inside). - HOPL revised the internal audit plan in smallholder block for year 2021. <p>All corrective action plan has been carried out. Audit team sighted the correction implemented by smallholder Jenny Pigirip. Furthermore, audit team sighted HOPL revise the SOP, Guidance, Internal Control System infrastructure, and monitoring mechanism in form of revised smallholder block inspection application, the internal audit plan. This improvement has been carried out and effective. The Major NC can be closed out.</p>
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Non-conformity			
NCR Ref #	1992828-202012-M4	Clause & Category (Critical / Minor)	7.10.1 (Critical)
Date Issued	15 December 2020	Due Date	14 March 2021
Closed (Yes / No)	Yes	Date of nonconformity Closure	23 February 2021

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Statement of Nonconformity:	Hargy Oil Palms Limited has not prepared the Palm GHG calculator version 4.0 until audit time ends.
Requirement Reference:	(C) GHG emissions are identified and assessed for the unit of certification. Plans to reduce or minimise them are implemented, monitored through the Palm GHG calculator and publicly reported.
Objective Evidence:	Hargy Oil Palms Limited has not prepared the Palm GHG calculator version 4.0 until audit time ends.
Corrections:	<ol style="list-style-type: none"> 1. Requested assistance from RSPO and SIPEF Medan to access PalmGHG version 4.0 online platform. 2. Re-entered PalmGHG data that was initially entered into PalmGHG version 3.0 into the PalmGHG version 4 online platform. 3. Request assistance from SIPEF Medan to submit to certification body (BSI) auditors.
Root Cause Analysis:	<ol style="list-style-type: none"> 1. No communication from Sipef Person in Charge (PIC) on the change from PalmGHG Version3.0 to PalmGHG Version4.0 2. HOPL Compliance staff had no access to the download site for PalmGHG application; the two staff with access are based in other Sipef sites. 3. HOPL staff not regularly checking for updates on the changes in PalmGHG calculator on RSPO website.
Corrective Actions:	<ol style="list-style-type: none"> 1. Assign one of the two authorized allowed by RSPO per Member to Hargy Oil Ltd person in charge, General Manager Compliance. 2. Schedule monthly update check on RSPO website for changes to mandatory reporting requirements and other relevant changes to RSPO standards. 3. Document a PalmGHG Calculator procedure to provide guidance on responsibilities, collection of data, verification of data and timeframes (for data collection, data entry, submission).
Assessment Conclusion:	<p>During NCR Close Out Review, Audit team verified and sighted:</p> <ul style="list-style-type: none"> - HOPL has completed the PalmGHG version 4.0 online for Hargy POM, Barema POM and Navo POM. - HOPL assigned GM Compliance for PalmGHG submission. - HOPL has carried out monthly update check on RSPO website. Monitoring schedule for each month established. Monthly update check on RSPO website month January and February 2021 evident. - HOPL established "Palm GHG Calculator SOP No.PRO-COM-EMS-024-01" dated 12 January 2021. Section 6 stipulates "Data Entry for the assessment year is to be completed by July every year" – to avoid late submission. <p>Audit team sighted the correction implemented by HOPL by submitting PaLmGHG. Furthermore, audit team sighted HOPL revise the SOP and monitoring mechanism to avoid late submission. This improvement has been carried out and effective. The Major NC can be closed out.</p>

Non-conformity			
NCR Ref #	1992828-202012-N1	Clause & Category (Critical / Minor)	7.2.8 (Minor)
Date Issued	15 December 2020	Due Date	14 March 2021

Closed (Yes / No)	No	Date of nonconformity Closure	Next ASA
Statement of Nonconformity:	Smallholder 111211 Jenny Pigirip has chemical spraying in her block. However, the disposal (and/or re-use) of chemical was not in accordance to recognize best practices and HOPL procedures.		
Requirement Reference:	<p>All pesticide containers are triple rinsed and punctured before being disposed of and/or handled responsibly if used for other purposes. Empty pesticide containers may be used for pre-mixing spray solution before transport to the plantation for use by sprayers. In this case they must have visual identification such as painted lines around them.</p> <p>Smallholder requirements: The requirements fully applicable to smallholders.</p>		
Objective Evidence:	<p>Visit to smallholder Block 111211, Jenny Pigirip, audit team found:</p> <ul style="list-style-type: none"> - chemical spraying using glyphosate by Junior Onpi; - empty chemical container stored inside chicken house, sometimes reused for chemical solution transport - no triple rinse, no visual identification; <p>This was also not in line with HOPL documents:</p> <ul style="list-style-type: none"> - Hargy Oil Palms Limited SOP for Pesticide Management PRO-ESD-GEN-004-011; - Hargy Oil Palms Limited Integrated Pest Management Plan PLN-ESDSUS-001-05; 		
Corrections:	<ol style="list-style-type: none"> 1. Individual meeting to be done to explain herbicide use and storage requirements to grower and the importance of training prior to handling. 2. Grower and sprayers will attend HOPL Herbicide Training in January 2021 and will be then certified for Chemical use. No chemical to be issued to the block until then. 3. Document a procedure outlining the Internal Control System that ensures that compliance to all relevant RSPO Principles and Criteria are monitored on a regular basis. 		
Root Cause Analysis:	<ol style="list-style-type: none"> 1. Grower and sprayers did not attend Herbicide training given by HOPL (latest training held in Kiava VOP in March 2020). 2. Grower is not purchasing chemical through HOPL but buying in Bialla/Kimbe stores making the control more difficult. 3. The current inspection checklist does not adequately cover the RSPO requirements for chemical handling in the smallholder blocks. 4. Staff conducting inspections are not trained adequately on the RSPO requirements for chemicals; to allow consistency in block inspection results. 5. There is inadequate monitoring on the current procedures and implementation of chemical handling in smallholder blocks to verify compliance. 		
Corrective Actions:	<ol style="list-style-type: none"> 1) Small Holders Herbicide use and Storage SOP will be designed by SHAAS Manager to document the RSPO chemical requirements in SH blocks. 2) Compliance department will compile a RSPO pamphlet for smallholder field days to include all relevant RSPO requirements for smallholders including chemical use and management on the blocks. 3) Review and revise the smallholders BIR (Block Inspection Report) form, to adequately include RSPO requirements for chemical handling. 		

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	<p>4) Conduct training to relevant staff in SHAAS and Compliance teams on the revised procedures of the Internal Control System including relevant standards, block inspection and monitoring.</p> <p>5) Training will continue over 2021 to train and give knowledge on herbicide handling to all interested growers, as per the revised SOPs in 1-3 above. Training will accompany the production improvement initiative, focusing on providing training to smallholders through the area committees & block inspections.</p> <p>6) Review and revise current SHAAS block inspection schedule for 2021 to cover a certain number of blocks annually across the Bialla project area.</p> <p>7) Review and revise the Compliance department’s internal audit plan for 2021 to cover smallholders as per the SHAAS programs. The internal audits will focus on verification of RSPO compliance on the SHAAS programs in place.</p>
Assessment Conclusion:	The CAP is accepted by the audit team, and subject to review effectiveness during subsequent assessment visit.

Non-conformity			
NCR Ref #	1992828-202012-N2	Clause & Category (Critical / Minor)	7.3.2 (Minor)
Date Issued	15 December 2020	Due Date	14 March 2021
Closed (Yes / No)	No	Date of nonconformity Closure	Next ASA
Statement of Nonconformity:	Segregation of waste is not implemented properly by Plantation and Smallholders.		
Requirement Reference:	<p>Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated. Medical waste must be disposed of in purpose- built incinerators.</p> <p>Guidance: With minimal opportunity for recycling in PNG and Solomon Islands, waste disposal is by landfill. Segregation of waste shall be into Hydrocarbon contaminated waste, putrescible waste and hard waste and compostable waste. Company procedures must state how these waste streams are managed.</p> <p>Smallholder requirements: The requirements fully applicable to smallholders.</p>		
Objective Evidence:	<p>1. Based on filed visit to the Domestic waste pit at Bakada plantation Sabalbala Division there was evidences of fertilizer bags and chemical containers mixed with domestic waste and put into the same pit. There is, no segregation of fertilizer bags and chemical containers from the domestic waste pit. Is not consistent with Article 9.1 Domestic and Industrial (hard) waste landfill on Waste Management Plan (PLN-COMEMS-001-10) Issued No. 10 date 21 March 2020.</p> <p>2. Based on visit to Smallholders blocks, e.g. LSS 311651 - FRED ALU and LSS 311554 - PHILLIP MANAU it was found that segregation of waste is not implemented appropriately.</p>		
Corrections:	<p>Bakada Plantation:</p> <p>1. Fertilizer bags and chemical containers removed from the domestic pit and correctly disposed into plastic pit.</p>		

	<p>2. Training and awareness conducted to compound upkeep workers and employees and their dependants on rubbish segregation.</p> <p>Smallholder Blocks: Conduct awareness to smallholder blocks 311651 and 311554.</p>
Root Cause Analysis:	<p>Bakada Plantation:</p> <ol style="list-style-type: none"> 1. Negligence and ignorance by worker and supervisor to comply with waste management procedures regarding rubbish segregation. 2. No land fill attendant stationed at the landfill to ensure rubbish is disposed in the right pits.
Corrective Actions:	<p>Bakada Plantation:</p> <ol style="list-style-type: none"> 1. Awareness on waste management integrated into monthly compound awareness which emphasizes on the relevant requirements in HOPL Waste Management Plan for compound and plantation rubbish handling. This includes segregation at homes and in the field operations up to when it is disposed into designated landfill pits. 2. Assign landfill attendant for the landfill to ensure rubbish is disposed correctly, maintain the grounds and report any issues for improvement. <p>Smallholder Blocks:</p> <ol style="list-style-type: none"> 1. Integrate more training & awareness on waste management in 2021 trainings/ field days in all Bialla project. Training will accompany the production improvement initiative, focusing on providing training to smallholders through the area committees & block inspections. 2. Compile a RSPO pamphlet for smallholder field days to include all relevant RSPO requirements for smallholders including waste management.
Assessment Conclusion:	<p>The CAP is accepted by the audit team, and subject to review effectiveness during subsequent assessment visit.</p>

Non-conformity			
NCR Ref #	1992828-202012-N3	Clause & Category (Critical / Minor)	7.3.3 (Minor)
Date Issued	15 December 2020	Due Date	14 March 2021
Closed (Yes / No)	No	Date of nonconformity Closure	Next ASA
Statement of Nonconformity:	Open fire for waste disposal is used by Smallholders.		
Requirement Reference:	<p>Open fire is not used for waste disposal by the Unit of Certification.</p> <p>Smallholder requirements: Smallholders must be able to verbally explain that they understand and observe this requirement.</p>		
Objective Evidence:	Based on visit to Smallholders Block, e.g. LSS 311651 - FRED ALU and LSS 331837 – LEONARD JULY it was found that open fire was use for domestic waste management around their house.		

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Corrections:	Awareness to be done to explain the RSPO requirements of not using open fire for domestic waste and its impacts, in blocks 311651 and 331837.
Root Cause Analysis:	<ol style="list-style-type: none"> 1. The use of open fires has been and is still is a part of the Papua New Guineans livelihood and thus is ingrained as a habitual part of daily living. 2. Lack of knowledge and awareness on RSPO requirements on use of fire for waste disposal and its impacts.
Corrective Actions:	<ol style="list-style-type: none"> 1. Integrate more training & awareness on waste management in 2021 trainings/field days in all Bialla project. Training will accompany the production improvement initiative, focusing on providing training to smallholders through the area committees & block inspections. 2. Compile a RSPO pamphlet for smallholder field days to include all relevant RSPO requirements for smallholders including use of fire for waste disposal on the blocks.
Assessment Conclusion:	The CAP is accepted by the audit team, and subject to review effectiveness during subsequent assessment visit.

Opportunity for Improvements	
OFI #	Description
OFI 1	Indicator 6.2.4 Unit of Certification need to consider restrictions on the number of occupants (people/families) in one house at worker compound, as refer to ILO Guidance on Workers' Housing Recommendation No. 115.
OFI 2	Indicator 7.10.2 Hargy Oil Palms Limited carried out HCSA/HCV Integrated Scoping Assessment Hargy Oil Palms Limited, West New Britain Province, Papua New Guinea, February 2019. Conclusion of the scoping assessment result expected.

Positive Findings	
PF #	Description
PF 1	Good preparation during audit Scenario 3.

3.4.1 Status of Nonconformities Previously Identified and Observations

Non-conformity			
NCR Ref #		Clause & Category (Critical / Minor)	
Closed (Yes / No)		Date of nonconformity Closure	
Statement of Nonconformity:	Nil		

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Requirement Reference:	
Objective Evidence:	
Corrective Actions:	
Assessment Conclusion:	

Opportunity for Improvement	
OFI#	Description
OFI 1	HOPL have procedure and mechanism to handle issues related to sexual harassment. Audit team have verified the resolution process. Consideration related to record of counselling/mediation process signed with both parties and witnesses if there is no request for anonymity.

3.4.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Critical / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
1037572M17 – RSPO SCCS	Major	D.3.2	28/03/2014	08/04/2014 (closed)
1037572M18 – RSPO SCCS	Major	D.3.3	28/03/2014	08/04/2014 (closed)
1037572N4	Minor	4.7.2	28/03/2014	06/03/2015 (closed)
10375752N5	Minor	4.7.3	28/03/2014	06/03/2015 (closed)
10375752N10	Minor	4.7.5	28/03/2014	Escalated to Major NC
10375752N9	Minor	5.3.2	28/03/2014	06/03/2015 (closed)
10375752N13	Minor	5.6.2	28/03/2014	06/03/2015 (closed)
10375752N15	Minor	6.5.3	28/03/2014	06/03/2015 (closed)
1161437M1	Major	4.7.5	06/03/2015	04/05/2015 (closed)
1161437M2	Major	5.6.1	06/03/2015	04/05/2015 (closed)
1161437N1	Minor	4.8.2	06/03/2015	20/02/2016 (closed)
1161437N2	Minor	5.2.4	06/03/2015	20/02/2016 (closed)
1295340M1	Major	2.2.1	20/02/2016	20/04/2016 (closed)
1295340M2	Major	4.7.3	20/02/2016	20/04/2016 (closed)
1295340M3	Major	6.3.2	20/02/2016	20/04/2016 (closed)
1295340M4 – RSPO SCCS	Major	D.4.1	20/02/2016	20/04/2016 (closed)
1295340N1	Minor	4.1.2	20/02/2016	01/08/2017 (closed)
1295340N2	Minor	4.7.5	20/02/2016	01/08/2017 (closed)
1664926-201807-M1	Major	6.5.2	10/08/2018	01/10/2018 (closed)

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1664926-201807-M2	Major	4.7.3	10/08/2018	01/10/2018 (closed)
1664926-201807-M3- RSPO SCCS	Major	5.5	10/08/2018	01/10/2018 (closed)
1664926-201807-M4- RSPO SCCS	Major	5.11	10/08/2018	01/10/2018 (closed)
1992828-202012-M1	Critical	6.7.3	15/12/2020	23/02/2021 (closed)
1992828-202012-M2	Critical	7.2.6	15/12/2020	23/02/2021 (closed)
1992828-202012-M3	Critical	7.2.7	15/12/2020	23/02/2021 (closed)
1992828-202012-M4	Critical	7.10.1	15/12/2020	23/02/2021 (closed)
1992828-202012-N1	Minor	7.2.8	15/12/2020	Open
1992828-202012-N2	Minor	7.3.2	15/12/2020	Open
1992828-202012-N3	Minor	7.3.3	15/12/2020	Open

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 Hargy Oil Palms Limited 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.

List of Stakeholders contacted	
<p>Internal Stakeholders</p> <ul style="list-style-type: none"> - Workers in Hargy Estate, Navo Estate and Pandi Estate - Workers in Hargy POM, Barema POM and Navo POM - Smallholders (sampled) - Employees of Barema Compound 	<p>Union/Contractors</p> <ul style="list-style-type: none"> - Women Representative of Gomu Village - Suspended Smallholder - Hargy Oil Palm Workers Union
<p>Government Departments</p> <ul style="list-style-type: none"> - Committee Leader – Bialla Town Councillor - Bialla Health Centre - Gigipuna Village Communities 	<p>NGO</p> <ul style="list-style-type: none"> - Bialla Oil Palm Grower Association (BOGA)

Stakeholders comment

<p>01</p>	<p>Feedbacks: Committee Leader – Bialla Town Councillor (Mr. Samoa Gaa)</p> <ul style="list-style-type: none"> - There is no attention from Hargy to his community. - A lot of people interest to working at Hargy, but only few people from his community working at Hargy. The company hire workers from other province, not prioritizing local community. - Since Hargy exist, the local economic was improved. However, Hargy less concern for some infrastructure development such as sanitation, road maintenance, CSR. - Expectation from community that Hargy able to assist them through collaboration program, such as truck service, vehicle repairing. <p>Management Responses:</p> <ol style="list-style-type: none"> 1. HOPL has been working in collaboration with the LLG President and LLG Manager, Business house representative WNB - Nixon Volele on various projects in town. 2. HOPL repaired the washout outside the magistrates court at LLG office due to severe erosion - no support from LLG office 3. HOPL has contributed k15,000 to repair the Police armoury as weapons were going missing due to poor management - no support from LLG office 4. HOPL provided rubbish bins to the business houses and LLG office as there was no due care for hygiene and sanitation by the Councillors office. - no support from the LLG office 5. HOPL initiated a local contractor at a cost of K12,000 - K6000 of which Hargy contributed to conduct site preparations for Police Barracks - No assistance from LLG office 6. HOPL through is Parent company SIPEF has contributed K140,000 towards the refurbishment of the Bialla Maternity Ward - No assistance from the LLG Office or WNB Provincial Government 7. All road contracts for repairs awarded to local business through the WNB Government - HOPL has no authority in this process 8. All our recruitment criteria are done transparently and we follow the following recruitment process: we advertise (internally and or externally), shortlist/interview and hire suitable candidates based on set qualifications, skills & knowledge required to perform the role efficiently and competently. When we prefer local hire we indicate on the advert, and assess according to the position specifics, where locally are being given the opportunity to apply be considered in the hiring process but subject to passing the requirements of the position. All applicants for roles to HOPL are selected as per skill requirements 9. HOPL provides free slashing of schools and churches, community sports grounds at a cost of between K4,500 – K6,000 per month throughout its Agriculture footprint. 10. Hargy keeps Bialla airport open for emergencies / evacuations at 4,500 a month just for grass cutting not including management time etc. 11. HOPL contributes finances in the form of Diesel Supply, Vehicle Maintenance, Company Vehicle usage, Housing to the MS 19 and other MS teams when deployed to HOPL during times of Law and order crisis. 12. Collaboration projects fail - because the community unfortunately see it as a free hand out and take no pride or responsibilities and therefore do not care if these projects fail. <p>Audit Team Findings: Audit team accepts the explanation from the unit of certification.</p>
<p>02</p>	<p>Feedbacks: Bialla Health Centre (Mr. James Managen)</p> <ul style="list-style-type: none"> - Very happy with Hargy, a lot of supports to Bialla Health Centre like medicine, hospital supplies, infrastructure, laboratory, building, etc. - Hargy has own incinerator for medical waste disposal. - During covid19 pandemic, all controls is under medical health centre at Kimbe. If there is any suspected covid19, then directly goes to Kimbe. - Hargy build water supplies installation and distribute to all people at Bialla township. <p>Management Responses:</p>

	<p>HOPL will continue to work alongside the Health Centre as this is a vital service to the entire Community and HOPL employees and we will continue to support where we can.</p> <p>Audit Team Findings: Audit team takes the stakeholder comment as positive input.</p>
03	<p>Feedbacks: Gigipuna Village Communities (Mr. Alois Kosalkia)</p> <ul style="list-style-type: none"> - His role as GM of Development Corporation engaged in sawmills. - Feeling happy with existence of the company, because very helpful to his business as well, such as supplied of timber. - Also he feel so happy due to smallholder program development by Hargy, then local community and customary people can get the advantage of oil palm crops. - He also have LSS block at Soi (8.5 Ha) which supplied to Barema Mill. - There is no land disputes between Hargy and village since last 3 years in their community. - Hargy also concern with protection of buffer zone, RTE species by installing sign board at designated area. <p>Management Responses: HOPL will continue to work alongside communities.</p> <p>Audit Team Findings: Audit team takes the stakeholder comment as positive input.</p>
04	<p>Feedbacks: Women Representative of Gomu Village</p> <ul style="list-style-type: none"> - They are responsible for loose fruit sold to company and the money goes to mama card. - Hargy provides them with training and workshop for literacy, cooking class, sawing, food storage. - Hargy provides knowledge on oil palm block upkeep such as spraying safely, frond stacking, etc. - Concerns raised the payslip was not given to the women representative when they sold loose fruit. <p>Management Responses: Payslips are printed for both Papa and Mama Cards. Payslips are then given by the Extension Officer in charge of the area to the VOP/section committee to distribute to every grower (both Mama and Papa). If payslips are not received, enquiry can be made at CA office for follow up with the committee and officer in charge.</p> <p>Audit Team Findings: Audit team accepts the explanation from the unit of certification.</p>
05	<p>Feedbacks: Bialla Oil Palm Grower Association (BOGA)</p> <ul style="list-style-type: none"> - BOGA and Hargy actively discuss the progress for smallholder during Local Planning Committee meeting, every quarter. - Hargy explains to BOGA and the members the importance of maintains natural resources, protect wildlife, prohibit hunting of animal. - BOGA raised concerns to Hargy related to New Planting for Outgrowers. - BOGA raised concerns to Hargy related to transparency in FFB pricing formula. For example in FFB transport cost. BOGA raised this matter on every LPC meeting, but has not provide with satisfactory answer. <p>Management Responses:</p> <ol style="list-style-type: none"> 1. New Planting restrictions are based on RSPO recommendation, not HOPL policies. HOPL is looking forward to be able to assist the growers by developing new oil palm plantings once RSPO requirements can be fulfilled. That is unfortunately currently not feasible for Smallholder growers. 2. A new training program on FFB price formula has started in 2020, explaining in details how the price is calculated every month. To date 11 trainings have been organised. BOGA committees attended these trainings.

	<p>Audit Team Findings: Audit team noted the stakeholder comment and included as part of indicator 6.10. No further action.</p>
06	<p>Feedbacks: Suspended Smallholder (Mr. Jackson Kausam)</p> <ul style="list-style-type: none"> - Block #339, total 6 Ha, suspended because Jackson’s son was suspected of involvement in arm holdup of a public motor vehicle. The case was reported to the mobile police and later to Hargy. - Police went to the block burn down the house locked up the son. After realising that the son was not involved he was released. - Jackson and his son and wife went to the OPIC, Bialla Oil Palm Growers Association and all went and met with Hargy to resolve the matter. After discussion with Hargy, the ban was uplifted, and they started harvesting again. - Jackson said to take the matter to court, so he can be compensated for the loss of his house and property plus to clear his sons good name and was framed as a criminal. <p>Management Responses:</p> <ul style="list-style-type: none"> - The block was suspended by the LPC after the block holders were found to be in possession of stolen goods seized during a police inspection at the block. This investigation was as a consequence of an armed hold up of a passenger vehicle at Tiaru on 3 Oct 20. The block had previously been suspended for a similar incident in which the son of the block holder was involved. In the recent raid, the computer belonging the government department (MVIL) held up in the 2018 hold up was discovered to be in the block holder’s possession. - HOPL management were not aware, nor had any involvement, nor condone, the actions allegedly taken by the police to burn down the house in the course of their investigations. This is a police issue and does not involve HOPL and therefore any claims for compensation for the loss of the house, directed to HOPL will be referred back to the police. - The block holder raised their concerns regarding the innocence their son and asked the matter to be reviewed again by police. HOPL, through the Security Department and with the support of the Small Holders Department are providing assistance by liaising with the police to have this issue reviewed and to mediate the concerns raised by the block holders. If the result of this police review finds evidence to the contrary then HOPL will make recommendations to the LPC to have the suspension lifted. <p>Audit Team Findings: Audit team noted the information from stakeholder and verified the information from unit of certification and Smallholders Affair. Audit team accepts the explanation from the unit of certification.</p>
07	<p>Feedbacks: Mr. Joachim Baliau (Previous land owner of Noau Village):</p> <ul style="list-style-type: none"> - In 2011, HOPL and representative of Noau Village to discuss agreement about land LLB of Abulmosi. - The land is government/state land, HOLP assisted the community to get their lease land tittle from the government. Then the community gets the lease land tittle and lease it to HOPL. - The village community get economic benefit from the land lease. - No comment to HOPL performance, feel grateful to HOPL for improving the economic standard of the Noau Village community. - Joachim suggested that HOPL could provide social support, such as education, health and road infrastructure. <p>Management Responses:</p> <ul style="list-style-type: none"> - HOPL will continue to work alongside communities. - Social support such as education health and road infrastructure are government responsibilities. Having said that; HOPL is still heavily involved in supporting all these areas where it can. <p>Audit Team Findings: Audit team noted the information from stakeholder and verified the information from unit of certification and Smallholders Affair. Audit team accepts the explanation from the unit of certification.</p>
	<p>Feedbacks:</p>

<p>08</p>	<p>Mr. John Jeffry (President of Hargy Oil Palm Workers Union)</p> <ul style="list-style-type: none"> - HOPL support workers union by allowing workers union activities. - There is no support in terms of infrastructure such as office or room. - Last meeting between HOPL management and Workers Union was in March 2020, no other meeting conducted thereafter. - Workers Union advice that prior terminating an employee, it is better to give warning first to the related employee. - Some driver/operator did not have driving license and causing accident to other employees. - Advise that employees who are made redundant at age 50 must be sent to their home provinces and they can go to their districts. - Advise that the company must not use treats to stop workers from joining the union. - Advice that during audit, e.g. RSPO audit, the company should allow unions to contact auditors themselves without any fear or threat. <p>Management Responses:</p> <ul style="list-style-type: none"> - There is no requirement for businesses to provide Unions with an office in which to conduct their business. WNBK President has advised on numerous occasions that an office is being built by the union at his block in Barema. To date, it is unclear as to whether this has occurred. - HOPL are more than willing to meet with the union, a point that has been stated over and over previously. However, the onus of arranging the meetings rests with the union representatives. HOPL have never declined a meeting. - This is always the case for all disciplinary issues except Gross Misconduct. HOPL are under no obligation to share information with the union if the decision does not impact a union member. - This was a matter involving Mr. Jeffry personally of which an investigation has been completed and the findings delivered and resolved as per company procedures. - HOPL will repatriate employees in accordance with the company's policy and the PNG employment act. - If Mr John Jeffery has any evidence to support his above statement then he is welcome to present it. HOPL have not prevented the union from entering and engaging in their business when prior notice to enter the business has been provided. The union is dysfunctional, and have not been able to organise meetings despite being given the approval to do so previously from HOPL management. Union Membership is low because of the union's inability to manage themselves, not because of HOPL. - If Mr John Jeffery has any evidence to support his above statement then he is welcome to present it. This, in our view and unless proven otherwise, is a completely misleading and is a false statement. HOPL have always advised the Unions of the RSPO visit and have never threatened any of their representatives. HOPL have also never sat in on their meetings with the auditors so therefore HOPL is not aware of what has been discussed. <p>Audit Team Findings: Audit team accepts the explanation from organization.</p>
<p>09</p>	<p>Feedbacks:</p> <p>Employees of Barema Plantation</p> <ul style="list-style-type: none"> - Employee complaining that there are 1 house used by 2 families, the first family have 2 kids and the other family have 4 kids. - The company provide workers with gardening area for planting of staples and vegetables, however the gardening area for Barema Plantation workers is quite too far. <p>Management Responses:</p> <ul style="list-style-type: none"> - The one family was moved out already, all new build houses is allocated 2 rooms per family. Work is in Progress to reduce employee numbers to required ratio so that housing is adequate and each family will be housed in one house. This is documented HOPL's Continuous Improvement Plan - The gardening area is ±4 km away from the compound, but there is a gardening area close by behind the plantation office and canteen currently under survey. The plan is to block into small plots and allocate to each house for vegetable gardening only. <p>Audit Team Findings:</p>

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	Audit team accepts the explanation from organization.
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List of land owner / user contacted					
Name	Years of ownership / used	Land area (ha)	Agreement (Yes / No)	Agreement base on FPIC (Yes/No)	Compliance on the agreement terms and conditions
Mr. Joachim Baliau (Previous land owner of Noau Village)	N/A	N/A	Yes	Yes	Complied
Notes: Series of negotiation on the terms and conditions on the leasing is available (e.g. Lease Leased Back awareness conducted on 30 September 2008; meeting minutes dated 13 January 2010 on the sub-leasing agreement) prior signing the MoU on 08 March 2010. The Sub-leasing agreement was dated 5 September 2011. Map of the area surveyed by PNG General Surveyor dated 10 March 2010 is available.					

Previous land owner / user comment	
01	<p>Feedbacks: Mr. Joachim Baliau (Previous land owner of Noau Village):</p> <ul style="list-style-type: none"> - In 2011, HOPL and representative of Noau Village to discuss agreement about land LLB of Abulmosi. - The land is government/state land, HOLP assisted the community to get their lease land tittle from the government. Then the community gets the lease land tittle and lease it to HOPL. - The village community get economic benefit from the land lease. - No comment to HOPL performance, feel grateful to HOPL for improving the economic standard of the Noau Village community. - Joachim suggested that HOPL could provide social support, such as education, health and road infrastructure. <p>Management Responses:</p> <ul style="list-style-type: none"> - HOPL will continue to work alongside communities. - Social support such as education health and road infrastructure are government responsibilities. Having said that; HOPL is still heavily involved in supporting all these areas where it can. <p>Audit Team Findings: Audit team noted the information from stakeholder and verified the information from unit of certification and Smallholders Affair. Audit team accepts the explanation from the unit of certification.</p>

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

<p>The audit objectives have been achieved and the certificate scope remains appropriate. Based on the results of this audit, it is concluded that Hargy Oil Palms Limited has complied with the Papua New Guinea & Solomon Island National Interpretation 2019 for RSPO P&C 2018 for the Production of Sustainable Palm Oil 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 Hargy Oil Palms Limited is continued.</p>	
Report prepared by	Acceptance of Assessment Conclusion
Name: Eko Purwanto	Name: David Mather
Company Name: on behalf of BSI Services Malaysia Sdn Bhd	Company Name: Hargy Oil Palms Limited
Title: Audit Team Leader	Title: Chief Executive Officer
Signature: 	Signature: <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> 
Date: 2 March 2021	Date: 2 March 2021

Appendix A: Summary of Findings

Criterion / Indicator	Assessment Findings	Compliance	
Principle 1: Behave ethically and transparently			
Criterion 1.1			
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.			
1.1.1	<p>(C) Management documents that are specified in the RSPO P&C are made publicly available.</p> <p>Smallholder Requirement: Organization that is managing the smallholders shall hold relevant documents and make available to interested parties on request. - Critical (Major) compliance -</p>	<p>SOP for Dissemination of Company Information & Documents (Doc. No.: PRO-COM-SUS-002-03, Issue No.: 3 dated 14/2/2020) was developed to outline how the company's documentation is disseminated both internally and externally. The requests could be made through verbal requests, during stakeholder and/ or consultation meetings, written requests or via phone calls or emails. All the requests will be recorded in the Request for Information Register. Hargy Oil Palms Limited has developed a List of Publicly Available Documents (Doc. No.: REG-COM-SUS-001-13, Issue No.: 13 dated 11/6/2020) approved by Chief Executive Officer. The documents are available in the notice board on sites, employee handbook and on request approved by CEO. For eg: company's policies, SEIA and EAI Register, OSH plan, HCV documentation, certification assessment reports, pollution prevention and reduction plan, land title and negotiation procedure. Besides, all the company's policies and grievance procedure are available in the company's website, https://www.sipef.com/hq/sustainability/sustainable-approach/</p>	Complied
1.1.2	<p>Documented Information is provided in English and accessible to relevant stakeholders. Explanatory information may be provided in writing or orally in Tok Pisin (PNG) or SI Pijin (Solomon Islands) - Minor compliance -</p>	<p>All documented information is available in English. Company made available policy in Tok Pisin: Freedom of Association Policy No.POL-HRD-GEN-009-04, dated 7 June 2019.</p> <p>Audit team sighted records of Field Day Report dated 5 August 2020, venue Uasilau Village, explanation provided in Tok Pisin, reported in</p>	Complied

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		<p>English: Transport operation system, harvesting schedule, Nasfund for growers saving; Transmission decrease estate; Use of child labour, provision of education, gender equality, health and safety; Environmental responsibility; Social responsibility; COVID-19 awareness. Attendance list recorded 172 smallholders.</p> <p>Audit team sighted records of RSPO Meeting Report dated 25 September 2020, venue Kabaya Village, explanation provided in Tok Pisin, reported in English: Minimum legal document such as Land Title and Surveyors Map, Transfer of Title to justify your ownership of land; No new planting procedure; No burning during replanting; No child labour; Buffer zone and endangered species protection. Attendance list recorded 35 smallholders.</p>	
<p>1.1.3</p>	<p>(C) Records of requests for information and responses are maintained. - Critical (Major) compliance -</p>	<p>The records of requests for information and responses are available at each site, whilst Grievances are registered centrally at Community Affairs Department and forwarded to Compliance Department. Records of the requests will be registered in the Request for Information Register as per the procedure above.</p>	<p>Complied</p>
<p>1.1.4</p>	<p>(C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by a nominated management official. - Critical (Major) compliance -</p>	<p>Communication Policy (Doc. No.: POL-HRD-GEN-002-05, Issue No.: 5 dated 7/6/2019) was established to facilitate the communication process whenever necessary. The communication process is a two-way process at all levels. The methods of communication are such as verbal, written and information posted on notice boards. The Community Affairs Manager is the person responsible in communication any internal or external affairs related to relevant stakeholders. The policy is communicated to the workers and seen the briefing records dated 22/6/2020 and 13/7/2020 in Atata Plantation (Navo Estate), 8/7/2020 in Bakada Plantation (Pandi Estate), 5/3/2020 in Barema Plantation (Hargy Estate), 27/5/2020 in Barema POM and 17/7/2020 in Hargy POM.</p> <p>The Extension Officers will conduct Field Day with smallholders to disseminate information and communicate with the smallholders.</p>	<p>Complied</p>

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		Contractors have signed on contract agreement and briefed on the policy.	
1.1.5	There is a current list of contact and details of stakeholders and their nominated representatives. - Minor compliance -	List of Interested Parties (Doc. No.: REG-COM-GEN-001-09, Issue No.: 9 dated 22/4/2020) was available to include all the categories of relevant stakeholders such as national, province and local government authorities, oil palm growers, local communities & wards, incorporated land group (ILG) & Landowner companies (LandCos), landowners' associations, NGOs, workers associations, other organizations and goods suppliers. Contact and details of the stakeholders are clearly listed.	Complied
Criterion 1.2			
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 by the milling Company. The policy is extended to smallholders through extension services provided by the Company and Government. Smallholders are expected to apply the policy in their own dealings with others. Smallholder Requirement: Organization that is managing the smallholders required to have a written policy committing to a code of ethical conduct and integrity in all operations and transactions - Minor compliance -	Unit of Certification has had POLICY CONCERNING ETHICAL CONDUCT (POL-HRD-GEN-003-03), issue No: 3, issued date: 7 Jun 2019. Awareness of this policy: 1. Atata 1 Plantation: 29 Jun 2020, attended by 50 employees. 2. Bakada Plantation: 8 Jul 2020, attended by 60 employees. 3. Barema Plantation: 6 Jul 2020, attended by 15 employees. 4. Barema POM: 26 May 2020, attended by 32 employees. 5. Navo POM: 18 Jun 2020, attended by 12 employees 6. Hargy POM: 17 Feb 2020, attended by 14 employees This policy has been communicated through the Hargy websites and notice boards within their operating sites. The policy emphasized on no illegal gratification and corrupt practices (solicitation and/or acceptance of corrupt payments, making corrupt payments, commission, using company resources), and receiving/giving gifts. This policy also cascading into relevant procedures, such as Contract Management Process (PRO-LEG-CON-001-01), dated 25 October 2019.	Complied

		<p>Smallholders: Associated smallholders has had Policy Concerning Ethical Conduct that issued by OPIC since 19th July 2017. This policy containing: Basic Principles; Conflict of Interest; Illegal Gratification and Corrupt Practice; Gifts and Internal Controls.</p>	
1.2.2	<p>A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice. - Minor compliance -</p>	<p>HOPL imposed internal audits to controls, prevent and detect any corrupt practices. It does this through whistle-blower process. In order to ensure HOPL is dealing with appropriated contractors, the controlled applied is a Tri-verification mechanism. Any contract that is proposed by the proposer will approved by the Head of Department and later verified by the Legal Department and Finance Department to ensure that the company has met the country legal requirements.</p> <p>Smallholders: Extension officer together with OPIC officer conduct the monitoring.</p>	Complied
<p>Principle 2: Operate legally and respect rights</p>			
<p>Criterion 2.1 There is compliance with all applicable local, national and ratified international laws and regulations.</p>			
2.1.1	<p>(C) The Unit of Certification complies with legal requirements</p> <p>Smallholder Requirement: Smallholders are to comply with all applicable PNG or Solomon Islands legal requirements. Organization that is managing the smallholders requires to monitor compliance during extension activities. Block inspection reports to provide evidence of compliance. - Critical (Major) compliance -</p>	<p>The Legal Department Head is responsible to track the changes of the regulations. Through interview, it was confirmed to the assessment team that he tracks the changes on the laws using the Pacific Islands Legal Information Institute (PaCLII) website.</p> <p>In Hargy POM; the Environment Permit to Hargy Oil Palms Limited, dated 11 January 2001, amendment 16 June 2006, expiry on 31 December 2053. The permit to carry out works at Ibana Oil Palm Plantation and Navo Palm Oil Mill within Portion 624, Biialla, West New Britain Province. - PNG Environment Act (Amendment) 2014</p>	Complied

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		<ul style="list-style-type: none"> - PNG Environmental Code of Practices – Vehicle Workshop & Hydrocarbons, Storage, Resale and Usage - PNG Environmental Code of Practice for Sanitary Landfill Sites <p>In Hargy POM; the Environment Permit to Hargy Oil Palms Limited, dated 11 January 2001, amendment 16 June 2006, expiry on 31 December 2053. The permit to carry out works at Ibana Oil Palm Plantation and Navo Palm Oil Mill within Portion 624, Bialla, West New Britain Province.</p> <p>“Certificate of Registration as a Factory – Mill Processing Plant No.9651 for Hargy Oil Palms Limited Hargy Mill, based on Industrial Safety, Health and Welfare Act 1961-1969”, until 31 December 2020.</p> <p>“Certificate of Registration as a Factory No.9652 – Power House for Hargy Oil Palms Limited Navo Mill, based on Industrial Safety, Health and Welfare Act 1961-1969”, until 31 December 2020.</p> <p>“Certificate of Registration as a Factory No.9653 – Water Treatment Plant for Hargy Oil Palms Limited Hargy Mill, based on Industrial Safety, Health and Welfare Act 1961-1969”, until 31 December 2020.</p> <p>“Certificate of Registration as a Factory No.9657 – Boiler house for Hargy Oil Palms Limited Hargy Mill, based on Industrial Safety, Health and Welfare Act 1961-1969”, until 31 December 2020.</p> <p>“Certificate of Registration of a Boiler Pressure Vessel No.12233, Registered No.B.1895 for PT. Atmindo Bidrum WT Boiler in Hargy Oil Palms Limited Hargy Mill, based on Industrial Safety, Health and Welfare Act 1961”, dated 24 April 2020 until 24 April 2021.</p> <p>“Certificate of Registration of a Boiler Pressure Vessel No.12220, Registered No.PV.0955 for Sterilizer-2 in Hargy Oil Palms Limited Hargy Mill, based on Industrial Safety, Health and Welfare Act 1961”, dated 24 April 2020 until 24 April 2021.</p>	
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		<p>"Certificate of Inspection of a Boiler Pressure Vessel No.10313, Certified No.PV.6955 for Sterilizer-2 in Hargy Oil Palms Limited Hargy Mill, based on Industrial Safety, Health and Welfare Act 1961", dated 24 April 2020 until 24 April 2021.</p> <p>"Certificate of Inspection of a Boiler Pressure Vessel No.10326, Certified No.PV.1595 for Back Pressure Vessel, in Hargy Oil Palms Limited-Hargy Mill, based on Industrial Safety, Health and Welfare Act 1961", dated 24 April 2020 until 24 April 2021.</p> <p>---</p> <p>In Barema POM, the list comprise of: "Certificate of Registration as a Factory – Mill Processing Plant No.9625 for Hargy Oil Palms Limited Barema Mill, based on Industrial Safety, Health and Welfare Act 1961-1969", until 31 December 2020.</p> <p>"Certificate of Registration as a Factory No.9631 – Sterilising Plant for Hargy Oil Palms Limited Barema Mill, based on Industrial Safety, Health and Welfare Act 1961-1969", until 31 December 2020.</p> <p>"Certificate of Registration as a Factory No.9628 – Boiler Room for Hargy Oil Palms Limited Barema Mill, based on Industrial Safety, Health and Welfare Act 1961-1969", until 31 December 2020.</p> <p>"Certificate of Registration as a Factory No.9626 – Biogas Plant for Hargy Oil Palms Limited Barema Mill, based on Industrial Safety, Health and Welfare Act 1961-1969", until 31 December 2020.</p> <p>"Certificate of Registration as a Factory No.9633 – Machining/Welding for Hargy Oil Palms Limited Barema Mill, based on Industrial Safety, Health and Welfare Act 1961-1969", until 31 December 2020.</p>	
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		<p>"Certificate of Registration of a Boiler Pressure Vessel No.12270, Registered No.B.1353 for Boiler-1 in Hargy Oil Palms Limited Barema Mill, based on Industrial Safety, Health and Welfare Act 1961", dated 24 April 2020 until 24 April 2021.</p> <p>"Certificate of Registration of a Boiler Pressure Vessel No.12257, Registered No.PV.1337 for Back Pressure Vessel in Hargy Oil Palms Limited Barema Mill, based on Industrial Safety, Health and Welfare Act 1961", dated 24 April 2020 until 24 April 2021.</p> <p>"Certificate of Registration of a Boiler Pressure Vessel No.12272, Registered No.PV.1357 for Gas Blower in Hargy Oil Palms Limited Barema Mill-Biogas Plant, based on Industrial Safety, Health and Welfare Act 1961", dated 24 April 2020 until 24 April 2021.</p> <p>"Certificate of Inspection of a Boiler Pressure Vessel No.10345, Certified No.PV.3132 for Boiler in Hargy Oil Palms Limited Barema Mill, based on Industrial Safety, Health and Welfare Act 1961", dated 24 April 2020 until 24 April 2021.</p> <p>"Certificate of Inspection of a Boiler Pressure Vessel No.10364, Certified No.PV.1357 for Gas Blower in Biogas Plant, address Hargy Oil Palms Limited-Barema Mill, based on Industrial Safety, Health and Welfare Act 1961", dated 24 April 2020 until 24 April 2021.</p> <p>---</p> <p>In Navo POM, the list of legal compliance comprise of: Environment Permit to Hargy Oil Palms Limited, dated 11 January 2001, amendment 16 June 2006, expiry on 31 December 2053. The permit to carry out works at Ibana Oil Palm Plantation and Navo Palm Oil Mill within Portion 624, Bialla, West New Britain Province.</p>	
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		<p>"Certificate of Registration as a Factory – Mill Processing Plant No.9620 for Hargy Oil Palms Limited Navo Mill, based on Industrial Safety, Health and Welfare Act 1961-1969", until 31 December 2020.</p> <p>"Certificate of Registration as a Factory No.9621 – Boiler Plant for Hargy Oil Palms Limited Navo Mill, based on Industrial Safety, Health and Welfare Act 1961-1969", until 31 December 2020.</p> <p>"Certificate of Registration as a Factory No.9623 – Water Treatment Plant for Hargy Oil Palms Limited Navo Mill, based on Industrial Safety, Health and Welfare Act 1961-1969", until 31 December 2020.</p> <p>"Certificate of Registration as a Factory No.9624 – Mill Maintenance Workshop for Hargy Oil Palms Limited Navo Mill, based on Industrial Safety, Health and Welfare Act 1961-1969", until 31 December 2020.</p> <p>"Certificate of Registration of a Boiler Pressure Vessel No.12242, Registered No.PV.2123 for Steriliser-1 in Hargy Oil Palms Limited Navo Mill, based on Industrial Safety, Health and Welfare Act 1961", dated 24 April 2020 until 24 April 2021.</p> <p>"Certificate of Registration of a Boiler Pressure Vessel No.12245, Registered No.PV.1334 for Back Pressure Vessel in Hargy Oil Palms Limited Navo Mill, based on Industrial Safety, Health and Welfare Act 1961", dated 24 April 2020 until 24 April 2021.</p> <p>"Certificate of Registration of a Boiler Pressure Vessel No.12246, Registered No.PV.1338 for Steam Separator in Hargy Oil Palms Limited Navo Mill, based on Industrial Safety, Health and Welfare Act 1961", dated 24 April 2020 until 24 April 2021.</p>	
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		<p>“Certificate of Inspection of a Boiler Pressure Vessel No.10335, Certified No.PV.2123 for Sterilizer-1 in Hargy Oil Palms Limited Navo Mill, based on Industrial Safety, Health and Welfare Act 1961”, dated 24 April 2020 until 24 April 2021.</p> <p>“Certificate of Inspection of a Boiler Pressure Vessel No.10338, Certified No.PV.1337 for Back Pressure Vessel, in Hargy Oil Palms Limited-Navo Mill, based on Industrial Safety, Health and Welfare Act 1961”, dated 24 April 2020 until 24 April 2021.</p> <p>---</p> <p>In Navo Estate – Atata Plantation, the list of legal compliance consist of: “License to Keep a Store where Inflammable Liquids and/or Dangerous Goods May Be Kept – Storage Tank No.27584 for Hargy Oil Palms Limited Atata Plantation, based on Industrial Safety, Health and Welfare Act 1961-1969”, until 30 September 2020.</p> <p>“License to Keep a Store where Inflammable Liquids and/or Dangerous Goods May Be Kept – Fertilizer Shed No.27758 for Hargy Oil Palms Limited Atata Plantation, based on Industrial Safety, Health and Welfare Act 1961-1969”, until 30 September 2020.</p> <p>“Certificate of Registration as a Factory – Power house No.9610 for Hargy Oil Palms Limited Atata Plantation, based on Industrial Safety, Health and Welfare Act 1961-1969”, until 31 December 2020.</p> <p>In Pandi Estate, the list of legal compliance consist of: “Certificate of Registration as a Factory – Fertilizer Storage No.8821 for Hargy Oil Palms Limited Bakada Plantation, based on Industrial Safety, Health and Welfare Act 1961-1969”, until 31 December 2020.</p>	
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		<p>"Certificate of Registration as a Factory – Chemical Mixing Bay No.8820 for Hargy Oil Palms Limited Bakada Plantation, based on Industrial Safety, Health and Welfare Act 1961-1969", until 31 December 2020.</p> <p>"Certificate of Registration as a Factory – Vehicle Maintenance No.8814 for Hargy Oil Palms Limited Bakada Plantation, based on Industrial Safety, Health and Welfare Act 1961-1969", until 31 December 2020.</p>	
<p>2.1.2</p>	<p>The milling Company has a documented system for ensuring legal compliance in place. This system has a means to track changes to the law and also includes listing and evidence of legal due diligence of all contracted third parties, recruitment agencies, service providers and labour contractors.</p> <p>Smallholder Requirement: Organization that is managing the smallholders shall disseminate information on legal changes to smallholders. - Minor compliance -</p>	<p>Hargy Oil Palms Limited established Procedure Compliance Obligation No.PRO-COM-EMS-002-10, dated 28 February 2020.</p> <ul style="list-style-type: none"> - This procedure to identify and understand legislations and regulations that apply. - List of legislation and regulation reviewed annually. - Source of relevant legislation: http://www.paclii.org/pg/legis/consolidated/ - any new or changed requirements must be addressed. - The reviewed list of applicable legislations will then be used to review and update Legal Compliance Checklist. - Any nonconformance identified discussed with relevant staff, corrective and/or preventive actions are agreed on and implemented. <p>Audit team sighted document List of PNG Applicable Legislations No.REG-COM-GEN-002-10, issue No.10, dated 24 February 2020. The PNG Applicable Legislations comprise of 71 Legislations and PNG Code of Practices. Some of the newest legislation: Business Name Act 2014 – reviewed on 19 February 2020. Cybercrime Code Act 2016 – reviewed 20 February 2020. Building Act 1971 – reviewed on 19 February 2020; status amended through Building Act 2016.</p> <p>Legal Compliance Checklist, latest version 14 August 2020.</p>	<p>Complied</p>

<p>2.1.3</p>	<p>For Company land, legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries.</p> <p>For Smallholder land, boundaries have been defined by a registered surveyor and portion numbers allocated by the Surveyor General OR boundaries of Customary Land have been defined by traditional means and agreed between neighbours with common boundaries and other interested parties; AND there is no significant dispute over tenure.</p> <p>Smallholder allotment boundaries may be identified by traditional means provided that boundary locations are agree by all neighbouring parties that share common boundaries.</p> <p>Guidance: Significant disputes are those disputes currently before the Courts.</p> <p>Smallholders requirement:</p> <p>Smallholders, evidence of the "Right to use the land" will be demonstrated by compliance with the following:</p> <p>a) Land title or lease OR uncontested occupancy where</p> <ul style="list-style-type: none"> boundaries have been defined by a registered surveyor and portion numbers allocated by the Surveyor General or boundaries have been defined by traditional means and agreed between neighbours with common boundaries and other interested parties; there is no significant dispute over tenure; Smallholder allotments, boundaries may be identified by traditional means provided that boundary locations are agreed by all neighbouring parties that share common boundaries. 	<p>Smallholders 080803 Susan Jerom, VOP with year of planting 1997. CLUA formed at OPIC, the plantation on customary land. No copy available with her. No dispute during cultivation, no dispute currently.</p> <p>Smallholders 01274 Theo Vincent, LSS 8.55Ha, with replanting 2Ha in 2008 and another replanting 2Ha in 2014. Land title available for 99 years. Agricultural Lease under Section 56, to Vinien Nusbui, dated 14 December 1978, Portion 274, Milinch Nakanai, Fourmil Talasea, area of 8.55Ha, West New Britain Province. Land title completed with map scale 1:7,500 for land parcel No.274, of 8.55Ha, Volume 71, Folio 124, Registration 31/3/1982. No dispute during cultivation, no dispute currently. Theo Vincent explains ongoing issue with the boundary. Said boundary was moved, have not reported but have already spoken to neighbour.</p> <p>Smallholders 040001 Tomarum Ali (interviewed wife, husband attending funeral), 2Ha VOP with year of planting 1998. Clan Land Use Agreement N0.040001, to Tomarum Ali, No.040001, for 2 Ha, for period 20 years – signed on 20 July 2017 by Gibolu Clans. No dispute during cultivation, no dispute currently.</p> <p>Smallholders 040025 Morgan Paliavu on state land. Has made submission to lands and Department of Agriculture Lease for any available land.</p> <ul style="list-style-type: none"> - Certificate of Incorporation of an Association Malasi Two Gule Community Association Inc. 5-104844, dated 19 December 1997. Maasi Gule Community Association Portion 839 – Block Holder List comprise of 99 members, including Morgan Paliavu 040025. - Notice Under Section 69 (2)(d) Land Act 1996 from Delegate of the Minister for Lands and Physical Planning, expansion of oil palm industry by Malasi Gule Community Association, covering area of 	<p>Complied</p>
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	<p>- Minor compliance -</p>	<p>1188.50 Ha on survey plan catalogue 15/494, Land File Reference 19038/0839, dated 21 July 2017.</p> <ul style="list-style-type: none"> - Application or Tender Form Notice under Sec 69 (2)(d) Land Act 1996 for Malasi Gule Community Association, type of lease applied Agriculture Lease, for Portion 839 Milinch of Banga Fourmil of Talasea, West New Britain, PNG, dated 21 July 2020. <p>Smallholders 040623 Baimo Paliavu (interview daughter of Baimo). The area was 2Ha block, identified as LSS, but no land title with block holder. Replanting on 2012. Baimo passed away, payment done but still waiting to transfer title. Document for transfer of title available: Statutory Declaration from Aimo Paliavu daughter; Luisa Ipe and Elisabeth Kavala to Dina Sabtaro to have the Title transmitted to her name, dated 5 June 2017.</p> <p>No dispute, no land issue.</p> <p>Smallholders 041176 Herman Bua.</p> <ul style="list-style-type: none"> - Sighted Application or Tender Form under name Ereman Bua, type of lease applied Agriculture Lease, for Portion 1176 Milinch of Banga Fourmil of Talasea, West New Britain, PNG, dated 12 August 2016. Statement from Division of Lands & Physical Planning from West New Britain Provincial Administration, dated 12 August 2016 stating his application is still pending. - Provincial Treasury Office – Kimbe Official Receipt from Ereman Bua, Land Application Fee Port 1176, Milinch Banga, Fourmil Talasea of K50.00 cash – dated 12 August 2016. Collector Ref 2/744/13. - Inspection Report from Division of Lands & Physical Planning from West New Britain Provincial Administration, dated 15 August 2016 for Portion 1176, Miinch Banga, Fourmil Talasea, type of lease Agricultural, Land area inspected 7.4Ha. Remarks the applicant has already developed 2Ha. 	
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		<p>- Survey map Portion 1170-1176 & 1197 scale 1:5,000, Milinch of Banga, Fourmil of Talasea; Catalogue No.15/672. No dispute during cultivation, no dispute currently.</p> <p>Smallholders 161601 Amos Koi, 2Ha land, VOP with year of planting 2006. Clan Land Use Agreement No.16-0001, to Amos Koi, for 2 Ha, for period 30 years – signed on 16 April 2018 by Keakea Clan Leaders. No dispute during cultivation, no dispute currently.</p> <p>Smallholders 161609 Boto Marisa, 2Ha land, VOP with year of planting 2006. Clan Land Use Agreement No.16-0001, to Boto marisa, for 2 Ha, for period 20 years – signed on 15 September 2018 by Gararua Clan Leaders. No dispute during cultivation, no dispute currently.</p> <p>Smallholders 050172 Wasoko Umesia Golupo, LSS 6Ha. Land title available for 99 years.</p> <ul style="list-style-type: none"> - Agricultural Lease under Section 56, to Umesia Holupo, dated 29 July 1965, Portion 172, Milinch Banga, Fourmil Talasea, area of 16 acres, West New Britain Province. Land title completed with map. - Statutory Declaration by Vasoko Umesia, nominated as the next of kin to take possession of father’s estate dated 17 August 2016. Based on convened on 16 August 2016, witnessed by all family members. - Next of Kin Identification Form, for Portion 172, dated 16 August 2016: : Tuali Umesia, Soa Umesia, Damaris Umesia, Ema Umesia. <p>No dispute during cultivation, no dispute currently.</p> <p>Smallholders 050287 Samson Nata, LSS 2Ha.</p> <ul style="list-style-type: none"> - Certificate of Incorporation of an Association Masile Community Association Inc. 5-104749, dated 31 October 2017. Masile Community Association Portion 1049 – Block Holder List comprise of 14 members, including Samson Nata 050287. 	
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		<ul style="list-style-type: none"> - Application or Tender Form Notice under Sec 69 (2)(d) Land Act 1996 for Masile Community Association, type of lease applied Agriculture Lease, for Portion 1049 Milinch of Banga Fourmil of Talasea, West New Britain, PNG, dated 14 May 2018. <p>Smallholders 260021 Stanis Meledi.</p> <ul style="list-style-type: none"> - Certificate of Incorporation of an Association: Sege Village Association Inc. 5-105095, dated 9 April 2018. Sege Village Association Portion 836 – Block Holder List comprise of 14 members, including Stanis Meledi 260021. - Application or Tender Form Notice under Sec 69 (2)(d) Land Act 1996 for Sege Village Association, type of lease applied Agriculture Lease, for Portion 836 Milinch of Banga Fourmil of Talasea, West New Britain, PNG, dated 21 July 2020. <p>Smallholders 260574 Thomas Ave.</p> <ul style="list-style-type: none"> - Department of Lands Application for a Replacement Title for land portion 574, Milinch Banga, Fourmil Talasea, under name Thomas Ave; land of 13.69Ha, the title was lost. Declared at Bialla, 3 May 2018. - Survey map Portion 568-576 scale 1:5,000, Milinch of Banga, Fourmil of Talasea; Catalogue No.15/235. - Data Verification for Owners Thomas Ave, Portion 574, Commence date 20 September 1979, terms 99 years. <p>Smallholders 260577 Boas Soa.</p> <ul style="list-style-type: none"> - Department of Lands Application for a Replacement Title for land portion 577, Milinch Banga, Fourmil Talasea, under name Pupusou Waubi; the title was lost. Declared at Bialla, 11 May 2017. - Statutory Declaration by Boas Soa, declared he has purchased oil palm block portion 577 Milinch Banga, Fourmil Talasea. He made payment of PGK5,500 to Pupusou Waubi. The original copy of the title for lease 	
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		<p>Portion 577 has been lost by registered leesees Mr. Pupusou Waubi; dated 11 May 2017.</p> <ul style="list-style-type: none"> - Survey map Portion 577-583 scale 1:5,000, Milinch of Banga, Fourmil of Talasea; Catalogue No.15/236. <p>Smallholders 290599 Jerry Boi.</p> <ul style="list-style-type: none"> - Application or Tender Form Notice under Sec 69 (2)(d) Land Act 1996 for Jerry Boi, type of lease applied Agriculture Lease, for Portion 599 Milinch of Banga Fourmil of Talasea, West New Britain, PNG, dated 16 July 2020. - Survey map Portion 599 scale 1:6,000, Milinch of Banga, Fourmil of Talasea; Catalogue No.15/211. <p>Smallholders 290777 Lydia Suma.</p> <ul style="list-style-type: none"> - Department of Lands Application for a Replacement Title for land portion 777, Milinch Banga, Fourmil Talasea, under name Lydia Suma; the title was lost. Declared at Biialla, 9 June 2019. - Statutory Declaration by Lydia Suma, declared he has purchased oil palm block portion 777 Milinch Banga, Fourmil Talasea. The original copy of the title for lease Portion 777 has been lost; dated 9 June 2019. - Survey map Portion 777 scale 1:6,000, Milinch of Banga, Fourmil of Talasea; Catalogue No.15/298. <p>Smallholders 292902 Rupen Silalea.</p> <ul style="list-style-type: none"> - Application or Tender Form Notice under Sec 69 (2)(d) Land Act 1996 for Sale Community Association, type of lease applied Agriculture Lease, for Portion 728 Milinch of Banga Fourmil of Talasea, West New Britain, PNG, dated 21 July 2020. - Notice Under Section 69 (2)(d) Land Act 1996 from Delegate of the Minister for Lands and Physical Planning, expansion of oil palm industry by Sale Community Association, covering area of 37 Ha on 	
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		<p>survey plan catalogue 15/212, Land File Reference 19038/0728, dated 21 July 2017.</p> <ul style="list-style-type: none"> - Notice of Intention to Apply for The Incorporation of An Association, from Mosi Kaitale, from Sale Community Association, dated 21 July 2020. - Notice of Passing of Special Resolution to Which Section 9 Applies for Sale Community Association dated 21 July 2020. - Survey map Portion 728 scale 1:6,000, Milinch of Banga, Fourmil of Talasea; Catalogue No.15/212. <p>Smallholders 292928 Uluvi Kivung.</p> <ul style="list-style-type: none"> - Application or Tender Form Notice under Sec 69 (2)(d) Land Act 1996 for Valepe Community Association, type of lease applied Agriculture Lease, for Portion 1210 Milinch of Banga Fourmil of Talasea, West New Britain, PNG, dated 21 July 2020. - Notice Under Section 69 (2)(d) Land Act 1996 from Delegate of the Minister for Lands and Physical Planning, expansion of oil palm industry by Valepe Community Association, covering area of 93.90 Ha on survey plan catalogue 15/679, Land File Reference 19038/1210, dated 21 July 2017. - Notice of Intention to Apply for The Incorporation of An Association, from Tavison Kanawei, from Valepe Community Association, dated 21 July 2020. - Notice of Passing of Special Resolution to Which Section 9 Applies for Valepe Community Association dated 21 July 2020. - Survey map Portion 1210 scale 1:5,000, Milinch of Banga, Fourmil of Talasea; Catalogue No.15/679. <p>Smallholders 321106 Stanis Ubia,</p> <ul style="list-style-type: none"> - Call for Land Board Recommendation No.1922, dated 7 July 1994. The lease was advertised as available for Application by Notice in the 	
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		<p>National Gazette of 11 November 1993. Total 114 formal applications were received for advertisement.</p> <ul style="list-style-type: none"> - Survey map Portion 1106, 7.64Ha, scale 1:5,000, Milinch of Banga, Fourmil of Talasea; Catalogue No.15/666. 	
<p>Criterion 2.2: All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements</p>			
2.2.1	<p>A list of contracted parties is maintained. Contracted parties include parties with whom a formal documented contract is in place and Smallholders where the contract is implied through the Smallholder offering fruit for sale by placing it at the pick-up point and the Company accepting the Smallholders offer by collecting it. The price to be paid and other conditions of the transaction are communicated by the Company. Each Smallholder pick-up is a separate transaction.</p> <p>Guidance: The Company docket issued when small-holder fruit is collected is evidence of the contract for that transaction.</p> <ul style="list-style-type: none"> - Minor compliance - 	<p>Unit of Certification has a 2020 Awarded Contracts Master List for all HOPL operating sites. According to the list, there are 32 contracts since January to June 2020 that have been reviewed.</p> <p>Sample of contract seen are:</p> <ul style="list-style-type: none"> - HOPL2020-002. Grounds Upkeep – Grasscutting activity. Contractor name: Earthworks Mowing Services Ltd. Dated 3 February 2020. - HOPL2020-004. Supply Labour Only – Mill. Contractor name: Marea General Contractors Ltd. Dated 20 February 2020. - HOPL2020-007. Hire of Heavy Equipment. Contactor name: Ambu Naiya Investment Ltd. Dated 6 February 2020. - HOPL2020-014. Delivery of Seedlings and Fertilizer. Contractor name: Roken Trading. Dated 3 April 2020. - HOPL2020-023. FFB Cartage. Contractor name: Infinite Transport. Dated 24 February 2020. <p>All the contracted parties are documented and well maintained by relevant department.</p>	Complied
2.2.2	<p>All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by all parties to the contract.</p> <p>Guidance: Companies may have standard conditions of supply for Smallholders which include this requirement.</p> <ul style="list-style-type: none"> - Minor compliance - 	<p>Sample of contract: Contract No. HOPL2020-023. FFB Cartage. Contractor name: Infinite Transport. Dated 24 February 2020. Within this contract already mentioned specific clause on meeting applicable legal requirements.</p>	Complied

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		On clause xi. "contractor is responsible to supply HOPL with a Certificate of compliance or by Law.	
2.2.3	<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>Guidance: Companies may have standard conditions of supply for Smallholders which include this requirement.</p> <p>- Minor compliance -</p>	<p>Sample of contract taken: Contract No. HOPL-2020-002. Grounds Upkeep – Grasscutting activity. Contractor name: Earthworks Mowing Services Ltd. Dated 3 February 2020.</p> <p>In point 11. Mentioned "The contractor must meet minimum legal terms and conditions of the PNG legislation regarding employment".</p>	Complied
<p>Criterion 2.3: All FFB supplies from outside the unit of certification are from legal sources.</p>			
2.3.1	<p>(C) For all directly sourced FFB, the mill requires: Company plantations, this will be Division or Sub-division, for Smallholder fruit, this will be Smallholder name, Division or Sub-division. Proof of the ownership status or the right/claim to the land by the grower/smallholder. Milling Companies in PNG and the Solomon Islands may only source fruit from their own plantations and directly from Independent Smallholders in geographic proximity that are participants in the Unit of Certification of the applicable smallholder group.</p> <p>- Critical (Major) compliance -</p>	<p>Hargy Oil Palms Lintied consist of three Palm Oil Mill which supplied by 3 Own Estates (Hargy Estate, Navo Estate and Pandi Estate) and Smallholders.</p> <p>The land titles for lands that was developed by HOPL are available and kept onsite. Scope of RSPO certification are: Own Estates = 20,468.69 Ha Smallholders = 13,892.73 Ha Three Mills covering Hargy POM, Barema POM and Navo POM.</p>	Complied
2.3.2	No fruit is to be indirectly sourced through third party traders.	Hargy Mill, Navo Mill and Barema Mill only receives FFB's from their supply base. No third parties FFB entering the mills.	Complied
<p>Principle 3: Optimise productivity, efficiency, positive impacts and resilience</p>			
<p>Criterion 3.1 There is an implemented management plan that aims to achieve long-term economic and financial viability.</p>			

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<p>3.1.1</p>	<p>(C) A business or management plan (minimum three years) is documented by the Milling Company that includes the projected contribution of fruit supplied by Smallholders that are within the Unit of Certification.</p> <p>- Critical (Major) compliance -</p>	<p>HOPL had a ten years business plan initiated, compiled and distributed from The CEO’s office. The document details among others the following data:</p> <p>Annual crop from plantation estates and the smallholders. Age profile, year planted & YPH (ranges from 17.59 – 30.06) The distribution of crop to the 3 mills to ensure optimum capacity. Targeted extraction ratios CPO Hargy Mill 23.96%; Navo Mill 24.50%; Barema Mill 25.00%; average 24.53%; and CPKO Hargy Mill 2.16%; Barema Mill 2.08%. Production cost of both estates and mills. Projected Profit/Loss statement.</p> <p>The projected crop for a duration of 2019 - 2028 was sighted and summarised below:</p> <table border="1" data-bbox="1088 810 1653 949"> <thead> <tr> <th>Source of FFB</th> <th>Total FFB 2019-2029</th> <th>% contribution</th> </tr> </thead> <tbody> <tr> <td>Company Plantation</td> <td>3,924,222</td> <td>61.42</td> </tr> <tr> <td>Growers</td> <td>2,464,588</td> <td>38.58</td> </tr> <tr> <td>Total</td> <td>6,388,811</td> <td>100.00</td> </tr> </tbody> </table> <table border="1" data-bbox="1088 976 1877 1141"> <thead> <tr> <th>Mill</th> <th>CPO-ER</th> <th>Total CPO 2019 - 2029</th> <th>CPKO-ER</th> <th>Total CPKO 2019 - 2029</th> </tr> </thead> <tbody> <tr> <td>Hargy Mill</td> <td>23.96</td> <td>453,468</td> <td>2.16</td> <td>40,937</td> </tr> <tr> <td>Navo Mill</td> <td>24.50</td> <td>628,675</td> <td>-</td> <td>-</td> </tr> <tr> <td>Barema Mill</td> <td>25.00</td> <td>482,554</td> <td>2.08</td> <td>93,506</td> </tr> <tr> <td>Total</td> <td>24.49</td> <td>1,564,697</td> <td>2.10</td> <td>134,443</td> </tr> </tbody> </table> <p>The breakdown of crop for the mill processing as shown above budgeted at 61.42% for plantation FFBS and 38.58% for Smallholder FFBS.</p> <p>The cost of relating to RSPO is reflected under item environment, whilst safety is absorbed under item health. PPE is taken into item staff welfare. All other related figures in details are available in soft copy and</p>	Source of FFB	Total FFB 2019-2029	% contribution	Company Plantation	3,924,222	61.42	Growers	2,464,588	38.58	Total	6,388,811	100.00	Mill	CPO-ER	Total CPO 2019 - 2029	CPKO-ER	Total CPKO 2019 - 2029	Hargy Mill	23.96	453,468	2.16	40,937	Navo Mill	24.50	628,675	-	-	Barema Mill	25.00	482,554	2.08	93,506	Total	24.49	1,564,697	2.10	134,443	<p>Complied</p>
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		<p>maintained in The CEO's Office. It is treated with full confidentiality released on discretion of the management.</p> <p>In conclusion the financial plan for the organisation has been prepared in comprehensive and adequate to address the direction of the business for the next 10 years.</p> <p>This is also made available as summarised below similar to the one prepared for the estates. The smallholders data is prepared through assistance given by OPIC and also the HOPL smallholders department. These are subjects discussed among others during the monthly extension meeting between the management and the smallholders.</p> <p>The HOPL 2020 targets are:</p> <table border="1"> <thead> <tr> <th>Description</th> <th>2020 Target</th> </tr> </thead> <tbody> <tr> <td>FFB</td> <td></td> </tr> <tr> <td>• Company</td> <td>280,516 Ton</td> </tr> <tr> <td>• Smallholders</td> <td>219,506 Ton</td> </tr> <tr> <td>Total FFB</td> <td>500,022 Ton</td> </tr> <tr> <td></td> <td></td> </tr> <tr> <td>Extraction Rates</td> <td></td> </tr> <tr> <td>• OER</td> <td>23.93%</td> </tr> <tr> <td>• PKOER</td> <td>2.10%</td> </tr> <tr> <td>FFA</td> <td><4%</td> </tr> <tr> <td>Oil Loses</td> <td>1.57%</td> </tr> <tr> <td>Oil Production</td> <td></td> </tr> <tr> <td>• CPO</td> <td>119,644 Ton</td> </tr> <tr> <td>• PK</td> <td>10,486 Ton</td> </tr> </tbody> </table>	Description	2020 Target	FFB		• Company	280,516 Ton	• Smallholders	219,506 Ton	Total FFB	500,022 Ton			Extraction Rates		• OER	23.93%	• PKOER	2.10%	FFA	<4%	Oil Loses	1.57%	Oil Production		• CPO	119,644 Ton	• PK	10,486 Ton	
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<p>3.1.2</p>	<p>The Milling Companies develop an annual replanting programme for Company plantations projected for a minimum of five years with yearly review.</p> <p>Smallholder requirements: Organization that is managing the smallholders develop replanting program for smallholders. - Minor compliance -</p>	<p>This information of annual replanting program for the entire estates in the Hargy Palm Oil Limited (HOPL) is available. Due to eruption of Mount Ulawun in 2019, replanting program is revised following nursery is covered by ashes from the volcano. Below are the latest revision of replanting program, issued by CEO of HOPL on 24 September 2019.</p> <p>Contents of which were sighted and shown below; figures in hectares otherwise stated.</p> <p>Replanting</p> <table border="1" data-bbox="1093 651 1877 842"> <thead> <tr> <th>Estate/Plantation</th> <th>2019</th> <th>2020</th> <th>2021</th> <th>2022</th> <th>2023</th> <th>2024</th> </tr> </thead> <tbody> <tr> <td>Hargy</td> <td>246.74</td> <td>-</td> <td>458.34</td> <td>-</td> <td>236.12</td> <td>-</td> </tr> <tr> <td>Navo/Kiba</td> <td>-</td> <td>-</td> <td>447.11</td> <td>771.12</td> <td>-</td> <td>-</td> </tr> <tr> <td>Navo/Ibana</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> <td>545.96</td> <td>839.15</td> </tr> <tr> <td>Total</td> <td>246.74</td> <td>-</td> <td>905.45</td> <td>771.12</td> <td>782.08</td> <td>839.15</td> </tr> </tbody> </table> <p>Planting cycle 0-3 years stated in Section 1, consist of 2018 replanting, that is 1,046.46 Ha Hargy Estate; 134.76 Ha Navo Estate and 94.74 Ha Pandi Estate.</p> <p>Replanting in Smallholders are managed incorporation with Oil Palm Industry Corporation (OPIC). There is LPC Approved Replant Work Plan, dated 10 July 2020. In Maututu Division, there are 40 blocks (80 hectares) in selective palm poisoning in 2017, 2018, 2019 and 2020. In Cenaka Division, total of 15 blocks due for palm poisoning in 2019. However 9 blocks were done leaving the balance of 7 yet to be completed.</p>	Estate/Plantation	2019	2020	2021	2022	2023	2024	Hargy	246.74	-	458.34	-	236.12	-	Navo/Kiba	-	-	447.11	771.12	-	-	Navo/Ibana	-	-	-	-	545.96	839.15	Total	246.74	-	905.45	771.12	782.08	839.15	<p>Complied</p>
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<p>3.1.3</p>	<p>The Milling Company holds management reviews at planned intervals appropriate to the scale and nature of the activities undertaken. - Minor compliance -</p>	<p>"Hargy Oil Palms Limited RSPO Supply Chain Certificate Manual No.MAN-COM-SCC-001-01 dated 28 August 2019". Section 5.13 Management Review: It is stated the management review annually at planned intervals, intergrated with ISO management review and follow an established agenda.</p>	<p>Complied</p>																																			

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		<p>Hargy Oil Palms Limited have conducted the 2019 Management Review – Hargy Oil Palms Limited (HOPL), dated 27 February 2020. The management review attended by the CEO, GM Plantation & Crop Operations, GM – Compliance, GM Engineering & Production, GM – Finance & Assets, Company Secretary.</p> <p>The management review input, as recorded in minutes of management review meeting dated 27 February 2020:</p> <ul style="list-style-type: none"> • Results of internal audits: Two internal audits were conducted for each site in 2019. In March & September, internal audit were conducted for Hargy & Barema Site, and in June & December, internal audit were conducted for Navo & Pandi sites. • Customer feedback: Department of Labor & Industrial Relations (DLIR) communicated to HOPL on 2019 Equipment License & Tradesman fees; All communication from smallholders in handled through Community Affairs and Smallholder Department. • Process performance and product conformity: <ul style="list-style-type: none"> ○ Both FFA & OER were below target and action in place for improvement. ○ FFB productivity: yield per hectare stood at 20.92 t/Ha for plantations and 13.47 t/Ha in smallholder blocks. • Status of preventive and corrective actions: corrective actions from the last internal audit has been reported. From external audit there were no non-conformance raised. • Follow up action from the previous management review: Additional Safety Staff – in progress. • Changes that could affect the management system: The RSPO P&C PNG National Interpretation was approved by RSPO in 2019 and contains some changes to the standard requirements which need to be implemented. No changes made that would have some impact on the supply chain management system. 	
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		<ul style="list-style-type: none"> Recommendations for improvement: proposals for change in reporting line for site RSPO reps & Mill OHS Supervisor; Sustainability KPI for all site/depts – proposals; Monthly reporting – Needs improvements; Continuous Improvement Plan (CIP) 2020. 	
<p>Criterion 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>(C) 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>- Critical (Major) compliance -</p>	<p>HOPL has document of Action Plan for Continual Improvement in Sustainable Performance (PLN-COM-GEN-001-017), Issue No.17, dated 14 Feb 2020.</p> <p>The Action Plan for Continual Improvement identifies the planned actions to further improve its performance in the key areas of:</p> <ul style="list-style-type: none"> Minimising the use of Certain Pesticides; Reducing negative and enhancing positive Environmental Impacts; Waste reduction; Pollution and emissions, and; Social Impacts. <p>HOPL commits to maintaining and reporting on progress implementing this improvement plan commencing 01/01/2020 and reviewing it annually. By following this plan, HOPL continually improve its performance.</p>	Complied
3.2.2	<p>As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the RSPO metrics template.</p> <p>- Minor Compliance -</p>	<p>The company has reported Annual Communication of Progress (ACOP) 2019 to RSPO website under organization name SIPEF Group, membership number 1-0021-05-000-00. Based on the report, number of management units certified under RSPO P&C Certification are 9 units; Total certified land under the RSPO P&C Certification, excluding scheme Smallholders is 82,976.23 Ha. Scheme Smallholder FFB volume supplied that is certified are 14,562.77 tonnes. Total CSPO sold as RSPO-certified are 183,111 tonnes; CSPO sold under other certification schemes are 83,180 tonnes; CSPO sold as conventional are 28,079 tonnes; total</p>	Complied

		<p>CSPK are 294,370 tonnes. CSPK sold under RSPO certified are 43,897 tonnes; CSPK sold under other certification schemes are 10,108 tonnes; total CSPK are 54,005 tonnes.</p>							
<p>Criterion 3.3 Operating procedures are Appropriately documented, consistently implemented and monitored.</p>									
<p>3.3.1</p>	<p>(C) Standard Operating Procedures (SOPs) for the unit of certification are in place.</p> <p>Smallholder requirements: Organization that is managing the smallholders provides relevant SOP of smallholding operations to smallholders. - Critical (Major) compliance -</p>	<p>HOPL had a documented Manual and Standard Operating Procedure (SOP) are indexed according for the subjects and scope covered. Copies are available in the estates and mill audited. Therein is shown issue no and date of revision. All SOPs are issued by the Environmental & Sustainability Manager. Format of SOP is standard through all the estates and mills. e.g.</p> <table border="1" data-bbox="1093 746 1877 783"> <tr> <td>PRO</td> <td>ESD</td> <td>GEN</td> <td>001</td> <td>09</td> <td>New Development</td> </tr> </table> <p>Based on updated List of Approved documents (REG-COM-EMS-002-014), documented information for the whole operation of HOPL are divided into sections as follow, including samples of procedures:</p> <ol style="list-style-type: none"> 1. Manuals: <ul style="list-style-type: none"> • MAN-COM-EMS-001-11; EMS Manual; Rev.11; dated 28/04/2020. • MAN-COM-SCC-001-02; HOPL SCC Manual; Rev.2; dated 28/02/2020. • MAN-PLT-HAR-001-01; Harvesting Manual; Rev.1; dated 23/04/2020. • MAN-HRD-GEN-001-01; HR Operations Manual; Rev.1; dated 10/01/2020. 2. General Procedures; <ul style="list-style-type: none"> • PRO-COM-GEN-001-10; New Development Procedure; Rev.10; dated 15/04/2018. • PRO-ESD-GEN-003-09; Upkeep management SOP; Rev.9; dated 10/02/2016. 	PRO	ESD	GEN	001	09	New Development	<p>Complied</p>
PRO	ESD	GEN	001	09	New Development				

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		<ul style="list-style-type: none"> • PRO-ESD-GEN-004-11; Pesticides Management SOP; Rev.11; dated 04/04/2018. • PRO-ESD-GEN-005-09; SOP for Nursery practices; Rev.9; dated 10/02/2016. • PRO-ESD-GEN-006-11; SOP for CPO Milling; Rev.11; dated 10/02/2016. • PRO-ESD-GEN-007-11; SOP for PKO Milling practices; Rev.11; dated 10/02/2016. • PRO-ESD-GEN-008-11; SOP for Waste management practice; Rev.11; dated 05/03/2018. • PRO-ESD-GEN-009-09; SOP for Compost management; Rev.9; dated 10/02/2016. • PRO-ESD-GEN-010-10; SOP for Hydrocarbons Management; Rev.10; dated 05/02/2018. • PRO-ESD-GEN-011-11; SOP for POME Management; Rev.11; dated 05/04/2018. • PRO-ESD-GEN-012-13; SOP for Shipping; Rev.13; dated 21/07/2018. • PRO-ESD-GEN-013-10; SOP for Transport; Rev.10; dated 16/04/2018. • PRO-ESD-GEN-014-10; SOP for Compound Management; Rev.10; dated 05/04/2018. • PRO-ESD-GEN-015-10; SOP for Central stores; Rev.10; dated 05/04/2018. • PRO-ESD-GEN-016-09; SOP for Construction; Rev.9; dated 10/02/2016. <p>3. EMS Procedures;</p> <ul style="list-style-type: none"> • PRO-COM-EMS-001-10; Environmental Aspects; Rev.10; dated 24/04/2020. • PRO-COM-EMS-002-10; Compliance Obligation; Rev.10; dated 28/02/2020. 	
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		<ul style="list-style-type: none"> • PRO-COM-EMS-003-09; Environmental Objectives; Rev.9; dated 24/04/2020. <ol style="list-style-type: none"> 4. Sustainability Procedures; <ul style="list-style-type: none"> • PRO-COM-SUS-002-03; SOP FOR DISSEMINATION OF COMPANY INFORMATION & DOCUMENTS; Rev.3; dated 14/02/2020. 5. Supply Chain Certification Procedures; <ul style="list-style-type: none"> • PRO-ESD-SCC-005-01; Out Sourcing Activities; Rev.1; dated 21/05/2019. • PRO-ESD-SCC-006-01; Sales and Goods Out; Rev.1; dated 21/05/2019. • PRO-ESD-SCC-011-02; Claims; Rev.2; dated 28/05/2020. • PRO-ESD-SCC-013-01; Management Review; Rev.1; dated 21/05/2019. 6. OHS Procedures; <ul style="list-style-type: none"> • PRO-ESD-OHS-001-02; FIRST AID HANDLING SOP; Rev.2; dated 26/06/2017. • ERP-ESD-GEN-003-08; Mills Factories Fire Evacuation Response Plan; Rev.8; dated 05/04/2018. • ERP-ESD-GEN-004-08; Bialla Tank Farm Tanker Terminal Fire Emergency Standard Response Procedure; Rev.8; dated 05/04/2018. • ERP-ESD-GEN-005-08; Bialla Tanker Terminal Oil Spill Standard Response (Involving People) Procedure; Rev.8; dated 05/04/2018. 7. Procedures Engineering Department – Lab; 8. Procedures Engineering Department – Shipping; 9. Procedures Engineering Department – Process; 10. Procedures Engineering Department – Biogas; 11. Procedures Engineering Department – Maintenance; 12. Procedures Engineering Department – General; 13. Procedures Vehicle Workshop; 	
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		<ol style="list-style-type: none"> 14. Procedures Community Affairs Department – General; 15. Procedures Community Affairs Department – Security; 16. Procedures Community Affairs Department – Lands; 17. Procedures Community Affairs Department – Community Engagement; 18. Procedures Community Affairs Department – Smallholder Agriculture Advisory Services; 19. Procedures Human Resource Department – Corporate Services; 20. Procedures Human Resource Department – Health; 21. Procedures Human Resource Department – General; 22. Procedures Smallholder Department – Payment; 23. Procedures Smallholder Department – Harvest & Pickup; 24. Procedures Smallholder Department – Planting; 25. Procedures Construction Department; 26. Procedures Plantation – General; 27. Procedures Plantation – Ancillary; 28. Procedures Plantation – Upkeep; 29. Procedures Plantation – Harvesting; 30. Procedures Legal; 31. Procedures CEO Administration; 32. Procedures Finance Department – General. <p>All procedures are in English and in certain specific areas being translated to Tok Pisin.</p> <p>The company has issued Statement from the CEO/Director Hargy Oil Palms Limited – Covid 19, dated 23 March 2020. HOPL are absolutely committed to the safety and wellbeing of all employees and their dependents. A number of measure have already been introduced over the past weeks to support the government’s intent to restrict COVID-19 spreading. These measures are constantly being reviewed and adjusted</p>	
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		<p>as the situation dictates and fit within the requirements of the State of Emergency (SOE).</p> <p>During pandemic, HOPL had specific COVID-19 mechanism which consist of:</p> <ul style="list-style-type: none"> - HOPL Statement from CEO regards to Covid19, dated 23 March 2020. - SOP Infection Prevention Control Guideline for COVID-19 Treatment/Isolation Centre (Area 8), dated 13 April 2020. <p>Also, Unit of Certification had documented Summary Report FINAL related HOPL COVID-19, dated 28 May 2020.</p> <p>For OHS aspect, there are several procedures that changes during updated on 20 July 2020, as below:</p> <ul style="list-style-type: none"> - PRO-ESD-OHS-001-02: First Aid Handling SOP, Issue: 2, replaces PRO-ESD-GEN-011-02. - PRO-ESD-OHS-002-01: Basic Operating Operator’s Guide For Garbage Truck. 	
3.3.2	<p>A mechanism to check consistent implementation of procedures is in place.</p> <p>Smallholder requirements: Organization that is managing the smallholders maintains production records and field day attendance records as evidence of improved performance.</p> <ul style="list-style-type: none"> - Minor Compliance - 	<p>Mechanism to check consistent implementation of procedures is in place from the lowest level of supervisory to the highest level like by The General Manager and external parties. On the Head office level the following among others are made:</p> <ul style="list-style-type: none"> • Regular evaluation of all procedures will be made annually 2 times/year audit by the Compliance Department, Workplace inspection by RSPO representative on monthly basis. • Chief Engineer visits to the mills. • Head of Plantation field inspection. • General Manager or Consultant Inspection. <p>Palm Oil Mill The Mill Manager inspects the mill on a daily basis. The Engineers, Supervisors monitors the entire production performance and product quality. This is made through the mill rounds and supervisions. The</p>	Complied

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		<p>checklist forms sighted during the visit are sterilizer safety operation checklist, press station checklist. The product/lab data sheet is checked hourly by shift superintendent to ensure conformity to quality standard of all process parameters. Monthly figures are analyzed/recommended for improved performance. Chief Engineer does regular visits to all the 3 mills and with a report being established.</p> <p>Plantation General Manager Plantation visited estates for the field inspection. A standard report is made to the management of the operating units. The report was being checked and discussed. Estates provide remedial plan/action taken. The report contains:</p> <ul style="list-style-type: none"> • Sections inspected immature, mature, new development. • Action points to be taken before next visit and completion date. • Harvesters productivity / standards • Upkeep standard / Pest & Diseases • RSPO related requirement • Documentation compliance. <p>Smallholders: HOPL by it smallholders affair has conducted field day to maintain knowledge of smallholders of sustainable production and best agriculture practices.</p>	
3.3.3	<p>Records of monitoring and any actions taken are maintained and available.</p> <p>- Minor Compliance -</p>	<p>Records of monitoring and any actions taken are maintained and available, as examples: Palm Oil Mill The Mill Manager inspects the mill on a daily basis. The Engineers, Supervisors monitors the entire production performance and product quality. This is made through the mill rounds and supervisions. The checklist forms sighted during the visit are sterilizer safety operation checklist, press station checklist. The product/lab data sheet is checked hourly by shift superintendent to ensure conformity to quality standard</p>	Complied

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		<p>of all process parameters. Monthly figures are analyzed/recommended for improved performance. Chief Engineer does regular visits to all the 3 mills and with a report being established. For example in Hargy Mill:</p> <ul style="list-style-type: none"> • Hargy POM RSPO Internal Audit report 4 Sep 2019. There are two (2) Major NC regarding Grievance SOP and Employee payments; there are three (3) minor NC regarding training records, first aid kit records and drum issue. • Mill EHS Monthly Inspection Visit, dated 9 Jul 2020; conducted by Daniel Kolinjim. <p>Barema Mill:</p> <ul style="list-style-type: none"> • Barema POM RSPO Internal Audit report 2 Sep 2019. There are four (4) Major NC identified regarding Training Plan, incomplete RSPO documents, Employee payments and incorrect PPE. There are four (4) minor NC identified regarding training records, first aiders certificate, storage issue, MI and LTA records. • Mill EHS Monthly Inspection Visit, dated 3 Jul 2020; conducted by Daniel Kolinjim. <p>Navo Mill:</p> <ul style="list-style-type: none"> • Navo POM RSPO Internal Audit report 4 Dec 2019. There are two (2) Major NC identified regarding Payslip issues and POME monitoring at ponds. There is one (1) minor NC identified regarding Fire hot reel and Achor static issue.. • Mill EHS Monthly Inspection Visit, dated 3 Jul 2020; conducted by Daniel Kolinjim. <p>Plantation:</p> <p>General Manager Plantation visited estates for the field inspection. A standard report is made to the management of the operating units. The report was being checked and discussed. Estates provide remedial plan/action taken. The report contains:</p>	
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		<ul style="list-style-type: none"> • Sections inspected immature, mature, new development. • Action points to be taken before next visit and completion date. • Harvesters productivity / standards • Upkeep standard / Pest & Diseases • RSPO related requirement • Documentation compliance. <p>There are several visit related estate performance conducted to the plantation in 2019-2020, such as:</p> <ul style="list-style-type: none"> • Fertilization Visit Report, October 2019, F. Dumortier. Key point for management attention are; the application program 2019 is running well beyond schedule this year, due to the volcanic eruptions but also to exercise delays in the fertilizer shipments of up to 40 days. Particular attention is required to ensure that all fields receive the recommended dose for all fertilizers, especially urea. Nutritional status N remains good in all plantation and P status is progressively improving; the K status remains low at Bakada, Remaling and Vamakuma – also at Ibana and Sena, but it is no longer becoming a limiting factor in this two plantations, due to the damage from the volcanic eruption. • Report No.6 from Palm Oil Consulting LTD, date of visit 28 Oct 2019 to 9 Nov 2019. The report summaries the impact of 3 volcano eruptions and key account points. The recommendations are prune of all dry desiccated hanging fronds as soon as possible – even if there is a few green leaflets left; Palms with horizontal dead fronds can be pruned off as harvesting or regular rounds of maintenance pruning continue. • RSPO P&C 2018 Internal Audit Report of Atata Plantation, on 3 Jun 2020. There are 7 Major NC regarding awareness, ethical policy awareness, Compound Security Coordinators, Grievance SOP, Payroll query, overdue short term contract, water supply to fertilizer shed. There are 8 minor NC regarding HOPL contractors, incomplete 	
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		<p>training records, awareness record for policy against forced and trafficked labor, awareness record on equal opportunity policy, awareness record on maternity leave and breastfeeding policy, incomplete employee records, awareness record on sexual harassment policy and employee contract not in order.</p> <ul style="list-style-type: none"> • RSPO P&C 2018 Internal Audit Report of Bakada Plantation, on 11 Jun 2020. There is 1 Major NC regarding Compound Security Coordinators but not implemented. There are 7 minor non conformities regarding No field training on required field standards (SOP), No awareness conducted on Equal Opportunity Policy, No awareness conducted on Maternity Leave and Breast Feeding policy, Payroll Query, Inconsistent Pay Rates, Employee contracts substitution and Short Term Contract overdue. • RSPO P&C 2018 Internal Audit Report of Barema Plantation, on 2 Mar 2020. There are 2 Major NC regarding Awareness on Communication, Freedom of Association, Child Labour and Protection of Reproduction Rights Policies, training calendar and no department training plan in place. There are 2 minor NC regarding Inconsistency in employee records, and Sprayer without Training Records. 	
<p>Criterion 3.4</p>			
<p>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.</p>			
<p>3.4.1</p>	<p>(C) 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.</p> <p>Guidance: SEIA will be undertaken where:</p> <p>a) It is required by law; or</p> <p>b) The certified operation meets any of these thresholds:</p>	<p>Hargy Oil Palm Limited has conducted an "Update of the 2009 Social Impact Assessment & a Social Management Plan" dated November 2013. The assessment has covered for the nuclear estates, land settlement scheme (LSS), village oil palm and independent estates. Major social risks were identified such as in-migration and natural population increase, pressures on public infrastructure and services. Stakeholder engagement was carried out by consulted local government</p>	<p>Complied</p>

	<ol style="list-style-type: none"> 1. Land conversion exceeding 500 hectares; 2. Additional water withdrawal exceeding 500,000 cubic meters per year for irrigation or processing; or 3. Additional industrial wastewater discharge exceeding 10,000 cubic meters per year. <p>The SEIA may be comprised of separate documents being a Social Impact Assessment and an Environmental Impact Assessment provided there is collaboration in the production of the documents to ensure coordination.</p> <p>- Critical (Major) compliance -</p>	<p>leaders, selected community representatives and local NGOs. Site visit to the villages and LSS blocks was conducted during the assessment.</p> <p>"Hargy Oil Palms Limited Update of the 2009 Social Impact Assessment and A Social Management Plan – November 2013". The study conducted by Roland Allbrook Consulting, November 2013. This study covers an area of 26,000 Ha: 12,540 Ha directly under Hargy and 13,565 Ha under smallholders. The area interviewed: Sulu village, Gomu village, Bageta village, Painave village, Noau village, Gigipuna village and Kiava village, Wilelo LSS.</p> <p>"Hargy Oil Palms Limited Biialla West New Britain Province Social and Environment Impact Assessment Report – August 2007". The study carried out by Mr. Narua Lovai, Imeana Ecosystem Services.</p> <p>"Barema Oil Palm Estate Social and Environmental Impact Assessment Report – August 2007". The study carried out by Narua Lovai, Imeana Ecosystem Services. The area of study covers area of 2,500 Ha in Barema area. Consultation with local villages along Barema River.</p>	
3.4.2	<p>For the unit of certification, a SEIA is available and social and environmental management and monitoring plans have been developed with participation of affected stakeholders. The SEIA shall be reviewed as a minimum once every two years and updated as necessary, in those cases where the review has concluded that changes shall be made to current practices. In any case, the complete SEIA shall be updated at least every ten years to evaluate the cumulative effect of incremental changes. There shall be evidence that the review includes the participation of affected stakeholders.</p> <p>Smallholder requirements: Improvements suggested at the pre-planting inspection should be noted on the inspection form.</p>	<p>A Social Management Plan was developed together with the SIA conducted on November 2013. Hargy Oil Palms Limited has reviewed and updated the Social Management Plan on July 2018. The plan has included the objectives, components, responsibility, actions taken, comment and new target date.</p>	Complied

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	- Minor Compliance -																						
3.4.3	<p>(C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.</p> <p>Smallholder requirements: Management improvements suggested by organization managing the smallholders during routine block inspections shall be implemented as practicable.</p> <p>- Critical (Major) compliance -</p>	<p>The Social Management Plan is due to review in Year 2020 as informed by the person in charge. The last reviewed was conducted on July 2018. Hargy Oil Palms Limited established HOPL Environmental Monitoring Program No. PLN-COM-EMS-002-08 with its latest status as of 24 April 2020:</p> <table border="1" data-bbox="1086 564 1868 1391"> <thead> <tr> <th>Activity/Aspect</th> <th>Monitoring</th> <th>Target</th> <th>Status at 24 April 2020</th> </tr> </thead> <tbody> <tr> <td>Land Clearing Impact: Vegetation removal; Land development; Soil Disturbance; Soil erosion</td> <td>- Visual - Environment Permit Compliance Evaluation – Annual; - Internal audit – bi-Annual; - Site EHS inspections - monthly</td> <td>Land clearing within boundaries as per EP condition;</td> <td>Complies, continue monitoring as required</td> </tr> <tr> <td>Buffer zone establishment Impact: Reduce soil erosion</td> <td>- Visual - Environment Permit Compliance Evaluation – Annual; - Internal audit – bi-Annual; - Site EHS inspections - monthly</td> <td>Nil erosion</td> <td>Complies, however there are incidences of buffer encroachment .</td> </tr> <tr> <td>Boiler operation & steam use Impact: Ash & smoke emission</td> <td>- Visual - Every hour (during operation hour)</td> <td>< Ringelmann 2 (40%) for 80% of operating time</td> <td>Being monitored as required and is generally compliant</td> </tr> <tr> <td>Chemical storage and use Impact: Ash & smoke emission</td> <td>- Visual - Site EHS inspections – monthly - Internal audit – bi-Annual;</td> <td>0 major chemical spill</td> <td>Zero spill recorded. Monitoring ongoing.</td> </tr> </tbody> </table>	Activity/Aspect	Monitoring	Target	Status at 24 April 2020	Land Clearing Impact: Vegetation removal; Land development; Soil Disturbance; Soil erosion	- Visual - Environment Permit Compliance Evaluation – Annual; - Internal audit – bi-Annual; - Site EHS inspections - monthly	Land clearing within boundaries as per EP condition;	Complies, continue monitoring as required	Buffer zone establishment Impact: Reduce soil erosion	- Visual - Environment Permit Compliance Evaluation – Annual; - Internal audit – bi-Annual; - Site EHS inspections - monthly	Nil erosion	Complies, however there are incidences of buffer encroachment .	Boiler operation & steam use Impact: Ash & smoke emission	- Visual - Every hour (during operation hour)	< Ringelmann 2 (40%) for 80% of operating time	Being monitored as required and is generally compliant	Chemical storage and use Impact: Ash & smoke emission	- Visual - Site EHS inspections – monthly - Internal audit – bi-Annual;	0 major chemical spill	Zero spill recorded. Monitoring ongoing.	Complied
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		<p>POME treatment; POME irrigation</p> <p>Impact: Effluent quality; Overflow from reactor tank & ponds; Run offs & valve leakage; Inadequate treatment & overflow; Anaerobic digestion</p>	<ul style="list-style-type: none"> - Lab. analysis - POME testing (internal) - POME testing (external) - POME monitoring (weekly) 	<ul style="list-style-type: none"> - pH:5-9 - BOD: 100mg/L - Oil &grease: 50mg/L - DO: <6mg/L - 0 (zero) overflows 	<ul style="list-style-type: none"> - Some variation evident, in general compliant. - Discrepancies exist between local and external analysis - De-silting of ponds continues. - There have been no overflow. - Complies, continue monitoring - One overflow recorded at Navo Mill in Feb 2020 due to heavy rainfall. Improvement to the pond include bunding and additional holding pond. 		
		<p>Petroleum hydrocarbons</p> <p>Impact: Leaks & Spillages</p>	<ul style="list-style-type: none"> - Visual - Site monthly EHS inspections - Internal audit – bi annual 	<p>0 (zero) major spills</p>	<p>Complies, continue monitoring</p>		

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		<p>Fuel and lubricant storage</p> <p>Impact: fuel/lubricant spills</p>	<ul style="list-style-type: none"> - Visual - Site monthly EHS inspections - Internal audit – bi annual 	0 (zero) spills	Complies, continue monitoring		
		<p>Fuel transfer from ship to bulk fuel tank</p> <p>Impact: Spillage</p>	<ul style="list-style-type: none"> - Visual - 24 hours supervision during loading - Site monthly EHS inspections - Internal audit – bi annual 	0 (zero) spills	Complies, continue monitoring		
		<p>Fuel transport by road tanker</p> <p>Impact: Road accident/spillage</p>	<ul style="list-style-type: none"> - Visual - Site monthly EHS inspections - Internal audit – bi annual 	0 (zero) major spills	Complies, continue monitoring		
		<p>Process Effluent Transfer</p> <p>Impact: Sludge tank & pit overflow</p>	<ul style="list-style-type: none"> - Visual - Site monthly EHS inspections - Internal audit – bi annual 	0 (zero) overflows	Complies, continue monitoring		
		<p>CPO Transport by road tanker</p> <p>Impact: Road accident/spillage</p>	<ul style="list-style-type: none"> - Visual - Site monthly EHS inspections - Internal audit – bi annual 	0 (zero) spills	No spills in the last 12 months		
		<p>CPO Transfer to ship</p> <p>Impact: Spillages into sea</p>	<ul style="list-style-type: none"> - Visual - 24 hours supervision during loading - Site monthly EHS inspections - Internal audit – bi annual 	0 (zero) spills	No spills in the last 12 months		

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		Workshop Operation	- Visual - Site monthly EHS inspections Internal audit – bi annual	0 (zero) spills	Complies, continue monitoring	
		Impact: Storm water run offs				
		Gravel extraction	- Visual - Environmental Permit Compliance Evaluation - annual	Within boundaries	Complies, continue monitoring	
		Use of fossil fuel	- Visual - Site monthly EHS inspections - Internal audit – bi annual	0 (zero) major spills	Complies, continue monitoring	
		Impact: Spill, leakage				

Criterion 3.5
 A system for managing human resources is in place.

3.5.1	Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives. - Minor Compliance -	HOPL has developed Human Resource Operations Manual (Doc. No.: MAN-HRD-GEN-001-01, Issue No.: 1 dated 10/1/2020) to outline the recruitment and probation/ promotion process.	Complied
3.5.2	Employment procedures are implemented, and records are maintained. - Minor Compliance -	Employment records are able to demonstrate that workers are employed or promoted base on capabilities and skills. Employment files reviewed did not show any discrimination of medical fitness for employment. Employment contract consist of: Position; Grade/Level; Remuneration (fortnightly basis); Designation/Start Date; Place of Recruitment; Working Hours; Working Schedule (7am-4.30pm, Fri 7am-2.30pm, Sat 7am-12pm); Overtime; Annual Leave (11 working days); Sick Leave (6 days/annum);	Complied

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		<p>Superannuation (6% employee, 8.4% employer) in accordance with PNG Superannuation Act; Probation Period (6 months); Medical Clearance; Maternity Leave (12 weeks and full pay after 12 months working) – refer to employee handbook for other conditions of maternity leave; Housing; Medical Treatment: worker and declared dependants receive medical treatment at no cost to the limit of the services available at HOPL clinics; Salary Review; Company Policy&RSPO; Transfer; Confidentiality of Information; Termination of this Agreement; Conclusion.</p> <p>Signed by HROps Manager, Division Manager, Employee, Witness.</p> <p>Since July to December 2020, no employment recruitment at Hargy Oil Palms Limited, both Mill and Estates.</p>	
<p>Criterion 3.6 An occupational health and safety (H&S) plan is documented, effectively communicated and implemented.</p>			
<p>3.6.1</p>	<p>(C) All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented.</p> <p>Smallholder requirements: Organization managing the smallholders to provide advice and training on identification and control of risks through extension activities. - Critical (Major) compliance -</p>	<p>As subsidiary of SIPEF, the company recognized that a safe and healthy workplace is the most important. The Policy on Occupational Health and Safety was established which was signed by General Manager of Hargy Oil Palms Limited, issue No.4, dated 16 December 2015.</p> <p>The OHS Plan (PLN-COM-OHS-001-10) was established. The latest review was carried out on 2 July 2020 (issue No.10) prepared by Compliance General Manager.</p> <p>The OHS plan was include the Hazard and risk assessment register, safety training and PPE records, OSH committee meeting, emergency procedure, medical care & accident insurance, incident/accident investigation and lost time accidents.</p> <p>Hazard and Risk Assessment (REG-ESD-OHS-001-11, dated 19 June 2019) covering all units, Mills, Estates and Smallholders.</p>	<p>Complied</p>

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3.6.2	<p>(C) The effectiveness of the H&S plan to address health and safety risks to people is monitored.</p> <p>- Critical (Major) compliance -</p>	<p>Monitoring of the health & Safety risks conducted in periodic time through inspection. The EHS inspection was conducted accordingly as seen below:</p> <ul style="list-style-type: none"> - Hargy Palm Oil Mill, carried out on 9 July 2020; - Navo Palm Oil Mill, carried out on 3 July 2020; conducted Daniel Kolinjim. - Barema Palm Oil Mill, carried out on 3 July 2020; conducted by Daniel Kolinjim. - Gamupa. Magalona, carried out on 24 June 2020. Inspected by Patrick Mungore. - Atata Plantation, Division 1 & 2, carried out on 4 February 2020; <p>Smallholders: Tiauru LSS inspection conducted on 8 July 2020.</p>	Complied
<p>Criterion 3.7 All staff, workers, Scheme Smallholders, outgrowers, and contract workers are appropriately trained.</p>			
3.7.1	<p>(C) A documented programme that provides training is in place, which is accessible to those who will be affected by the programme, taking into account gender-specific needs, and which covers applicable aspects of the RSPO P&C, in a form they understand, and which includes assessments of training.</p> <p>Smallholder requirements: Organization managing the smallholders to provide advice and ongoing support to Smallholders through field days and visits to Smallholder blocks.</p> <p>- Critical (Major) compliance -</p>	<p>All workers involved in the operation have been adequately trained in safe working practices. 2020 HOPL Workforce Development Training Calendar was established. There are 22 courses title in January 2020; 29 courses title in February 2020; 22 courses title in March 2020; April and May (all training was cancelled due to COVID19 pandemic); 33 courses title in June 2020; 42 courses title in July 2020.</p> <p>Awareness and training program had been carried out. All workers involved had been adequately trained in safe working practices. The objective was to ensure all workers involved have been adequately trained in understanding MSDS, safe working practices and the correct use of PPE.</p> <p>Some training records seen as below:</p>	Complied

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		<ul style="list-style-type: none"> - Safety regarding work safety and how to use mask and glass. Location: Atata plantation, conducted on 19 August 2019. - Safety at Workplace and Update of LFC Bags Rate. Location: Bakada Plantation, dated 31 January 2020. - Identifying Hazard. Location: Barema POM, dated 24 April 2020. - How to Use Fire Hydrant. Location: Navo POM, dated 13 May 2020. - Safe working method and PPE usage at all times. Location: Barema Plantation, dated 27 April 2020. 	
3.7.2	<p>Records of training are maintained, where appropriate on an individual basis. Appropriate records include records of training or evidence of competency for trade qualifications, boiler operation and other safety related activities such as chemical handling</p> <p>Smallholder requirements: Smallholder training records are maintained.</p> <p>- Minor Compliance -</p>	<p>Some training records seen as below:</p> <ul style="list-style-type: none"> - Safety regarding work safety and how to use mask and glass. Location: Atata plantation, conducted on 19 August 2019. - Safety at Workplace and Update of LFC Bags Rate. Location: Bakada Plantation, dated 31 January 2020. - Identifying Hazard. Location: Barema POM, dated 24 April 2020. - How to Use Fire Hydrant. Location: Navo POM, dated 13 May 2020. - Safe working method and PPE usage at all times. Location: Barema Plantation, dated 27 April 2020. 	Complied
3.7.3	<p>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> <p>- Minor Compliance -</p>	<p>Training program is available in monthly basis. For the competency or specific training program is refer to relevant Department. Hargy Oil Palms Limited have prepared training plan for RSPO SCCS in June and December 2020 for Hargy POM, Barema POM and Navo POM.</p> <p>Training have been provided for all personnel involved in the RSPO SCCS implementation in Hargy Oil Palms Limited.</p> <ul style="list-style-type: none"> - In Hargy POM: Training record (for Mill Manager, Sustainability Officer, laboratory superintendent, weighbridge clerk, truck driver, smallholder officer). Supply Chain Certification Standard RSPO training in June 2020. Refresher Session Supply Chain in July 2020, facilitated by Leila Lepakot, attended by Eddy Solomon (Weighbridge Clerk), Joel Temon (Weighbridge Clerk), Darius Robin (FFB Grader). - In Barema POM: RSPO Supply Chain Standards training provided for Mr. Michael Naure (Electrical representative), Ezekiel Pais 	Complied

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		<p>(weighbridge clerk), Stanton Meingo (KCP Supervisor), Richard Karrek (Laboratory Analyst), Sapak Papah (QC Lab Supervisor), Rosalyne M. (weighridge clerk), Agnes Nintui (Admin. clerk), Lormah Galgal (Payroll clerk) in July 2020. Trainer Mr. Thomas Tade.</p> <ul style="list-style-type: none"> - In Navo POM: RSPO Supply Chain Standards training in June 2020, provided for Cletus Wekako (QC Supervisor), Gerard (Divisional Manager Smallholder), Serah Bakut (RSPO representative Smallholder), Billy Werake (Transport Clerk – Pandi Estate) and other 17 employees. Training for RSPO SCCS “Identifying Certified FFB ad Uncertified FFB” in Navo POM including Christa Banovo (Weighbridge clerk), Peter Kavale (Laboratory Supervisor), Blaise Tongove (Demin Plant Operator), John Paul Bau, Harrison M (FFB Grader) in May 2020. 	
<p>Criterion 3.8 Supply chain requirement for mills (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)</p>			
<p>3.8.1</p>	<p>Identity Preserved Module A mill is deemed to be Identity Preserved (IP) if the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO Principles and Criteria (RSPO P&C), or against the Group Certification scheme. Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. If a mill process certified and uncertified FFB without physically separating them, then only Mass Balance Module is applicable.</p>	<p>Hargy Oil Palms Limited is implementing Module D for CPO Mills: Identity Preserved. Hargy Palm Oil Mills consist of 3 certified palm oil mills: Hargy POM, Barema POM and Navo POM. Each palm oil mill only receiving certified FFB from company owned plantation: Hargy Plantation, Navo Plantation and Pandi Plantation; as well as from certified associated smallholders.</p> <p>Verification of volumes and sources of certified FFB entering the palm oil mills catered by transport fleet. The transport fleet is organized to certain FFB pick up scheduled.</p> <p>Referring to HOPL procedure Collection and Transport of FFB No.PRO-COM-SCC-016 section 2.1: “Within company estates, as the FFB/LF is harvested it is placed at designated locations called “market places”. The nominated recorder takes the bunch count and records it on the Rollover</p>	<p>Complied</p>

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		form. A scissors tractor with trailer then picks up the FFB/LF from the market place and as they do the pick up the driver records the number of bunches of FFB in the FFB collection docket based on the information on the rollover form. The FFB collection docket shows the plantation name, division, field and block where FFB/LF is from and the bunch count. This docket also indicates the supply chain certification model (Identity Preserved) used, by means of either a 'IP' stamp on the docket or 'IP' pre-printed on the docket. The Lat/Long of this location can be determined from GIS records as required.	
3.8.2	<p>Mass Balance Module</p> <p>A mill is deemed to be Identity Preserved (IP) if the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO Principles and Criteria (RSPO P&C), or against the Group Certification scheme.</p>	HOPL implement Identity Preserved. This indicator is not applicable.	Not Applicable
3.8.3	<p>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.</p>	<p>The estimated annual tonnage for certified FFB processed, CPO and PK production are available in the Estate and Mill annual production budget for 12 months since last surveillance assessment. The FFB tonnage received from all certified supply bases (company-owned plantation and associated smallholders).</p> <p>The estimated for CPO and PK production from Hargy POM, Barema POM and Navo POM is recorded under the public summary report and the RSPO certificate for Hargy Oil Palms Limited. The actual CPO and PK production were verified during each subsequent annual surveillance assessment visit to ensure that certified mill only deliver the allowed tonnage for the year.</p> <p>BSI Group as certification body has submitted estimated of FFB received, CPO and PK produced to RSPO Public Summary Report and the RSPO PalmTrace system.</p>	Complied

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3.8.4	The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.	Hargy Oil Palms Limited, under SIPEF Group, Belgium – holds RSPO membership number 1-0021-05-000-00, since 7 December 2005. Hargy POM PalmTrace ID: RSPO_PO10000 00053. Barema POM PalmTrace ID: RSPO_PO10000 01655. Navo POM PalmTrace ID: RSPO_PO10000 00105.	Complied
3.8.5	<p>Documented procedures</p> <p>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> <ol style="list-style-type: none"> Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements. Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records). 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. The mill shall have documented procedures for receiving and processing certified and non-certified FFBs including ensuring no contamination in the IP mill. 	<p>HOPL also have a Supply Chain manual under MAN-COM-SCC-001-02, RSPO Supply Chain Certification Manual dated 28 February 2020. The document mentions on page 4 that Chief Executive Officer of HOPL has overall responsibility for and authority over the implementation of RSPO Supply Chain Certification and compliance with applicable requirements. This mean includes inform client about termination or suspension within 3 business days from the day of termination or suspension.</p> <p>Hargy Oil Palms Limited has established set of Standard Operating Procedure to ensure the implementation of all elements of the RSPO Supply Chain Certification Standards in Hargy’s Palm Oil Mills. The procedures have been updated in 21 May 2019. The procedures are:</p> <ul style="list-style-type: none"> - PRO-ESD-SCC-001-01, Receiving; - PRO-ESD-SCC-002-02, Production; - PRO-ESD-SCC-004-01, Non Conformity; - PRO-ESD-SCC-005-01, Outsourcing Activity; - PRO-ESD-SCC-006-01, Sales and Goods Out; - PRO-ESD-SCC-007-01, Receipt of Transaction; - PRO-ESD-SCC-008-01, Training; - PRO-ESD-SCC-009-01, Record Keeping; - PRO-ESD-SCC-010-01, Conversion Factors; - PRO-ESD-SCC-011-01, Claim; - PRO-ESD-SCC-012-01, Complaint; - PRO-ESD-SCC-013-01, Management Review. 	Complied
3.8.6	Internal Audit	Hargy Oil Palms Limited has revised RSPO Supply Chain Certification Manual No.MAN-COM-SCC-001-02, dated 28 February 2020. The	Complied

	<ul style="list-style-type: none"> i. The mill shall have a written procedure to conduct annual internal audit to determine whether the mill; <ul style="list-style-type: none"> a. Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. b. Effectively implements and maintains the standard requirements within its organisation. ii. 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>document mentioned on page 4 that HOPL conducted internal audits of all procedures undertaken for Supply Chain Certification to ensure conformity.</p> <p>HOPL has a written procedure of Internal Audit No.PRO-ESD-EMS-016-11 dated 27 April 2020 to conduct annual internal audit to verify that HOPL:</p> <ul style="list-style-type: none"> - Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communication and Claims Documents. - Effectively implements and maintains the standard requirements within its organization. <p>Non conformities found as part of the internal audit shall be issued corrective action requests. The result of the internal audits and all actions taken to correct non-conformities are available to the certification body upon request. The outcome of internal audit are reviewed by top management at the annual management review.</p>	
3.8.7	<p>Purchasing and Goods In</p> <ul style="list-style-type: none"> i. The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received. ii. The mill shall inform the CB immediately if there is a projected overproduction of certified tonnage. iii. The mill shall have a mechanism in place for handling non-conforming FFB and/or documents. 	<p>The internal audit have been carried out by Compliance Department for Hargy POM, Navo POM and Barema POM.</p> <p>In Hargy POM, RSPO SCCS audit carried out on 4 March 2020, by Fidelis Hiamangi and Stephanie Silik. The audit carried out against standard of General Chain of Custody Requirements for the Supply Chain, CPO Mill-RSPO Supply Chain Module D. The internal audit process is taking sample of CPO delivery ticket; PK delivery ticket; and trading records.</p> <p>The latest internal audit in Barema POM carried out in 2 March 2020, by Fidelis Hiamangi. The audit covers General Chain of Custody Requirements for the Supply Chain, CPO Mill-RSPO Supply Chain Module D standard.</p>	Complied

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		<p>The latest internal audit in Navo POM carried out in 5 June 2020, by Fidelis Hiamangi. The audit covers General Chain of Custody Requirements for the Supply Chain, CPO Mill-RSPO Supply Chain Module D standard. The internal audit is taking sample of CPO delivery ticket, Smallholder FFB dockets; and training records.</p> <p>The weighbridge operators, QC and laboratory analyst, process superintendent, assistant operator, laboratory and shipping superintendent, and compliance officer participated the internal audit process. Supply Chain Certification Internal Audit was evident covering General chain of custody requirements for the supply chain, RSPO rules on market communication and claims and module D.</p>	
<p>3.8.8</p>	<p>Sales and Goods Out</p> <p>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"> The name and address of the buyer; The name and address of the seller; The loading or shipment / delivery date; The date on which the documents were issued; RSPO certificate number; A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations); The quantity of the products delivered; 	<p>Hargy Oil Palms Limited has established RSPO Supply Chain Certification Manual No.MAN-COM-SCC-001-02 dated 28 February 2020 and Procedure of Sales and Goods Out No.PRO-ESD-SCC-006-01 dated 21 May 2019. The documents explain that record of final tonnage shipped was recorded in the FOSFA Combined Weight Certificate & Loading Report. Shipping documents such as Contract documents, Sales advice and FOSFA Combined Weight & Loading Report include the information.</p> <p>Sales of CPO under PalmTrace transaction No.TR-14f7cabe-e8aa:</p> <ul style="list-style-type: none"> Contract No.PHO-10684 dated 25 November 2019. Product: New Britain Crude Sustainable Unbleached Palm Oil in Bulk SG. Quantity: 500 MT. Seller: Hargy Oil Palms Limited. Seller Address: PO Box 21 Bialla, West New Britain, Papua New Guinea. Buyer: SIPEF – Antwerp; End Buyer: Fuji Oil Europe N.V; Buyer Address: 9000 Gent, Belgium. Tanker Bill of Lading No.BIA/ROT-10, dated 30 January 2020. Shipper: Hargy Oil Palms Limited, Private Mail Bag Kimbe, West New Britain Province, Papua New Guinea. Notify Address: Fuji Oil Europe N.V. Kuhlmannlan 96, 900 Gent. Tanker: MT Stena Image. Voyage: V2001. Loaded at port: Bialla, Papua New Guinea. Delivered to port: 	<p>Complied</p>

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	<p>h. Any related transport documentation; i. A unique identification number.</p>	<p>Rotterdam. Commodity: Crude Sustainable Palm Kernel Oil/SG RSPO Certificate No.RSPO535739. Volume 502.45 MT. Reference to Contract No.PHO-10684 SG.</p> <ul style="list-style-type: none"> Shipping Announcement No.TR-14f7cabe-e8aa. Date 3 February 2020. Seller: Hargy Palm Oil Mill – SIPEF, Papua New Guinea. Member ID: RSPO_PO1000002567. Buyer: Fuji Oil Europe. Member ID: RSPO_PO1000000077. Product name: CSPO. Program: Segregation. Volume 502.45 MT. <p>Information for RSPO certified products made available:</p> <ul style="list-style-type: none"> The name and address of the buyer: Fuji Oil Europe NV, Kuhlmannlan 96, 900 Gent; The name and address of the seller: Hargy Oil Palms Limited, Private Mail Bag Kimbe, West New Britain Province, Papua New Guinea; The loading or shipment/ delivery date: 30 January 2020; The date on which the documents were issued: 30 January 2020; A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations): Crude Sustainable Palm Oil/SG; The quantity of the products delivered: 502.45 MT; Any related transport documentation: Bill of Lading No.BIA/ROT-10 dated 30 January 2020; Supply chain certificate number of the seller: RSPO535739; A unique identification number: Contract No.PHO-10684 SG; <p>Sales of CPO under PalmTrace transaction No.TR-aa5a493c-e09a:</p> <ul style="list-style-type: none"> Contract No.PHO-10551 dated 7 February 2019. Product: New Britain Crude Sustainable Unbleached Palm Oil in Bulk SG. Quantity: 2,500 MT. Seller: Hargy Oil Palms Limited. Seller Address: PO Box 21 Bialla, West New Britain, Papua New Guinea. Buyer: SIPEF – Antwerp; End Buyer: OLENEX SARL; Buyer Address: CH-1180 Rolle. 	
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		<ul style="list-style-type: none"> • Tanker Bill of Lading No.BIA/ROT-07, dated 7 July 2020. Shipper: Hargy Oil Palms Limited, Private Mail Bag Kimbe, West New Britain Province, Papua New Guinea. Notify Address: OLENEX SARL, A One Business Center, La Piece 3 CH-1180 Rolle - Switzerland. Tanker: MT Yasa Albatross. Voyage: V.1901. Loaded at port: Bialla, Papua New Guinea. Delivered to port: Rotterdam. Commodity: Crude Sustainable Palm Oil/SG RSPO Certificate No.RSPO535739. Volume 2,500 MT. Reference to Contract No.PHO-10551 SG. • Shipping Announcement No.TR-aa5a493c-e09a. Date 17 January 2020. Seller: Hargy Palm Oil Mill – SIPEF, Papua New Guinea. Member ID: RSPO_PO1000002567. Buyer: OLENEX SARL. Member ID: RSPO_PO1000000031. Product name: CSPO. Program: Segregation. Volume 2,500 MT. <p>Information for RSPO certified products made available:</p> <ul style="list-style-type: none"> • The name and address of the buyer: OLENEX SARL, A One Business Center, La Piece 3 CH-1180 Rolle - Switzerland; • The name and address of the seller: Hargy Oil Palms Limited, Private Mail Bag Kimbe, West New Britain Province, Papua New Guinea; • The loading or shipment/ delivery date: 7 July 2019; • The date on which the documents were issued: 7 July 2019; • A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations): Crude Sustainable Palm Oil/SG; • The quantity of the products delivered: 2,500 MT; • Any related transport documentation: Bill of Lading No.BIA/ROT-07 dated 7 July 2019; • Supply chain certificate number of the seller: RSPO535739; • A unique identification number: Contract No.PHKO-10551 SG <p>Sales of CPO under PalmTrace transaction No.TR-19fadc99-5cd8:</p>	
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		<ul style="list-style-type: none"> • Contract No.PHO-10725 dated 29 May 2020. Product: New Britain Crude Sustainable Unbleached Palm Oil in Bulk SG. Quantity: 1,000 MT. Seller: Hargy Oil Palms Limited. Seller Address: PO Box 21 Bialla, West New Britain, Papua New Guinea. Buyer: SIPEF – Antwerp; End Buyer: Cargill BV; Buyer Address: NL-1118 CZZ Schiphol. • Tanker Bill of Lading No.BIA/ROT-17, dated 29 May 2020. Shipper: Hargy Oil Palms Limited, Private Mail Bag Kimbe, West New Britain Province, Papua New Guinea. Notify Address: CARGILL BV. CROE INBOUND, 21st Floor, Evert van de Beekstraat 378, NL-2311 CZ, Schiphol. Tanker: MT Navi8 Guard. Voyage: V.2001. Loaded at port: Bialla, Papua New Guinea. Delivered to port: Rotterdam. Commodity: Crude Sustainable Palm Oil/SG RSPO Certificate No.RSPO535739. Volume 1,000 MT. Reference to Contract No.PHO-10725 SG. • Shipping Announcement No.TR-19fadc99-5cd8. Date 4 June 2020. Seller: Hargy Palm Oil Mill – SIPEF, Papua New Guinea. Member ID: RSPO_PO1000002567. Buyer: CARGILL BV. Member ID: RSPO_PO1000000031. Product name: CSPO. Program: Segregation. Volume 1,000 MT. <p>Information for RSPO certified products made available:</p> <ul style="list-style-type: none"> • The name and address of the buyer: CARGILL BV. CROE INBOUND, 21st Floor, Evert van de Beekstraat 378, NL-2311 CZ, Schiphol; • The name and address of the seller: Hargy Oil Palms Limited, Private Mail Bag Kimbe, West New Britain Province, Papua New Guinea; • The loading or shipment/ delivery date: 29 May 2020; • The date on which the documents were issued: 29 May 2020; • A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations): Crude Sustainable Palm Oil/SG; • The quantity of the products delivered: 1,000 MT; 	
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		<ul style="list-style-type: none"> • Any related transport documentation: Bill of Lading No.BIA/ROT-17 dated 29 May 2020; • Supply chain certificate number of the seller: RSPO535739; • A unique identification number: Contract No.PHKO-10725 SG <p>Information are available in across range of document, such as Sales Contract, Tanker Bill of Lading, Shipping Announcement.</p>	
3.8.9	<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> <ol style="list-style-type: none"> a. The mill has legal ownership of all input material to be included in outsourced processes 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. c. The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor. d. 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 	<p>Hargy Oil Palms Limited performs outsourcing activities for FFB transport, when the CH have legal ownership of the material (FFB).</p> <p>Contract with FFB transport contractor: Contract No.HOPL 2020-031. Contract Type: Smallholders Self Delivery Contract Service, Vehicle Rego No.KAG514 for Smallholders FFB Cartage Service between Hargy Oil Palms Limited and Mu-u mata Mini Oil Palm Estate of Noau Village, sign date 8 January 2020 and ends 8 January 2021 for delivery contract. The signee from Mu-u mata is Mr. James Kaiwa (Manager). Point 2 of contract stipulated Crop should not be diverted and weighed to other blocks of Independent Estates. Point 13 of contract stipulates Contractors shall comply with the relevant requirements of RSPO Supply Chain Certification Standard & RSPO Principle and Criteria; The contractor shall provide relevant access for duly accredited certification bodies (CBs) to their respective operations, systems and other information; when deemed necessary.</p> <p>Hargy Oil Palms Limited provided Contractor Induction Agreement to Mu-u mata Oil Palms Estate on 8 January 2020. The induction related to HOPL Environment, OHS Policy, EMS Policy and RSPO requirements.</p> <p>Hargy Oil Palms Limited has procedure PRO-ESD-SCC-005-01, Outsourcing Activity to regulate the outsourcing activity. Hargy Oil Palms</p>	Complied

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	this is announced in advance.	Limited performs outsourcing activities for FFB transport, when the CH have legal ownership of the material (FFB).																												
3.8.10	The mill shall record the names and contact details of all contractors used for the physical handling of RSPO certified oil palm products.	<p>Name and contact details of trucking contractor:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr style="background-color: #e1f5fe;"> <th style="text-align: center;">Contractor</th> <th style="text-align: center;">Contact Person</th> <th style="text-align: center;">Contact Number/Address</th> </tr> </thead> <tbody> <tr> <td>Alaba Development Inc.</td> <td>Nixon Volele</td> <td>PO BOX 172, Bialla 624</td> </tr> <tr> <td>Benny Larry (self delivery)</td> <td>Benny Larry</td> <td></td> </tr> <tr> <td>Endy Estate (self delivery)</td> <td>Benny Larry</td> <td></td> </tr> <tr> <td>Kijomhal Transport (FFB cartage)</td> <td>Allan Zairere</td> <td>705***16</td> </tr> <tr> <td>Kijomhal Transport (self delivery)</td> <td>Allan Zairere</td> <td>705***16</td> </tr> <tr> <td>Liwale Nane Building and Maintenance</td> <td>Kiru Dariako</td> <td>PO BOX 78, Bialla</td> </tr> <tr> <td>Membu Welding & Construction Limited</td> <td>Erick Wali</td> <td>PO BOX 231, Bialla 624</td> </tr> <tr> <td>Mu-u mata Holdings</td> <td>Jame Kaiwa</td> <td>PO BOX 159, Bialla 624,</td> </tr> </tbody> </table> <p>Name and contact details of shipping company: Paradise Shipping & Logistics Limited, PO BOX 3580, Lae – Morobe Province, Papua New Guinea. Contact Person: Mr. Joe Auteke. Contact No.793****48.</p>	Contractor	Contact Person	Contact Number/Address	Alaba Development Inc.	Nixon Volele	PO BOX 172, Bialla 624	Benny Larry (self delivery)	Benny Larry		Endy Estate (self delivery)	Benny Larry		Kijomhal Transport (FFB cartage)	Allan Zairere	705***16	Kijomhal Transport (self delivery)	Allan Zairere	705***16	Liwale Nane Building and Maintenance	Kiru Dariako	PO BOX 78, Bialla	Membu Welding & Construction Limited	Erick Wali	PO BOX 231, Bialla 624	Mu-u mata Holdings	Jame Kaiwa	PO BOX 159, Bialla 624,	Complied
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3.8.11	The mill shall inform its CB in advance prior to conduct of its next audit of the names and contact details of any new contractor used for the physical handling of RSPO certified oil palm products.	Hargy Oil Palms Limited informed BSI of the new contractor used for FFB transport from smallholder blocks to HOPL's palm oil mills.	Complied																											
3.8.12	<p>Record keeping</p> <ul style="list-style-type: none"> 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. ii. Retention times for all records and reports shall be a minimum of two (2) years and shall comply with relevant legal and 	Hargy POM, Barema Pom and Navo POM maintains accurate, complete, up-to-date and accessible records and reports covering all aspects of RSPO Supply Chain Certification Standard requirements. The organization has implemented RSPO Supply Chain Certification Standard based on procedure PRO-ESD-SCC-009-01, Record Keeping and RSPO SCC Manual "HOPL RSPO Supply Chain Certification Manual No.MAN-COM-SCC-001-01. Hargy Oil Palms Limited can demonstrate that all	Complied																											

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	<p>regulatory requirements and be able to confirm the certified status of raw materials or products held in stock.</p> <p>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.</p> <p>iv. For Mass Balance Module, the mill:</p> <p>a. Shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis.</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> <p>c. 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.</p>	<p>record and report are maintained accuracy, completeness and up-to-date. Sample seen:</p> <ul style="list-style-type: none"> - Daily Production Figure of Hargy POM for 30 June 2020, mentioned that FFB Stock before is 469.738 Ton; FFB received is 464.160 Ton; FFB processed is 505.648 Ton; stock carry forward is 428.250 Ton; FFB processed year to date is 74,815.306 Ton. CPO IP Stock B/F is 14,122.577 Ton; Produced is 123.608 Ton; Stock C/F is 14,246.185 Ton. PK IP Stock B/F is 92.847 Ton; Produced is 29.085 Ton; Stock C/F is 97.725 Ton. Mill Throughput month to date is 44.98 ton/hour; year to date is 44.68 ton/hour. CPO Extraction Rate month to date is 24.03 %; year to date is 23.48 %. PK Extraction Rate month to date is 5.75 %; year to date is 5.11 %. - Daily Production Figure of Barema POM for 30 June 2020, mentioned that FFB Stock B/F is 410.440 Ton; FFB received is 395.780 Ton; FFB processed is 710.220 Ton; stock C/F is 96.000 Ton; FFB processed year to date is 88,137.14 Ton. CPO IP Stock B/F is 459.357 Ton; Produced is 202.851 Ton; Stock C/F is 662.208 Ton. PK IP Stock B/F is 7.609 Ton; Received is 16.200 Ton; Produced is 37.060 Ton; Stock C/F is 11.564 Ton. Mill Throughput month to date is 45.60 ton/hour; year to date is 45.00 ton/hour. CPO Extraction Rate month to date is 25.51 %; year to date is 25.00 %. PK Extraction Rate month to date is 4.93 %; year to date is 5.14 %. - Daily Production Figure of Navo POM for 30 June 2020, mentioned that FFB Stock B/F is 130.99 Ton; FFB received is 396.02 Ton; FFB processed is 415.22 Ton; stock C/F 111.79 Ton; FFB processed year to date is 86,500.682 Ton. CPO IP Stock B/F is 1,053.43 Ton; Produced is 104.64 Ton; Stock C/F is 1,158.07 Ton. PK IP Stock B/F is 78.47 Ton; Despatched is 16.20 Ton; Produced is 18.27 Ton; Stock C/F is 80.54 Ton. Mill Throughput month to date is 50.96 ton/hour; year to date is 51.61 ton/hour. CPO Extraction Rate month to date is 25.37 %; year to date is 24.59 %. PK Extraction Rate month to date is 5.63 %; year to date is 5.21 %. 	
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		<p>- Quarterly Balance Report period January to March 2020 and April to June 2020. Based on the record, CPO stock at end of June 2020 in Hargy POM is 14,246.18 MT; in Barema POM is 662.21 MT; in Navo POM is 1,158.07 MT.</p> <p>"HOPL RSPO Supply Chain Certification Manual No.MAN-COM-SCC-001-01 dated 28 August 2019". In section 5.9.1 Record Keeping stated retention times for all records and reports is a minimum of two (2) years and complies with legal and regulatory requirements. The records confirm the certified status of raw materials or products held in stock. Based on record review in Hargy POM, Barema POM and Navo POM: FFB delivery docket, weighbridge ticket, CPO dispatch slip, PK dispatch slip, daily production report from 2018 and 2019 can be retrieved. HOPL uses Identity Preserved Module for the Palm Oil Mill, as evidence above, the mills has record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.</p>	
3.8.13	<p>Extraction Rate</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>Based on Mill Daily Production Report dated 30 June 2020, the mills have recorded daily, as in Hargy POM: CPO Extraction Rate month to date is 24.03 %; year to date is 23.48 %. PK Extraction Rate month to date is 5.75 %; year to date is 5.11 %. In Barema POM CPO Extraction Rate month to date is 25.51 %; year to date is 25.00 %. PK Extraction Rate month to date is 4.93 %; year to date is 5.14 %. In Navo POM CPO Extraction Rate month to date is 25.37 %; year to date is 24.59 %. PK Extraction Rate month to date is 5.63 %; year to date is 5.21 %.</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>HOPL Mills have updated CPO and PK extraction in daily basis to ensure accuracy against actual performance.</p>	Complied
3.8.15	<p>Processing</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</p>	<p>The procedure for production recording as in PRO-ESD-SCC-009-01, Record Keeping dated 21 May 2019 - has rules out a record keeping for RSPO certified FFB CPO and PK. At the moment, all FFB sources are certified. There is no non-certified FFB sources coming to Hargy POMs.</p>	Complied

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	<p>products, including during transport and storage to strive for 100% separation.</p>	<p>All records are provided and traceable such as Daily Production Report for Hargy POM, Barema POM and Navo POM as well as Quarterly Balance Report.</p> <p>Barema POM and Navo POM delivering their certified CPO product to the HOPL Bulking Station which located in Hargy POM and downgrading certified CPO "IP" into "SG" in Bulking Station due to mixing certified CPO product in tanks, then exported through bulking tanks and a jetty managed exclusively by HOPL.</p>	
<p>3.8.16</p>	<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>ii. 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>Hargy Oil Palms Limited have registered all of their POM into RSPO PalmTrace. Hargy Oil Palms Limited, under SIPEF Group, Belgium – holds RSPO membership number 1-0021-05-000-00, since 7 December 2005.</p> <p>Hargy POM PalmTrace ID: RSPO_PO10000 00053. Barema POM PalmTrace ID: RSPO_PO10000 01655. Navo POM PalmTrace ID: RSPO_PO10000 00105.</p> <p>Sales of CPO under PalmTrace transaction No.TR-14f7cabe-e8aa:</p> <ul style="list-style-type: none"> • Contract No.PHO-10684 dated 25 November 2019. Product: New Britain Crude Sustainable Unbleached Palm Oil in Bulk SG. Quantity: 500 MT. Seller: Hargy Oil Palms Limited. Seller Address: PO Box 21 Bialla, West New Britain, Papua New Guinea. Buyer: SIPEF – Antwerp; End Buyer: Fuji Oil Europe N.V; Buyer Address: 9000 Gent, Belgium. • Tanker Bill of Lading No.BIA/ROT-10, dated 30 January 2020. Shipper: Hargy Oil Palms Limited, Private Mail Bag Kimbe, West New Britain Province, Papua New Guinea. Notify Address: Fuji Oil Europe N.V. Kuhlmannlan 96, 900 Gent. Tanker: MT Stena Image. Voyage: V2001. Loaded at port: Bialla, Papua New Guinea. Delivered to port: Rotterdam. Commodity: Crude Sustainable Palm Kernel Oil/SG RSPO Certificate No.RSPO535739. Volume 502.45 MT. Reference to Contract No.PHO-10684 SG. 	<p>Complied</p>

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		<ul style="list-style-type: none"> Shipping Announcement No.TR-14f7cabe-e8aa. Date 3 February 2020. Seller: Hargy Palm Oil Mill – SIPEF, Papua New Guinea. Member ID: RSPO_PO1000000053. Buyer: Fuji Oil Europe. Member ID: RSPO_PO1000000077. Product name: CSPO. Program: Segregation. Volume 502.45 MT. <p>Information for RSPO certified products made available:</p> <ul style="list-style-type: none"> The name and address of the buyer: Fuji Oil Europe NV, Kuhlmannlan 96, 900 Gent; The name and address of the seller: Hargy Oil Palms Limited, Private Mail Bag Kimbe, West New Britain Province, Papua New Guinea; The loading or shipment/ delivery date: 30 January 2020; The date on which the documents were issued: 30 January 2020; A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations): Crude Sustainable Palm Oil/SG; The quantity of the products delivered: 502.45 MT; Any related transport documentation: Bill of Lading No.BIA/ROT-10 dated 30 January 2020; Supply chain certificate number of the seller: RSPO535739; A unique identification number: Contract No.PHO-10684 SG; <p>Sales of CPO under PalmTrace transaction No.TR-aa5a493c-e09a:</p> <ul style="list-style-type: none"> Contract No.PHO-10551 dated 7 February 2019. Product: New Britain Crude Sustainable Unbleached Palm Oil in Bulk SG. Quantity: 2,500 MT. Seller: Hargy Oil Palms Limited. Seller Address: PO Box 21 Biiala, West New Britain, Papua New Guinea. Buyer: SIPEF – Antwerp; End Buyer: OLENEX SARL; Buyer Address: CH-1180 Rolle. Tanker Bill of Lading No.BIA/ROT-07, dated 7 July 2020. Shipper: Hargy Oil Palms Limited, Private Mail Bag Kimbe, West New Britain Province, Papua New Guinea. Notify Address: OLENEX SARL, A One Business Center, La Piece 3 CH-1180 Rolle - Switzerland. Tanker: MT 	
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		<p>Yasa Albatross. Voyage: V.1901. Loaded at port: Bialla, Papua New Guinea. Delivered to port: Rotterdam. Commodity: Crude Sustainable Palm Oil/SG RSPO Certificate No.RSPO535739. Volume 2,500 MT. Reference to Contract No.PHO-10551 SG.</p> <ul style="list-style-type: none"> Shipping Announcement No.TR-aa5a493c-e09a. Date 17 January 2020. Seller: Barema Palm Oil Mill – SIPEF, Papua New Guinea. Member ID: RSPO_PO1000001655. Buyer: OLENEX SARL. Member ID: RSPO_PO1000000031. Product name: CSPO. Program: Segregation. Volume 2,500 MT. <p>Information for RSPO certified products made available:</p> <ul style="list-style-type: none"> The name and address of the buyer: OLENEX SARL, A One Business Center, La Piece 3 CH-1180 Rolle - Switzerland; The name and address of the seller: Hargy Oil Palms Limited, Private Mail Bag Kimbe, West New Britain Province, Papua New Guinea; The loading or shipment/ delivery date: 7 July 2019; The date on which the documents were issued: 7 July 2019; A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations): Crude Sustainable Palm Oil/SG; The quantity of the products delivered: 2,500 MT; Any related transport documentation: Bill of Lading No.BIA/ROT-07 dated 7 July 2019; Supply chain certificate number of the seller: RSPO535739; A unique identification number: Contract No.PHKO-10551 SG <p>Sales of CPO under PalmTrace transaction No.TR-19fadc99-5cd8:</p> <ul style="list-style-type: none"> Contract No.PHO-10725 dated 29 May 2020. Product: New Britain Crude Sustainable Unbleached Palm Oil in Bulk SG. Quantity: 1,000 MT. Seller: Hargy Oil Palms Limited. Seller Address: PO Box 21 Bialla, West New Britain, Papua New Guinea. Buyer: SIPEF – Antwerp; End Buyer: Cargill BV; Buyer Address: NL-1118 CZZ Schiphol. 	
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		<ul style="list-style-type: none"> • Tanker Bill of Lading No.BIA/ROT-17, dated 29 May 2020. Shipper: Hargy Oil Palms Limited, Private Mail Bag Kimbe, West New Britain Province, Papua New Guinea. Notify Address: CARGILL BV. CROE INBOUND, 21st Floor, Evert van de Beekstraat 378, NL-2311 CZ, Schiphol. Tanker: MT Navi8 Guard. Voyage: V.2001. Loaded at port: Biiala, Papua New Guinea. Delivered to port: Rotterdam. Commodity: Crude Sustainable Palm Oil/SG RSPO Certificate No.RSPO535739. Volume 1,000 MT. Reference to Contract No.PHO-10725 SG. • Shipping Announcement No.TR-19fad99-5cd8. Date 4 June 2020. Seller: Navo Palm Oil Mill – SIPEF, Papua New Guinea. Member ID: RSPO_PO1000000105. Buyer: CARGILL BV. Member ID: RSPO_PO1000000031. Product name: CSPO. Program: Segregation. Volume 1,000 MT. <p>Information for RSPO certified products made available:</p> <ul style="list-style-type: none"> • The name and address of the buyer: CARGILL BV. CROE INBOUND, 21st Floor, Evert van de Beekstraat 378, NL-2311 CZ, Schiphol; • The name and address of the seller: Hargy Oil Palms Limited, Private Mail Bag Kimbe, West New Britain Province, Papua New Guinea; • The loading or shipment/ delivery date: 29 May 2020; • The date on which the documents were issued: 29 May 2020; • A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations): Crude Sustainable Palm Oil/SG; • The quantity of the products delivered: 1,000 MT; • Any related transport documentation: Bill of Lading No.BIA/ROT-17 dated 29 May 2020; • Supply chain certificate number of the seller: RSPO535739; • A unique identification number: Contract No.PHKO-10725 SG 	
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		Information are available in across range of document, such as Sales Contract, Tanker Bill of Lading, Shipping Announcement. There is no remove implemented, because all RSPO certified product sold and registered into RSPO PalmTrace.	
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>	The mechanism for claims is stated in Hargy Oil Palms Limited RSPO Supply Chain Certification Manual No.MAN-COM-SCC-001-01 dated 28 August 2019. Sample of document verified, Daily Production Figure, Weighbridge Card, Sales Contract and Tanker Bill of Lading demonstrated that there is no RSPO corporate logo or Trade Mark logo displayed in those documents. Hargy Oil Palms Limited has aware and comply with the RSPO Rules on Market Communication and Claims.	Complied
General corporate communications			
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.	<p>The following was communicate in the group website: https://www.sipef.com/</p> <p>Hargy Oil Palms Limited (HOPL) is a subsidiary of SIPEF. SIPEF is producing and selling palm products, such as crude palm oil, palm kernels and crude palm kernel oil, as well as natural rubber, tea in bulk, green bananas, flowers and foliage. All our products are 100% traceable to the source. 100% RSPO compliant with all criteria for processing RSPO certified oil palm products in the Group.</p>	Complied
4.2	<p>In corporate communications a member is allowed to:</p> <ul style="list-style-type: none"> a. Display its RSPO membership status b. Display the RSPO web address (www.rspo.org) c. State that the member supports the work of the RSPO d. State the member's history with regard to the RSPO. e. Use the RSPO trademark to promote its membership of the RSPO. <p>Additionally, where an RSPO member displays the RSPO trademark in digital format this must be accompanied by the text 'Check our</p>	The communication in https://www.sipef.com/ states that all products are 100% traceable to the source and 100% compliant with all criteria for processing RSPO certified oil palm products in the Group.	Complied

	progress at www.rspo.org where the link must lead to the member's profile page.		
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.	The communication in https://www.sipef.com/ does not do that. There is clear that no statement may lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products.	Complied
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.	The communication in https://www.sipef.com/ is consistent, clear and not mislead consumers or other stakeholders as to the certified content of oil palm products in the HOPL's own products..	Complied
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.	There is no RSPO corporate logo has been used in the website, official documents or official letterhead template.	Complied
Business to business communications			
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.	The only business to business communication is through the delivery documents. However the communication is mainly of the RSPO certificate number and product description. There is no trademark used.	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.	The only business to business communication is through the delivery documents. However the communication is mainly of the RSPO certificate number and product description. There is no trademark used.	Complied
5.3	Where a distributor or wholesaler takes title to products containing certified sustainable oil palm products, the requirements of the RSPO SCCS can follow either of two options: a. If the distributor or wholesaler holds only a Distributor license, it may only communicate RSPO-certified oil palm products by	HOPL is not a distributor or wholesaler. Not Applicable.	Not Applicable

	<p>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>b. If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2.</p>		
Business to consumer communication			
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.	There is no business to consumer communication as this is an upstream activity certification.	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.	There is no business to consumer communication as this is an upstream activity certification.	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.	There is no business to consumer communication as this is an upstream activity certification.	Not Applicable
6.4	Business to consumer communication shall not include information about the claimant’s RSPO membership status.	There is no business to consumer communication as this is an upstream activity certification.	Not Applicable
6.5	Members shall not communicate to consumers’ information about their suppliers’ RSPO membership status.	There is no business to consumer communication as this is an upstream activity certification.	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.	There is no business to consumer communication as this is an upstream activity certification.	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.	There is no business to consumer communication as this is an upstream activity certification.	Not Applicable
6.8	RSPO members who are retailers or food service companies can apply for an RSPO trademark license for use in business to consumer communications, provided they can demonstrate the validity of these claims to an RSPO-accredited certification body (CB). This will be undertaken via a remote audit, prior to the trademark use, during which the retailer or food service company will need to demonstrate that the use of the trademark is in compliance with the rules contained within this document and that the claim itself can be supported through a certified supply chain. Any other palm oil claims, including those highlighting the absence of palm oil, must be highlighted to the CB 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 www.rspo.org .	There is no business to consumer communication as this is an upstream activity certification.	Not Applicable

MODULE A – IDENTITY PRESERVED & SEGREGATED SPECIFIC RULES

Certified oil palm content (IP)

	For IP, 95% or above of the oil palm content must be RSPO IP-certified.	<p>Hargy Oil Palms Limited is certified for production of RSPO CPO and PK, the supply chain module is IP, therefore all claim based on 100% certified palm product.</p> <p>Barema POM and Navo POM delivering their certified CPO product to the HOPL Bulking Station which located in Hargy POM. Due to mixing of certified CPO product in tanks, then exported through bulking tanks and a jetty managed exclusively by HOPL, therefore all certified CPO are</p>	Complied
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		downgraded from "IP" into "SG". Hargy Oil Palms Limited sold their RSPO certified product as SG (multi mill).	
	For SG, 95% or above of the oil palm content must be SG, or a combination of SG and IP.	Hargy Oil Palms Limited is certified for production of RSPO CPO and PK, the supply chain module is IP, therefore all claim based on 100% certified palm product. Barema POM and Navo POM delivering their certified CPO product to the HOPL Bulking Station which located in Hargy POM. Due to mixing of certified CPO product in tanks, then exported through bulking tanks and a jetty managed exclusively by HOPL, therefore all certified CPO are downgraded from "IP" into "SG". Hargy Oil Palms Limited sold their RSPO certified product as SG (multi mill).	Complied
	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.	Hargy Oil Palms Limited is certified RSPO CPO and PK, the supply chain module is IP, therefore all claim based on 100% certified palm product.	Complied
Labelling and trademark (IP)			
	Members are allowed to use the RSPO label in one of the following ways: a. RSPO trademark which includes the tag 'CERTIFIED' or b. 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.	There was no on product label claims for the certification of HOPL mills.	Not Applicable
Messaging (IP)			

	<p>Messaging ALLOWED in storytelling in product-related communications may include some or all of the following elements:</p> <ul style="list-style-type: none"> • The oil palm products contained in this product have been certified to come from RSPO sources. www.rspo.org • By choosing this product, you are sure it contains RSPO-certified palm oil. For more information: www.rspo.org • RSPO-certified sustainable oil palm products were kept apart from other oil palm products throughout the supply chain. www.rspo.org • Certified sustainable oil palm products can be traced back to RSPO-certified mills and plantations. www.rspo.org • The entire supply chain is monitored by independent, RSPO-accredited auditors. www.rspo.org • RSPO-certified sustainable palm oil has been produced to stringent environmental and social criteria. www.rspo.org • References to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown by company records. 	<p>There was no on product label claims for the certification of HOPL mills.</p>	<p>Not Applicable</p>
<p>Principle 4: Respect community and human rights and deliver benefits</p>			
<p>Criterion 4.1</p>			
<p>The unit of Certification respects human rights, which includes respecting the rights of Human Rights Defenders.</p>			
<p>4.1.1</p>	<p>(C) A policy to respect human rights, including Prohibiting retaliation against Human Rights Defenders (HRD), is documented and communicated 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.</p> <p>- Critical (Major) compliance -</p>	<p>Hargy Oil Palms Limited has developed Policy on Human Rights (Doc. No.: POL-HRD-GEN-005-03, Issue No.: 3 dated 7/6/2019) approved by CEO. The company is recognizing the Human Rights are universal and apply to all without any form of distinction. They support the implementation of the International Bill of Human Rights, the UN guiding principles on business and human rights and of the ILO Declaration on Fundamental Principles and Rights at Work. Hargy Oil Palm Ltd is prohibits retaliation against Human Rights Defenders (HRD) and complainants including intimidation and harassment by HOPL employees</p>	<p>Complied</p>

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		<p>and contracted services. The policy is communicated to the workers and seen the briefing records dated 5/2/2020 in Atata Plantation (Navo Estate), 21/6/2019 in Barema Plantation (Hargy Estate), 5/3/2020, 9/3/2020 and 12/5/2020 in Barema POM, 17/7/2020 in Hargy POM and 18/6/2020 in Navo POM. The contractors and their employees that provided services to the company have signed on the Contractor Induction Agreement and Employee Induction Checklist to acknowledge compliance on RSPO and legal requirements.</p>	
<p>4.1.2</p>	<p>The unit of certification does not instigate violence or use any form of harassment, including the use of mercenaries and paramilitaries in their operations. - Minor compliance -</p>	<p>Based on interview with stakeholder, it is known that HOPL never instigate violence or use any form of harassment, including use of mercenaries and paramilitaries in the operation.</p> <p>Smallholders 080803 Susan Jerom, stated no violence or use of any form of harassment, including use of mercenaries/paramilitaries in operation or dispute settlement. No dispute during cultivation, no dispute currently.</p> <p>Smallholders 01274 Theo Vincent, stated no violence or use of any form of harassment, including use of mercenaries/paramilitaries in operation or dispute settlement. Theo Vincent explains ongoing issue with the boundary. Said boundary was moved, have not reported but have already spoken to neighbour.</p> <p>Smallholders 040001 Tomarum Ali (interviewed wife, husband attending funeral), stated no violence or use of any form of harassment, including use of mercenaries/paramilitaries in operation or dispute settlement. No dispute during cultivation, no dispute currently.</p> <p>Smallholders 040025 Morgan Paliavu. Land have surveyed by BOGA (Mr. Oka) for VOP extension.</p>	<p>Complied</p>

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		<p>He went through court system to solve issue. Court advised to do land mediation out of court. Have issue with Bagili Estate and Tagila Estate. Tagila Estate also planted palms and surveyed area. stated no violence or use of any form of harassment, including use of mercenaries/paramilitaries in operation or dispute settlement. No dispute during cultivation, no dispute currently.</p> <p>Smallholders 040623 Baimo Paliavu (interview daughter of Baimo); 041176 Herman Bua; 161601 Amos Koi, 161609 Boto Marisa, stated no violence or use of any form of harassment, including use of mercenaries/paramilitaries in operation or dispute settlement. No dispute during cultivation, no dispute currently.</p>	
<p>Criterion 4.2 There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties</p>			
<p>4.2.1</p>	<p>(C) 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 whistle-blowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD. - Critical (Major) compliance -</p>	<p>The new procedure of Grievance Mechanism (PRO-ESD-GEN-017-04, issued 22 February 2019). Section 12.1 Time schedule for grievance procedure process is 30 days (Day 29 Deadline for submission to CA Department about final response; Day 30 Closing of the grievance and briefing of response to complainants).</p> <p>Smallholders 080803 Susan Jerom, received awareness related to no child labour, protect human rights during Field Day.</p> <p>Smallholders 01274 Theo Vincent, heard of dispute resolution during field day. Theo Vincent explains ongoing issue with the boundary. Said boundary was moved, have not reported but have already spoken to neighbour.</p> <p>Smallholders 040001 Tomarum Ali (interviewed wife, husband attending funeral), have received awareness on dispute resolution.</p>	<p>Complied</p>

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		<p>Smallholders 040025 Morgan Paliavu. He received information related to dispute resolution and protect human rights during Field Day.</p> <p>Smallholders 040623 Baimo Paliavu (interview daughter of Baimo). She responded any issues, will go to OPIC.</p> <p>Smallholders 161601 Amos Koi, and 161609 Boto Marisa, received awareness related to dispute resolution and protect human rights during Field Day, August 2020.</p>	
4.2.2	<p>Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.</p> <p>- Minor compliance -</p>	<p>Grievance Mechanism (Doc. No.: PRO-COM-GEN-017-04, Issue No.: 4 dated 19/6/2019) was developed to provide a way to reduce risks from company employees, offer external stakeholders an effective avenue for expressing concerns achieving remedies, and promote a mutually constructive relationship with all relevant stakeholders and the company. Community Affairs Manager will be the primary interface between HOPL and any external stakeholders intending to raise their grievance whereas Security Department and Human Resource Department will be the primary interface between HOPL and company employees on grievances related to social safety, security nature and employment of employees. Business Development Officer form a centralized reporting, Grievance Tracking Database and will ensure all grievances are channelled to relevant departments. The target to response and provides feedback to 100% of grievances within 7 days dealing directly with the person raising the grievance. Mechanism to receive grievance such as:</p> <ul style="list-style-type: none"> • Requests, Complaints, Grievances and Disputes Register Form – Company employees • Form of letter or verbally to register in Requests, Complaints, Grievances and Disputes Register Form – External stakeholders and contractors <p>The Grievance Policy is communicated to the workers and seen the briefing records dated 5/2/2020 in Atata Plantation (Navo Estate),</p>	Complied

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		21/5/2020, 26/5/2020 and 8/6/2020 in Barema POM, 16/11/2019 in Hargy POM and 18/6/2020 in Navo POM.	
4.2.3	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. - Minor compliance -	Reviewed the Grievance Records July 2019 – June 2020 for the closed issues. Sampled the following Complaints, Grievance & Disputes Register Form and records of the closure of complaint as below: 1. Issue 305: Workers strike on pay issues at Navo Estate (Atata Plantation) on 16/6/2020 Action taken: Management has taken action to cross-check the list of grievances and queries raised by the workers and the productivity records accordingly. The management has conducted discussion with the employees on 15/6/2020 and 16/6/2020 and made payment accordingly. 2. Issue 238: Sexual harassment in Barema Plantation on 11/7/2019 Action taken: Management has taken action to investigate the complaint and had meeting with the relevant parties on 17/8/2019 and a warning letter was issued to the defendant on 27/8/2019 as he admitted his wrongdoing. The grievance was closed on 10/9/2019.	Complied
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. - Minor compliance -	As per the Grievance Mechanism mentioned in indicator 4.2.2, the complainant has the option of accessing independent legal and technical advice of their choice and the ability to choose individuals or groups to support them as well as option of a third party mediator.	Complied
Criterion 4.3			
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. Smallholder requirements:	Hargy Oil Palms Limited made community development projects. One of the project was Bialla Health Center Manternity Ward renovation. The consultation meeting was held on 17 March 2020, attended by Bialla LLG (Local Level Government) President, Project Coordinator, Development Advisor and Development Officer. HOPL and community have chosen to	Complied

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	<p>Smallholder should participate in Field days and other extension activities delivered by organization managing the smallholders. All records shall be maintained.</p> <p>- Minor compliance -</p>	<p>upgrade the Maternity Section of the Bialla Health Centre, to help women access the high quality maternal health care they need to be able to give birth safely.</p> <p>Smallholders are participating in Field Days. Smallholders 080803 Susan Jerom, received awareness related to no child labour, block management, HCV and river buffer protection, protect pregnant women, and protect human rights during Field Day.</p> <p>Smallholders 01274 Theo Vincent, heard of safety and protection of work, block management, buffer zone protection, no child worker, dispute resolution during field day.</p> <p>Smallholders 040001 Tomarum Ali (interviewed wife, husband attending funeral), have received field day, informing no child labor, human rights policy, use of PPE for safety, wildlife protection awareness.</p> <p>Smallholders 040025 Morgan Paliavu. He received information related to block maintenance, preserve land for bird/animal, preserve forest, clid labour awareness, dispute resolution and protect human rights during Field Day.</p> <p>Smallholders 161601 Amos Koi, and 161609 Boto Marisa, received awareness related to dispute resolution and protect human rights during Field Day, August 2020.</p>	
<p>Criterion 4.4</p>			
<p>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.</p>			
<p>4.4.1</p>	<p>(C) 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 where such documents have been issued by the appropriate Government agency.</p>	<p>HOPL has fully developed the leasehold land transferred from predecessors or through purchase and transfer of title. There will be no further own land expansion from HOPL. The development of the Bialla project inclusive of smallholders and sub-leasing from customary land</p>	<p>Complied</p>

	<p>For Customary land where such documents are not available, evidence of ownership will be demonstrated as follows:</p> <ul style="list-style-type: none"> - Critical (Major) compliance - 	<p>(through the Leased Lease Back program with Incorporated Land Grouping (customary land) and incorporated companies (state lease)). The LLBs are land belongs to the clan. Therefore, in order to maintain the "FPIC" requirements, HOPL has developed the Land Negotiation Procedure to manage clan lands registration. The procedures provide guidance to the clan and the clan members shall discuss their user rights and interest of communal benefits and come to the consensus to incorporate land grouping (ILG).</p> <p>The land titles for lands that was developed by HOPL are available and kept onsite.</p>	
	<p>4.4.1(a) For PNG, there are no written laws on customary land, but decisions are guided by customs of the landowning group or clan and documented in a CLUA (Customary Land Use Agreement) which is valid for one planting cycle only. Decisions on land use and distribution are normally done conventionally at the level of the clan and may vary from clan to clan. Individuals only have exclusive rights to use and occupy land based on verbal and mutual agreement, whilst undisputed outright ownership status of customary land is vested in the clan. Traditionally, clans decide on occupancy and user rights. One has to be a member of a land-owning group through custom in order to have access to land.</p>	<p>Sample of CLUA that seen and verified as follow:</p> <ul style="list-style-type: none"> - 040001 Tomarum Ali: Clan Land Use Agreement No. 040001 for Tomarum Ali, to use the land known as Aliu and which allocated 2 Ha as the VOP Block No. 040001 of Malasi VOP area; dated 20 July 2017 and period 20 years. - 077148 Nick Valu: Clan Land Use Agreement No. 077148 for Nick Valu, to use the land known as Madudua and which allocated 2 Ha as the VOP Block No. 077148 of Noau VOP area; dated 7 November 2016 and period 25 years. - 080803 Susan Jerom: Clan Land Use Agreement No. 080803 for Susan Jerom, to use the land known as Tiulagelagea and which allocated 2 Ha as the VOP Block No. 080803 of Sulie VOP area; dated 7 July 2017 and period 10 years. - 111211 Jenny Pigirip: Clan Land Use Agreement No. 111211 for Jenny Pigirip, to use the land known as Pela and which allocated 2 Ha as the VOP Block No. 111211 of Kiava VOP area; dated 3 August 2016 and period 10 years. 	

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	<p>4.4.1(b) For Solomon Islands, Customary Land may be recorded in accordance with the Customary Lands Record Act 1994 (as amended). This act provides for the Recording officer appointed by the National Records to determine the Customary Owners, the survey the land with maps to be held at the Central and other Land Record offices. Other mechanisms to manage Customary Land may be applied.</p> <p>Companies must be able to demonstrate that where they have leased customary land, they have negotiated with the recognised owners of the land or their authorised representatives and have observed full FPIC requirements in those negotiations with all required details being appropriately documented.</p>	<p>- 161601 Amos Koi: Clan Land Use Agreement No. 161601 for Amos Koi, to use the land known as Gou and which allocated 2 Ha as the VOP Block No. 161601 of Kaiamu VOP area; dated 16 April 2018 and period 30 years.</p> <p>HOPL is located in PNG. Not Applicable</p>	
<p>4.4.2</p>	<p>Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:</p>	<p>According to interview with sample of smallholders, explained that for VOP smallholders the land status owned by Customary Land. Copies of documents evidencing that smallholders able to cultivate the land namely Clan Land Use Agreement (CLUA). From the sample of VOP smallholders visited, their acknowledge that CLUA was lease from customary land for various period, but mostly one period of oil palm cycle (25 years).</p> <p>FPIC process was informed at the time of signing CLUA between Customary Head and smallholder.</p> <p>While for Land Settlement Scheme (LSS) smallholders, copies of document indicates the land status was Agricultural Lease and all the copies are well recorded at unit of certification.</p>	<p>Complied</p>

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4.4.2a	<p>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>- Minor compliance -</p>	<p>According to interview with sample of smallholders (LSS and VOP), explained that no unresolved issues/grievance arise related use of the land for oil palm crops within past 12 months. The company carry out field days in periodic time to gathering information from smallholders and villager. This is part of FPIC process that implement by the company.</p>	Complied
4.4.2b	<p>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>- Minor compliance -</p>	<p>Field days that carried out in periodic time is the evidence that the unit of certification has respected communities' decisions to give or withhold their consent to the operation at the time. This event not only allocated for smallholders, but also communities involved to address their consent.</p>	Complied
4.4.2c	<p>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>- Minor compliance -</p>	<p>HOPL has fully developed the leasehold land transferred from predecessors or through purchase and transfer of title. There will be no further own land expansion from HOPL. The development of the Bialla project inclusive of smallholders and sub-leasing from customary land (through the Leased Lease Back program with Incorporated Land Grouping (customary land) and incorporated companies (state lease)). The LLBs are land belongs to the clan. Therefore, in order to maintain the "FPIC" requirements, HOPL has developed the Land Negotiation Procedure to manage clan lands registration. The procedures provide guidance to the clan and the clan members shall discuss their user rights and interest of communal benefits and come to the consensus to incorporate land grouping (ILG).</p> <p>The land titles for lands that was developed by HOPL are available and kept onsite.</p>	Complied

4.4.3	<p>(C) 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).</p> <p>- Critical (Major) compliance -</p>	<p>Unit of Certification HOPL is maintaining maps of the Customary lands that are being lease leased back from the clan owners for Plantations.</p> <ul style="list-style-type: none"> - Map of Bakada Plantation (Pandi Estate), Scale 1: - Map of Atata Plantation (Navo Estate), Scale 1 : 17,000 - Map of Barema Plantation (Hargy Estate), Scale 1 : 18,000 - Map of Bialla Project, Scale 1 : 115,000. <p>The overall map covering the entire Lands that are leased by HOPL is available and HOPL maintained its' own GIS team to managed the mapping. The assessment team had verified the availability of the maps. HOPL has identify a Continuous Improvement Plan to include all the Village Oil Palm location into the HOPL GIS system with geo-coordinates.</p>	Complied
4.4.4	<p>All relevant information is available in appropriate forms and the English language, including assessments of impacts, proposed benefit sharing, and legal arrangements. Explanatory documentation may be provided in Tok Pisin in PNG or Solomon Pijin is the Solomon Islands and verbal presentation may be made in those languages.</p> <p>- Minor compliance -</p>	<p>Policies and other relevant information is provide in bilingual (English and Tok Pisin). All documented relevant information and records are disseminated on notice board at each operation unit (Mill and Estates).</p>	Complied
4.4.5	<p>(C) 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.</p> <p>- Critical (Major) compliance -</p>	<p>According to interview with sample of smallholders (LSS and VOP), explained that communities are represented by community leader for any issues raise or they can choose freely to select legal counsel. However, based on stakeholder consultation there is no unresolved issues/grievance arise within past 12 months.</p>	Complied
4.4.6	<p>There is evidence that implementation of agreements negotiated through FPIC is reviewed in consultation with affected parties midway through the term of the agreement however regular communication between the parties is encouraged through the duration of the agreement.</p> <p>- Minor compliance -</p>	<p>HOPL has fully developed the leasehold land transferred from predecessors or through purchase and transfer of title. There will be no further own land expansion from HOPL. The development of the Bialla project inclusive of smallholders and sub-leasing from customary land (through the Leased Lease Back program with Incorporated Land Grouping (customary land) and incorporated companies (state lease)). The LLBs are land belongs to the clan. Therefore, in order to maintain the "FPIC" requirements, HOPL has developed the Land Negotiation</p>	Complied

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		<p>Procedure to manage clan lands registration. The procedures provide guidance to the clan and the clan members shall discuss their user rights and interest of communal benefits and come to the consensus to incorporate land grouping (ILG).</p> <p>The land titles for lands that was developed by HOPL are available and kept onsite.</p>	
<p>Criterion 4.5: 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>(C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available. - Critical (Major) compliance -</p>	<p>HOPL has fully developed the leasehold land transferred from predecessors or through purchase and transfer of title. There will be no further own land expansion from HOPL. The development of the Bialla project inclusive of smallholders and sub-leasing from customary land (through the Leased Lease Back program with Incorporated Land Grouping (customary land) and incorporated companies (state lease)). The LLBs are land belongs to the clan. Therefore, in order to maintain the "FPIC" requirements, HOPL has developed the Land Negotiation Procedure to manage clan lands registration. The procedures provide guidance to the clan and the clan members shall discuss their user rights and interest of communal benefits and come to the consensus to incorporate land grouping (ILG).</p> <p>The land titles for lands that was developed by HOPL are available and kept onsite.</p>	Complied
4.5.2	<p>(C) 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</p>	<p>HOPL has fully developed the leasehold land transferred from predecessors or through purchase and transfer of title. There will be no further own land expansion from HOPL. The development of the Bialla project inclusive of smallholders and sub-leasing from customary land (through the Leased Lease Back program with Incorporated Land Grouping (customary land) and incorporated companies (state lease)).</p>	Complied

	<p>resourced access to independent advice through a documented, long-term and two-way process of consultation and negotiation.</p> <p>- Critical (Major) compliance -</p>	<p>The LLBs are land belongs to the clan. Therefore, in order to maintain the "FPIC" requirements, HOPL has developed the Land Negotiation Procedure to manage clan lands registration. The procedures provide guidance to the clan and the clan members shall discuss their user rights and interest of communal benefits and come to the consensus to incorporate land grouping (ILG).</p> <p>The land titles for lands that was developed by HOPL are available and kept onsite.</p>	
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 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.</p> <p>- Minor compliance -</p>	<p>According to interview with sample of smallholders (LSS: 1513; 1551; 1554; 1596; 1597; 1622; 1651; 1837 and VOP: 380023; 380067), explained that the company conduct initial discussion prior to develop their land. The discussion is aim to information gathering and associated consultations. Transparency is implemented during this session and no forced action are taken.</p> <p>At the time, no new development after 15 November 2018 in scope of certificate holder.</p>	Complied
4.5.4	<p>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.</p> <p>- Minor compliance -</p>	<p>According to interview with sample of smallholders (LSS: 1513; 1551; 1554; 1596; 1597; 1622; 1651; 1837 and VOP: 380023; 380067), explained that the company conduct initial discussion prior to develop their land. The discussion is aim to information gathering and associated consultations. Transparency is implemented during this session and no forced action are taken.</p> <p>At the time, no new development after 15 November 2018 in scope of certificate holder.</p>	Complied
4.5.5	<p>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,</p>	<p>According to interview with sample of smallholders (LSS: 1513; 1551; 1554; 1596; 1597; 1622; 1651; 1837 and VOP: 380023; 380067), explained that the company conduct initial discussion prior to develop their land. The discussion is aim to information gathering and associated</p>	Complied

	<p>economic, environmental and social implications of the proposed operations on their lands.</p> <p>- Minor compliance -</p>	<p>consultations. Transparency is implemented during this session and no forced action are taken.</p> <p>At the time, no new development after 15 November 2018 in scope of certificate holder.</p>	
4.5.6	<p>Evidence is available that the communities (or their representatives) gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator</p> <p>- Minor compliance -</p>	<p>According to interview with sample of smallholders (LSS: 1513; 1551; 1554; 1596; 1597; 1622; 1651; 1837 and VOP: 380023; 380067), explained that the company conduct initial discussion prior to develop their land. The discussion is aim to information gathering and associated consultations. Transparency is implemented during this session and no forced action are taken.</p> <p>At the time, no new development after 15 November 2018 in scope of certificate holder.</p>	Complied
4.5.7	<p>New lands will not be acquired for plantations and mills after 15 November 2018 as a result of recent (2005 or later) expropriations in the national interest without consent (eminent domain), except in cases of smallholders benefitting from agrarian reform or anti-drug programmes.</p> <p>- Minor compliance -</p>	<p>No new development after 15 November 2018 in scope of certificate holder.</p>	Complied
4.5.8	<p>(C) New lands are not acquired in areas inhabited by communities in voluntary isolation unless a full FPIC process has been undertaken with recognised community representatives and their right to use the land is verified in accordance with 4.4.1.</p> <p>- Critical (Major) compliance -</p>	<p>No new development after 15 November 2018 in scope of certificate holder</p>	Complied

Criterion 4.6

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.

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4.6.1	<p>(C) A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place.</p> <p>- Critical (Major) compliance -</p>	<p>HOPL demonstrates Land Negotiation Procedure: A Guide to Acquiring Land for Oil Palm Development was established with flow charts have been prepared for awareness session among stakeholders/land owners concerning the process for establishing new blocks respectively in accordance with the lease-lease back and alienated land approaches.</p>	Complied
4.6.2	<p>(C) A mutually agreed procedure for calculating and distributing fair 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. Distribution of monies within families is determined by the families.</p> <p>Guidance: Where possible, Companies shall set up banking arrangements with the ILGs to provide for monies to be paid directly into members' bank accounts at the agreed percentages to avoid the possibility of theft or diversion of funds.</p> <p>- Critical (Major) compliance -</p>	<p>The terms and condition for the agriculture leased lease back approached was established since 1996 by palm oil industry in PNG involving the Palm Oil Producer Association.</p> <p>The royalties' percentage and PGK50 land rental for per hectare for production land was agreed by the industry. The land rental had increased over the years from PGK50 to PGK75 per Ha for production land and additional PGK20 per Ha is paid for buffer land.</p> <p>HOPL has developed the Land Negotiation Procedure: A Guide to Acquiring Land for Oil Palm Development that documented the Industry acceptance of the method to determine the leasing payment.</p> <p>Sample of the agreement verified including for "Memorandum of Agreement between Hargy Oil Palms Limited and Ivule Holding Limited", signed on 20 October 2020. The recitals HOPL has interest to manage and rehabilitate Ivule Oil Palm Estate, property of Ivule Holding Limited. Upon signing the MOA, a cash grant payment of K332 per Ha shall be paid to Ivule Holding for 81 Ha, an additional amount of K150 per Ha shall be paid to Ivule Holding for 99.7 Ha upon signing Agricultural Sub-lease Agreement. HOPL shall redevelop the Land at its own cost and pay a monthly royalty at 10% of FFB in Kina value for period 12 months. Annual rental fee at K75 per Ha of planted land including K20 per hectare buffer in addition to FFB royalty.</p>	Complied
4.6.3	<p>Evidence is available that equal opportunities are provided to both men and women to hold land titles for small holdings in accordance with National law.</p>	<p>Equal opportunities are provided to men and women to hold land titles for smallholdings.</p> <p>Audit team made onsite interview with female smallholder. Ex: Susan Jerom 080803, Clan Land Use Agreement No. 080803 for Susan Jerom,</p>	Complied

	<p>- Minor compliance -</p>	<p>to use the land known as Tiulagelagea and which allocated 2 Ha as the VOP Block No. 080803 of Sulie VOP area; dated 7 July 2017 and period 10 years.</p> <p>Interview with stakeholder Women Representative of Gomu Village statement obtained: The women are responsible for loose fruit sold to company and the money goes to mama card; Hargy provides them with training and workshop for literacy, cooking class, sewing, food storage; Hargy provides knowledge on oil palm block upkeep such as spraying safely, frond stacking, etc. For women with no land title, they given opportunity to manages the loose fruit crop.</p> <p>HOPL demonstrates Services Agreement/Contract No.HOPL 2020-054: Under Brushing Work – Ivule Estate. The agreement between HOPL and Ivule Holding Limited (contractor) to carry out under brushing work at Ivule Estates, for period 26 October 2020 to 31 December 2020.</p>	
4.6.4	<p>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 provided that the right to privacy and confidentiality is respected..</p> <p>- Minor compliance -</p>	<p>Negotiation evidences has been verified. Samples of the execution on the payments as per the agreement were verified to be accordance to the MoUs signed between HOPL and land owners (ILGs, or incorporated companies).</p> <p>Agreement with consent from the lease-lease back program are available. Sample of the agreement verified including for "Memorandum of Agreement between Hargy Oil Palms Limited and Ivule Holding Limited", signed on 20 October 2020. The recitals HOPL has interest to manage and rehabilitate Ivule Oil Palm Estate, property of Ivule Holding Limited.</p>	Complied

Criterion 4.7

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.

4.7.1	<p>(C) A mutually agreed procedure for identifying people entitled to compensation is in place. - Critical (Major) compliance -</p>	<p>There is a process for identifying those people entitled to compensation when customary land is involved, in line with Social and Environmental Impact Assessment. This system for determining compensation is defined in the PNG Lands Act. This development came about via the requests of the local people.</p>	Complied
4.7.2	<p>(C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is in place and documented and made available to affected parties. - Critical (Major) compliance -</p>	<p>HOPL has procedure "Land Negotiation Procedure: A Guide to Acquiring Land for Oil Palm Development" dated 1 March 2015.</p> <p>Sample of the agreement verified including for "Memorandum of Agreement between Hargy Oil Palms Limited and Ivule Holding Limited", signed on 20 October 2020. The recitals HOPL has interest to manage and rehabilitate Ivule Oil Palm Estate, property of Ivule Holding Limited. Upon signing the MOA, a cash grant payment of K332 per Ha shall be paid to Ivule Holding for 81 Ha, an additional amount of K150 per Ha shall be paid to Ivule Holding for 99.7 Ha upon signing Agricultural Sub-lease Agreement. HOPL shall redevelop the Land at its own cost and pay a monthly royalty at 10% of FFB in Kina value for period 12 months. Annual rental fee at K75 per Ha of planted land including K20 per hectare buffer in addition to FFB royalty.</p>	Complied
4.7.3	<p>Communities that have lost access and rights to land for plantation expansion are given opportunities including employment and supply contracts to benefit from plantation development. - Minor compliance -</p>	<p>The compensation offered, based on the New Britain Palm Oil model, PGK20 hectare for vacant land (i.e. buffer zones/areas too steep to plant) and PGK75 hectare for planted areas. Additionally, there is a PGK150/hectare payment upon the signing of a sub-lease agreement. Added to this there is a royalty payment on the fruit which is 10% of the smallholder FB price paid monthly. Furthermore, indirect compensation as people benefit from the new development via improved economy, paid employment, improved education facilities, housing, medical facilities and better infrastructure as a result.</p> <p>Sample taken from cooperation between HOPL and Ivule Holding. Agreement verified including for "Memorandum of Agreement between</p>	Complied

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		<p>Hargy Oil Palms Limited and Ivule Holding Limited”, signed on 20 October 2020. The recitals HOPL has interest to manage and rehabilitate Ivule Oil Palm Estate, property of Ivule Holding Limited. Upon signing the MOA, a cash grant payment of K332 per Ha shall be paid to Ivule Holding for 81 Ha, an additional amount of K150 per Ha shall be paid to Ivule Holding for 99.7 Ha upon signing Agricultural Sub-lease Agreement. HOPL shall redevelop the Land at its own cost and pay a monthly royalty at 10% of FFB in Kina value for period 12 months. Annual rental fee at K75 per Ha of planted land including K20 per hectare buffer in addition to FFB royalty.</p> <p>HOPL demonstrates Services Agreement/Contract No.HOPL 2020-054: Under Brushing Work – Ivule Estate. The agreement between HOPL and Ivule Holding Limited (contractor) to carry out under brushing work at Ivule Estates, for period 26 October 2020 to 31 December 2020.</p>	
<p>Criterion 4.8</p>			
<p>The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrate that they have legal, customary, or user rights.</p>			
<p>4.8.1</p>	<p>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.</p> <p>Guidance: In some circumstances where FPIC was conducted many years ago, documented evidence of the process may not be available. In these cases, evidence of continuing agreement of all parties shall be regarded as evidence of resolution.</p> <p>- Minor compliance -</p>	<p>Based on interview with stakeholders and document review, there is no land acquisition by HOPL since the last assessment.</p>	<p>Complied</p>
<p>4.8.2</p>	<p>(C) Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes</p>	<p>HOPL has established Grievance Mechanism (Doc. No.: PRO-COM-GEN-017-04, Issue No.: 4 dated 19/6/2019), it was developed to provide a</p>	<p>Complied</p>

	<p>(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 certification addresses any unresolved conflict through appropriate conflict resolution mechanisms.</p> <p>- Critical (Major) compliance -</p>	<p>way to reduce risks from external stakeholders an effective channel for expressing concerns achieving remedies and promote a mutually constructive relationship with all relevant stakeholders and the company. Community Affairs Manager will be the primary interface between HOPL and any external stakeholders intending to raise their grievance. Business Development Officer form a centralized reporting, Grievance Tracking Database and will ensure all grievances are channelled to relevant departments. The target to response and provides feedback to 100% of grievances within 7 days dealing directly with the person raising the grievance.</p> <p>Based on interview with stakeholders, there is no land conflict present in area of HOPL.</p>	
4.8.3	<p>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 rights, these claims will be settled using the relevant requirements (Indicators 4.4.2, 4.4.3 and 4.4.4)</p> <p>- Minor compliance -</p>	<p>Based on interview with stakeholders and document review, there is no land acquisition by HOPL since the last assessment.</p>	Complied
4.8.4	<p>For any conflict or dispute over the land, the extent of the disputed area is mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable).</p> <p>- Minor compliance -</p>	<p>Based on interview with stakeholders and document review, there is no land acquisition by HOPL since the last assessment.</p>	Complied

Principle 5: Support smallholder inclusion

Criterion 5.1
 The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.

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<p>5.1.1</p>	<p>Current and previous period prices paid for FFB are publicly available and accessible by smallholders. - Minor compliance -</p>	<p>Price sets together with OPIC on behalf of government. The price calculation carried out with consideration of the international palm product value price of CPO CIF Rotterdam price. Document sighted: FFB Price Formula Review 2013. The FFB price are publicly available and accessible by smallholders.</p> <table border="1" data-bbox="1086 523 1877 742"> <thead> <tr> <th>Month/period</th> <th>Farm gate price (PGK)/1MT FFB</th> <th>Month/period</th> <th>Farm gate price (PGK)/1MT FFB</th> </tr> </thead> <tbody> <tr> <td>Jul 2019</td> <td>163.65</td> <td>Jan 2020</td> <td>297.07</td> </tr> <tr> <td>Aug 2019</td> <td>163.93</td> <td>Feb 2020</td> <td>331.30</td> </tr> <tr> <td>Sept 2019</td> <td>183.09</td> <td>Mar 2020</td> <td>279.99</td> </tr> <tr> <td>Oct 2019</td> <td>192.59</td> <td>Apr 2020</td> <td>224.22</td> </tr> <tr> <td>Nov 2019</td> <td>191.72</td> <td>May 2020</td> <td>200.75</td> </tr> <tr> <td>Dec 2019</td> <td>236.73</td> <td>Jun 2020</td> <td>182.39</td> </tr> </tbody> </table> <p>June 2020: US\$ price for CPO CIF Rotterdam US\$ 551.18; US\$ price for PKO Rotterdam US\$ 673.51; Palm product value of 1 MT of FFB: Average extraction rate for CPO @ US\$ 111.44; Average extraction rate for PKO @ US\$ 11.89;</p> <p>Palm Product Value of 1MT of FFB US\$ 123.32; exchange rate US\$ to Kina 0.29; Palm product value of 1MT of FFB Kina PGK 425.25; Farmers pay out ratio at PGK 242.39; add 1% VAT PGK 2.42; Less OPRA Levy -PGK 2.20; Less Sexava Levy -PGK 2.50; Less OPIC Levy -PGK 4.00; Less VAT10% on OPIC Levy -PGK 0.40; Mill Gate Price PGK 235.71; Less FFB Transport Costs -PGK 53.22; Farm Gate Price PGK 182.39</p>	Month/period	Farm gate price (PGK)/1MT FFB	Month/period	Farm gate price (PGK)/1MT FFB	Jul 2019	163.65	Jan 2020	297.07	Aug 2019	163.93	Feb 2020	331.30	Sept 2019	183.09	Mar 2020	279.99	Oct 2019	192.59	Apr 2020	224.22	Nov 2019	191.72	May 2020	200.75	Dec 2019	236.73	Jun 2020	182.39	<p>Complied</p>
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		<p>FFB price information provided and made available in various premises: Community Affairs Office, Compliance Office Notice Board, OPIC Office Notice Board; Smallholders Office Notice Boards.</p> <p>HOPL conducted communication to smallholders in Tiauru "FFB Price Calculation for Smallholder Growers" dated 10 March 2020. The communication attended by 10 smallholders from Tiauru area.</p> <p>HOPL conducted communication to smallholders in Bialla VOP "FFB Price Calculation Smallholder" dated 13 May 2020. The communication attended by 12 VOP smallholders.</p> <p>HOPL conducted communication to smallholders in Bialla VOP "FFB Price Explanation Smallholder" dated 2 June 2020. The communication attended by 6 VOP smallholders.</p> <p>HOPL conducted communication to smallholders in Wanaimasile "FFB Price for Smallholder" dated 27 May 2020. The communication attended by 25 smallholders.</p> <p>HOPL conducted communication to smallholders in Wilelo "FFB Price for Smallholder" dated 9 June 2020. The communication attended by 15 smallholders.</p>	
5.1.2	<p>(C) Evidence is available that the unit of certification explains the FFB pricing to smallholders on request from individual smallholders.</p> <p>- Critical (Major) compliance -</p>	<p>HOPL demonstrates evidence of FFB pricing explained to smallholder and other interested parties.</p> <p>Independent estate: mill gate price.</p> <p>Bialla Local Planning Committee Meeting No.01/2020 dated 19 May 2020 attended by HOPL CEO, OPIC representative, Bialla Oil Palms Grower (BOGA), OPRA. The meeting agenda discussing: minutes of previous meeting; Inward and outward correspondences; Project financial and physical report; COVID-19 update and HOPL response; Update and current balance – Sexava fund; Proposal on Debt Recovery Scale based on FFB price levels; Update Mama Loose Fruit Program; Smallholder extension – field days; Smallholder fertilizer application issue.</p>	Complied

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		Based on interview with sampled smallholder, they stated HOPL and OPIC Extension officer provides explanation on FFB pricing including deduction for transport and fertilizer.	
5.1.3	<p>(C) Fair pricing, calculated as a portion of the international CPO price less costs is provided to smallholders in the supply base and documented. Premium pricing, when achieved for RSPO certified sustainable palm oil is also shared with Smallholders.</p> <p>- Critical (Major) compliance -</p>	<p>HOPL demonstrates evidence of FFB pricing explained to smallholder and other interested parties.</p> <p>Independent estate: mill gate price.</p> <p>Bialla Local Planning Committee Meeting No.01/2020 dated 19 May 2020 attended by HOPL CEO, OPIC representative, Bialla Oil Palms Grower (BOGA), OPRA. The meeting agenda discussing: minutes of previous meeting; Inward and outward correspondences; Project financial and physical report; COVID-19 update and HOPL response; Update and current balance – Sexava fund; Proposal on Debt Recovery Scale based on FFB price levels; Update Mama Loose Fruit Program; Smallholder extension – field days; Smallholder fertilizer application issue.</p> <p>Based on interview with sampled smallholder, they stated HOPL and OPIC Extension officer provides explanation on FFB pricing including deduction for transport and fertilizer.</p>	Complied
5.1.4	<p>(C) Evidence is available that all parties within the Unit of Certification, including women and independent representative organisations assisting smallholders where requested, are involved in decision-making processes and understand the basis on which their fruit is sold to the Companies. These include those involving finance, loans/credits, and repayments through FFB price reductions for replanting and or other support mechanisms where applicable. To assist this, Companies include financial literacy information in their extension activities.</p> <p>- Critical (Major) compliance -</p>	<p>Interview (using audit facilitator) with stakeholder Women Representative of Gomu Village statement obtained: The women are responsible for loose fruit sold to company and the money goes to mama card; Hargy provides them with training and workshop for financial literacy, cooking class, sewing, food storage; Hargy provides knowledge on oil palm block upkeep such as spraying safely, frond stacking, etc. For women with no land title, they given opportunity to manages the loose fruit crop.</p> <p>Sampled smallholders 080803 Susan Jerom, is women. During field day last year given understanding on financial literacy to manage her oil palm block.</p>	Complied

		Smallholders 040623 Baimo Paliavu (interview daughter of Baimo) now inherited to her daughter. She understands the decision making process in managing her oil palms block	
5.1.5	<p>Contracts are fair, legal and transparent and have an agreed timeframe.</p> <p>Smallholder requirements: Smallholders must be able to verbally explain that they understand and observe their obligations and the obligations of the Company to whom they are selling their fruit. - Minor compliance -</p>	<p>Independent estate: use CLUA, mill gate price.</p> <p>Bialla Local Planning Committee Meeting No.01/2020 on 19 May 2020 attended by HOPL CEO, OPIC representative, Bialla Oil Palms Grower (BOGA), OPRA. The meeting agenda discussing: minutes of previous meeting; Inward and outward correspondences; Project financial and physical report; COVID-19 update and HOPL response; Update and current balance – Sexava fund; Propodal on Debt Recovery Scale based on FFB price levels; Update Mama Loose Fruit Program; Smallholder extension – field days; Smallholder fertilizer application issue;</p>	Complied
5.1.6	<p>(C) Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given.</p> <p>Guidance: Weight of FFB may be determined by weighing at the point of pick-up or by calculation of average bunch weight when weighed at the verified mill weighbridge. The organization managing the smallholders should determine the data used for payment and communicated to all smallholders. - Critical (Major) compliance -</p>	<p>Sample of smallholders payment advice:</p> <ul style="list-style-type: none"> - Block 010274 – Theo Vincent. FFB collected on 23 June 2020 2.492 MT (docket No.041127); 24 June 2020 2.336 MT (docket No.017360); 26 June 2020 0.876 MT (docket No.008825) – total 5.704 MT. Paid PGK 823.15 from price PGK 182.39/MT FFB (farmgate price) x 5.704 MT and total deduction of PGK 217.2 (loans & BOGA levy) on 28 June 2020. - Block 020687 – Hellen Pamakari. FFB collected on 24 June 2020 5.945 MT (docket No.007197). Paid PGK 1,072.40 from price PGK 182.39/MT FFB (farmgate price) x 5.945 MT and total deduction of PGK 11.89 on 28 June 2020. - Block 021061 – Denny Kembaiyo. FFB collected on 12 June 2020 3.17 MT (docket No.02670). Paid PGK 554.44 from price PGK 182.39/MT FFB (farmgate price) x 3.842 MT and total deduction of PGK 146.29 on 14 June 2020. - Block 021445 – Dia Sosa. FFB collected on 10 June 2020 2.244 MT (docket No.008367). Paid PGK 404.78 from price PGK 182.39/MT FFB (farmgate price) x 2.244 MT and total deduction of PGK 4.49 on 14 June 2020. 	Complied

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		<p>- Block 031289 – Zepron Yamaku. FFB collected on 18 June 2020 6.582 MT (docket No.008600). Paid PGK 664.90 from price PGK 182.39/MT FFB (farmgate price) x 6.582 MT and total deduction of PGK 535.58 on 21 June 2020.</p> <p>- Block 040025 – Morgan Paliavu. FFB collected on 24 June 2020 1.419 MT (docket No.017364). Paid PGK 230.35 from price PGK 182.39/MT FFB (farmgate price) x 1.419 MT and total deduction of PGK 28.44 on 28 June 2020.</p> <p>- Block 041176 – Herman Bua. FFB collected on 24 June 2020 1.993 MT (docket No.023261). Paid PGK 420.65 from price PGK 182.39/MT FFB (farmgate price) x 1.993 MT and total deduction of PGK 4.66 on 28 June 2020.</p> <p>- Block 050172 – Wasoko Umesia Golupo. FFB collected on 16 June 2020 1.803 MT (docket No.017170); 18 June 2020 0.562 MT (docket No.017186); 18 June 2020 1.239 MT (docket No.017185) – total 3.604 MT. Paid PGK 650.10 from price PGK 182.39/MT FFB (farmgate price) x 3.604 MT and total deduction of PGK 7.21 on 21 June 2020.</p> <p>Block 380047 – Blasius Lagisa. FFB collected on 7 April 2020 0.297 MT (docket No.048954). Paid PGK 66 from price PGK 224.22/MT FFB (farmgate price) x 0.297 MT and total deduction of PGK 0.59 on 12 April 2020.</p>	
5.1.7	<p>Weighbridges used for determining payment to smallholders are verified by an independent third party on a regular basis (this can be government). Other weighing equipment used may be calibrated using weights that are verified on the weighbridges. Records are maintained to provide an audit trail.</p> <p>- Minor compliance -</p>	<p>Weighbridge calibration certificates have been updated: In Hargy POM: Independent Consumer Competition Commission – Certificate of Inspection No.ICCC1854 dated 16 July 2020 for weighbridge model JC 320 NUWEIGH capacity 60 tonnes in Hargy Oil Palms Limited – Hargy Mill. Next inspection date 16 July 2021.</p> <p>In Barema POM, sighted Independent Consumer Competition Commission – Certificate of Inspection No.ICCC1855 dated 16 July 2020 for weighbridge model R420 RINSTRUM capacity 60 tonnes, in Hargy Oil Palms Limited – Barema Mill. Next inspection date 16 July 2021.</p>	Complied

		In Navo POM, the Independent Consumer Competition Commission – Certificate of Inspection No.ICCC1856 dated 16 July 2020 for weighbridge model E1110 capacity 60 tonnes in Hargy Oil Palms Limited – Navo Mill. Next inspection date 16 July 2021.	
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. - Minor compliance -	The smallholder in PNG is associated smallholder. Internal Control System-function was performed by HOPL in cooperation with OPIC.	Complied
5.1.9	(C) The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner. - Critical (Major) compliance -	HOPL implementing the Procedure Grievance Mechanism No.PRO-COM-GEN-017-04 dated 19 June 2019. Section 5 Performance Indicator stipulate that Response: the target is to provide a feedback to 100% of grievances within 7 days, dealing directly with the person raising the grievance.	Complied
Criterion 5.2			
The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.			
5.2.1	The Company consults with interested smallholders (irrespective of type) within the Unit of Certification, 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. - Minor compliance -	HOPL made regular consultation and communication meeting with OPIC, with Women Representative, with LLG (Local Level Government), with Bialla Local Planning Committee (consist of OPIC, Bialla Oil Palms Grower (BOGA), OPRA). Bialla Local Planning Committee Meeting No.01/2020 dated 19 May 2020 attended by HOPL CEO, OPIC representative, Bialla Oil Palms Grower (BOGA), OPRA. The meeting agenda discussing: minutes of previous meeting; Inward and outward correspondences; Project financial and physical report; COVID-19 update and HOPL response; Update and current balance – Sexava fund; Proposal on Debt Recovery Scale based	Complied

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		on FFB price levels; Update Mama Loose Fruit Program; Smallholder extension – field days; Smallholder fertilizer application issue.	
5.2.2	<p>The Company and Government Extension Service provide extension services to support the development and implementation of livelihood improvement programmes, including capacity building to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Independent Smallholder Standard.</p> <p>PROCEDURAL NOTE: The RSPO is currently developing a separate standard for Independent Smallholders to be referred to as the “RSPO Independent Smallholder Standard”. A National Interpretation for PNG&SI will be developed after the standard is ratified.</p> <p>- Minor compliance -</p>	<p>HOPL made regular consultation and communication meeting with OPIC, with Women Representative, with LLG (Local Level Government), with Bialla Local Planning Committee (consist of OPIC, Bialla Oil Palms Grower (BOGA), OPRA).</p> <p>Bialla Local Planning Committee Meeting No.01/2020 dated 19 May 2020 attended by HOPL CEO, OPIC representative, Bialla Oil Palms Grower (BOGA), OPRA. The meeting agenda discussing: minutes of previous meeting; Inward and outward correspondences; Project financial and physical report; COVID-19 update and HOPL response; Update and current balance – Sexava fund; Proposal on Debt Recovery Scale based on FFB price levels; Update Mama Loose Fruit Program; Smallholder extension – field days; Smallholder fertilizer application issue.</p> <p>Interview (using audit facilitator) with stakeholder Women Representative of Gomu Village: The women are responsible for loose fruit sold to company and the money goes to mama card; Hargy provides them with training and workshop for financial literacy, cooking class, sewing, food storage; Hargy provides knowledge on oil palm block upkeep such as spraying safely, frond stacking, etc. For women with no land title, they given opportunity to manages the loose fruit crop.</p>	Complied
5.2.3	<p>Where applicable, the Company and Government Extension Service provide extension services to Smallholders to enhance their understanding of the legal requirements for FFB production to maintain RSPO certification.</p> <p>- Minor compliance -</p>	<p>HOPL and OPIC assist smallholder in obtaining legal ownership of the land.</p> <p>Smallholders 040025 Morgan Paliavu on state land. Has made submission to lands and Department of Agriculture Lease for any available land.</p> <p>- Certificate of Incorporation of an Association Malasi Two Gule Community Association Inc. 5-104844, dated 19 December 1997.</p>	Complied

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		<p>Maasi Gule Community Association Portion 839 – Block Holder List comprise of 99 members, including Morgan Paliavu 040025.</p> <ul style="list-style-type: none"> - Notice Under Section 69 (2)(d) Land Act 1996 from Delegate of the Minister for Lands and Physical Planning, expansion of oil palm industry by Malasi Gule Community Association, covering area of 1188.50 Ha on survey plan catalogue 15/494, Land File Reference 19038/0839, dated 21 July 2017. - Application or Tender Form Notice under Sec 69 (2)(d) Land Act 1996 for Malasi Gule Community Association, type of lease applied Agriculture Lease, for Portion 839 Milinch of Banga Fourmil of Talasea, West New Britain, PNG, dated 21 July 2020. <p>This process assisted by HOPL and OPIC.</p> <p>Smallholders 040623 Baimo Paliavu (interview daughter of Baimo). The area was 2Ha block, identified as LSS, but no land title with block holder. Replanting on 2012. Baimo passed away, payment done but still waiting to transfer title. Document for transfer of title available: Statutory Declaration from Aimo Paliavu daughter; Luisa Ipe and Elisabeth Kavala to Dina Sabtaro to have the Title transmitted to her name, dated 5 June 2017. This process was assisted by HOPL and OPIC.</p> <p>Smallholders 050287 Samson Nata, LSS 2Ha.</p> <ul style="list-style-type: none"> - Certificate of Incorporation of an Association Masile Community Association Inc. 5-104749, dated 31 October 2017. Masile Community Association Portion 1049 – Block Holder List comprise of 14 members, including Samson Nata 050287. - Application or Tender Form Notice under Sec 69 (2)(d) Land Act 1996 for Masile Community Association, type of lease applied Agriculture Lease, for Portion 1049 Milinch of Banga Fourmil of Talasea, West New Britain, PNG, dated 14 May 2018. <p>This process was assisted by HOPL and OPIC.</p>	
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		<p>Smallholders 260021 Stanis Meledi.</p> <ul style="list-style-type: none"> - Certificate of Incorporation of an Association: Sege Village Association Inc. 5-105095, dated 9 April 2018. Sege Village Association Portion 836 – Block Holder List comprise of 14 members, including Stanis Meledi 260021. - Application or Tender Form Notice under Sec 69 (2)(d) Land Act 1996 for Sege Village Association, type of lease applied Agriculture Lease, for Portion 836 Milinch of Banga Fourmil of Talasea, West New Britain, PNG, dated 21 July 2020. <p>This process was assisted by HOPL and OPIC.</p> <p>Smallholders 290599 Jerry Boi.</p> <ul style="list-style-type: none"> - Application or Tender Form Notice under Sec 69 (2)(d) Land Act 1996 for Jerry Boi, type of lease applied Agriculture Lease, for Portion 599 Milinch of Banga Fourmil of Talasea, West New Britain, PNG, dated 16 July 2020. - Survey map Portion 599 scale 1:6,000, Milinch of Banga, Fourmil of Talasea; Catalogue No.15/211. <p>This process was assisted by HOPL and OPIC.</p> <p>Smallholders 290777 Lydia Suma.</p> <ul style="list-style-type: none"> - Department of Lands Application for a Replacement Title for land portion 777, Milinch Banga, Fourmil Talasea, under name Lydia Suma; the title was lost. Declared at Bialla, 9 June 2019. - Statutory Declaration by Lydia Suma, declared he has purchased oil palm block portion 777 Milinch Banga, Fourmil Talasea. The original copy of the title for lease Portion 777 has been lost; dated 9 June 2019. <p>This process was assisted by HOPL and OPIC.</p> <p>Smallholders 292902 Rupen Silalea.</p>	
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		<ul style="list-style-type: none"> - Application or Tender Form Notice under Sec 69 (2)(d) Land Act 1996 for Sale Community Association, type of lease applied Agriculture Lease, for Portion 728 Milinch of Banga Fourmil of Talasea, West New Britain, PNG, dated 21 July 2020. - Notice Under Section 69 (2)(d) Land Act 1996 from Delegate of the Minister for Lands and Physical Planning, expansion of oil palm industry by Sale Community Association, covering area of 37 Ha on survey plan catalogue 15/212, Land File Reference 19038/0728, dated 21 July 2017. - Notice of Intention to Apply for The Incorporation of An Association, from Mosi Kaitale, from Sale Community Association, dated 21 July 2020. - Notice of Passing of Special Resolution to Which Section 9 Applies for Sale Community Association dated 21 July 2020. <p>This process was assisted by HOPL and OPIC.</p>	
5.2.4	<p>(C) Evidence exists that pesticide handling training is available from the Company and/or Government Extension Service for Smallholders within the Unit of Certification. This may be verified by interview with the Smallholders.</p> <p>- Critical (Major) compliance -</p>	<p>HOPL provides pesticide handling training for smallholders.</p> <p>Sampled smallholders 161601 Amos Koi has Certificate of Attendance, for Training on Agricultural Safety spraying Method dated 30 August 2017. But not spraying since 2017.</p> <p>Smallholders 010174 Theo Vincent has Certificate of Attendance, for Training on Agricultural Safety and Crop Spraying dated 5 October 2010.</p>	Complied
5.2.5	<p>The unit of certification regularly reviews and publicly reports on the progress of the Smallholder support programme.</p> <p>- Minor compliance -</p>	<p>The progress of smallholder support programme was reviewed during Bialla Local Planning Committee Meeting.</p> <p>Bialla Local Planning Committee Meeting No.01/2020 dated 19 May 2020 attended by HOPL CEO, OPIC representative, Bialla Oil Palms Grower (BOGA), OPRA. The meeting agenda discussing: minutes of previous meeting; Inward and outward correspondences; Project financial and physical report; COVID-19 update and HOPL response; Update and</p>	Complied

		current balance – Sexava fund; Proposal on Debt Recovery Scale based on FFB price levels; Update Mama Loose Fruit Program; Smallholder extension – field days; Smallholder fertilizer application issue.	
Principle 6: Respect workers’ rights and conditions			
Criterion 6.1: Any form of discrimination is prohibited.			
6.1.1	<p>(C) 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> <p>- Critical (Major) compliance -</p>	<p>Equal Employment Opportunity Policy (Doc. No.: POL-HRD-GEN-008-06, Issue No.: 6 dated 7/6/2019) was available where the company is committed to a non-discriminatory workplace and will abide by the relevant Anti-discrimination and Equal Employment laws and regulations of the countries where it operates. HOPL does not discriminate against anyone during recruitment or in the performance of its business operations. Recruitment selection process is based on merit with desired qualification and experience will be considered for the open position. Promotion and sanctions are handled on the same basis of non-discrimination.</p> <p>Management of Hargy Estate (Barema Plantation) informed that the composition of employees is 78% of male and 22% of female. Employment of employees are based on medical fit and all of them are paying salary as per the legal requirement. Promotion of the employees will be based on the performance.</p>	Complied
6.1.2	<p>(C) Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against. Evidence includes migrant workers' non-payment of recruitment fees.</p> <p>- Critical (Major) compliance -</p>	<p>Based on information collected during interview with sample of workers, migrant workers at HOPL is absence. Discrimination to the workers related job assignment was also absence within unit of certification.</p> <p>Therefore, no evidence that discrimination is apply within this certificate holder operation,</p>	Complied
6.1.3	<p>The unit of certification demonstrates that recruitment selection, hiring, access to training and promotion are based on skills,</p>	<p>HOPL has developed Human Resource Operations Manual (Doc. No.: MAN-HRD-GEN-001-01, Issue No.: 1 dated 10/1/2020) and Equal Employment Opportunity Policy (Doc. No.: POL-HRD-GEN-008-06, Issue</p>	Complied

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	<p>capabilities, qualities and medical fitness necessary for the jobs available.</p> <p>- Minor compliance -</p>	<p>No.: 6 dated 7/6/2019) where the policy clearly stated that Recruitment selection process is based on merit with desired qualification and experience will be considered for the open position. Promotion and sanctions are handled on the same basis of non-discrimination. Initial review and screening based on criteria will be conducted by HR Recruitment Officer.</p> <p>Sampled records of promotion such as Staff Order – General with the details of appointment/ transfer with new grade level and basic wages included.</p> <p>Besides, reviewed the Staff Employment Form for the sampled recruitment on last 12 months found that the employment was based on capabilities and qualification. Medical check will be done prior the employment to ensure medical fit.</p>	
<p>6.1.4</p>	<p>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.</p> <p>- Minor compliance -</p>	<p>Pregnancy testing conducted without any discrimination and it is performed when requested by the female workers. The pregnancy testing usually conducted at the clinic which located in every compound.</p>	<p>Complied</p>
<p>6.1.5</p>	<p>(C) A Social Issues Committee (SOC) is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.</p> <p>- Critical (Major) compliance -</p>	<p>Hargy Oil Palms Limited has established Hargy Oil Palms Gender Committee Terms of Reference where the company has established a Gender Committee to ensure a safe and secure working environment for its employees. The committee will be a forum where gender related issues are discussed and where possible, to provide options to address these issues or to mitigate them. It will provide both men and women equal access to lodge/raise grievances about workplace inequalities. The Gender Committee shall meet quarterly basis to review progress and plan the next quarter activities.</p> <p>There was Gender Committee meeting conducted on 14/3/2020 and 27/9/2019.</p>	<p>Complied</p>

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6.1.6	There is evidence of equal pay for the same work scope. - Minor compliance -	Reviewed the payslips for both gender, male and female workers found that they are paying the minimum basic rate, K2.80/ hour. The rate will be adjusted to higher depends on the job scope and the position. There is no discrimination of pay based on gender.	Complied
Criterion 6.2 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)..			
6.2.1	(C) Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions are available to the workers in the English language and verbally explained to them in language they understand. - Critical (Major) compliance -	Reviewed the sampled Contract of Employment which in English for the mills and estates. Details of pay and conditions are clearly stated in the Contract of Employment and acknowledged by the employees. Details of the Contract of Employment are such as: <ul style="list-style-type: none"> • Position • Grade/ Level • Remuneration • Designation/Start Dates • Place of Recruitment • Working Hours • Working Schedule • Overtime • Annual Leave • Superannuation • Probationary Period • Maternity Leave • Housing • Medical Treatment • Termination of the agreement 	Complied
6.2.2	(C) 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	HOPL has implemented Employee Handbook revised January 2015 where summary of employment conditions was clearly stated in the handbook such as hours of work, overtime, annual leave, sick days, housing, electricity, water, promotion, loans and advances, probation	Complied

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	<p>national legal requirements) and payroll documents give accurate information on compensation for all work performed, including work done by family members.</p> <p>Family members who work must be employed to ensure that they have access to those benefits. Notwithstanding that, young children may assist their parents on Smallholder blocks provided it does not interfere with their schooling, their physical and emotional development and they are under the direct supervision of their parents.</p> <p>- Critical (Major) compliance -</p>	<p>notice and maternity leave. Reviewed payslips where all types of work done and the deduction made by the company have stated in the payslips.</p>	
6.2.3	<p>(C) 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.</p> <p>- Critical (Major) compliance -</p>	<p>Reviewed on the payslips found that no exceeded of overtime been carried out by the workers. This will further be reviewed during onsite assessment.</p>	Complied
6.2.4	<p>(C) The Company 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. Smallholders may live in houses of traditional materials or other accommodation of their choosing.</p> <p>- Critical (Major) compliance -</p>	<p>Based on visit at Barema compound (GL 41, GL 55 and GL 56), it was clearly that the company provides adequate housing with sanitation facilities, water supply, medical centre/clinic and welfare amenities (sport court, crops gardening) also available. During interview with the workers, they are satisfied with facilities from the company.</p> <p>Smallholders: According to interview with sample of smallholder block owners, for VOP Blocks the house of smallholders are located in the oil palm blocks. Where the LSS smallholders housing is located in the village and separate location from their oil palm blocks.</p>	OFI
6.2.5	<p>The unit of certification being the mill and Company operated plantations makes efforts to improve workers' access to adequate, sufficient and affordable food.</p>	<p>The company provides canteen in each compound as part of business of opportunities to the local community. The canteen management is by</p>	Complied

	<p>- Minor compliance -</p>	<p>rental system to the local communities with the agreement. Crops gardening also allocated by the company in every compound.</p>	
<p>6.2.6</p>	<p>A DLW is paid to all workers, including piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours.</p> <p>PROCEDURAL NOTE: 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.</p> <p>In the absence of such benchmarks, the RSPO will collaborate with the GLWC and/or local experts on developing oil palm industry benchmarks¹. 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.</p> <p>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.</p> <p>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:</p> <ul style="list-style-type: none"> • 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), 	<p>HOPL has established the prevailing wage calculation to include all the in-kind benefits provided to the workers. The in-kind benefits are such as housing, electricity & water, education, healthcare, transport, food and sport & recreation facilities. Based on the calculations, the total cost of in-kind benefits is K664.81.</p>	<p>Complied</p>

	<p>this should be used as the foundation for the gradual implementation of the living wage payment</p> <ul style="list-style-type: none"> The UoC may to 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. <p>- Minor compliance -</p>		
6.2.7	<p>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.</p> <p>- Minor compliance -</p>	<p>According to interview with Mill Manager and Estate Manager, all employees that working at Hargy Oil Palm Ltd. are permanent workers. No casual nor temporary workers found on site.</p> <p>Smallholders: Most of smallholders are cultivate their blocks by themselves nor their families. There is no permanent, temporary or casual worker that hired by smallholders.</p>	Complied
<p>Criterion 6.3</p> <p>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.</p>			
6.3.1	<p>(C) A published statement recognising freedom of association and right to collective bargaining in national languages is available and is explained to all workers in languages that they understand and is demonstrably implemented.</p> <p>- Critical (Major) compliance -</p>	<p>Freedom of Association Policy No.POL-HRD-GEN-009-04, issued on 7 June 2019, issue No. 4. Bilingual: English and Tok Pisin language. This policy was available on Division notice board and auditor was noted that the policy is bilingual (English and Tok Pisin).</p> <p>Dissemination of information to the employees regarding this policy was conducted. Sample of awareness record taken are:</p> <ul style="list-style-type: none"> 21 June 2019. Awareness on Policy at Barema Plantation. 15 June 2020. Awareness on Policy at Barema Mill 18 June 2020. Awareness on Policy at Navo Mill 	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 and made available upon request. - Minor compliance -	Based on interview with representative of Human Resource, the trade union meeting is carried out periodically. The latest minutes of meeting conducted on 21 December 2020 at 10 am – 10.30 am and attended by 5 participants.	Complied
6.3.3	Management does not interfere with the formation or operation of registered unions/ labour organisations or associations, or other freely elected representatives for all workers including migrant and contract workers. - Minor compliance -	According to information from HR Department, the company gives freedom for association to all workers for joining any trade/labour union.	Complied
Criterion 6.4 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. - Minor compliance -	Policy on Child Labour (Doc. No.: POL-HRD-GEN-007-06, Issue No.: 6 dated 7/6/2019) was developed where the company does not employ anyone under the age of 18 years for any work-related purpose. At the time of hiring, the age of all employee is positively checked (ID card or other official documents). Officer in charge will use her/ his best judgement if there are no official documents for age verification. Employment could be refused in case of doubt during verification. Contractors, smallholders and other parties performing work for the company are to be informed on the policy. Reviewed the Services Agreement/ Contract for the contractors that provided services to the company confirmed that the employees must be 18 years or over.	Complied
6.4.2	(C) 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 which must be carried out by clinic or supervisory staff to be applied where other documentary evidence of date of birth is not available.	HOPL has developed Human Resource Operations Manual (Doc. No.: MAN-HRD-GEN-001-01, Issue No.: 1 dated 10/1/2020) where age verification will be part of the process of recruitment. The age verification will be done as per the company's Child Labour Policy as mentioned above. Verified the Staff Employment Form found that method of age verification is recorded such as through birth certificate,	Complied

	- Critical (Major) compliance -	clinic book, national identity card or others such as best facial judgement or professional curriculum vitae.	
6.4.3	<p>(C) Young persons may be employed only for non- hazardous work, with protective restrictions in place for that work. Normally the minimum age for employment by the Company is 18 year however in certain circumstances such as school work experience, persons as young as 16 years may be employed. These persons are classified as Young Persons.</p> <p>- Critical (Major) compliance -</p>	<p>According to interview with sample of workers at Mill and Estates workers, the company following their policy that disallowing child labour employed in Hargy Oil Palm Limited. The youngest workers is 20 year old when the workers hired by the company.</p> <p>Dissemination information of this policy and employment requirement are through notification board and frequent awareness at the site by each supervisor.</p>	Complied
6.4.4	<p>The Company demonstrates communication about its “no child labour” policy and the negative effects of child labour through notices at workers’ housing compounds and Smallholder field days. It promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live.</p> <p>- Minor compliance -</p>	<p>Based on direct interview with 11 smallholders block owner, no child labour policy are frequent communicated through field days. Smallholders block owner understood that child labour is disallowed employed both at the company and smallholders block.</p>	Complied
<p>Criterion 6.5 There is no harassment or abuse in the workplace, and reproductive rights are protected.</p>			
6.5.1	<p>(C) A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce.</p> <p>Smallholder requirements: Smallholders must be able to verbally explain that they understand and observe this requirement.</p> <p>- Critical (Major) compliance -</p>	<p>Sexual Harassment Policy (Doc. No.: POL-HRD-GEN-011-06, Issue No.: 6 dated 7/6/2019) was available where the company is committed to ensure a harmonious and productive work environment for its employees. This commitment recognized that the work place should be free from sexual harassment. Sexual harassment applies equally to all genders. The policy is communicated to the workers and seen the briefing records dated 22/6/2020 in Atata Plantation (Navo Estate), 17/3/2020 in Barema Plantation (Hargy Estate), 28/5/2020, 5/6/2020, 24/6/2020 in Barema POM, 8/7/2020 in Pandi Estate (Bakada Plantation) and 18/6/2020 in Navo POM.</p>	Complied

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6.5.2	<p>(C) A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce.</p> <p>Smallholder requirements: Smallholders must be able to verbally explain that they understand and observe this requirement. - Critical (Major) compliance -</p>	<p>Hargy Oil Palms Limited has established Policy on the Protection of Reproductive Rights (Doc. No.: POL-HRD-GEN-014-02, Issue No.: 2 dated 7/6/2019) to protect the reproductive rights of its employees and to provide medical services associated with reproductive health. The couples or individuals can freely decide when and how many children they want. The policy is communicated to the workers and seen the briefing records dated 21/6/2019 in Barema Plantation (Hargy Estate), 28/2/2020, 18/3/2020, 15/6/2020 and 17/6/2020 in Barema POM and 18/6/2020 in Navo POM</p>	Complied
6.5.3	<p>Management has assessed the needs of new mothers, in consultation with the new mothers, and a procedure has been determined that identifies actions are taken to address the needs of them and their babies. - Minor compliance -</p>	<p>According to the information from audit facilitator, there is no new mothers are employed by unit of certification, both Mill and Estates. Unit of certification has identified actions that are taken to address the needs of new mother already capture within Policy on the Protection of Reproductive Rights (Doc. No.: POL-HRD-GEN-014-02, Issue No.: 2 dated 7/6/2019).</p>	Complied
6.5.4	<p>A grievance mechanism, which respects anonymity and protects complainants where requested, is established, implemented and communicated to all levels of the workforce. - Minor compliance -</p>	<p>Based on stakeholder’s interview, no grievance arise during this assessment. The stakeholder’s contacted are feeling happy with existence of Hargy Plantation. If grievance occurs, the company will inform to the stakeholders affected to follow the grievance mechanism applied.</p>	Complied
<p>Criterion 6.6 No forms of forced or trafficked labour are used.</p>			
6.6.1	<p>(C) All work is voluntary and following are prohibited:</p> <ul style="list-style-type: none"> • Retention of identity documents or passports • Payment of recruitment fees • Contract substitution • Involuntary overtime 	<p>All the estates and mills have recorded all the overtime and productivity of the workers in Checkroll Audit Report fortnightly. No deduction of wages was sighted through verified the Employee Salary Pay Advice. All the workers have signed on the Contract of Employment prior to work. Termination of the employment is clearly stated in the employment contract.</p>	Complied

	<ul style="list-style-type: none"> • Lack of freedom of workers to resign • Penalty for termination of employment • Debt bondage • Withholding of wages <p>Note: where a Company has advanced money to an employee as a loan, this is to be regarded as a debt to the Company by the employee and a documented arrangement for repayment is to be established that is acceptable to both parties.</p> <p>Smallholder requirements: Smallholders must be able to verbally explain that they understand and observe this requirement. - Critical (Major) compliance -</p>		
6.6.2	<p>(C) Where temporary or migrant workers are employed for seasonal or activity related periods of high demand, these are regarded as "casual" workers. A specific labour policy and procedures for casual workers are established and implemented. - Critical (Major) compliance -</p>	<p>Hargy Oil Palms Limited has developed Employee Handbook revised on January 2015 where company is committed to a non-discriminatory workplace, provided housing to the employees, trainings will be provided and HOPL is followed the directives of PNG Employment Act 1978 where contract is a legally binding agreement between company and employee. The contract cannot be altered without consent of both parties. All employees will be issued with a contract of employment before commencement of work.</p>	Complied
<p>Criterion 6.7 The unit of certification ensures that the working environment under its control is safe and without undue risk to health.</p>			
6.7.1	<p>(C) The responsible person(s) for H&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>Unit of Certification has appointed responsible person for H&S at each unit. There are: PIC H&S in Barema Plantation: Mr. Joe Wanda. PIC H&S in Atata Plantation: Mrs. Faustina Mohe. PIC H&S in Bakada Plantation: Mr. Michael Silpaga.</p>	Complied

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	<p>- Critical (Major) compliance -</p>	<p>PIC H&S in Barema Palm Oil Mill: Mr. Thomas Tade. PIC H&S in Hargy Palm Oil Mill: Mr. David Tautele. PIC H&S in Navo Palm Oil Mill: Mr. Samson Chee.</p> <p>The main duties & responsibilities of H&S officer are:</p> <ol style="list-style-type: none"> 1. Ensuring compliance to RSPO (including OHS) and EMS at specific site's operations. Including compounds. 2. Ensure safety, social and environmental issues are documented, investigated and mitigated. 3. Coordinate the timely response of non-conformances, corrective & preventive actions and other inspection outcomes for the site. 4. Ensure RSPO meeting/trainng or RSPO related activities are carried out as required. 5. Conduct site induction for new employees. 6. Etc. <p>H&S meeting conducted in monthly basis at each unit. Several records seen are:</p> <ul style="list-style-type: none"> - NAVO Mill: H&S meeting conducted on 1 May 2020. Meeting agenda is reviewing of previous meeting, in safety aspect such as: safety equipment required for safe work; need to provide new step ladder for maintenance team; providing transport for employees that have night shift; Full body safety harness for domestic electricians. - Barema Plantation: H&S meeting conducted on 29 April 2020. Meeting agenda is reviewing previous meeting. There is no H&S case raised. - Bakada Plantation: H&S meeting conducted on 27 March 2020. Meeting agenda related H&S issues such as: road condition is unsafe for driving due to inclement weather pattern; employees sitting on L-truck side board when travelling to the field. 	
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		<ul style="list-style-type: none"> - HARGY Mill: H&S meeting conducted on 25 June 2020. Some issues related H&S are undone training, such as: training on working at heights, training in confined space, no competent person conducting inspection of lifting gear. 	
<p>6.7.2</p>	<p>Accident and emergency procedures are in place and instructions are clearly understood by all workers. Accident procedures are available in the appropriate language of 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>- Minor compliance -</p>	<p>Accident and emergency procedures namely Emergency Response Procedures No.ERP-ESD-GEN-001-08, dated 22 June 2019. Evacuation Response Plan are available for each emergency stations, for examples</p> <ul style="list-style-type: none"> - No.ERP-ESD-GEN-001-09 for Volcano Eruption; - No.ERP-ESD-GEN-002-09 for Flooding Rivers Evacuation ERP; - No.ERP-ESD-GEN-003-09 for Mill Factories Fires Evacuation; - No.ERP-ESD-GEN-004-09 for Bialla Tank Farm and Tanker Terminal Fire; - No.ERP-ESD-GEN-005-09 Bialla Tangker Terminal Oil Spill; - No.ERP-ESD-GEN-008-09 for Motor Vehicle Accident; - No.ERP-ESD-GEN-009-09 for Fire Emergency Response. - No.ERP-ESD-GEN-007-09 for Medical Emergency - No.ERP-ESD-GEN-010-09 for Search and Rescue Response. <p>The plans have been communicated to employees, contractors and visitors. The procedure was available in English and Tok Pisin language. During pandemic, HOPL had specific COVID-19 mechanism which consist of:</p> <ul style="list-style-type: none"> - HOPL Statement from CEO regards to Covid19, dated 23 March 2020. - SOP Infection Prevention Control Guideline for COVID-19 Treatment/Isolation Centre (Area 8), dated 13 April 2020. - COVID-19 Awareness Template in English and Tok Pidgin languages. The awareness containing Preventive Measures for The Spread of Covid-19 Viruses. - COVID-19 Screening Form - Hargy COVID19 Surveillance Plan 2020 Flowchart 	<p>Complied</p>

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		<p>- Summary Report FINAL related HOPL COVID-19, dated 28 May 2020. Records of all accidents are kept and periodically reviewed in monthly basis.</p>	
<p>6.7.3</p>	<p>(C) Workers use appropriate personal protective equipment (PPE) as specified in Company procedures, 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. - Critical (Major) compliance -</p>	<p>According to onsite visit for harvesting activity at Atata Field 5, Block CCID 12K-26 and 11K-26, it is sighted two harvesters did not use safety footwear during to work, as required within company risk assessment and procedure.</p> <ol style="list-style-type: none"> Hazard and Risk Assessment for Plantations (REG-ESD-OHS-001-11) issue No. 11, dated 19 June 2019. <ul style="list-style-type: none"> Hazard: Harvesting & Maintenance. Risk: FFB & Fronds falling on workers causing injuries. Proposed controls: PPE (Safety footwear). Personal Protective Equipment (PPE) SOP (PRO-ESD-OHS-003-02, issue No.2, dated 28 June 2019). PPE matrix identify the minimum required PPE for Harvester is Gum Boot. <p>Harvester’s not using appropriate PPE as required in Hazard and Risk Assessment for Plantations (REG-ESD-OHS-001-11) issue No. 11, dated 19 June 2019.</p> <p>Critical Non-Conformity raised against this indicator.</p> <p>According to onsite visit for harvesting activity at Atata Field 5, Block CCID 12K-26 and 11K-26, it is sighted two harvesters did not use safety footwear during to work, as required within company risk assessment and procedure.</p> <ol style="list-style-type: none"> Hazard and Risk Assessment for Plantations (REG-ESD-OHS-001-11) issue No. 11, dated 19 June 2019. <ul style="list-style-type: none"> Hazard: Harvesting & Maintenance. 	<p>Non-compliance (1992828-202012-M1)</p>

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		<ul style="list-style-type: none"> • Risk: FFB & Fronds falling on workers causing injuries. • Proposed controls: PPE (Safety footwear). <p>2. Personal Protective Equipment (PPE) SOP (PRO-ESD-OHS-003-02, issue No.2, dated 28 June 2019). PPE matrix identify the minimum required PPE for Harvester is Gum Boot.</p>	
6.7.4	<p>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 national law or by the unit of certification where national law does not offer protection.</p> <p>- Minor compliance -</p>	<p>Medical care is provided to all the employees. Each mills and plantation have clinic for handling health and accident. If unit's clinic cannot handle the incident, then patient will be referred to central clinic at Hargy POM. All the workers are local and they are covered under Workers Compensation Act 1978. There are company doctor in each site, e.g. for Navo POM and Estate, the clinic and the doctor located at Atata Plantation Compound. For Pandi Estate, company clinic located at Bakada Plantation office complex.</p> <p>During the assessment HOPL still have contract of medical, health and worker compensation for staffs with MARSH & McLENNAN COMPANIES as agent. The Insurance Manual for Hargy Oil Palms Limited was sighted at CEO office dated 31 December 2018.</p> <p>Detail of insurance are as follows: Workers Compensation Excluding WETHA Extension; policy number W0015566. Insurer: QBE Insurance (PNG) Ltd – 100%; covering insured's legal liability to workers under the Workers Compensation Act 1978 (as amended).</p> <p>National Managers Medical (Marsh Medicare); policy number HOPL 31121617. Insurer: Capital Life Insurance Company Limited – 100%. Scope (1) Medical & Hospital benefits, covering eligible reimbursement of medical expenses following sickness or hospitalization of nominated employee and his/or declared dependants on application including natural parents. (2) Persona; Accident (Death by Accident), covering</p>	Complied

		loss of life (Death) resulting from accidental causes (as defined) 24 hours, 7 days a week.																																	
6.7.5	Occupational injuries are recorded using Lost Time Accident (LTA) metrics. - Minor compliance -	<p>Unit of Certification able to demonstrate Incident/Accident Report 2020 (upto June). From the summary, data recorded as follow:</p> <table border="1"> <thead> <tr> <th></th> <th>Jan</th> <th>Feb</th> <th>Mar</th> <th>Apr</th> <th>May</th> <th>Jun</th> <th>YTD</th> </tr> </thead> <tbody> <tr> <td>LTI case</td> <td>23</td> <td>21</td> <td>46</td> <td>44</td> <td>36</td> <td>23</td> <td>193</td> </tr> <tr> <td>No. workers</td> <td>4,687</td> <td>4,764</td> <td>5,089</td> <td>4,771</td> <td>4,790</td> <td>4,743</td> <td>28,844</td> </tr> <tr> <td>Work day lost</td> <td>58</td> <td>76</td> <td>88</td> <td>78</td> <td>74</td> <td>60</td> <td>434</td> </tr> </tbody> </table> <p>Sample of accident record is: 6 May 2020. Mr. Nim Robin as Fruit Cutter at Barema Plantation got injury type Scratch/Abrasion on his Left Leg. The accident occurs cause by fallen fronds. Days off given is for 7 days (30/04/2020 to 06/05/2020).</p>		Jan	Feb	Mar	Apr	May	Jun	YTD	LTI case	23	21	46	44	36	23	193	No. workers	4,687	4,764	5,089	4,771	4,790	4,743	28,844	Work day lost	58	76	88	78	74	60	434	Complied
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Principle 7: Protect, conserve and enhance ecosystems and the environment																																			
Criterion 7.1																																			
Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.																																			
7.1.1	<p>(C) IPM plans are implemented and monitored to ensure effective pest control.</p> <p>Smallholder requirements: Organization managing the smallholders to manage IPM program for smallholders. - Critical (Major) compliance -</p>	<p>SOP Available in document No.PLN-ESD-SUS-001-05 dated 28 April 2017, therein includes: Protocol for Monitoring and Managing Oil Palm Pests and Pesticides usage, aimed to ensure that handling, collection, storage, application and disposal of pesticides at plantation levels is in compliance with both the environmental, health, safety policies and applicable national & international legislations. Example are:</p> <ol style="list-style-type: none"> 1. Pest survey & monitoring; 2. Safety and effective use of pesticides; 3. Insect control; 4. Weed control; 5. Disease control. 	Complied																																

		<p>Methods of reducing pesticides usage: More prudent use of pesticides, key components:</p> <ul style="list-style-type: none"> - Applying pesticides as needed, rather than on a fixed schedule. - Avoidance of persistent pesticides and those that bio-accumulate. - Decreased use of chemical spraying and increased efficiency of spray equipment. - Use of buffers near waterways to reduce possible contamination of non-target sectors of the ecosystem. - Sparing use. - Use of pesticides in combination with other control methods namely mechanical, biological and cultural controls <p>Judicious use of pesticides, HOPL uses only chemical approved under national regulation and the environmentally compatible chemical are chosen for use in the plantation. Less toxic pesticides and specific target pesticides are preferred over broad spectrum ones to avoid killing predators and parasites. Chemicals for pest and disease control should be judiciously applied when outbreak reach economic injury level. In the first instance biological control is considered ahead of chemical control. Host plants of natural enemy of pests are encouraged and conserved to build up their populations.</p> <p>Officer/Staff who detect pest report to Entomology (PNG-OPRA), as recorded in "Pest Infestation Request (PestReq)".</p> <p>The company held IPM meeting in quarterly basis. Latest IPM meeting held on 25 Feb 2019. After that, IPM meeting are suspended due to Covid-19 pandemic. IPM Meeting attended by Entimology Supervisor-PNGOPRA-Bialla, Crop Protection Supervisor, Navo Group Plantation Manager, Manager Agriculture Advisory, Assistant Agronomy, General Manager Community Affairs, Plantation Manager-Barema, OPIC Officer, Head of Department Community Affairs, SSR/Agronomic OIC-Bialla,</p>	
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		Company Agronomist, Plantation Manager Hargy Plantation, General Plantation Manager HOPL. Meeting discussed about safety, training, awareness, overall pest and disease situation, matter arise from meeting, pest survey and monitoring, update on monitoring and treatment/control and new report, material and equipment stock, productivity, previous monitoring reporting, and action plan.	
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. Any imported species must first be approved in PNG by National Agriculture Quarantine and Inspection Authority (NAQIA) and in the Solomon Islands by Biosecurity Solomon Islands (BSI). - Minor compliance -	Based on HOPL Integrated Pest Management Plan (PLN-ESD-SUS-001-05) stated that resident pests and possible invasive introduced species (if any) are effectively managed using appropriate IPM techniques. Routine patrols are conducted to detect pest infestations and implement an effective control strategy promptly before large-scale control measures are required.	Complied
7.1.3	There is no use of fire for pest control unless in exceptional circumstances such as plantation sanitation, i.e. where no other effective methods exist, and with prior approval of government authorities. - Minor compliance -	Based on interview with workers and smallholder, there is no use of fire for pest control.	Complied
Criterion 7.2			
Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.			
7.2.1	(C) Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised. - Critical (Major) compliance -	Documented justification of all agrochemical use is available under Approved Product List for use in industrial and agricultural application, informing the product name, type of pesticide, active ingredients, LD50, approved agricultural use. The guidelines were used for company-owned plantation and smallholder blocks. Justification came from the government agency as well named "Environment Permit" issued by Conservation and Environment Protection Authority. Environment Permit is issued based on Section 65 of the Environment Act 2000. Sample evident for Dimehypo (Bisultap)	Complied

		<p>under permit number P-144, dated of issue 4 July 2016, valid until 3 July 2021.</p> <p>Based on field visit to spraying activity – circle and path at Block 18 & 19 Barema Plantation, Hargy Estate. Worker demonstrated that spraying only applied to the specific area and weeds. There are no uses of Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat. Workers are using PPE such as overall, head cover, hand gloves and gum boots. Medical surveillance are regularly conducted and evidence can be shown by the company. In the field there is no worker under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions.</p> <p>Smallholders: No pesticide was issued to the smallholders. The smallholders would only use herbicide. In case of chemical control of pest such as Saxava, it was done by HOPL – under supervision of PNG OPRA.</p>													
7.2.2	<p>(C) 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.</p> <p>Smallholder requirements: Organization managing the smallholders to maintain records of herbicide issue to smallholders. - Critical (Major) compliance -</p>	<p>Hargy Oil Palms maintained the record of pesticide use, active ingredient, LD50 and hectare of area treated – for each estate. Daily spraying works are recorded in Herbicide Spray Cost Book.</p> <p>Below are record of pesticide use in whole HOPL area for 2020 (to-date November) based on OMP Report. Hargy Estate:</p> <table border="1" data-bbox="1088 1171 1877 1358"> <thead> <tr> <th>Active Ingredients</th> <th>Applied (kg or litres)</th> <th>Sprayed Area (Ha)</th> <th>Pesticides applied (kg or litres/Ha)</th> </tr> </thead> <tbody> <tr> <td>Dimehypo (Program: Injection)</td> <td>14.4</td> <td>99.0</td> <td>0.15</td> </tr> <tr> <td>Ally 20DF – Metyl Metsulfuron 200g/kg (Program: Circle and Path)</td> <td>189.8</td> <td>4,429.6</td> <td>0.04</td> </tr> </tbody> </table>	Active Ingredients	Applied (kg or litres)	Sprayed Area (Ha)	Pesticides applied (kg or litres/Ha)	Dimehypo (Program: Injection)	14.4	99.0	0.15	Ally 20DF – Metyl Metsulfuron 200g/kg (Program: Circle and Path)	189.8	4,429.6	0.04	Complied
Active Ingredients	Applied (kg or litres)	Sprayed Area (Ha)	Pesticides applied (kg or litres/Ha)												
Dimehypo (Program: Injection)	14.4	99.0	0.15												
Ally 20DF – Metyl Metsulfuron 200g/kg (Program: Circle and Path)	189.8	4,429.6	0.04												

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		Ally 20DF – <i>Metyl Metsulfuron</i> 200g/kg (Program: Selective weeding)	17.0	1,198.5	0.01		
		Asulox – Asulam 400g/liter (Program: Circle and Path)	257.4	298.1	0.86		
		Asulox – Asulam 400g/liter (Program: Selective)	25.0	68.5	0.37		
		Glyphosate (Program: Circle and Path)	5,410.2	4,429.6	1.22		
		Glyphosate (Program: Selective)	906.6	4,429.6	0.20		
		Li-700 (Program: Circle and Path)	1,171.8	4,429.6	0.26		
		Li-700 (Program: Selective)	188.9	4,429.6	0.04		
		Tri-Ester (Program: Circle and Path)	153.0	1,509.1	0.10		
		Tri-Ester (Program: Selective)	61.8	1,003.3	0.06		
		Navo Estate:					
				Active Ingredients	Applied (kg or litres)	Sprayed Area (Ha)	Pesticides applied (kg or litres/Ha)
				Dimehypo (Program: Injection)	30.3	27.1	1.12
				Ally 20DF – <i>Metyl Metsulfuron</i> 200g/kg (Program: Circle and Path)	372.3	6,593.9	0.06
				Ally 20DF – <i>Metyl Metsulfuron</i> 200g/kg (Program: Selective weeding)	132.1	2,290.4	0.06
				Asulox – Asulam 400g/liter (Program: Circle and Path)	56.7	265.4	0.21
				Glyphosate (Program: Circle and Path)	5,775.2	6,593.9	0.88
				Glyphosate (Program: Selective)	1,428.4	6,593.9	0.22
				Li-700 (Program: Circle and Path)	1,052.0	6,593.9	0.16
				Li-700 (Program: Selective)	655.2	6,593.9	0.10
		Tri-Ester (Program: Circle and Path)	20.1	146.9	0.14		
Pandi Estate:							

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Active Ingredients	Applied (kg or litres)	Sprayed Area (Ha)	Pesticides applied (kg or litres/Ha)
Dimehypo (Program: Injection)	187.0	123.4	1.52
Ally 20DF – Metyl Metsulfuron 200g/kg (Program: Circle and Path)	103.5	2,584.1	0.04
Glyphosate (Program: Circle and Path)	2,631.1	2,584.1	1.02
Glyphosate (Program: Selective)	259.7	2,584.1	0.10
Li-700 (Program: Circle and Path)	711.8	2,584.1	0.28
Li-700 (Program: Selective)	16.4	2,584.1	0.01

Below are toxicity analysis over all HOPL plantation 2020 (to-date November 2020):

Active Ingredients	AI %	LD50	AI Applied (kg)	Tox./Ha	Tox./t on FFB
Ally 20DF – Metyl Metsulfuron 200g/kg	20	5000	4.19	0.03	-
Asulox – Alkylethersulfate, sodium	20	5000	2.73	0.65	0.38
Glyphosate – Glyphosate	45	5000	140.97	0.91	0.13
Li-700 – Propionic Acid	40	5000	29.40	0.19	0.03
Tri-Ester – Triclopyr-butotyl	32	2000	2.94	0.45	0.03
Dimehypo – Bisultap	25	480	9.12	32.38	1.49

Smallholders:

		In case of chemical control of pest such as Sexava, it was done by HOPL – under supervision of PNG OPRA. Recod of Dimehypo uses for saxava control based on “Smallholders Blocks – Palm Poisoning”.	
7.2.3	<p>(C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.</p> <p>Smallholder requirements: Organization managing the smallholders to manage IPM for smallholders. - Critical (Major) compliance -</p>	<p>The use of pesticide is minimized as part of Continuous Improvement Plan.</p> <p>OPIC provide herbicide to smallholder who want to do spraying circle and path. Education has been provided to smallholders regarding IPM. At the OPIC office, it was observed that poster is available to educate the smallholders regarding IPM.</p>	Complied
7.2.4	<p>There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines.</p> <p>- Minor compliance -</p>	Based on interview with workers and smallholders, there is no prophylactic use of pesticides in whole are of Hargy Oil Palms Limited.	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> <p>7.2.5a Judgment of the threat and verify why this is a major threat</p> <p>7.2.5b Why there is no other alternative which can be used</p> <p>7.2.5c Which process was applied to verify why there is no other less hazardous alternative</p> <p>7.2.5d What is the process to limit the negative impacts of the application</p> <p>7.2.5e Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.</p>	There is no pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat used in whole area of HOPL including in smallholders area.	Complied

	<p>Smallholder requirements:</p> <p>Smallholders not using pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat. Smallholders to follow the policies of the organization managing the smallholders</p> <p>- Minor compliance -</p>		
7.2.6	<p>(C) 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 Criteria 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they carry out.</p> <p>Smallholder requirements:</p> <p>Smallholders using and/or storing pesticides must demonstrate knowledge of the correct handling, storage, application and disposal requirements.</p> <p>- Critical (Major) compliance -</p>	<p>Training of pesticide handling and application are routinely conducted, e.g. Refreshing on spraying standard in Atata Division on 23 Oct 2019, attended by 10 spraying workers; in Bakada Plantation on 21 Apr 2020, attended by 19 spraying workers; in Barema Plantation on 26 May 2020, attended by 12 spraying workers.</p> <p>Smallholder: Smallholder generally performs slashing to control weeds. However, for associated smallholder who performed spraying, it was done by trained smallholder – issued with certificate. HOPL and OPIC conducted special training for Agricultural Safety and Crop Spraying. Certificate of Training Attendance were available. Record of training are available such as in Gigipuna VOP on 21 Apr 2020, attended by 16 Smallholders; in Apupul VOP on 18 May 2020, attended by 32 Smallholders; in Kaiamu VOP on 2 Jun 2020, attended by 31 Smallholders; in Kiava VOP on 3 Mar 2020 attended by 24 Smallholders.</p> <p>Critical Non-Conformity raised against this indicator.</p> <p>Visit to smallholder Block 111211, Jenny Pigirip, audit team found:</p> <ul style="list-style-type: none"> - Chemical spraying using glyphosate by Junior Onpi; - Junior Onpi cannot demonstrate certificate of training. 	<p>Non-compliance (1992828-202012-M2)</p>

		<p>This was also not in line with HOPL documents:</p> <ul style="list-style-type: none"> - Hargy Oil Palms Limited SOP for Pesticide Management PRO-ESD-GEN-004-011; - Hargy Oil Palms Limited Integrated Pest Management Plan PLN-ESDSUS-001-05. 	
7.2.7	<p>(C) Storage of all pesticides is in accordance with recognised best practices.</p> <p>Smallholder requirements: The requirements fully applicable to smallholders.</p> <ul style="list-style-type: none"> - Critical (Major) compliance - 	<p>Based on site visit and interview, storage of all pesticides in HOPL found to be consistent with the Material Safety Data Sheet and Best Agricultural Practice. The guidelines of pesticide storage are available under the procedure of Plantation Management Practice – Pesticide Practices.</p> <p>Each estate has chemical shed to store the herbicide and pesticide. Agrochemical is stored and segregated based on type. The chemical shed has mixing bay and washing basin. All chemical are pre-mixed and no pure chemical brought to field. All work uniform, PPE and spraying tools are washed and stored in locked room. The estates disposed of the empty herbicide container into landfill.</p> <p>Smallholder: Smallholder generally performs slashing to control weeds. However, for associated smallholder who performed spraying, it was done by trained smallholder – issued with certificate. Storage of pesticides is away from housing.</p> <p>Critical Non-Conformity raised against this indicator. Visit to smallholder Block 111211, Jenny Pigirip, audit team found:</p> <ul style="list-style-type: none"> - chemical container (filled) stored inside chicken house; - empty chemical container stored inside chicken house, sometimes reused for chemical solution transport - no triple rinse, no visual identification; - knapsack were stored in worker’s room; 	<p>Non-compliance (1992828-202012-M3)</p>

		<ul style="list-style-type: none"> - PPE: overall and gumboot stored inside house. <p>This was also not in line with HOPL documents:</p> <ul style="list-style-type: none"> - Hargy Oil Palms Limited SOP for Pesticide Management PRO-ESD-GEN-004-011; - Hargy Oil Palms Limited Integrated Pest Management Plan PLN-ESDSUS-001-05. 	
7.2.8	<p>All pesticide containers are triple rinsed and punctured before being disposed of and/or handled responsibly if used for other purposes. Empty pesticide containers may be used for pre-mixing spray solution before transport to the plantation for use by sprayers. In this case they must have visual identification such as painted lines around them.</p> <p>Smallholder requirements: The requirements fully applicable to smallholders. - Minor compliance -</p>	<p>The empty container is triple rinsed and cut into small pieces for ease of transport. The company inventory of chemical and their container that is used and kept on site. The chemical container is stored and re-use for mixed of pesticides/herbicides. The record for ex container recycling was sighted, titled Chemical Container Recycling Record, No.FOR-ESD-UPK-012-02, The record for ex container disposal was sighted, titled Chemical Container Disposal Record, No.FOR-ESD-EMS-012-03.</p> <p>Smallholder: Smallholder generally performs slashing to control weeds. However, for associated smallholder who performed spraying, the chemical container is stored and re-use for mixed of pesticides/herbicides.</p> <p>Minor Non-Conformity raised against this indicator. Visit to smallholder Block 111211, Jenny Pigirip, audit team found:</p> <ul style="list-style-type: none"> - chemical spraying using glyphosate by Junior Onpi; - empty chemical container stored inside chicken house, sometimes reused for chemical solution transport - no triple rinse, no visual identification. <p>This was also not in line with HOPL documents:</p> <ul style="list-style-type: none"> - Hargy Oil Palms Limited SOP for Pesticide Management PRO-ESD-GEN-004-011; - Hargy Oil Palms Limited Integrated Pest Management Plan PLN-ESDSUS-001-05. 	<p>Non-compliance (1992828-202012-N1)</p>

<p>7.2.9</p>	<p>(C) 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 information is provided to affected local communities at least 48 hours prior to application of aerial spraying.</p> <p>Smallholder requirements: The requirements fully applicable to smallholders. - Critical (Major) compliance -</p>	<p>There is no pesticides applied aerially in whole area of HOPL including in Smallholders area.</p>	<p>Complied</p>
<p>7.2.10</p>	<p>(C) Specific bi-annual medical surveillance for pesticide operators handling organophosphate insecticides, and documented action to treat related health conditions, is demonstrated.</p> <p>Smallholder requirements: The requirements fully applicable to smallholders. - Critical (Major) compliance -</p>	<p>Specific annual medical surveillance for pesticides operator has been done by HOPL, and it was carried out on regular basis. Record regarding health condition of the pesticides operators are under "Baseline Surveillance for Sprayers", that contains demographic data, occupational history, medical history, basic examination (eyes, nose, throat, respiratory, skin, rash, bones) to prepare conclusion on status to working with agrochemical. Records were sight for interviewed sprayer, e.g. Gideon Russel and Raymond Duatna, fitness classification are fit.</p> <p>Annual Medical surveillance in Navo Estate – Atata Plantation were evident for spraying worker Lenni Zanza and Benson Potape, both are good for conducting chemical spraying. In Hargy Estate – Kerakera Plantation were evident for interviewed sprayer Raymond Buatna and Gideon Russel, both are good for conducting chemical spraying. Medical surveillance for Saxava team has been done annually for example Eugene Kao (test result U/L 293), Davidson Sonny (U/L 294), Tidal Morgan (U/L 267), comments are satisfactory to continue sexava control activity.</p> <p>Smallholders:</p>	<p>Complied</p>

		The medical surveillance includes trunk injector for smallholder area. For example: Willie Kos, Kevin Jocky and Colin Michael.	
7.2.11	<p>(C) 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.</p> <p>Smallholder requirements: The requirements fully applicable to smallholders. - Critical (Major) compliance -</p>	<p>Based on field visit and interview, there are no worker under 18 years old. Review to employee record concluded that no recruitment being made to under 18 years old worker. All herbicide sprayer and trunk injector are male workers. However, based on interview during field visit these male workers understood company policy regarding no work with pesticide shall be undertaken by pregnant or breastfeeding women.</p> <p>At the smallholder blocks, pesticide are only applied by those that have attend the Agriculture Safety and Crop Spraying conducted by OPIC and HOPL. There was no evidence observed that spraying was conducted by other parties, such as women or children.</p>	Complied
<p>Criterion 7.3 Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.</p>			
7.3.1	<p>A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.</p> <p>Smallholder requirements: Smallholders must demonstrate planned waste management and disposal by disposing of waste products in a designated waste pit. - Minor compliance -</p>	<p>HOPL established a Waste Management Plan Np.PLN-COM-EMS-001-10 dated 21 March 2020. The waste management in HOPL be in accordance with the waste minimization and cleaner production principles (<i>waste-avoidance, reduction, segregation, reuse, recycling, treatment and disposal</i>), as well as relevant PNG Industry Environmental Code Of practices, guidelines, and other best environmental management practices & procedures applicable to the industry. HOPL have identified source of waste activities:</p> <ul style="list-style-type: none"> - Land Clearing & Preparation (vegetation clearing, exposed top soil); - Road Construction (exposed top soil hydrocarbon related product); - Plantation Establishment, Maintenance and Harvesting (polybags, fertilizer bags, empty pesticide containers, hydrocarbon related products, unserviceable equipment, palm fronds); - Residential Compounds and Office Establishments (exposed top soil, gravel extraction, domestic waste, waste water, toilet/septic waste, 	Complied

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		<p>pesticide containers, storm water runoff, offensive odor, litter, medical waste, construction waste, landfill construction);</p> <ul style="list-style-type: none"> - Maintenance workshop, gensets, storage sheds, housing construction and maintenance (runoff water, waste oil, used batteries, used tyres, oil/fuel spills, used filters, packaging material, litter, hydrocarbon storage drums); - Medical Wastes - Field equipment servicing (waste oil, oil/fuel spillages, used filters, litter); - Vehicle Workshop (waste oil, oil/fuel spillages, used filters, litter, hydrocarbon storage drum, used batteries, used tyres); - HOPL's Palm Oil Mills - CPO and PKO Bulk Storage Tanks <p>In Barema Plantation, waste management implemented: triple rinse 51 Urea fertilizer bags and 6 July 2020 triple rinse 94 Kieserite fertilizer bags;</p> <p>Triple rinsing of pesticide containers record dated 19 June 2020 for 3 Glyphosate containers; and 27 May 2020 for 3 chemical containers;</p> <p>In Atata Plantation, waste management implemented: Apply 520 bags of fertilizer – 502 used bags re-use as loose fruit collection and 18 bags broken – disposed off in March 2020. Landfill record period June – July 2020: 24 June 2020 disposed off empty fertilizer bags; 10 July 2020 disposing metal waste; 13 July 2020 disposing plastic waste; 15 July 2020 disposed off store rubbish;</p> <p>Triple rinsing of pesticide containers record dated 2 June 2020 for 4 chemical containers; and 13 July 2020 for 6 chemical containers.</p> <p>Block Inspection Report Survey for Hargy Smallholder: check on frond stacking; check on toilet/latrine pit; check landfill for waste and trash;</p>	
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		<p>check on waste segregation: organic (store rubbish, vegetables) and inorganic waste (tin, chemical container, plastic, fertilizer bag, etc);</p> <p>In smallholder sampled 010274 Theo Vincent, dated 2 March 2020 have pit latrine with hat; landfill available but waste mixed;</p> <p>In smallholder sampled 020687 Hellen Pamakari dated 12 March 2020 have pit latrine and no landfill available;</p> <p>In smallholder sampled 21072 Utas Mawala dated 19 April 2020 have pit latrine with hat; landfill available but waste mixed;</p> <p>In smallholder sampled 21445 Dia Sosa dated 8 January 2020 have pit latrine with hat; landfill available and waste being segregated;</p> <p>In smallholder sampled 21473 Andrew Wwelemo dated 19 April 2020 have pit latrine with hat; landfill available but waste mixed;</p> <p>In smallholder sampled 031385 Joseph Nagi dated 13 February 2020 have pit latrine with hat; landfill available but waste mixed;</p> <p>In smallholder sampled 260574 Thomas Ave dated 14 March 2020 have pit latrine without hat; landfill available but waste mixed;</p> <p>In smallholder sampled 380067 Gabriel Tamai dated 1 May 2020 have pit latrine with hat; no landfill.</p>	
7.3.2	<p>Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated. Medical waste must be disposed of in purpose- built incinerators.</p> <p>Guidance: With minimal opportunity for recycling in PNG and Solomon Islands, waste disposal is by landfill. Segregation of waste shall be into Hydrocarbon contaminated waste, putrescible waste and hard waste and compostable waste. Company procedures must state how these waste streams are managed.</p>	<p>Based on field visit (using audit facilitator) to 3 (three) Palm Oil Mills and 3 (three) Estates, audit team found that disposal of waste material was consistent with Waste Management Plan. The Medical waste disposed of into incinerator in Navo Estate.</p> <p>Smallholders 01274 Theo Vincent, prepared landfill for waste disposal. There was no hydrocarbon waste.</p>	<p>Non-compliance (1992828-202012-N2)</p>

	<p>Smallholder requirements: The requirements fully applicable to smallholders. - Minor compliance -</p>	<p>Smallholders 040001 Tomarum Ali (interviewed wife, husband attending funeral), prepared landfill for waste disposal mainly plastic waste. There was no hydrocarbon waste.</p> <p>Smallholders 040025 Morgan Paliavu, prepared landfill for waste disposal mainly plastic waste. There was no hydrocarbon waste.</p> <p>Smallholder 041176 Herman Bua, prepared landfill for waste disposal. There was no hydrocarbon waste.</p> <p>Smallholders 080803 Susan Jerom, prepared landfill for waste disposal. There was no hydrocarbon waste.</p> <p>Smallholder 161601 Amos Koi and 161609 Boto Marisa, prepared landfill for waste disposal. There was no hydrocarbon waste.</p> <p>Minor Non-Conformity raised against this indicator.</p> <ol style="list-style-type: none"> 1. Based on filed visit to the Domestic waste pit at Bakada plantation Sabalbala Division there was evidences of fertilizer bags and chemical containers mixed with domestic waste and put into the same pit. There is, no segregation of fertilizer bags and chemical containers from the domestic waste pit. Is not consistent with Article 9.1 Domestic and Industrial (hard) waste landfill on Waste Management Plan (PLN-COMEMS-001-10) Issued No. 10 date 21 March 2020. 2. Based on visit to Smallholders blocks, e.g. LSS 311651 - FRED ALU and LSS 311554 - PHILLIP MANAU it was found that segregation of waste is not implemented appropriately. 	
7.3.3	<p>Open fire is not used for waste disposal by the Unit of Certification.</p> <p>Smallholder requirements:</p>	<p>Based on field visit (using audit facilitator) to 3 (three) Palm Oil Mills and 3 (three) Estates, audit team found no use of open fire for waste disposal.</p>	<p>Non-compliance</p>

	<p>Smallholders must be able to verbally explain that they understand and observe this requirement.</p> <p>- Minor compliance -</p>	<p>Smallholders 01274 Theo Vincent; 040001 Tomarum Ali (interviewed wife, husband attending funeral); 040025 Morgan Paliavu; 041176 Herman Bua; 080803 Susan Jerom; 161601 Amos Koi and 161609 Boto Marisa, explains they are not allowed to use fire for waste disposal. All of sampled smallholder prepared landfill for waste disposal. There was no hydrocarbon waste.</p> <p>Minor Non-Conformity raised against this indicator. Based on visit to Smallholders Block, e.g. LSS 311651 - FRED ALU and LSS 331837 – LEONARD JULY it was found that open fire was use for domestic waste management around their house.</p>	<p>(1992828-202012-N3)</p>
<p>Criterion 7.4 Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.</p>			
<p>7.4.1</p>	<p>Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts.</p> <p>Smallholder requirements: Smallholders to implement good agriculture practices as communicated through extension services delivered by organization that is managing the smallholders.</p> <p>- Minor compliance -</p>	<p>HOPL has established and implemented procedures for good agriculture practices in maintaining the soil fertility, PRO-ESD-GEN-003-09, Upkeep management SOP, dated 10/02/2016. The procedures comprises of manual and mechanical inorganic fertilizer application. The procedures are Standard Operating Procedure for Soil Sampling in HOPL Plantations and Standard Operating Procedure for Inorganic Fertilizer in HOPL Plantations. Inclusive is the organic fertilizer through Empty Fruit Bunches (EFB) application and estates whereby the land application is in practice. HOPL use fertilizer recommendation issued by OPRA as guidance to maintain soil fertility.</p>	<p>Complied</p>
<p>7.4.2</p>	<p>Periodic tissue and soil sampling is carried out by Companies to monitor and manage changes in soil fertility and plant health. Tissue testing is conducted annually to determine fertiliser requirements for the following year. Soil testing is carried out at replant.</p> <p>Guidance: Smallholders are provided with access to test results applicable to the Company Management Unit closes to their block.</p>	<p>HOPL practices periodic tissue and soil analysis. The periodic tissue and soil sampling carried out by Applied Agricultural Resources Sdn. Bhd. Tissue sampling is taken on annual basis prior to the manuring program being established. Guidelines are available in the "GUIDELINE FOR OIL PALM TISSUE SAMPLING IN HOPL PLANTATIONS". Therein is shown:</p> <ul style="list-style-type: none"> • Introduction/Background; • Identifying a frond to sample/identifying each leaf; 	<p>Complied</p>

	<p>Smallholder requirements: Organization that is managing the smallholders to take tissue samples from representative Smallholders annually. - Minor compliance -</p>	<ul style="list-style-type: none"> • Leaf sampling/sampling methodology/leaf sampling density; • Leaf sample processing; • Frequency & timing; • Deficiency symptoms. <p>Document seen: Fertilization Visit Report, by F. Dumortier, October 2019; Visit to Hargy Plantations by Palm Oil Consulting Ltd, 28th Oct to 9th Nov 2019; Bialla AAR Leaf Data 2019; Soil Analysis Result by Hill Laboratories, 2019; Volcanic Ash Analysis by Hill Laboratories, 2019.</p>																					
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. - Minor compliance -</p>	<p>There are records of EFB and palm kernel expeller application being applied in the fields for the respective estates. Monitoring is being made for the actual quantity applied vs the budget and also the cost incurred on monthly & yearly basis both absolute and unit cost/MT FFB and unit cost /Ha. The rate of EFB application is 35 - 40 MT/Ha. Sighted EFB application at Atata Plantation, YTD 11,580 MT; at Bakada Plantation, YTD 135 MT; at Barema Plantation, YTD 9,646 MT. EFB application was recorded in Crop Residue Application and Monthly Agronomic Dashboard.</p>	Complied																				
7.4.4	<p>Records of fertiliser inputs are maintained.</p> <p>Smallholder requirements: Organization that is managing the smallholders to maintain records of fertiliser distribution. - Minor compliance -</p>	<p>Records for fertilizer application are available and maintained under Fertilizer Booklet and OMP (Oil Palm Management Practice) Report. During this annual surveillance assessment the following fertilizer input was captured and verified. Below is the fertiliser input in HOPL for year 2020 up to November.</p> <p>Hargy Estate:</p> <table border="1" data-bbox="1088 1177 1928 1374"> <thead> <tr> <th>Fertiliser Group</th> <th>Fertiliser</th> <th>Application Method</th> <th>Total (ton)</th> </tr> </thead> <tbody> <tr> <td>N - Source</td> <td>Urea</td> <td>Manual</td> <td>929</td> </tr> <tr> <td>P - Source</td> <td>DAP</td> <td>Manual</td> <td>439</td> </tr> <tr> <td>K - Source</td> <td>MOP</td> <td>Manual</td> <td>456</td> </tr> <tr> <td>Others</td> <td>Fertibor 25kg</td> <td>Manual</td> <td>11</td> </tr> </tbody> </table>	Fertiliser Group	Fertiliser	Application Method	Total (ton)	N - Source	Urea	Manual	929	P - Source	DAP	Manual	439	K - Source	MOP	Manual	456	Others	Fertibor 25kg	Manual	11	Complied
Fertiliser Group	Fertiliser	Application Method	Total (ton)																				
N - Source	Urea	Manual	929																				
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K - Source	MOP	Manual	456																				
Others	Fertibor 25kg	Manual	11																				

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	Kieserite	Manual	116
Crop Residue	EFB	Mechanical	36,807
	Expeller	Mechanical	2,072

Navo Estate:

Fertiliser Group	Fertiliser	Application Method	Total (ton)
N - Source	ACL	Manual	205
	NP Blend	Manual	4
	SOA	Manual	18
	Urea	Manual	1,033
P - Source	DAP	Manual	218
K - Source	MOP	Manual	258
Others	Fertibor 25kg	Manual	19
	Kieserite	Manual	33
Crop Residue	EFB	Mechanical	17,880

Pandi Estate:

Fertiliser Group	Fertiliser	Application Method	Total (ton)
N - Source	Urea	Manual	598
P - Source	DAP	Manual	179
K - Source	MOP	Manual	340
Others	Fertibor 25kg	Manual	3
	Kieserite	Manual	71

During the audit, conducted visit by audit facilitator to fertilizer activity. All workers can demonstrate good practice in fertilizing activity according to correct time, type, dosage and object. PPE were used, e.g. gum boots, apron, hand gloves and dust mask. It shows that all worker are well trained.

Criterion 7.5 Practices minimise and control erosion and degradation of soils.			
7.5.1	<p>(C) Maps identifying marginal and fragile soils, including steep terrain, are available.</p> <p>- Critical (Major) compliance -</p>	<p>Soil map of Bialla Project 2017, scale 1:115,000, dated June 2017 is available. The map consist of soil type and topography of Hargy Plantation, Barema Plantation, Karla Plantation, Ibana Plantation, Bakada Plantation, all smallholders and all Mills.</p> <p>Based on Soil analysis issued by Hill Laboratories dated 10 Apr 2006, Hargy Pit 1 Soil description was as follows:</p> <ul style="list-style-type: none"> • Parent material: Volcanic alluvial materials; • Landform: Alluvial plain on foot slope; • Slope: Flat; • Previous land use: Logged forest; • Vegetation: Logged secondary forest; • Surface features: Thick litter layer and no outcrops, deep water trench common feature; • Ground cover: good ground cover with forest under growth; • Soil drainage: well drained; <p>Comments: there were no stones and gravel found throughout the profile, there were orange inclusions at 150-200 cm depth; Description: Brown (10YR 4/3); sandy clay loam; friable; weakly developed fine-medium sub angular blocky structure; slightly sticky; plastic; many fine pores; rapid porosity; many fine and medium and few coarse roots, diffuse boundary to.</p> <p>Below are detail of soil type in HOPL:</p> <ul style="list-style-type: none"> • Yanaswali Plantation – Vamakuma Soils. Mengen Bakada Soils (HOPL expansion 2014), Scale 1:16,950. ± 90% is Sandy clay loam; 10 % is River gravel. • Yanaswali Plantation – Sena Soils. Mengen Bakada Soils (HOPL expansion 2014), Scale 1:17,200. 100 % is loamy sand/gravel. 	Complied

		<ul style="list-style-type: none"> • Bakada Plantation – Magalona Soils. Mengen Bakada Soils (HOPL expansion 2014), Scale 1:20,230. ± 65% is loamy sand/gravel; ± 35 % is loamy sand. • Karla Plantation Soils. Scale 1:40,200. Surface soil texture: ± 70% is sand to loamy sand, ± 20% is loam to sandy loam, 10% is heavy loam to sand clay loam. • Ibana Plantation Soils, Scale 1:37,440. Surface soil texture: 100% is sand to loamy sand. • Hargy Plantation Soils. Surface soil texture: sand to loamy sand (15%), heavy loam to sand clay loam (68%), clay loam to silty clay loam (5%), No data (10%), organic loam to sandy clay loam (2%). • Barema Plantation Soils. Surface soil texture: silty clay (70%), organic loam to sand clay loam (15%), clay loam to silty clay loam (15%). • Bakada Plantation - Alangily Soils, scale 1:26,590. Surface soil texture: sandy loam (90%), loamy sand (10%). • Bakada Plantation – Alaba Soils, scale 1:31,110. Surface soil texture: loamy sand/gravel (80%), loamy sand (20%). • Bakada Plantation – Abulmosi soils, scale 1:25,290. Surface soil texture: loamy sand/gravel (90%), loamy sand (10%). 	
7.5.2	<p>There is no extensive replanting of oil palm on steep terrain.</p> <p>Smallholder requirements: Smallholders do not plant on unsuitable slopes. Organization managing the smallholders to advise on slope suitability after consideration of gradient, soil type, harvesting safety and other relevant issue. - Minor compliance -</p>	<p>Based on field observation by audit facilitator and interview, there is no extensive replanting of oil palm on steep terrain in HOPL area including in smallholders.</p> <p>There were two LSS smallholders blocks at Barema Division 1 which did replanting in 2019, which is Block #031256 (Kondrack Gerwa) and Block #031289, those blocks are located in flat area.</p>	Complied
7.5.3	<p>There is no new planting of oil palm on steep terrain.</p>	<p>Based on field observation by audit facilitator and interview, there is no new planting activity in HOPL area including in smallholders.</p>	Complied

	- Minor compliance -		
Criterion 7.6			
Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.			
7.6.1	<p>(C) 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.</p> <p>- Critical (Major) compliance -</p>	<p>Soil map of Bialla Project 2017, scale 1:115,000, dated June 2017 is available. The map consist of soil type and topography of Hargy Plantation, Barema Plantation, Karla Plantation, Ibana Plantation, Bakada Plantation, all smallholders and all Mills.</p> <p>The certificate holder has had management strategy for fragile and problem soils and it is stated in the SOP for New Development No.PRO-ESD-GEN-001-10, issue No.10, dated 15 April 2018. It was stipulated in page 3: Consideration for New Planting Procedures Soil Surveys & Topographic Information. Extensive planting on steep terrain, and/or on marginal soils, is avoided. The requirements are: Where limited planting on fragile and marginal soils is proposed, plans (including maps) shall be developed and implemented to protect soils thus minimising adverse environmental and social impacts; Avoid planting on slope in excess of 25° slope; Avoid planting on contiguous areas of peat soils >3m deep and >150 Ha in extent.</p> <p>Soil surveys and topography information are used for site planning the establishment of new plantings, and the results are incorporated into plans and operations. Requirements are: Soil suitability map or soil surveys adequate to established the long-term suitability of land for oil palm cultivation should be available; Topographic information adequate to guide the planning of drainage and irrigation systems, roads and other infrastructure should be available.</p>	Complied
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.	Based on field observation by audit facilitator and interview, there is no extensive planting on marginal and fragile soils.	Complied

	- Minor compliance -		
7.6.3	Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure. - Minor compliance -	Soil surveys and topography information are used for site planning the establishment of new plantings, and the results are incorporated into plans and operations. Requirements are: Soil suitability map or soil surveys adequate to established the long-term suitability of land for oil palm cultivation should be available; Topographic information adequate to guide the planning of drainage and irrigation systems, roads and other infrastructure should be available.	Complied
Criterion 7.7			
No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.			
7.7.1	(C) There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas. - Critical (Major) compliance -	Based on Soil analysis issued by Hill Laboratories dated 10 Apr 2006, there is no peat in whole HOPL Plantations including in Smallholders area. This indicator is not applicable.	Not Applicable
7.7.2	Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat. PROCEDURAL NOTE: Maps and other documentation of peat soils are provided, prepared and shared in line with RSPO Peatland Working Group (PLWG) audit guidance (see Procedural Note for 7.7.5 below). - Minor compliance -	Based on Soil analysis issued by Hill Laboratories dated 10 Apr 2006, there is no peat in whole HOPL Plantations including in Smallholders area. This indicator is not applicable.	Not Applicable
7.7.3	(C) Subsidence of peat is monitored, documented and minimised. - Critical (Major) compliance -	Based on Soil analysis issued by Hill Laboratories dated 10 Apr 2006, there is no peat in whole HOPL Plantations including in Smallholders area. This indicator is not applicable.	Not Applicable
7.7.4	(C) A documented water and ground cover management programme is in place. - Critical (Major) compliance -	Based on Soil analysis issued by Hill Laboratories dated 10 Apr 2006, there is no peat in whole HOPL Plantations including in Smallholders area. This indicator is not applicable.	Not Applicable

<p>7.7.5</p>	<p>(C) 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>PROCEDURAL NOTE: Full details of the RSPO Drainability Assessment Guidelines and related concepts and detailed actions are in the manual currently being fine-tuned/tested by PLWG. A final version should be approved by PLWG in January 2019 and will include additional guidance on the steps to be followed after the decision not to replant as well as implications for other stakeholders, smallholders, local communities and the unit of certification. It is recommended that a further twelve-month methodology trial period is proposed for all related management units (i.e. those with plantations on peat) to utilise the methodology and provide feedback to the PLWG to enable further refinement of procedure as appropriate before January 2020. Units of certification have the option to defer replanting till after the availability of the revised guidelines. Additional guidance on alternative crops and rehabilitation of natural vegetation will be provided by PLWG.</p> <p>PROCEDURAL NOTE: PLWG and the Smallholder Interim Group (SHIG) will collaboratively develop guidance for Independent Smallholders [cross links to SHIG and GHG issues]</p> <p>- Critical (Major) compliance -</p>	<p>Based on Soil analysis issued by Hill Laboratories dated 10 Apr 2006, there is no peat in whole HOPL Plantations including in Smallholders area. This indicator is not applicable.</p>	<p>Not Applicable</p>
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7.7.6	<p>(C) 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> <p>- Critical (Major) compliance -</p>	<p>Based on Soil analysis issued by Hill Laboratories dated 10 Apr 2006, there is no peat in whole HOPL Plantations including in Smallholders area. This indicator is not applicable.</p>	Not Applicable
7.7.7	<p>(C) 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 Rehabilitation of Natural Vegetation Associated with Oil Palm Cultivation on Peat', version 2 (2018) and associated audit guidance</p> <p>- Critical (Major) compliance -</p>	<p>Based on Soil analysis issued by Hill Laboratories dated 10 Apr 2006, there is no peat in whole HOPL Plantations including in Smallholders area. This indicator is not applicable.</p>	Not Applicable
<p>Criterion 7.8 Practices maintain the quality and availability of surface and groundwater.</p>			
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>7.8.1a The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities.</p> <p>7.8.1b Workers have adequate access to clean water.</p> <p>- Minor compliance -</p>	<p>HOPL had a detailed Water Management Plan with latest issue No.8 dated on 7 February 2019 approved by The General Manager. The Water Management Plan guide the company's water supply, use and discharge; Mitigation against negative impacts; Prevention and mitigation of pollution incidents; Proactively conserving water in all its activities.</p> <p>HOPL water management plan purpose to ensure all water complies with legal requirement; water is used efficiently; water quality of surface and ground water is maintained.</p> <p>The water management plan includes the use for mill processes, workshop, pesticide mixing and use, domestic use and compound use. Therein is also indicated the water discharged is monitored for BOD and COD. All POME are treated within legal limit as per PNG Code of Practice</p>	Complied

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for POM. HOPL main source of water extraction is from 2 sources i.e surface water and ground water. The surface extraction is from the river systems within the company estates i.e. Sabalbala River, Ibane River, Area 7 and Vamakuma. The underground water is pumped using bore pumps extracted at locations of Hargy mill & compound, Makakiwa Division 1, Barema Estate & Mill and Urumaili Division 2.

Permit for such extraction is obtained to comply with Section 65 of the Environment Act 2000.

Permit No	Site & Grid Reference	Issue date	Expiry date	Quantity Specified
WE-L2B(166)	Mengen/ Bakada Portion 733	9 November 2009	9 December 2034	34,560 m ³ /year
WE-2LB(209)	Barema Portion 2038	9 December 2010	7 January 2035	34,476 m ³ /year
WE-2LB(80)	Ibane river Portion 624	11 January 2001	31 December 2053	227,520 m ³ /year

Usage: Domestic use at compound; Domestic use at compound and Mill use; Domestic use at compound and Nursery Irrigation.

According to environmental permit and PNG Environmental Code of Practice 2013, there is parameters required to measuring/testing on TSS parameter from effluent discharge, as follows:

Parameter	Land Application	Discharge to Surface Water
pH	5-9	5-9
BOD	4000 mg/L	100 mg/L

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		<table border="1" data-bbox="1086 363 1713 622"> <tr> <td>COD</td> <td>-</td> <td>-</td> </tr> <tr> <td>Total Solids</td> <td>3000 mg/L</td> <td>1500 mg/L</td> </tr> <tr> <td>Suspended Solids</td> <td>1000</td> <td>500</td> </tr> <tr> <td>Oil and Grease</td> <td>50 mg/L</td> <td>50 mg/L</td> </tr> <tr> <td>Ammoniacal Nitrogen</td> <td>Not defined</td> <td>150 mg/L</td> </tr> <tr> <td>Total Nitrogen</td> <td>Not defined</td> <td>200 mg/L</td> </tr> </table> <p data-bbox="1086 670 1937 798">The Certificate Holder maintain the quality of mill wastewater/effluent discharge to natural watercourse by sending sample to accredited laboratory to be analyse. BOD and COD is the parameters that strictly to be monitor by the Mills, prior to discharge.</p> <p data-bbox="1086 813 1937 941">The water quality in Hargy Oil Palms Limited being analysed by New Britain Laboratory Services latest May 2020. The result in Sabalbala compound: Total solids 230 mg/L; turbidity 9.0 NTU; total Coliform TNTC CFU; E. Coli TNTC CFU;</p> <p data-bbox="1086 957 1937 1021">in Atata compound: Total solids 180 mg/L; turbidity 8.7 NTU; total Coliform 0 CFU; E. Coli 0 CFU;</p> <p data-bbox="1086 1037 1937 1101">in Barema compound: Total solids 160 mg/L; turbidity 0.2 NTU; total Coliform 19 CFU; E. Coli 0 CFU;</p> <p data-bbox="1086 1117 1937 1181">in Hargy POM compound: Total solids 160 mg/L; turbidity 0.2 NTU; total Coliform 5 CFU; E. Coli 0 CFU.</p>	COD	-	-	Total Solids	3000 mg/L	1500 mg/L	Suspended Solids	1000	500	Oil and Grease	50 mg/L	50 mg/L	Ammoniacal Nitrogen	Not defined	150 mg/L	Total Nitrogen	Not defined	200 mg/L	
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7.8.2	<p>(C) 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) or applicable National legislation or specific environmental permit. Smallholders may replant existing</p>	<p>HOPL has protected water course and wetlands, 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). Waste water from Hargy Mill are discharge to ocean. Based on field observation, the wastewater from effluent pond is discharge straight to the Bismarck ocean/Kimbe bay.</p>	Complied																		

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	<p>planted areas provided there is no evidence of environmental deterioration having occurred during the previous cycle.</p> <p>Smallholder requirements: Smallholders must protect water courses and wetlands by not polluting with rubbish or other waste. - Critical (Major) compliance -</p>	<p>The GPS coordinate for discharge point is located at Lat: 5° 18' 42.55" S; Lon: 151° 0' 30.63" E. This coordinate is appropriate with the coordinate given under Environment Act 2000 (No: WD-L2 (56), dated 13 October 1993, validity: 25 years, expiry 31 December 2028).</p> <p>Protection of watercourse (ocean) related POME from Hargy Mill is by monitoring of final wastewater quality that tested by Analysis Laboratory Unitech Development & Consultancy Pty Ltd, PNG (registered under PNGLAS) in monthly basis. Based on field observation on several conservation area, the buffer zone has a long distance from plantation area (around 150 m).</p> <p>The management has own procedure to protect the watercourse, and it is well implemented. Using the water for Mill and Plantation sourced from Ibana river. The management has a permit of water usage (Permit No. WE-2LB(80) issued on 11 January 2001, valid until 31 December 2053), Quantity specified (227,520 m3/year). Domestic usage at compounds and Nursery irrigation; Source: underground spring water. The Certificate Holder has s procedure to protect the conservation area which including protect the watercourse. Conservation Areas SOP (PRO-ESD-GEN-018, issued 30 June 2018).</p> <p>There is one river (Pandi river) were located in the eastern of the plantation (Div. 2 – Alangily). This river flows from south (Mount Ulawun) to north (Bismarck sea). Conservation area has delineated as riparian zone to protect the watercourse, including stream that cross the plantation area. The condition of buffer/riparian zone is well managed.</p>	
7.8.3	<p>Mill effluent is treated to be in compliance with national regulations. Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is regularly monitored. - Minor compliance -</p>	<p>Hargy POM have POME treatment ponds, using anaerobic treatment, before final discharge to sea. The capacity of the POME ponds:</p> <ul style="list-style-type: none"> - Pond 1: 30 x 17.5 x 1.8 m = 945 m3 (cooling) - Pond 2: 30 x 16.5 x 1.2 m = 594 m3 (cooling) - Anaerobic Pond 3: 124.5 x 29 x 4 m = 14,442 m3 (retention 13 days) 	Complied

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		<ul style="list-style-type: none"> - Anaerobic Pond 4: 3 x (102.2 x 20 x 4 m) = 24,528 m3 (retention 22 days) - Anaerobic Pond 5: 2 x (102.2 x 20 x 4 m) = 16,352 m3 (retention 15 days) - Anaerobic Pond 6: 136 x 32.5 x 4 m = 17,680 m3 (retention 16 days) - The POME quality was monitored on monthly basis from National Analytical & Testing Services Ltd., Lae, Morobe Province in PNG. <p>Hargy Mill's POME quality from final discharge</p> <table border="1" data-bbox="1086 683 1841 742"> <thead> <tr> <th>Parameter</th> <th>Jan 2020</th> <th>Feb 2020</th> <th>Mar 2020</th> <th>Apr 2020</th> </tr> </thead> <tbody> <tr> <td>BOD (5 days)</td> <td>50 mg/L</td> <td>150 mg/L</td> <td>90 mg/L</td> <td>38 mg/L*</td> </tr> </tbody> </table> <p><i>*) done internally due to travel restriction</i></p> <p>Barema Mill's POME quality from final discharge</p> <table border="1" data-bbox="1086 794 1841 853"> <thead> <tr> <th>Parameter</th> <th>Jan 2020</th> <th>Feb 2020</th> <th>Mar 2020</th> <th>Apr 2020</th> </tr> </thead> <tbody> <tr> <td>BOD (5 days)</td> <td>100 mg/L</td> <td>3100 mg/L*</td> <td>100 mg/L</td> <td>- mg/L</td> </tr> </tbody> </table> <p><i>*) high result due to de-silting the biogas plant</i></p> <p>Navo Mill's POME quality</p> <table border="1" data-bbox="1086 938 1841 997"> <thead> <tr> <th>Parameter</th> <th>Jan 2020</th> <th>Feb 2020</th> <th>Mar 2020</th> <th>Apr 2020</th> </tr> </thead> <tbody> <tr> <td>BOD (5 days)</td> <td>100 mg/L</td> <td>150 mg/L</td> <td>250 mg/L</td> <td>- mg/L*</td> </tr> </tbody> </table> <p><i>*) no analysis due to travel restriction</i></p>	Parameter	Jan 2020	Feb 2020	Mar 2020	Apr 2020	BOD (5 days)	50 mg/L	150 mg/L	90 mg/L	38 mg/L*	Parameter	Jan 2020	Feb 2020	Mar 2020	Apr 2020	BOD (5 days)	100 mg/L	3100 mg/L*	100 mg/L	- mg/L	Parameter	Jan 2020	Feb 2020	Mar 2020	Apr 2020	BOD (5 days)	100 mg/L	150 mg/L	250 mg/L	- mg/L*						
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7.8.4	<p>Mill water use per tonne of FFB is monitored and recorded.</p> <p>- Minor compliance -</p>	<p>Hargy POM:</p> <table border="1" data-bbox="1086 1050 1758 1390"> <thead> <tr> <th>Description</th> <th>2017</th> <th>2018</th> <th>2019</th> <th>2020</th> </tr> </thead> <tbody> <tr> <td>FFB Processed</td> <td>171,839.46</td> <td>145,051.70</td> <td>122,810</td> <td>74,815</td> </tr> <tr> <td>Raw water</td> <td>202,212</td> <td>126,243.75</td> <td>144,799</td> <td>15,345</td> </tr> <tr> <td>Processed water</td> <td>139,507</td> <td>42,539</td> <td>46,381</td> <td>8,923</td> </tr> <tr> <td>Boiler water</td> <td>44,915</td> <td>54,931</td> <td>54,893</td> <td>5,430</td> </tr> <tr> <td>Domestic water</td> <td>22,556</td> <td>55,505</td> <td>28,978</td> <td>5,761</td> </tr> <tr> <td>Raw water per tonne FFB</td> <td>1.18</td> <td>0.87</td> <td>1.18</td> <td>0.2</td> </tr> </tbody> </table>	Description	2017	2018	2019	2020	FFB Processed	171,839.46	145,051.70	122,810	74,815	Raw water	202,212	126,243.75	144,799	15,345	Processed water	139,507	42,539	46,381	8,923	Boiler water	44,915	54,931	54,893	5,430	Domestic water	22,556	55,505	28,978	5,761	Raw water per tonne FFB	1.18	0.87	1.18	0.2	Complied
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		Processed water per tonne FFB	0.18	0.29	0.38	0.12		
		Boiler water per tonne FFB	0.26	0.83	0.45	0.07		
		Domestic water per tonne FFB	0.13	0.83	0.24	0.08		
		Barema POM:						
		Description	2017	2018	2019	2020		
		FFB	167,080	192,562	146,856	88,137		
		Processed						
		Raw water	200,894	226,818	237,581	136,070		
		Processed water	69,247	47,785	37,080	22,625		
		Boiler water	97,931	108,542	78,919	45,895		
		Domestic water	46,525	46,399	63,343	32,565		
		Raw water per tonne FFB	1.20	1.18	1.62	1.54		
		Processed water per tonne FFB	0.41	0.25	0.25	0.26		
		Boiler water per tonne FFB	0.59	0.56	0.54	0.52		
		Domestic water per tonne FFB	0.28	0.24	0.43	0.37		
		Navo POM:						
		Description	2017	2018	2019	2020		
		FFB	218,043	239,392	170,421	86,501		
		Processed						

		Raw water	1,572	1,545	72,842	29,794		
		Processed water	155,459	167,595	84,784	66,767		
		Boiler water	113,249	115,977	83,274	40,000		
		Domestic water	92,859	102,757	49,207	46,772		
		Raw water per tonne FFB	0.01	0.01	0.43	0.34		
		Processed water per tonne FFB	0.71	0.70	0.50	0.77		
		Boiler water per tonne FFB	0.52	0.48	0.49	0.46		
		Domestic water per tonne FFB	0.43	0.43	0.29	0.54		

Criterion 7.9
 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 optimise renewable energy is in place, monitored and reported. - Minor compliance -	<p>Hargy Oil Palms Limited made Electrical Weekly Service Schedule as controls to minimise mileage and fuel usage by servicing the genset. Capex 2020 for Hargy POM to have boiler 2 automation to maximize utilization thus reduce non-renewable energy. Use of Renewable energy and its Diesel Fuel saving in Hargy POM:</p> <table border="1"> <thead> <tr> <th rowspan="2">Month</th> <th colspan="4">2020</th> </tr> <tr> <th>Fibre (MT)</th> <th>Shell (MT)</th> <th>Power from Mill fibre and shell</th> <th>Diesel used (liters)</th> </tr> </thead> <tbody> <tr> <td>Jan</td> <td>1,846</td> <td>710.00</td> <td>255,588</td> <td>54,800</td> </tr> <tr> <td>Feb</td> <td>1,699</td> <td>653.53</td> <td>235,274</td> <td>39,000</td> </tr> <tr> <td>Mar</td> <td>1,443</td> <td>555.04</td> <td>199,818</td> <td>58,600</td> </tr> <tr> <td>Apr</td> <td>1,622</td> <td>623.92</td> <td>224,612</td> <td>56,600</td> </tr> <tr> <td>May</td> <td>1,569</td> <td>603.63</td> <td>217,307</td> <td>45,100</td> </tr> <tr> <td>Jun</td> <td>1,546</td> <td>594.65</td> <td>214,077</td> <td>52,600</td> </tr> <tr> <td></td> <td>9,726</td> <td>3,741</td> <td>1,346,676</td> <td>306,700</td> </tr> </tbody> </table>	Month	2020				Fibre (MT)	Shell (MT)	Power from Mill fibre and shell	Diesel used (liters)	Jan	1,846	710.00	255,588	54,800	Feb	1,699	653.53	235,274	39,000	Mar	1,443	555.04	199,818	58,600	Apr	1,622	623.92	224,612	56,600	May	1,569	603.63	217,307	45,100	Jun	1,546	594.65	214,077	52,600		9,726	3,741	1,346,676	306,700	Complied
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May	1,858	715	482,313																																																																															
Jun	1,999	769	519,005																																																																															
	11,458	4,407	2,974,628																																																																															
Month	2020																																																																																	
	Fibre (MT)	Shell (MT)	Power from Mill fibre and shell	Diesel usage (liters)																																																																														
Jan	1,984.89	763.42	294,462	37,522																																																																														
Feb	1,816.28	698.57	269,448	35,185																																																																														
Mar	2,132.82	820.31	316,407	39,250																																																																														
Apr	1,675.18	644.30	248,516	36,783																																																																														
May	2,051.11	788.88	304,285	37,706																																																																														
Jun	1,584.78	609.53	235,105	38,352																																																																														
	11,245.08	4,325.03	1,668,222	224,798																																																																														

Criterion 7.10
 Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.

7.10.1	<p>(C) GHG emissions are identified and assessed for the unit of certification. Plans to reduce or minimise them are implemented, monitored through the Palm GHG calculator and publicly reported.</p>	<p>The parameter are Significant Aspect, Objective, Requirement, Resource, Timeframe, and Basis of Evaluation. Significant pollutants and GHG emissions from any sources is identify, including the plan to reducing it. For example: to reduce the GHG, Barema POM already has</p>	<p>Non-compliance</p>
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	<p>- Critical (Major) compliance -</p>	<p>Methane Gas Capture from Mill effluent prior discharge to the plantation as Land Application.</p> <p>Critical Non-Conformity raised against this indicator. Hargy Oil Palms Limited has not prepared the Palm GHG calculator version 4.0 until audit time ends.</p>	<p>(1992828-202012-M4)</p>
<p>7.10.2</p>	<p>(C) 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 minimise them prepared and implemented (following the RSPO GHG Assessment Procedure for New Development).</p> <p>- Critical (Major) compliance -</p>	<p>In February 2019, Unit of Certification conducting HCSA/HCV integrated Scoping Assessment for Hargy Oil Palm Limited. This assessment conducted by Hollow-wood Enterprises Pty Ltd, as a consultant.</p> <p>The scoping study aims to deliver on the Pre-assessment phase of an integrated HCSA/HCV assessment, reporting on the five required outputs specified by the HCVRN integration manual 2017. This document is not intended to report detailed findings relating to HCV management areas, HCSA conservation or provide detailed accounts of the current status of FPIC or participatory community mapping.</p> <p>Scope of this assessment consist of Nucleus Estates operates by HOPL approximately 20,473.2 Ha and Smallholders with 24,160.3 Ha.</p> <p>Plan to minimise emission from carbon stock prepared and implemented, in form of HOPL restricted new planting. This was explained to smallholder and discussed during stakeholder consultation with BOGA.</p>	<p>OFI</p>
<p>7.10.3</p>	<p>(C) Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored</p> <p>- Critical (Major) compliance -</p>	<p>The company has prepared a strategy in effort to reduce and mitigate pollution and emission. Monitoring of pollution and emission quality for plantation has been planned and implemented. Smoke emission trend based on Ringelmann chart being monitored since 2016.</p> <p>The parameter are Significant Aspect, Objective, Requirement, Resource, Timeframe, and Basis of Evaluation. Significant pollutants and</p>	<p>Complied</p>

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		<p>GHG emissions from any sources is identify, including the plan to reducing it. For example: to reduce the GHG, Barema POM already has Methane Gas Capture from Mill effluent prior discharge to the plantation as Land Application.</p> <p>In Barema POM, biogas plant received 400 m³/hour, coming into buffer tank, into reactor tank to produce biogas.</p> <p>Monitoring and reporting of the significant pollutants to water, gaseous emissions to air and contamination on land are in place. Tools and systems used include the water quality at discharge points. Water samples taken every month, tested by mill environment officer in charge, and analysed to ensure compliance to Conservation Protection Authority (CEPA) requirements at final discharge points. The water samples were sent to National Analysis Laboratory for analysis. Records are maintained and verified on-site to have met the permissible regulatory limits.</p>	
<p>Criterion 7.11 Fire is not used for preparing land and is prevented in the managed area</p>			
7.11.1	<p>(C) Land for new planting or replanting is not prepared by burning. - Critical (Major) compliance -</p>	<p>Based on field visit, document review and interview, there is no new planting or replanting preparation carried out by burning in HOPL area.</p>	Complied
7.11.2	<p>The unit of certification establishes fire prevention and control measures for the areas directly managed by the unit of certification. - Minor compliance -</p>	<p>Based on field visit, document review and interview, there is no new planting or replanting preparation carried out by burning in HOPL area.</p> <p>Fire prevention and control as in Zero burning policy already stated within Hargy Oil Palms Limited prepared Environmental Aspects Impacts Master Register No.REG-ESD-EMS-001-17, latest review 18 February 2019 and Waste Management Plan (PLN-ESD-EMS-001-08, Issue No: 8, Issued dated: 30 March 2018).</p>	Complied

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7.11.3	<p>The unit of certification engages with adjacent stakeholders on fire prevention and control measures.</p> <p>- Minor compliance -</p>	<p>Based on field visit, document review and interview, there is no new planting or replanting preparation carried out by burning in HOPL area.</p> <p>Fire prevention and control as in Zero burning policy already stated within Hargy Oil Palms Limited prepared Environmental Aspects Impacts Master Register No.REG-ESD-EMS-001-17, latest review 18 February 2019 and Waste Management Plan (PLN-ESD-EMS-001-08, Issue No: 8, Issued dated: 30 March 2018).</p>	Complied
<p>Criterion 7.12</p> <p>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>			
<p>PROCEDURAL NOTE for 7.12</p> <p>The 2018 RSPO P&C include new requirements to ensure the effective contribution of RSPO to halting deforestation. This will be achieved by incorporating the High Carbon Stock Approach (HCSA) Toolkit in the revised standard.</p> <p>The RSPO ToC also commits RSPO to balancing sustainable livelihoods and poverty reduction with the need to conserve, protect and enhance ecosystems.</p> <p>High Forest Cover Countries (HFCCs) urgently require economic opportunities that enable communities to choose their own development path, while providing socio-economic benefits and safeguards. Adapted procedures will be developed to support the sustainable development of palm oil by indigenous peoples and local communities with legal or customary rights. These will apply in specific HFCCs, and within those, in High Forest Cover Landscapes (HFCLs).</p> <p>The development of these procedures will be guided by a No Deforestation Joint Steering Group (NDJSG) of RSPO and HCSA members. In HFCCs, RSPO will work through national and local participatory processes with governments, communities and other stakeholders to develop these procedures. A timeframe for these activities is stipulated in the Terms of Reference for the NDJSG and publicly available.</p>			
7.12.1	<p>(C) Land clearing since November 2005 has not damaged primary forest or any area required to protect or 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>	<p>Based on explanation from RSPO Representative in Barema Plantation (Mr. Joe Wanda) and Plantation Manager, there is no extension area within the Barema Plantation since 15 November 2018, including the smallholders.</p> <p>The HCV study conducted by Douglas Environmental Services in February 2009. According to the HCV assessment that within Alangily,</p>	Complied

	- Critical (Major) compliance -	Gamupa and Alaba area, there is no HCV are present. There is no new planting have replaced primary forest for extension area. Land Use Change Analysis (LUCA) is not yet required for the certificate holder due to NPP submitted to RSPO.	
7.12.2	<p>(C) HCVs, HCS forests and other conservation areas are identified as follows:</p> <p>7.12.2a 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>7.12.2b 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>PROCEDURAL NOTE: For details of transitional measures, refer to Annex 5: RSPO transition from HCV assessments to HCV-HCSA assessments.</p> <p>- Critical (Major) compliance -</p>	<p>The HCV study conducted by Douglas Environmental Services in February 2009. According to the HCV assessment that within Alangily, Gamupa and Alaba area, there is no HCV are present. There is no new planting have replaced primary forest for extension area.</p> <p>In February 2019, Unit of Certification conducting HCSA/HCV integrated Scoping Assessment for Hargy Oil Palm Limited. This assessment conducted by Hollow-wood Enterprises Pty Ltd, as a consultant.</p> <p>The scoping study aims to deliver on the Pre-assessment phase of an integrated HCSA/HCV assessment, reporting on the five required outputs specified by the HCVRN integration manual 2017. This document is not intended to report detailed findings relating to HCV management areas, HCSA conservation or provide detailed accounts of the current status of FPIC or participatory community mapping.</p> <p>Scope of this assessment consist of Nucleus Estates operates by HOPL approximately 20,473.2 Ha and Smallholders with 24,160.3 Ha.</p>	Complied
7.12.3	<p>(C) In High Forest Cover Landscapes (HFCLs) within HFCCs, a specific procedure will apply for legacy cases and development by indigenous peoples and local communities with legal or customary rights, taking into consideration regional and national multi-stakeholder processes. Until this procedure is developed and endorsed, 7.12.2 applies.</p>	No new development after 15 November 2018 in scope of certificate holder. HCV assessment has been carried out on February 2009 and HCSA/HCV integrated Scoping Assessment for Hargy Oil Palm Limited in February 2019.	Complied

	<p>PROCEDURAL NOTE: There shall be demonstrable benefits to the local community; clear recognition of legal and customary lands based on participatory land use planning; development shall be proportional to the needs of the local community; with a balance between conservation and development. This procedure will also cover planting on previous or abandoned agricultural land/ plantations. All other P&C requirements apply, including FPIC and HCV requirements.</p> <p>- Critical (Major) compliance -</p>		
7.12.4	<p>(C) Where HCVs, HCS forests after 15 November 2018, peat land and other conservation areas within Company managed land 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 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) that may result from the actions of the Unit of Certification.</p> <p>- Critical (Major) compliance -</p>	<p>Based on explanation from RSPO Representative in Barema Plantation (Mr. Joe Wanda) and Plantation Manager, there is no extension area within the Barema Plantation since 15 November 2018, including the smallholders.</p> <p>The HCV study conducted by Douglas Environmental Services in February 2009. According to the HCV assessment that within Alangily, Gamupa and Alaba area, there is no HCV are present. There is no new planting have replaced primary forest for extension area.</p> <p>In February 2019, Unit of Certification conducting HCSA/HCV integrated Scoping Assessment for Hargy Oil Palm Limited. This assessment conducted by Hollow-wood Enterprises Pty Ltd, as a consultant.</p> <p>The scoping study aims to deliver on the Pre-assessment phase of an integrated HCSA/HCV assessment, reporting on the five required outputs specified by the HCVRN integration manual 2017. This document is not intended to report detailed findings relating to HCV management areas, HCSA conservation or provide detailed accounts of the current status of FPIC or participatory community mapping.</p> <p>Scope of this assessment consist of Nucleus Estates operates by HOPL approximately 20,473.2 Ha and Smallholders with 24,160.3 Ha.</p>	Complied

7.12.5	<p>Where rights of local communities have been identified in HCV areas, HCS forest after 15 November 2018, peat land and other conservation areas, there is no reduction of these rights without evidence of a negotiated agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas.</p> <p>- Minor compliance -</p>	<p>No new development after 15 November 2018 in scope of certificate holder. HCV assessment has been carried out on February 2009 and HCSA/HCV integrated Scoping Assessment for Hargy Oil Palm Limited in February 2019.</p>	Complied
7.12.6	<p>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.</p> <p>Smallholder requirements: Organization managing the smallholders to educate and support Smallholders through field days and visits to Smallholder blocks as part of their routine extension activities.</p> <p>- Minor compliance -</p>	<p>The HCV study conducted by Douglas Environmental Services in February 2009. According to the HCV assessment that within Alangily, Gamupa and Alaba area, there is no HCV are present. There is no new planting have replaced primary forest for extension area.</p> <p>In February 2019, Unit of Certification conducting HCSA/HCV integrated Scoping Assessment for Hargy Oil Palm Limited. This assessment conducted by Hollow-wood Enterprises Pty Ltd, as a consultant.</p> <p>The scoping study aims to deliver on the Pre-assessment phase of an integrated HCSA/HCV assessment, reporting on the five required outputs specified by the HCVRN integration manual 2017. This document is not intended to report detailed findings relating to HCV management areas, HCSA conservation or provide detailed accounts of the current status of FPIC or participatory community mapping.</p> <p>Scope of this assessment consist of Nucleus Estates operates by HOPL approximately 20,473.2 Ha and Smallholders with 24,160.3 Ha.</p> <p>Even though no HCV are present within the certified area (based on HCV assessment report Feb 2009), HOPL as Unit of Certification still conducting awareness and monitoring for wildlife in monthly basis.</p>	Complied
7.12.7	<p>The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is</p>	<p>No new development after 15 November 2018 in scope of certificate holder. HCV assessment has been carried out on February 2009 and</p>	Complied

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	<p>monitored. Outcomes of this monitoring are fed back into the management plan.</p> <p>- Minor compliance -</p>	<p>HCSA/HCV integrated Scoping Assessment for Hargy Oil Palm Limited in February 2019.</p>	
<p>7.12.8</p>	<p>(C) 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.</p> <p>- Critical (Major) compliance -</p>	<p>Based on explanation from RSPO Representative in Barema Plantation (Mr. Joe Wanda) and Plantation Manager, there is no extension area within the Barema Plantation since 15 November 2018, including the smallholders.</p> <p>The HCV study conducted by Douglas Environmental Services in February 2009. According to the HCV assessment that within Alangily, Gamupa and Alaba area, there is no HCV are present. There is no new planting have replaced primary forest for extension area. Land Use Change Analysis (LUCA) is not yet required for the certificate holder due to NPP submitted to RSPO.</p>	<p>Complied</p>

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Appendix B: Approved Time Bound Plan

Name of company	Name of Mill	Location	Supply Base	Time Bound Plan	Target Year for RSPO
PT Agro Muko	Muko Muko POM	Mukomuko Regency, Bengkulu Province, Indonesia	Muko Muko Estate, Sei Betung Estate, Tanah Rekah Estate, Talang Petai Estate, Sei Kiang Estate and KMD	2011	Certified
	Bunga Tanjung POM	Mukomuko Regency, Bengkulu Province, Indonesia	Bunga Tanjung Estate, Air Bikuk Estate, Air Buluh Estate and KMD	2011	Certified
			PT Mukomuko Agro Sejahtera: - Air Manjunta Estate - Malin Deman Estate	2014	Certified
			Ex. PT Asri Rimba Wirabhakti (acquisition in 2018)	2021	A new NPP submitted in 2020 to cover Ex PT ARWB as PT MMAS; Changes due to Covid-19 pandemic
PT Tolan Tiga	Bukit Maradja POM	Simalungun Regency, North Sumatera, Indonesia	- Bukit Maradja Estate (PT Eastern Sumatra Indonesia) - Kerasaan Estate (PT Kerasaan Indonesia) - PT Timbang Deli Indonesia	2010 2018	Certified May 2010 Certified in 2018 as supply base of Bukit Maradja POM, PT Eastern Sumatra Indonesia
	Perlabian POM	Labuhan Batu Selatan Regency, North Sumatera, Indonesia	Perlabian Estate and Tolan Estate.	2010	Certified May 2010
PT Umbul Mas Wisesa	Umbul Mas Wisesa POM	Labuhan Batu Selatan Regency, North Sumatera, Indonesia	UMW South Estate, UMW North Estate and Toton Usaha Mandiri Estate	2014	Certified in March 2015
PT Agro Kati Lama	Kati Lama POM	Musirawas Regency, South Sumatera, Indonesia		2023	Certification to take place after obtaining HGU; A new NPP submitted in 2019 to cover new areas licenced at the end of 2018.
PT Agro Rawas Ulu	No mill	Musirawas Regency, South Sumatera, Indonesia		2023	Part of Muara Rupit POM supply base; Certification to take place after obtaining HGU.
PT Agro Muara Rupit	Muara Rupit POM	Musirawas Regency, South Sumatera, Indonesia		2023	Certification to take place after obtaining HGU; A new NPP submitted in 2019 to cover new areas licenced at the end of 2018.

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Hargy Oil Palm Limited (HOPL)	Hargy POM	East of Bialla, West New Britain Province, PNG	Hargy Estate	2009	Certified in April 2009
	Navo POM	50 Kms East of Bialla, West New Britain Province, PNG	Navo Estate, Bakada Estate and Mengen Estate	2009	Certified in April 2009
	Barema POM	30 km East of Bialla, West New Britain Province, PNG	Barema Estate	2014	RSPO Certified in April 2014
PT Dendymarker Indah Lestari	Dendymarker POM	Musirawas Utara Regency, South Sumatera Province, Indonesia	Sei Mandang Estate, Sei Liam Estate	2015	Acquired on 1 August 2017. RSPO certified in 2015.
PT Citra Sawit Mandiri	No mill	Labuhanbatu Regency, North Sumatera Province		2022	Certification to take place after HGU, following review by RSPO.

Note: Timebound Plan updated on 26 November 2020

Appendix C: GHG Reporting Executive Summary

The GHG emissions that were produced in 2020 for Hargy POM and supply base was calculated using the PalmGHG Calculator version 4.0.1. The assessment team had verified the data input in the PalmGHG Calculator against operations records. PalmGHG Calculation Options selected 'Full version' and 'Exclude LUC Emission' calculation option is not applied. The records verified includes:

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

The summary of the Net GHG emitted in 2020 for Hargy POM and supply base are as following:

Emission per product	tCO ₂ e/tProduct
CPO	1.12
PKO	1.36

Extraction	%
OER	23.05
KER	5.16

Production	t/yr
FFB Process	127,924.50
CPO Produced	30,256.437
PKO Produced	3,002.501

Land Use	Ha
OP Planted Area	21,645.92
OP Planted on peat	0
Conservation (forested)	0
Conservation (non-forested)	0
Total	21,645.92

Summary of Field Emission and Sink

	Own Crop*		Group		3 rd Party		Total	
	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB
Emission								
Land Conversion	23,314.67	0.60	0.00	0.00	50,360.39	0.00	73,675.07	0.60
CO ₂ Emission from fertilizer	676.73	0.02	0.00	0.00	1,570.38	0.00	2,247.11	0.02
N ₂ O Emission from peat	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
N ₂ O Emission from fertilizer	783.08	0.02	0.00	0.00	2,025.24	0.00	2,808.32	0.02
Fuel Consumption	467.86	0.01	0.00	0.00	0.00	0.00	467.86	0.01
Peat Oxidation	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Sink								
Crop Sequestration	-22,099.08	-0.57	0.00	0.00	-43,068.78	0.00	-65,167.86	-0.57
Sequestration in Conservation Area	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total	3,143.25	0.08	0.00	0.00	10,887.24	0.00	14,030.49	0.08

*Note: Includes both estates and smallholders

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Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	25,075.37	0.20
Fuel Consumption	2,008.56	0.02
Grid Electricity Utilization	0.00	0.00
Credit		
Export of Excess Electricity to Housing & Grid	0.00	0.00
Sales of PKS	0.00	0.00
Sales of EFB	0.00	0.00
Total	27,083.93	

Summary of Kernel Crusher Emission and Credit (if applicable)

Emissions	tCO₂e
PK from own mill	8,031.03
PK from other source	0.00
Fuel Consumptions	0.00
Total Crusher emissions	8,031.03

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

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

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The GHG emissions that were produced in 2020 for Barema POM 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:

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

The summary of the Net GHG emitted in 2020 for Barema POM and supply base are as following:

Emission per product	tCO ₂ e/tProduct	Extraction	%
CPO	0.65	OER	24.55
PKO	5.44	KER	5.01

Production	t/yr	Land Use	Ha
FFB Process	157,672.40	OP Planted Area	28,426.85
CPO Produced	38,706.217	OP Planted on peat	0.00
PKO Produced	5,879.565	Conservation (forested)	0.00
		Conservation (non-forested)	0.00
		Total	28,426.85

Summary of Field Emission and Sink

	Own Crop*		Group		3 rd Party		Total	
	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB
Emission								
Land Conversion	34,211.61	0.46	0.00	0.00	54,841.90	0.00	89,053.51	0.46
CO ₂ Emission from fertilizer	2,199.65	0.03	0.00	0.00	853.08	0.00	3,052.73	0.03
N ₂ O Emission from peat	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
N ₂ O Emission from fertilizer	2,708.21	0.04	0.00	0.00	1,101.11	0.00	3,809.32	0.04
Fuel Consumption	1,292.29	0.02	0.00	0.00	0.00	0.00	1,292.29	0.02
Peat Oxidation	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Sink								
Crop Sequestration	-32,428.06	-2.38	0.00	0.00	-41,810.70	0.00	-74,238.76	-2.38
Sequestration in Conservation Area	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total	7,983.69	0.59	0.00	0.00	14,985.39	0.00	22,969.08	0.59

*Note: Includes both estates and smallholders

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Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	4,527.80	0.03
Fuel Consumption	2,598.58	0.02
Grid Electricity Utilization	0.00	0.00
Credit		
Export of Excess Electricity to Housing & Grid	0.00	0.00
Sales of PKS	0.00	0.00
Sales of EFB	0.00	0.00
Total	7,126.38	0.05

Summary of Kernel Crusher Emission and Credit (if applicable)

Emissions	tCO ₂ e
PK from own mill	16,236.69
PK from other source	24,882.03
Fuel Consumptions	0.00
Total Crusher emissions	41,118.72

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

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

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The GHG emissions that were produced in 2020 for Navo POM and supply base was calculated using the PalmGHG Calculator version 3.0.1. The assessment team had verified the data input in the PalmGHG Calculator against operations records. PalmGHG Calculation Options selected 'Full version' and 'Exclude LUC Emission' calculation option is not applied. The records verified includes:

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

The summary of the Net GHG emitted in 2020 for Navo POM and supply base are as following:

Emission per product	tCO ₂ e/tProduct
CPO	1.05
PKO	0.00

Extraction	%
OER	24.92
KER	5.21

Production	t/yr
FFB Process	136,416.13
CPO Produced	33,997.73
PKO Produced	0.00

Land Use	Ha
OP Planted Area	18,870.39
OP Planted on peat	0.00
Conservation (forested)	0.00
Conservation (non-forested)	0.00
Total	18,870.39

Summary of Field Emission and Sink

	Own Crop*		Group		3 rd Party		Total	
	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB
Emission								
Land Conversion	55,803.36	0.48	0.00	0.00	21,681.86	0.00	77,485.22	0.48
CO ₂ Emission from fertilizer	2,750.99	0.02	0.00	0.00	202.00	0.00	2,952.99	0.02
N ₂ O Emission from peat	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
N ₂ O Emission from fertilizer	3,341.35	0.03	0.00	0.00	260.50	0.00	3,601.86	0.03
Fuel Consumption	2,969.38	0.03	0.00	0.00	0.00	0.00	2,969.38	0.03
Peat Oxidation	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Sink								
Crop Sequestration	-52894.17	-0.45	0.00	0.00	-19,059.68	0.00	-71,953.85	-0.45
Sequestration in Conservation Area	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total	11970.91	0.10	0.00	0.00	3,084.68	0.00	15,055.59	0.10

*Note: Includes both estates and smallholders

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Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	26,739.87	0.20
Fuel Consumption	1487.55	0.01
Grid Electricity Utilization	0.00	0.00
Credit		
Export of Excess Electricity to Housing & Grid	0.00	0.00
Sales of PKS	0.00	0.00
Sales of EFB	0.00	0.00
Total	28,227.42	0.21

Summary of Kernel Crusher Emission and Credit (if applicable)

Emissions	tCO ₂ e
PK from own mill	0.00
PK from other source	0.00
Fuel Consumptions	0.00
Total Crusher emissions	0.00

*This mill has no kernel crusher operation.

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

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

Appendix D: Supply Chain Declaration

A. Monthly Records of Certified and Uncertified FFB Received since the last audit				
No.	Month - Year	Volume of FFB from certified supply bases (mt)	Volume of FFB from uncertified supply bases (mt)	Total FFB/Month (mt)
1	October 2019	32,346.555	0.00	32,346.555
2	November 2019	34,869.778	0.00	34,869.778
3	December 2019	34,480.996	0.00	34,480.996
4	January 2020	42,129.832	0.00	42,129.832
5	February 2020	40,475.711	0.00	40,475.711
6	March 2020	42,807.690	0.00	42,807.690
7	April 2020	42,436.989	0.00	42,436.989
8	May 2020	42,141.153	0.00	42,141.153
9	June 2020	39,461.753	0.00	39,461.753
10	July 2020	36,984.514	0.00	36,984.514
11	August 2020	33,110.331	0.00	33,110.331
12	September 2020	34,901.925	0.00	34,901.925
13	October 2020	39,631.943	0.00	39,631.943
14	November 2020	38,502.751	0.00	38,502.751
15	December 2020	47,044.000	0.00	47,044.000
	TOTAL	581,325.921	0.00	581,325.921

Note:
 Last assessment performed in October 2019, this assessment performed in December 2020.

B. Monthly Records of Certified CPO & PK since the last audit			
No.	Month - Year	Certified CPO (mt)	Certified PK (mt)
1	October 2019	7,791.437	1,588.656
2	November 2019	8,405.161	1,811.943
3	December 2019	8,737.696	1,746.972
4	January 2020	9,885.029	2,071.620
5	February 2020	9,491.176	2,021.087
6	March 2020	10,464.974	2,162.803
7	April 2020	10,538.384	2,149.598
8	May 2020	10,609.972	2,328.198
9	June 2020	9,874.918	2,127.682
10	July 2020	9,432.066	1,880.887

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11	August 2020	7,958.574	1,699.127
12	September 2020	8,430.316	1,796.179
13	October 2020	9,990.125	1,960.616
14	November 2020	9,628.789	2,028.230
15	December 2020	11,818.000	2,480.000
	TOTAL	143,056.617	29,853.598

Note:

Last assessment performed in October 2019, this assessment performed in December 2020.

C. Records of Certified CPO & PK Sold under PalmTrace since the last audit (if any)				
No.	Buyers Name	Palmtrace Trading License Number	Certified CPO Sold (mt)	Certified PK Sold (mt)
	<i>October 2019</i>			
1	Buyer C	RSPO_PO1000000031	3,491.82	
2	Buyer H	RSPO_PO1000002567		1022.62
	<i>January 2020</i>			
3	Buyer C	RSPO_PO1000000031	25,044.72	
4	Buyer F	RSPO_PO1000000077	2,002.90	
5	Buyer O	RSPO_PO1000004914	2,500.00	
6	Buyer H	RSPO_PO1000002567		6,003.42
	<i>March 2020</i>			
7	Buyer C	RSPO_PO1000000031	9,503.02	
8	Buyer F	RSPO_PO1000000077	500	
9	Buyer H	RSPO_PO1000002567		1,662.59
	<i>April 2020</i>			
10	Buyer C	RSPO_PO1000000031	9,012.12	
	<i>May 2020</i>			
11	Buyer C	RSPO_PO1000000031	23,012.91	
12	Buyer H	RSPO_PO1000002567		4,762.74
	<i>July 2020</i>			
13	Buyer C	RSPO_PO1000000031	10,003.57	
14	Buyer H	RSPO_PO1000002567		4,350.47
	<i>August 2020</i>			
15	Buyer C	RSPO_PO1000000031	16,013.05	
16	Buyer H	RSPO_PO1000002567		1,667.38
	<i>October 2020</i>			
17	Buyer C	RSPO_PO1000000031	8,002.36	

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18	Buyer H	RSPO_PO1000002567		1,565.03
	<i>November 2020</i>			
19	Buyer C	RSPO_PO1000000031	10,004.64	
	TOTAL		118,591.11	21,034.25

Note:

Last assessment performed in October 2019, this assessment performed in December 2020.

D. Records of CPO & PK Sold under other schemes since the last audit (if any)

No.	Buyers Name	Scheme Name	CPO Sold (mt)	PK Sold (mt)
	Nil	Nil	Nil	Nil

Note:

E. Records of CPO & PK Sold as conventional since the last audit (if any)

No.	Buyers Name	CPO Sold (mt)	PK Sold (mt)
	Nil	Nil	Nil

Note:

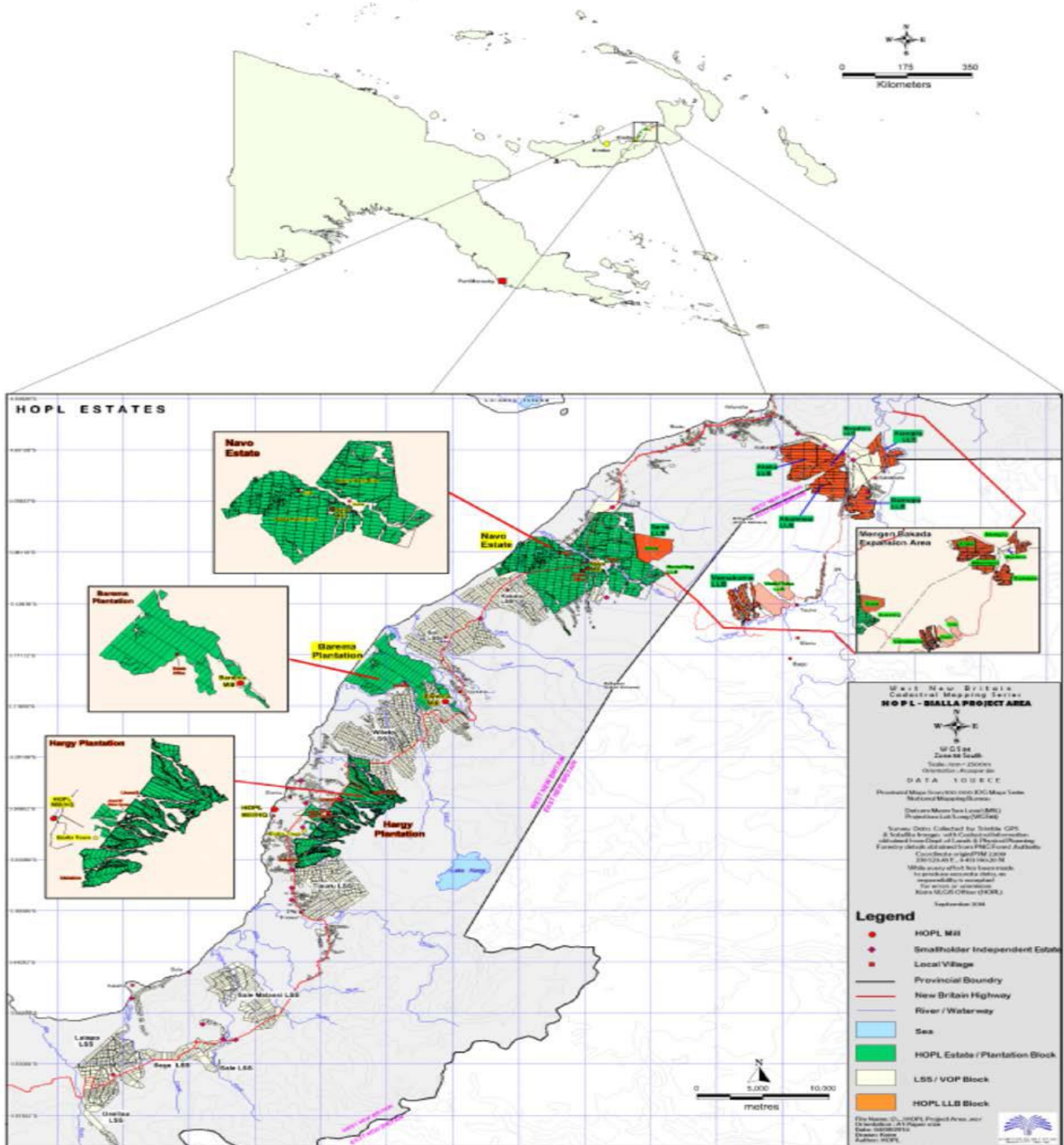
F. Records of Certified CPO Sold under RSPO Credits since the last audit (if any)

No.	Buyers Name	PalmTrace Trading License Number	RSPO Credits of Certified CPO Sold (mt)
	Nil	Nil	Nil

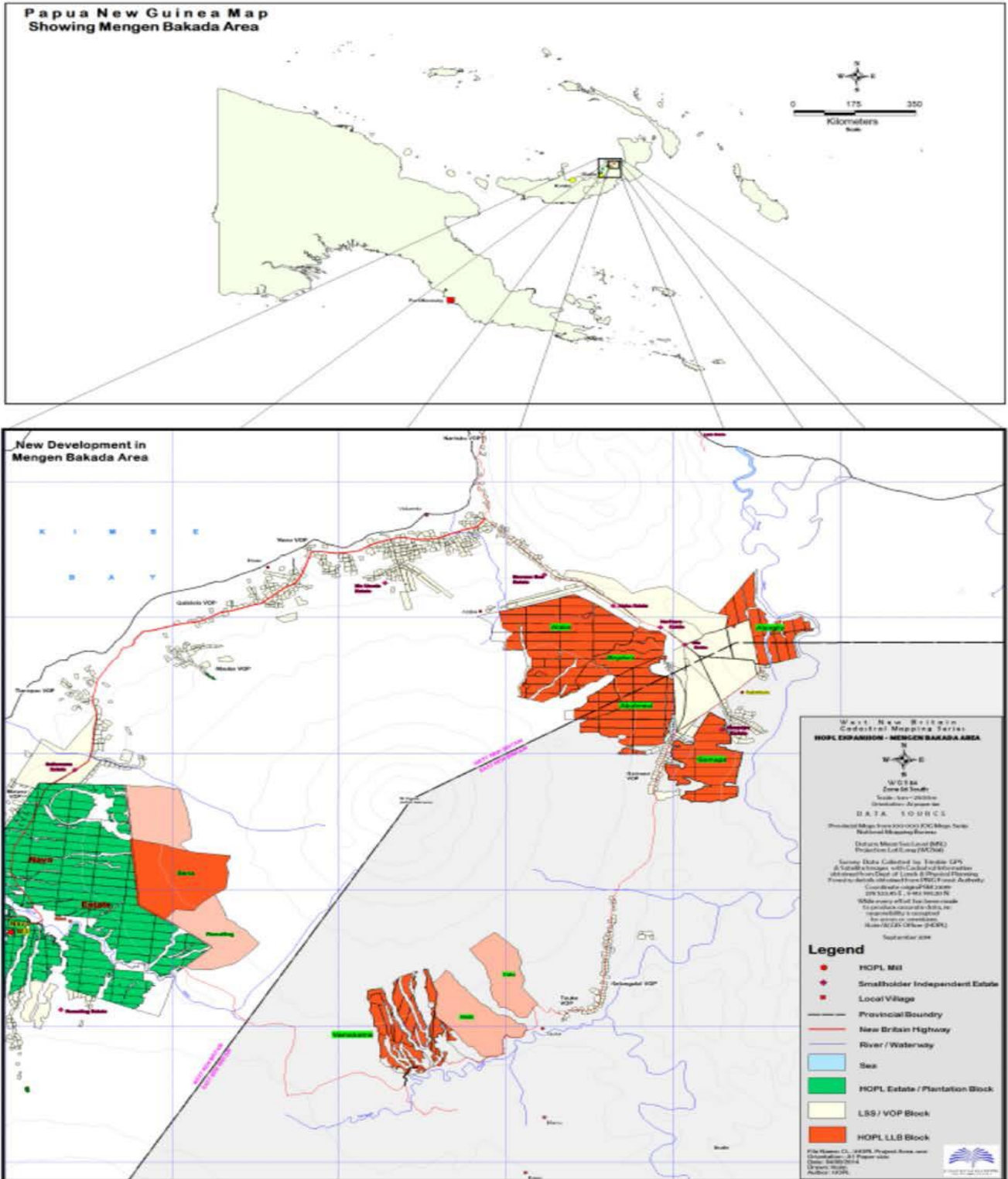
Note:

Appendix E: Location Map of Certification Unit and Supply bases

PNG Map Showing HOPL Estates



Appendix F: Estate Field Map



Appendix G: List of Smallholder Sampled

Code	Name	Status	Hectarage
010274	THEO VINCENT	Land Settlement Scheme	6.2
020687	HELLEN PAMAKARI	Land Settlement Scheme	6
021061	DENNY KEMBAIYO	Land Settlement Scheme	6
021064	JECK KUVI	Land Settlement Scheme	6
021072	UTAS MAWALA	Land Settlement Scheme	5.08
021090	JACK AVU AUGUST	Land Settlement Scheme	4
021445	DIA SOSA	Land Settlement Scheme	6
021460	JOSEPH WAKAI WAKI	Land Settlement Scheme	6
021473	ANDREW WELEMO	Land Settlement Scheme	3
031256	KONDRACK GERWA	Land Settlement Scheme	4
031289	ZEPRON YAMAKU	Land Settlement Scheme	6
031385	JOSEPH NAGI	Land Settlement Scheme	4
031422	JOHN SAVA YAKOAPI	Land Settlement Scheme	4
031464	BAREMA PRIMARYSCHOOL	Land Settlement Scheme	2.49
040001	TOMARUM ALI	Village Oil Palm	3.95
040025	MORGAN PALIAVU	Land Settlement Scheme	1.95
040623	BAIMO PALIAVU	Land Settlement Scheme	2
041176	HERMAN BUA	Land Settlement Scheme	2
050172	WASOKO UMESIA GOLUPO	Land Settlement Scheme	6
050287	SAMSON NATA	Land Settlement Scheme	2
077148	NICK VALU	Village Oil Palm	4
080803	SUSAN JEROM	Village Oil Palm	2
090930	LAWRENCE KOMA	Village Oil Palm	2
101090	TOVURA JULY	Village Oil Palm	4
111142	ALLAN JOHN	Village Oil Palm	2.53
111211	JENNY PIGIRIP	Village Oil Palm	1.92
111213	MAKOVU JOHN	Village Oil Palm	2
120100	ELLY SIMON	Village Oil Palm	2
121234	KALSIE JONATHON EMOS	Village Oil Palm	2
141420	ROBERT OLPAGARE	Village Oil Palm	2.66
161601	AMOS KOI	Village Oil Palm	3.92
161609	BOTO MARISA	Village Oil Palm	2
181846	EPHRAIM TOURA	Village Oil Palm	2.9
181880	DOROTHY PATIKEN	Village Oil Palm	3.36
260021	STANIS MELEDI	Land Settlement Scheme	1.83
260574	THOMAS AVE	Land Settlement Scheme	5.1
260577	BOAS SOA	Land Settlement Scheme	1.44
290599	JERRY BOI	Land Settlement Scheme	6
290777	LYDIA SUMA	Land Settlement Scheme	6

Code	Name	Status	Hectarage
292902	RUPEN SILALEA	Land Settlement Scheme	3
292928	ULUVI KIVUNG	Land Settlement Scheme	1.75
311513	ALPHONSE KAVULIO	Land Settlement Scheme	5.6
311551	THOMAS NAMUI	Land Settlement Scheme	6
311554	PHILLIP MANAU	Land Settlement Scheme	6
311596	LILI AMBU	Land Settlement Scheme	4.2
311597	MICHAEL KULI	Land Settlement Scheme	3.23
311622	DIMMY SOKE	Land Settlement Scheme	5.61
311651	FRED ALU	Land Settlement Scheme	6
311742	SEP TASATA	Land Settlement Scheme	5.8
311783	LAWRENCE KEBU	Land Settlement Scheme	3
321106	STANIS UBIA	Land Settlement Scheme	6
321156	BARBARA KAPUMBAE	Land Settlement Scheme	6
331837	LEONARD JULY	Land Settlement Scheme	5.95
331838	BENJAMIN JUBILEE	Land Settlement Scheme	5.76
331949	MICHAEL KOMOMBURAU	Land Settlement Scheme	6
332023	MATHILDA LOBAO	Land Settlement Scheme	6
380023	EBART TAUMOSI	Village Oil Palm	0.98
380047	BLASIUS LAGISA	Village Oil Palm	0.88
380067	GABRIEL TAMAI	Village Oil Palm	2.48
410081	CHRISTOP PAIAKI	Village Oil Palm	2

Appendix H: List of Abbreviations

a.i	Active Ingredient
BOD	Biochemical Oxygen Demand
BOGA	Bialla Oil Palm Growers Association
CB	Certification Bodies
CHRA	Chemical Health Risk Assessment
COD	Chemical Oxygen Demand
CPO	Crude Palm Oil
CSPO	Certified Sustainable Palm Oil
DO	Delivery Order
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
GM	General Manager
GMP	Good Manufacturing Practice
GPS	Global Positioning System
HCV	High Conservation Value
HOPL	Hargy Oil Palms Limited
ILG	Incorporated Land Group
IPM	Integrated Pest Management
IP	Identity Preserved
ISCC	International Sustainable Carbon Certification
LD50	Lethal Dose for 50 sample
LLG	Local Level Government
LSS	Land Settlement Scheme
MB	Mass Balance
MSDS	Material Safety Data Sheet
MT	Metric Tonnes
OER	Oil Extraction Rate
OPIC	Oil Palm Industry Corporation
OSH	Occupational Safety and Health
PK	Palm Kernel
PKO	Palm Kernel Oil
PNG	Papua New Guinea
PNG-OPRA	Papua New Guinea Oil Palm Research Association
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
SG	Segregation
SHAAS	Smallholder Agricultural Advisory Services
SIA	Social Impact Assessment

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SOP Standard Operating Procedure
VOP Village Oil Palms
WNBP West New Britain Province