

**RSPO PRINCIPLE AND CRITERIA
PUBLIC SUMMARY REPORT**

- Initial Assessment**
- Annual Surveillance Assessment (2_3)**
- 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 Hargy Palm Oil Mill, Barema Palm Oil Mill and Navo Palm Oil Mill</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: 02/02/2022</p>

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Section 1: Scope of the 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 9831191

2. Certification Information			
Certificate Number	RSPO 535739	Certificate Start Date	08/10/2019
Date of First Certification	09/04/2009	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_3) and extension to scope:</p> <ul style="list-style-type: none"> To confirm that the elements of the proposed scope of registration, the new scope 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"/> Pre Assessment (Choose an item.) <input type="checkbox"/> Initial Assessment <input checked="" type="checkbox"/> Annual Surveillance Assessment (ASA 2_3) <input type="checkbox"/> Recertification Assessment (Choose an item.) <input checked="" type="checkbox"/> Scope Extension		
Applicable Standards / Normative Reference	RSPO Certification System for P&C and RSPO ISH 2020		

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	<input type="checkbox"/> RSPO P&C 2018 for the Production of Sustainable Palm Oil <input type="checkbox"/> RSPO P&C 2018 for the Production of Sustainable Palm Oil <input type="checkbox"/> RSPO P&C 2018 for the Production of Sustainable Palm Oil <input checked="" type="checkbox"/> PNG & SI National Interpretation 2019 for RSPO P&C 2018 for the Production of Sustainable Palm Oil		
Supply Chain Module	<input checked="" type="checkbox"/> Identity Preserved; <input type="checkbox"/> Mass Balance	Mill Capacity	Refer to table 10
ISH certification Phase	<input type="checkbox"/> Eligibility <input type="checkbox"/> Milestone A <input type="checkbox"/> Milestone B <input checked="" type="checkbox"/> Not Applicable		

3. Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
RSPO 633028	RSPO Supply Chain Certification Standard	BSI	23/07/2025

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base)	Location	GPS Coordinates	
		Latitude	Longitude
Hargy Palm Oil Mill	Bialla, WNB Province, PNG	05° 18' 40.05" S	151° 00' 39.46" E
Barema Palm Oil Mill	30 km East of Bialla, WNB, PNG	05° 12' 40.25" S	151° 07' 51.10" E
Navo Palm Oil Mill	60 km East of Bialla, WNB, PNG	05° 05' 38.86" S	151° 13' 28.03" E
Hargy Estate	7 km East of Bialla, WNB, PNG	05° 17' 47.77" S	151° 03' 28.03" E
Navo Estate	33km East of Barema POM, WNB Province, PNG	05° 05' 38.41" S	151° 13' 30.01" E
Pandi Estate	44km East of Navo Estate, WNB Province, PNG	05° 00' 44.29" S	151° 25' 27.12" E
Smallholders	Bialla, West New Britain, WNB Province, PNG	05° 18' 40.05" S	151° 00' 39.46" E

5. Description of Supply Base					
New Planting Development	<input checked="" type="checkbox"/> No (no change in total planted area)		<input type="checkbox"/> Yes (please refer to Principle 7 for details)		
Estate / Smallholders	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other* (ha)	Total Area (ha)	% of Planted
Hargy Estate	4,427.30	0	2,330.35	6,757.65	65.52
Navo Estate	6,600.96	0	1,252.23	7,853.19	84.05
Pandi Estate	2,584.60	0	3,264.10	5,848.70	44.19
Sub Total	13,612.86	0	6,846.68	20,459.54	66.54
Smallholders	14,872.00	0	18.00	14,890.00	99.88
Total	28,484.86	0	6,865.15	35,350.01	80.62

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Note:

UoC is having Extension to Scope.

*) Buffer zone areas of 3,831.85 Ha was set aside and categorized under "Infrastructure & Other".

6. Plantings & Cycle

Estate / Smallholders	Age (Years)					Mature	Immature
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		
Hargy Estate	190.39	1,662.10	2,438.05	136.76	0	4,236.91	190.39
Navo Estate	183.65	3,094.14	2,682.28	640.89	0	6,417.31	183.65
Pandi Estate	94.74	2,225.50	264.36	0	0	2,489.86	94.74
Smallholders	938.80	2,747.02	6,870.02	2,978.70	1,337.30	13,933.20	938.80
Total (ha)	1,407.58	9,728.92	12,254.71	3,756.35	1,337.30	27,077.28	1,407.58

Note: See 4.4.1 for changes in planted area. UoC is applying for Extension to Scope and added 13 new smallholders.

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

Estate / Smallholders	Tonnage / year			
	Estimated last year* (Jan-Dec 2021)	Actual (Oct 2020-Sept 2021)		Forecast (Oct 2021-Sept 2022)
		Previous license period (Oct-Dec 2020)	Current license period (Jan 2021-Sept 2021)	
Hargy Estate	116,189.67	26,143.00	99,629.00	123,438.00
Navo Estate	114,607.32	36,427.00	113,148.00	138,202.00
Pandi Estate	80,563.15	15,142.00	57,248.00	79,876.00
Subtotal	311,360.14	77,712.00	270,025.00	341,516.00
Smallholders	230,244.86	46,816.00	170,142.00	221,279.00
Total	541,605.00	564,695.00		562,795.00

Note:

*) "Estimated" period reported on Jan-Dec 2021 as previous period put in 30% remote audit report.

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

Estate / Smallholders	Tonnage / year			
	Estimated last year (Jan-Dec 2021)	Actual (Oct 2020-Sept 2021)		Forecast (Oct 2021-Sept 2022)
		Previous license period (Oct-Dec 2020)	Current license period (Jan 2021-Sept 2021)	

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N/A		N/A	N/A	
Total		N/A		

9. Summary of Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)				
Out growers / smallholders	Tonnage / year			
	Estimated last year (Jan-Dec 2021)	Actual (Oct 2020-Sept 2021)		Forecast (Oct 2021-Sept 2022)
		Previous license period (Oct-Dec 2020)	Current license period (Jan 2021-Sept 2021)	
N/A	N/A	N/A	N/A	N/A
Total	N/A	N/A		N/A

9A. Monthly Records of Certified and Uncertified FFB Received since the last audit				
No.	Month - Year	Volume of FFB from certified supply base (mt)	Volume of FFB from uncertified supply base (mt)	Total FFB/Month (mt)
1	Oct 2020	39,283.16	0	39,283.16
2	Nov 2020	39,180.28	0	39,180.28
3	Dec 2020	47,043.15	0	47,043.15
4	Jan 2021	51,376.51	0	51,376.51
5	Feb 2021	45,852.52	0	45,852.52
6	Mar 2021	51,264.24	0	51,264.24
7	Apr 2021	50,795.75	0	50,795.75
8	May 2021	50,246.24	0	50,246.24
9	Jun 2021	53,172.44	0	53,172.44
10	Jul 2021	49,011.24	0	49,011.24
11	Aug 2021	45,035.20	0	45,035.20
12	Sept 2021	42,434.26	0	42,434.26
	TOTAL	564,695.00	0.00	564,695.00

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10. Summary of Certified Tonnage (not applicable for ISS)			
Estimated last year# (Jan 2021-Dec 2021)	Actual (Oct 2020-Sept 2021)		Forecast (Oct 2021-Sept 2022)
	<i>Previous license period (Oct-Dec 2020)</i>	<i>Current license period (Jan 2021-Sept 2021)</i>	
Hargy POM – Mill Capacity 45 MT/hour			
FFB	FFB	FFB	FFB
149,623.00*	34,309.48	120,311.38	148,271.15
CPO (OER: 23.60 %)	CPO (OER: 24.71 %)		CPO (OER: 23.60 %)
35,311.00*	8,243.98	29,962.70	35,255.54
PK (KER: 5.15 %)	PK (KER: 5.21 %)		PK (KER: 5.15 %)
7,705.00*	1,673.96	6,396.20	7,635.98
Barema POM – Mill Capacity 45 MT/hour			
FFB	FFB	FFB	FFB
162,023.00**	48,641.88	152,280.43	191,630.40
CPO (OER: 25.10 %)	CPO (OER: 25.69 %)		CPO (OER: 25.10 %)
40,669.00**	12,579.81	39,057.22	47,861.28
PK (KER: 5.15 %)	PK (KER: 5.13 %)		PK (KER: 5.15 %)
8,347.00**	2,509.49	7,797.82	9,868.97
Navo POM – Mill Capacity 45 MT/hour			
FFB	FFB	FFB	FFB
229,959.00	42,226.49	166,925.34	222,893.45
CPO (OER: 24.50 %)	CPO (OER: 25.79 %)		CPO (OER: 24.56 %)
56,342.00	10,613.48	43,339.54	54,742.63
PK (KER: 5.15 %)	PK (KER: 5.14 %)		PK (KER: 5.15 %)
11,842.00	2,285.05	8,465.91	11,479.01
Note:			
#) "Estimated" period reported on Jan-Dec 2021 as previous period put in 30% remote audit report.			
*) Volume extended (new volume) = FFB 155,121.18 MT; CPO 38,510.60 MT; PK 8,115.48 MT			
**) Volume extended (new volume) = FFB 204,369.40 MT; CPO 52,611.71 MT; PK 10,522.53 MT			

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10A. Monthly Records of Certified CPO & PK since the last audit			
No.	Month - Year	Certified CPO (mt)	Certified PK (mt)
1	Oct 2020	9,990.13	1,960.62
2	Nov 2020	9,628.79	2,028.23
3	Dec 2020	11,818.34	2,479.65
4	Jan 2021	13,595.43	2,679.61
5	Feb 2021	11,425.22	2,378.79
6	Mar 2021	12,687.62	2,651.58
7	Apr 2021	13,019.76	2,646.46
8	May 2021	12,697.56	2,581.73
9	Jun 2021	13,614.68	2,808.83
10	Jul 2021	13,019.62	2,525.32
11	Aug 2021	11,566.64	2,219.83
12	Sept 2021	10,732.94	2,167.78
TOTAL		143,796.73	29,128.43

11. Summary of Actual Volume sold					
Current License period (Jan-Sept 2021)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
CPO (MT)	115,378.46	0	0	0	115,378.46
PK (MT)	21,410.09	0	0	0	21,410.09
Credits	0	0	0	0	0
Previous License period (Oct-Dec 2020)					
CPO (MT)	27,961.74	0	0	0	27,961.74
PK (MT)	3,235.28	0	0	0	3,235.28
Credits	0	0	0	0	0

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11A. 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)
1	Cargill B.V. Refined Oils Europe	RSPO_PO1000001655	143,340.20	-
2	Hargy Oil Palms - Kernel Crushing Plant	RSPO_PO1000000053	-	24,645.37
TOTAL			143,340.20	24,645.37

11B. 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			
TOTAL				

11C. Records of CPO & PK Sold as conventional since the last audit (if any)				
No.	Buyers Name	CPO Sold (mt)	PK Sold (mt)	
	Nil			
TOTAL				

11D. 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		
TOTAL			

12. Independent Smallholders Certified Tonnage / Volume									
Phase	Estimated last year (Jan-Dec 2021)			Actual (Oct 2020-Sept 2021)			Forecast (Oct 2021-Sept 2022)		
	Eligibility	MS A	MS B	Eligibility	MS A	MS B	Eligibility	MS A	MS B
	40%	70%	100%	40%	70%	100%	40%	70%	100%
FFB			N/A			N/A			N/A
IS-CSPO	N/A	N/A		N/A	N/A		N/A	N/A	
IS-CSPKO	N/A	N/A		N/A	N/A		N/A	N/A	
IS-CSPKE	N/A	N/A		N/A	N/A		N/A	N/A	

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13. Independent Smallholders Actual Sold Tonnage / Volume						
	FFB	FFB Conventional	FFB Other schemes	IS-CSPO	IS-CSPK	IS-CSPKE
Current License period (<i>Jan-Sept 2021</i>)						
Credits				N/A	N/A	N/A
Physical	N/A	N/A	N/A			

Section 2: Assessment Process

Certification Body:

BSI Services Malaysia Sdn. Bhd. (ASI Accreditation Number: ASI-ACC-067)
Suite 29.01 Level 29, The Gardens North Tower,
Mid Valley City, Lingkaran Syed Putra,
59200 Kuala Lumpur, Malaysia.
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BSI is a leading global provider of management systems assessment and certification, with more than 92,000 certified locations and clients in over 193 countries. BSI 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 assessment with audit facilitators was conducted on 6-15 September 2021. 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 30 August – 2 September 2021.

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 on-site assessment was conducted on 7 December 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. PNG & Solomon Islands National Interpretation 2019 of the RSPO P&C 2018 was used as the normative reference to assess compliance. The comments made by external stakeholders were also taken into account in the assessment.

The minimum sample size is four estates. Sample size for certification unit with more than four (4) estates were determined based on formula $N = (\sqrt{y}) \times (z)$ where y is the number of estates and where z is the multiplier defined by risk assessment. While, the sampling of smallholders were based on the formula $(\sqrt{y}) \times (z)$; where y is total number of group member and where z is the multiplier defined by the risk assessment. The sampled smallholder listed in Appendix E.

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

Structured worker interviews with male and female workers and staff were held in private at the workplace in the mill and the estates. Fieldworkers were interviewed informally in small groups in the field. In addition, the wives of workers and staff were interviewed in informal group meetings at their housing. Separate visits were made to each of the local communities to meet with the village head and residents. Company officials were not present at any of the internal or external stakeholder interviews. A list of Stakeholders contacted is included as Section 3.4.

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The non-conformities for this audit are detailed in Section 3.3 and unless it is stated in this section, all previous nonconformities including minor nonconformities are remains closed.

This report is structured to provide a summary of assessment finding as provided in Appendix A. The assessment was conducted based on risk based approach sampling and therefore nonconformities may exist.

For Initial, Re-certification and Extension of Scope assessment, the report was externally reviewed by approved external peer 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 (ASA 2_1)	Year 3 (ASA 2_2)	Year 4 (ASA 2_3)	Year 5 (ASA 2_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: September 1, 2022 - September 14, 2022

Total Number of Mandays: 36

2.2 BSI Assessment Team

Name	Role	Competency
Pratama A. Sedayu (PS)	Team Leader	<p>Education: Holds a Degree in Social Economic of Agriculture from University of Jenderal Soedirman.</p> <p>Work Experience: He has more than 10 years auditing experience in sustainability and traceability on RSPO, ISPO, FSC, CAFÉ, Organic programs and Timber origins.</p> <p>Training attended: Attended and completed the ISO 9001:2008 Lead Auditor Course (2009), Endorsed RSPO P&C Lead Auditor Course (2013), and Endorsed RSPO SCCS Lead Auditor Course (2014), LAC ISO 14001:2004 (2014), LAC OHSAS 18001:2007 (2013), RSPO P&C Lead Auditors Refresher Course (2019), RSPO Supply Chain Certification Refresher Course (2019), LAC ISO 37001:2016 (2020), Introductory Course for High Conservation Value (HCV) and High Carbon Stock (HCS) in Oil Palm Plantation (2021), Pelatihan Refreshment Auditor ISPO sesuai Peraturan Menteri Pertanian No.38 tahun 2020 (2021), SMETA Requirements Training (2021).</p> <p>Aspect covered in this audit: During this assessment, he assessed on the Environmental aspect, management plans, environmental policies, business ethical, waste & GHG management, legal compliance, land matters, maps</p>

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		<p>and water & energy resources, HCV management and monitoring, conservation policies.</p> <p>Language proficiency: Fluent in English and understands Tok Pisin</p>
Eko Purwanto (EP)	Team Member	<p>Education: Holds a Bachelor Degree of Forestry from Forest Conservation Department, Faculty of Forestry, Bogor Institute of Agriculture (IPB).</p> <p>Work Experience: 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 been involved in quality (ISO 9001) management system audits for different industrial and involved in RSPO and ISPO audit for several plantations and mills since October 2012.</p> <p>Training attended: Attended and 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), ISO 37001:2016 Anti-bribery Management System Implementing Training Course (2019), RSPO P&C Lead Auditors Refresher Course (2019), RSPO Supply Chain Certification Refresher Course (2019), Introductory Course for High Conservation Value (HCV) and High Carbon Stock (HCS) in Oil Palm Plantation (2021), Pelatihan Refreshment Auditor ISPO sesuai Peraturan Menteri Pertanian No.38 tahun 2020 (2021), SMETA Requirements Training (2021).</p> <p>Aspect covered in this audit: During this assessment, he assessed the long term management plan, standard operating procedure implementation and monitoring, estate and mill best practices, RSPO Supply Chain, agronomy activities, IPM, pesticide usage, internal audit, management review, action plan and monitoring of Continuous improvement.</p> <p>Language proficiency: Fluent in English</p>
Y. Wisnu Rahmanto (YW)	Team Member	<p>Education: Holds a Bachelor Degree of Forestry, Faculty of Forestry, University of Gadjah Mada graduated in 2006.</p> <p>Work Experience: He has a combination of 12 years experience as Agronomy Field Assistant and sustainability auditor including RSPO, ISPO, FSC, CAFÉ and Organic programs.</p> <p>Training attended: Attended and completed Quality Management System (QMS) ISO 9001:2008 Auditor/Lead Auditor Course (2010), GIS-Basic Mapping and Spatial Analysis (2011), Timber Legality Assurance System-SVLK (2011), Verification Organization Training C.A.F.E Practices-Starbucks (2011), ISPO Auditor/Lead Auditor Course (2012), RSPO Endorsed Lead Auditor Training Course (2013), RSPO P&C Social and Labour Standards and the Mechanics of Social Auditing (2014), RSPO Next Training Course for Lead Auditor (2016), Online Training: FSC Auditor Transition Exam (2017), e-Course UTZ Programme (2017), RSPO P&C Lead Auditors Refresher Course (2018), IRCA Lead Auditor Course ISO 9001:2015 (2018), Sustainability Reporting Assurance Training (2019), IRCA Lead Auditor Course ISO 14001:2015 (2019), IRCA Lead Auditor Course ISO 45001:2015 (2019), ISO 37001:2016 Anti-bribery Management System Implementing Training Course (2019), RSPO P&C Lead Auditors Refresher Course (2019), RSPO Supply Chain Certification Refresher Course (2019), Introductory Course for High Conservation Value (HCV) and High Carbon Stock (HCS) in Oil Palm Plantation (2021), Pelatihan Refreshment Auditor ISPO sesuai Peraturan Menteri Pertanian No.38 tahun 2020 (2021), SMETA Requirements Training (2021).</p>

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		<p>Aspect covered in this audit: During this assessment, he assessed occupational health and safety aspect, legal compliance, training, decent living wage, pay & conditions, social policies, social impact assessment, management plans, human resource procedures and worker welfare, grievance procedures, communication procedures, stakeholder engagement, and contribution to local development.</p> <p>Language proficiency: Fluent in English</p>
Dr. Suhaili Bin Sahari	Peer Reviewer	<p>Education: Graduated from University Technology Mara (UiTM), Malaysia in Diploma in Science in 1990. He furthers his first degree in B.Sc (Hons) in Chemistry with Industrial Chemistry in 1995 from Liverpool University, England. He later advances his study in Master in Business Administration (General) in 2002 and graduated in 2005 from University of Multimedia, Malaysia. Completed his PhD from University Science Islam Malaysia (Faculty of Economy and Muamalat - Management) under the supervision of previous University Vice Chancellor Dato' Mohd Muda.</p> <p>Work Experience: Worked with Hong Leong Group of Companies as a production executive cum TQM facilitator and continues to advance in his career as a manager and senior manager in management, production, training and quality for more than 11 years. During his tenure with Hong Leong Group of Companies, he heavily involved in strategic management decision issues such as developing SWOT analysis, Vision, Mission, Business and Corporate Strategy formulation, Acquisition and restructuring strategies. Strategic actions and implementation etc. Then he joint Kumpulan Guthrie and Sime Darby Group of Companies for more than 7 years as a manager, heads of department and Assistant Vice President in management, quality and training. Part of his duty is to strategies the departmental vision; mission, critical success factors and action plan into actions and support the corporate strategic plan.</p> <p>Training attended:</p> <ol style="list-style-type: none"> 1. ISO 9001:2015 Lead Auditor and Internal Auditor 2. ASI Peer Reviewer Training 3. Health and Safety 4. ISO 14001:2015 Standard 5. RSPO Standards: RSPO P&C 2018 MY-NI 2019 6. MSPO Standards: MS 2530:2013 part 1, 2 , 3 and 4 7. Problem Solving Technique: 8 D, ICC, QCC, Systematic PS 8. HACCP MS 1480:2019 9. GAP Standard: GLOBALG.A.P., Euro GAP

Accompanying Persons:

Name	Role
Max Kuduk	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.

Date	Time	Subjects	PS	EP	YW	ICT Planned
Monday, 30/08/2021	09.00-10.00 (06.00 IDN)	Opening Meeting Opening Presentation by Audit team leader. Confirmation of assessment scope and finalize Audit plan	√	√	√	Video/screen share through MS Team, Google Drive
	10.00-12.00 (07.00 IDN)	Hargy Estate (Hargy Plantation) Clarification and discussion on implementation of environmental aspect including HCV, management plans, conservation and environmental policies, business ethical, waste & GHG management, land matters, maps and water & energy resources, RSPO metric template	√			Video/screen share through MS Team, Google Drive
		Hargy Estate (Hargy Plantation) Clarification and discussion on implementation of long-term management plan, standard operating procedure, estate and mill best practices, agronomy activities, IPM, pesticide usage, continuous improvement.		√		
		Hargy Estate (Hargy Plantation) Clarification and discussion on implementation of social aspect including Social impact assessment, management plans, human resource procedures, grievance procedures, communication procedures, decent living wage, pay & conditions, related social policies, equal opportunities, human rights defender, women rights & child protection, stakeholder engagement, harassment, forced labor and contribution to local development, occupational health and safety aspect including standard operating procedure, legal compliance, training, related OHS policies, lost time injury and risk assessment			√	
	12.00-13.00 (09.00 IDN)	Lunch break	√	√	√	
	13.00-14.00 (10.00 IDN)	Continue - Hargy Estate (Hargy Plantation) Clarification and discussion on implementation of environmental aspect including HCV, management plans, etc.	√			Video/screen share through MS Team, Google Drive
Hargy Estate (Hargy Plantation) Clarification and discussion on implementation of long-term management plan, standard operating procedure, estate and mill best practices, etc.			√			
Hargy Estate (Hargy Plantation) Clarification and discussion on implementation of social aspect including Social impact assessment, management plans, related OHS policies, lost time injury and risk assessment etc.				√		

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	14.00-17.00 (11.00 IDN)	Hargy POM Clarification and discussion on implementation of environmental aspect, management plans, conservation and environmental policies, business ethical, waste & GHG management, and water & energy resources	√			Video/screen share through MS Team, Google Drive
		Hargy POM Clarification and discussion on implementation Supply Chain element, mill best practices, milling activities, economic plan, training, Continuous improvement.		√		
		Hargy POM Clarification and discussion on implementation of social aspect including Social impact assessment, management plans, human resource procedures, grievance procedures, communication procedures, decent living wage, pay & conditions, related social policies, equal opportunities, human rights defender, women rights & child protection, stakeholder engagement, harassment, forced labor and contribution to local development, occupational health and safety aspect including standard operating procedure, legal compliance, training, related OHS policies, lost time injury and risk assessment			√	
	17.00-17.30 (14.00 IDN)	Daily wash up meeting	√	√	√	
Tuesday, 31/08/2021	09.00-11.00 (06.00 IDN)	Navo Estate Clarification and discussion on implementation of environmental aspect including HCV, management plans, conservation and environmental policies, business ethical, waste & GHG management, land matters, maps and water & energy resources, RSPO metric template	√			Video/screen share through MS Team, Google Drive
		Navo Estate Clarification and discussion on implementation of long-term management plan, standard operating procedure, estate and mill best practices, agronomy activities, IPM, pesticide usage, Continuous improvement.		√		
		Navo Estate Clarification and discussion on implementation of social aspect including Social impact assessment, management plans, human resource procedures, grievance procedures, communication procedures, decent living wage, pay & conditions, related social policies, equal opportunities, human rights defender, women rights & child protection, stakeholder engagement, harassment, forced labor and contribution to local development, occupational health and safety aspect including standard operating procedure, legal compliance, training, related OHS policies, lost time injury and risk assessment			√	
		12.00-13.00 (09.00 IDN)	Lunch break	√	√	√

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Date	Time	Subjects	PS	EP	YW	ICT Planned
	13.00-17.00 (12.00 IDN)	Barema POM Clarification and discussion on implementation of environmental aspect, management plans, conservation and environmental policies, business ethical, waste & GHG management, and water & energy resources	√			Video/screen share through MS Team, Google Drive
		Barema POM Clarification and discussion on implementation Supply Chain element, mill best practices, milling activities, economic plan, training, Continuous improvement.		√		
		Barema POM Clarification and discussion on implementation of social aspect including Social impact assessment, management plans, human resource procedures, grievance procedures, communication procedures, decent living wage, pay & conditions, related social policies, equal opportunities, human rights defender, women rights & child protection, stakeholder engagement, harassment, forced labor and contribution to local development, occupational health and safety aspect including standard operating procedure, legal compliance, training, related OHS policies, lost time injury and risk assessment			√	
	17.00-17.30 (13.00 IDN)	Daily wash up meeting	√	√	√	
Wednesday 01/09/2021	09.00-12.00 (06.00 IDN)	Pandi Estate (Yanaswali Plantation) Clarification and discussion on implementation of environmental aspect including HCV, management plans, conservation and environmental policies, business ethical, waste & GHG management, land matters, maps and water & energy resources, RSPO metric template	√			Video/screen share through MS Team, Google Drive
		Pandi Estate (Yanaswali Plantation) Clarification and discussion on implementation of long-term management plan, standard operating procedure, estate and mill best practices, agronomy activities, IPM, pesticide usage, Continuous improvement.		√		
		Pandi Estate (Yanaswali Plantation) Clarification and discussion on implementation of social aspect including Social impact assessment, management plans, human resource procedures, grievance procedures, communication procedures, decent living wage, pay & conditions, related social policies, equal opportunities, human rights defender, women rights & child protection, stakeholder engagement, harassment, forced labor and contribution to local development, occupational health and safety aspect including standard operating procedure, legal compliance, training, related OHS policies, lost time injury and risk assessment			√	
	12.00-13.00 (09.00 IDN)	Lunch break	√	√	√	

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Date	Time	Subjects	PS	EP	YW	ICT Planned
	13.00-17.00 (10.00 IDN)	<p>Navo POM Clarification and discussion on implementation of environmental aspect, management plans, conservation and environmental policies, business ethical, waste & GHG management, and water & energy resources</p> <p>Navo POM Clarification and discussion on implementation Supply Chain element, mill best practices, milling activities, economic plan, training, Continuous improvement.</p> <p>Navo POM Clarification and discussion on implementation of social aspect including Social impact assessment, management plans, human resource procedures, grievance procedures, communication procedures, decent living wage, pay & conditions, related social policies, equal opportunities, human rights defender, women rights & child protection, stakeholder engagement, harassment, forced labor and contribution to local development, occupational health and safety aspect including standard operating procedure, legal compliance, training, related OHS policies, lost time injury and risk assessment</p>	√			Video/screen share through MS Team, Google Drive
				√		
	17.00-17.30 (14.00 IDN)	Daily wash up meeting	√	√	√	
Thursday 02/09/2021	09.00-12.00 (06.00 IDN)	<p>Smallholders and Independent Estate Clarification and discussion on implementation of environmental aspect including HCV, management plans, waste & GHG management, legal compliance, FFB pricing mechanism, FFB delivered, payment</p> <p>Smallholders and Independent Estate Clarification and discussion on implementation of agronomy aspect including best practices, agronomy activities, IPM, pesticide usage, training, and Continuous improvement.</p> <p>Clarification and discussion on implementation of social aspect including Social impact assessment, management plans, grievance, communication, smallholder contracts agreement, social related policy briefing records. Clarification and discussion on implementation of OHS aspect including training, emergency response, and risk assessment</p>	√			Video/screen share through MS Team, Google Drive
				√		
	12.00-13.00 (09.00 IDN)	Lunch break	√	√	√	
	13.00-14.00 (10.00 IDN)	Report Preparation	√	√	√	
	14.00-15.00 (11.00 IDN)	Closing meeting	√	√	√	

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Date	Time	Subjects	SP/ MK	EP/ MT	YW/ Epi	ICT Planned
Monday, 06/09/2021	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/s taff shall present
	10.00-12.00 (07.00 IDN)	Audit to Hargy POM	√	√		
		Audit to smallholders (4 sample smallholders)			√	
	12.00-13.00 (09.00 IDN)	Lunch break	√	√	√	
	13.00-17.00 (10.00 IDN)	Audit to Hargy POM	√	√		
		Audit to smallholders (4 sample smallholders)			√	
Tuesday, 07/09/2021	09.00-12.00 (06.00 IDN)	Audit to Hargy Estate	√	√		
		Audit to smallholders (4 sample smallholders)			√	
	12.00-13.00 (09.00 IDN)	Lunch break	√	√	√	
	13.00-17.00 (10.00 IDN)	Audit to Hargy Estate	√	√		
		Audit to smallholders (4 sample smallholders)			√	
Wednesday 08/09/2021	09.00-12.00 (06.00 IDN)	Audit to Barema POM		√	√	
		Audit to smallholders (4 sample smallholders)	√			
	12.00-13.00 (09.00 IDN)	Lunch break	√	√	√	
	13.00-17.00 (10.00 IDN)	Audit to Barema POM		√	√	
		Audit to smallholders (4 sample smallholders)	√			
Thursday 09/09/2021	09.00-12.00 (06.00 IDN)	Audit to Navo Estate		√	√	
		Audit to smallholders (4 sample smallholders)	√			
	12.00-13.00 (09.00 IDN)	Lunch break	√	√	√	
	13.00-17.00 (10.00 IDN)	Audit to Navo Estate		√	√	
		Audit to smallholders (4 sample smallholders)	√			
Friday 10/09/2021	09.00-12.00 (06.00 IDN)	Audit to Navo POM	√		√	
		Audit to smallholders (4 sample smallholders)		√		
	12.00-13.00 (09.00 IDN)	Lunch break	√	√	√	
	13.00-17.00 (10.00 IDN)	Audit to Navo POM	√		√	
		Audit to smallholders (4 sample smallholders)		√		
Saturday 11/09/2021	09.00-12.00 (06.00 IDN)	Audit to smallholders (4 sample smallholders for each auditor)	√	√	√	

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Date	Time	Subjects	SP/ MK	EP/ MT	YW/ Epi	ICT Planned
	12.00-13.00 (09.00 IDN)	Break - weekend				
Sunday 12/09/2021		Break	√	√	√	
Monday, 13/09/2021	09.00-12.00 (06.00 IDN)	Audit to Pandi Estate	√		√	
		Audit to smallholders (4 sample smallholders)		√		
	12.00-13.00 (09.00 IDN)	Lunch break	√	√	√	
	13.00-17.00 (10.00 IDN)	Audit to Pandi Estate	√		√	
Audit to smallholders (4 sample smallholders)			√			
Tuesday, 14/09/2021	09.00-12.00 (06.00 IDN)	Audit to smallholders from suspended blocks (4 sample smallholders for each auditor)	√	√	√	
	12.00-13.00 (09.00 IDN)	Lunch break	√	√	√	
	13.00-17.00 (10.00 IDN)	Audit to smallholders from suspended blocks (4 sample smallholders for each auditor)	√	√	√	
Wednesday, 15/09/2021	09.00-12.00 (06.00 IDN)	Audit to smallholders (4 sample smallholders for each auditor)	√	√	√	
	12.00-14.00 (09.00 IDN)	Lunch break	√	√	√	
	14.00-16.00 (10.00 IDN)	Report Preparation	√	√	√	
	16.00-17.00 (13.00 IDN)	Closing meeting	√	√	√	

Date	Time	Subjects	Sedayu/ Pamela	ICT Planned
Monday, 06/12/2021	Half day	Audit Facilitator Travel Kimbe - Biiala	√	- Video conference through MS Team - Video call or voice call through Whatsapp
		HOPL prepare smallholder database and other documented evidence in Google Drive	√	
Tuesday, 07/12/2021	09.00-09.30 (06.00 IDN)	Opening Meeting Opening Presentation by Audit team leader. Confirmation of assessment scope and finalize Audit plan	√	

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Date	Time	Subjects	Sedayu/ Pamela	ICT Planned
	09.30-12.00 (06.30 IDN)	Field visit and interview to Navo Estate – Kiba Plantation, to check waste pit; Field visit and interview to Navo Estate – Kiba Plantation, to check chemical sprayer and chemical sprayer PPE usage; Parallel, auditor verifying on: Document review on smallholder database; Document review on HIRADC documents, including loose fruit collection, fertilizer application, etc.;	√	- When interview, no management/staff shall present
	12.00-13.00 (09.00 IDN)	Lunch break	√	
	13.00-16.00 (10.00 IDN)	Field visit and interview to smallholder blocks identified with issue on pesticide container disposal practices: 010380 (Imaran Mogosa), 010398 (Barnabas Kua), 010292 (Kotbundi Masip). Field visit and interview to 3 non-sampled smallholder blocks to verify CAP effectiveness. Parallel, Auditor verifying on: Document review on OHS training program for suspended smallholders; Document review on Integrated Pest Management for suspended smallholders;	√	
	16.00-16.30 (13.00 IDN)	Report Preparation	√	
	16.30-17.00 (13.30 IDN)	Closing meeting	√	

Section 3: Assessment Findings

3.1 Multiple Management Units and Time Bound Plan

Requirement	Assessment	Compliance
Does the time bound plan include all current subsidiaries, estates and mills that is under the control and/or minor shareholding of the holding company?	The time bound plan has included all the subsidiary and group of companies of SIPEF Group. The TBP was verified against the Group Member information published in the RSPO website under the parent company SIPEF.	Complied.
Have all the estates and mills certified within five (5) years after obtaining RSPO membership?	There are estates and mills that are not certified within 5 years of the RSPO membership. But, since this requirement was published in July 2017, the 5 years starts from 2017 in which the SIPEF have up to 2022 to comply with this requirement. Despite the above, SIPEF had demonstrated that those units/estates that are not able to be certified are either due to awaiting for the HGU (Hak Guna Usaha <i>Right to Cultivate</i>) and/or awaiting for full estate development.	Complied
Have there been any new acquisitions? If yes, the new acquisitions shall be certified within three (3) years from the date of acquisition. Certification plan for the new acquisition shall be available. <i>Note:</i>	PT. Asri Rimba Wirabhakti (ARWB) in Bengkulu Province was acquired by SIPEF in end of 2018 with Sei Teramang Estate attached to the acquisition. Sei Teramang was supposed to be audited during the recertification audit of PT. Agro Muko – Bunga Tanjung Palm Oil Mill. However, due to technical glitch at RSPO where the liabilities cannot yet be confirmed, the certification audit for Sei Teramang Estate has to be postponed and audited as extension of scope to the current PT. Agro Muko – Bunga Tanjung Palm Oil Mill supply base. The estimated time to audit will be end 2022 depending of the results of the liability check by RSPO Secretariat.	Complied
Any deviations from the maximum periods requires approval by the RSPO Secretariat.	So far, the deviations periods are acceptable and justifiable. There was no deliberate delay by the company.	Complied
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?	The commitment timeline has shorten from 2024 to 2023. The changes are acceptable as the control of being certified is not on the hands of the Company due to awaiting for HGU which the approval is beyond the company choice.	Complied
Have there been any isolated lapses in implementation of the plan? If yes a Minor non-compliance shall be raised	All lapses of implanting the original plan are justified base on the awaiting for the HGU (Hak Guna Usaha <i>Right to Cultivate</i>) and/or awaiting for full estate development. While for the newly acquired estate, it is justified based on awaiting for RSPO Secretariat to confirm liabilities for Sei Teramang Estate.	Complied

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<p>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</p>	<p>There is no fundamental failure as all delays are justified as stated above.</p>	<p>Complied</p>
Un-Certified Units or Holdings		
<p>No replacement of primary forest or any area required to maintain or enhance HCVs and HCS in accordance with RSPO P&C criterion 7.12.</p>	<p>Previously prior to certification, PT. Umbul Mas Wisesa and PT. Tonton Usaha Mandiri had liabilities. The compensation plan have been approved by the Compensation Task Force during the staged implementation of the RaCP between May 2014 and November 2015.</p>	<p>Complied</p>
<p>Any new plantings since January 1st 2010 shall comply with the RSPO New Plantings Procedure.</p>	<p>All the new development that are not yet certified has undergone NPP and published in the RSPO website</p> <p>PT. Agro Muara Rupit</p> <ul style="list-style-type: none"> • https://rspo.org/certification/new-planting-procedure/public-consultations/sipef-group-pt-agro-muara-rupit-iii-and-iv-pt-amr • https://rspo.org/certification/new-planting-procedure/public-consultations/sipef-pt-agro-muara-rupit <p>PT. Agro Kati Lama</p> <ul style="list-style-type: none"> • https://rspo.org/certification/new-planting-procedure/public-consultations/sipef-pt-agro-kati-lama-phase-ii <p>PT. Agro Rawas Ulu</p> <ul style="list-style-type: none"> • https://rspo.org/certification/new-planting-procedure/public-consultations/sipef-pt-agro-rawas-ulu-new-planting-assessment-call-for-comments • https://rspo.org/certification/new-planting-procedure/public-consultations/sipef-pt-agro-rawas-ulu-new-planting-assessment-call-for-comments-1 • https://rspo.org/certification/new-planting-procedure/public-consultations/sipef-pt-agro-rawas-ulu-new-planting-assessment-call-for-comments-1 <p>PT. Bandar Sumatra Indonesia</p> <ul style="list-style-type: none"> • https://rspo.org/certification/new-planting-procedure/public-consultations/sipef-pt-bandar-sumatra-indonesia-bandar-pinang-estate 	<p>Complied</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 4.4, 4.5, 4.6, 4.7 and 4.8.</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>Complied</p>

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<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>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.</p> <p>On 20 December 2018, the complaint is officially closed. The case tracker available on link https://askrspo.force.com/Complaint/s/case/5090000028Es1JAAS/detail</p> <p>Based on RaCP tracker in RSPO website there are 4 MU's which have potential liability, 2 of them are PT. Umbul Mas Wisesa and PT. Tonton 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 2, PT. Dendymarker Indah Lestari have submitted CN to the RSPO Secretariat and waiting for approval and PT. Bandar Sumatra Indonesia awaiting for RSPO to revert regarding any potential liabilities.</p>	
<p>Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 4.2</p>	<p>The assessment team has conducted a search to RSPO Complaint Panel and RSPO Dispute Settlement Facility to confirm that there is a lodged complaint related to casual worker payment and welfare, that was recorded as complaint under RSPO Case Tracker; raised by complainant requesting confidentiality, on those SIPEF Management Unit that have not been certified.</p> <p>RSPO Case Tracker recorded complaint to PT. Agro Kati Lama. The case tracker available on link https://askrspo.force.com/Complaint/s/case/5000o000039f18kAAA/detail</p> <p>Date complaints submitted 22 January 2021. Date complaints accepted 5 March 2021. The complainant brought forward the issue of:</p> <ul style="list-style-type: none"> -The daily casual workers are paid below the minimum wage set out by the Musi Rawas District Government; -The daily casual workers are not protected and no remedy available for work accidents; -The daily casual workers are not equipped with personal protection equipment [PPE] and are not equipped with working tools; -The daily casual workers did not receive festive allowance in accordance with the regulation; -The daily casual workers, who are hired through the third party, do not get a pay slip. The amount written in the payment receipt is without formal stamp and without the name of the party who rendered the payment. 	<p>Complied</p>

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	<p>SIPEF correspond with RSPO Grievance Manager – Indonesia to follow up the complaint on 16 March 2021, 19 March 2021 with highlight that the complainant has decided to resolve the complaint through mediation by RSPO Dispute Settlement Forum/DSF.</p> <p>On 1 April 2021, SIPEF sent formal response to the complaint, addressed to RSPO Grievance Manager. The latest update is on 25 August 2021 where the first pre-mediation was complete and pending finalization of the mediation process agreement.</p>	
Any Legal non-compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1	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.	Complied
Did the company conduct internal audit for those uncertified estates against the uncertified management units requirement and covering the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12? If yes, a positive assurance statement shall be available and justified.	<p>Currently (2021) Sei Teramang Estate – PT. Mukomuko Agro Sejahtera is uncertified estate.</p> <p>NPP for Sei Teramang Estate has been conducted onsite visit on 5 – 9 February 2021 by Global Gateway Certification. Area covers for NPP is 372.62 Ha. Submission of NPP notification to RSPO on September 2021 and still ongoing approval process by RSPO.</p> <p>Internal audit for Sei Teramang Estate has been conducted in 19 July 2021. Report of internal audit completed in 14 August 2021 with reference to RSPO Certification System. Reference criteria of internal audit covers Criteria 2.1, 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12.</p> <p>Positive assurance statement already justified within the Internal Audit Checklist that Sei Teramang Estate almost fulfilled with RSPO P&C requirement and Sei Teramang Estate is ready to RSPO P&C certification as scheduled in Time Bound Plan.</p>	Complied
Are there any Critical (Major) non-compliance raised against any of the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12 during the last internal audit of the uncertified estates? If yes is the NC(s) actively addressed with RSPO?	Previously prior to certification, PT. Umbul Mas Wisesa and PT. Tonton Usaha Mandiri had liabilities. The compensation plan have been approved by the Compensation Task Force during the staged implementation of the RaCP between May 2014 and November 2015.	Complied
Have there been any stakeholder (including NGO) consultation conducted?	<p>All the new development that are not yet certified has undergone NPP and published in the RSPO website PT Agro Muara Rupit</p> <ul style="list-style-type: none"> • https://rspo.org/certification/new-planting-procedure/public-consultations/sipef-group-pt-agro-muara-rupit-iii-and-iv-pt-amr 	Complied

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	<ul style="list-style-type: none"> • https://rspo.org/certification/new-planting-procedure/public-consultations/sipef-pt-agro-muara-rupit <p>PT Agro Kati Lama</p> <ul style="list-style-type: none"> • https://rspo.org/certification/new-planting-procedure/public-consultations/sipef-pt-agro-kati-lama-phase-ii <p>PT Agro Rawas Ulu</p> <ul style="list-style-type: none"> • https://rspo.org/certification/new-planting-procedure/public-consultations/sipef-pt-agro-rawas-ulu-new-planting-assessment-call-for-comments • https://rspo.org/certification/new-planting-procedure/public-consultations/sipef-pt-agro-rawas-ulu-new-planting-assessment-call-for-comments-1 • https://rspo.org/certification/new-planting-procedure/public-consultations/sipef-pt-agro-rawas-ulu-new-planting-assessment-call-for-comments-1 <p>PT Bandar Sumatra Indonesia</p> <ul style="list-style-type: none"> • https://rspo.org/certification/new-planting-procedure/public-consultations/sipef-pt-bandar-sumatra-indonesia-bandar-pinang-estate 	
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3.2 Progress of scheme smallholders and/or outgrowers

Progress of scheme smallholders or outgrowers towards compliance with relevant standards		
Requirement	Remarks	Compliance
<p>Has 100% of scheme smallholders and/or scheme outgrowers comply with the standard within three years of the mill's initial certification?</p> <p>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.</p>	<p>Yes. Hargy Oil Palms Limited put all the smallholder into RSPO P&C Certification scope.</p>	<p>Complied</p>

Approved Time Bound Plan

Name of company	Name of Mill	Location	Supply Base	TBP	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 Manjuntio Estate, Malin Deman Estate	2014	Certified
			PT Asri Rimba Wirabhakti (acquisition in 2018) – Sei Teramang Estate	2022	Audited and awaiting for certification.
PT. Tolan Tiga	Bukit Maradja POM	Simalungun Regency, North Sumatera, Indonesia	PT Eastern Sumatra Indonesia – Bukit Maradja Estate PT Kerasaan Indonesia – Kerasaan Estate	2010	Certified May 2010
			PT Timbang Deli Indonesia	2018	Certified in 2018 as supply base of Bukit Maradja POM
	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 (UMW) POM	Labuhan Batu Selatan Regency, North Sumatera, Indonesia	UMW South Estate, UMW North Estate PT Tonton 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; An 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;

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Name of company	Name of Mill	Location	Supply Base	TBP	Target Year for RSPO
					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; An NPP submitted in 2019 to cover new areas licenced at the end of 2018.
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	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. 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.
PT. Bandar Sumatra Indonesia	No mill	Kecamatan Bintang Bayu, Kabupaten Serdang Bedagai, North Sumatra Indonesia	Bandar Pinang Estate	2025	Rubber plantation conversion. NPP submitted in July 2021

3.3 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 5 Critical; 7 Minor nonconformities and 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 its effectiveness and closed accordingly. The below is the summary of the non-conformity raised during this assessment.

Non-conformity			
NCR Ref #	2104903-202108-M1	Date Issued	15 September 2021
Due Date	14 December 2021	Date of nonconformity Closure	7 December 2021
Clause & Category (Critical / Minor)	3.1.1 / Critical		
Statement of Nonconformity:	The data and document for smallholder planted area are not consistent, for projection contribution of FFB supplied by smallholders within the unit of certification.		
Requirement Reference:	(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.		
Objective Evidence:	<ul style="list-style-type: none"> • The submitted RSPO Pre Audit information submitted 30 August 2021, stated smallholder total area is 13,892.73 Ha; • The smallholder block listing 2021 dated 9 August 2021, total planted area from 3,647 smallholders is 14,876.72 Ha • Based on field visit and document review, audit team found "ghost block" or block not existing and not planted (nil production) on smallholder No. 380150 (Augustine Kautu) and 350030 (Michael Waula) block was not planted with oil palm, however the smallholder block listing 2021 dated 9 August 2021, stated it was planted. 		
Corrections:	<ol style="list-style-type: none"> i. Review all data sets that are currently in use and determine the data set to use with justification for use. After review of different sets of data; it was agreed that OMP data (14,741 Ha) is the most reliable data as it is the most updated. ii. Update Smallholder Management with data from OMP for Smallholder area and align with other relevant data including the pre-audit data. iii. Conduct analysis of updated SH block listing to identify ghost blocks (block not existing and not planted (nil production)) with verification on the ground and update to correspond to OMP information. 		
Root Cause Analysis:	<ol style="list-style-type: none"> i. Different databases within HOPL have different data sets that have not been aligned to one figure; pending completion of smallholder block mapping and consequently updates. Currently in place are; <ol style="list-style-type: none"> a. 13,892.73 Ha: Based on past audit reports and not updated pending smallholder block mapping which is still in progress. 		

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	<p>b. 14,876.72 Ha: From SHM in Lintramax, has not been updated; pending smallholder block mapping completion.</p> <p>c. 14,741 Ha: From OMP database, initially based on Lintramax SHM (2016) and continuously updated in line with replanting program as it happens. The data in OMP thus is evolving data and will change year on year as the updates continue.</p> <p>d. 10,222.29ha: From GIS, Work in Progress as the smallholder mapping & data analysis is still in progress.</p> <p>ii. Smallholder List in Lintramax SHM has not been updated for ghost blocks/ Block not existing and not planted (nil production), but in actual not planted to be removed.</p>
Corrective Actions:	<p>i. Conduct 6 monthly review of data on relevant databases containing smallholder hectare data and address any discrepancies in the data. This will be done by Sustainability.</p> <p>ii. Conduct monthly review of the Smallholder listing to verify continuing compliance with regards to the number of blocks on relevant databases containing smallholder data. This will be done by Smallholder Affairs department.</p> <p>Audit team verification:</p> <ul style="list-style-type: none"> - Audit team reviewed the monthly smallholder data review. Month October smallholder data review stated total 3,647 smallholders with area of 14,876.72 Ha. - Audit team reviewed the month October smallholder data review stated total 3,635 smallholders with area of 14,768.15 Ha. - Audit team reviewed the "Smallholder Ghost Blocks Report Investigation", dated 1 December 2021, reviewing all not planted – no production smallholder blocks in all three divisions. Sampled investigation result: Division 2: smallholder No. 060643 Atharnasius Kolove, comment: Ghost block – Block not existing and not planted (nil production), corrective action: to be deleted from the system. Smallholder No. 380150 (Augustine Kautu), comment: Ghost block – Block not existing and not planted (nil production), corrective action: to be deleted from the system. - Audit team reviewed the 6 monthly smallholder data review, dated 4 December 2021. - The smallholder number verified at 3,635 smallholders with total hectareage of 14,768.15 Ha. The smallholders comprise of 1,797 LSS smallholder with area 8,587.32 Ha; 1,812 VOP smallholders with area 3,956.18 Ha; 26 Independent Estate smallholders with area 2,224.65 Ha.
Assessment Conclusion:	<p>Correction and corrective action have been implemented. Internal audit and inspections carried out as mechanism to prevent reoccurrence. The action plan by company is effective. NC Major closed out.</p>

NCR Ref #	2104903-202108-M2	Date Issued	15 September 2021
Due Date	14 December 2021	Date of nonconformity Closure	7 December 2021
Clause & Category (Critical / Minor)	3.6.1 / Critical		

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<p>Statement of Nonconformity:</p>	<p>The Health and Safety risk assessment, training and implementation was not consistently implemented.</p> <ul style="list-style-type: none"> - Risk assessments, mitigation plans and H&S issues of all operations are not thoroughly identified. - Training on identification and control of risks for smallholders suspended blocks was not available. - Procedure was not implemented properly.
<p>Requirement Reference:</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.</p>
<p>Objective Evidence:</p>	<ul style="list-style-type: none"> - In document of Plantation Operation Risk Assessment 2021, Loose Fruit Collection activity was not identify, while in PPE Matrix (PPE SOP PRO-SUS-OHS-003-05, issue No.5, date 18 March 2021) this activity was listed. - One risk of fertilizer application within document of Plantation Operation Risk Assessment 2021 that were identified is inhalation of vapors. However, within in PPE Matrix (PPE SOP PRO-SUS-OHS-003-05, issue No.5, date 18 March 2021) face mask or respirator was not required for Fertiliser Handling (application). - Training on identification and control of risks for smallholders suspended blocks was not available and not implemented. - Procedure of Chemical Weeding (PRO-PLT-UPK-006-03) dated 24 March 2021, SOP #04 – Chemical Mixing in Safety part stated no personal clothing to be worn underneath the overalls whilst working with chemical. This covers both the Mixer and the Sprayers. Based on field observation and interview with sprayers at Hargy Estate (Hargy Plantation) and Navo Estate (Kiba Plantation), all sprayers still worn personal clothing underneath overalls.
<p>Corrections:</p>	<ol style="list-style-type: none"> i. Re-conduct safety risk assessment for all Plantation operations in detail and align with the PPE Matrix and all relevant SOPs, procedures & processes within the plantation operations. ii. Conduct training/awareness session on safety for the small holder suspended blocks. iii. Complete the training to all spray gangs across the plantation sites on Chemical Weeding SOP.
<p>Root Cause Analysis:</p>	<ol style="list-style-type: none"> i. During safety risk assessment loose fruit collection was overlooked & not included. Safety Risk assessment conducted combined 3 safety risk associated with fertilizer application which resulted in the safety risks not adequately assessed individually to assign risk rating and consequently controls. ii. Lack of understanding of the requirements for suspended smallholders in the scope extension of the audit. No clear requirements on auditing of smallholder suspended blocks. iii. Chemical weeding procedure (SOP#4) was rolled out and trainings conducted to supervisory level only, but training was not completed in covering all spray gangs; as some trainings were impeded by C-19 restrictions in first half of year.

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Corrective Actions:	<p>i. Annual review of safety risk register to ensure continuing alignment with processes, procedures and operations. The results of annual safety risk assessment review shall be part of the annual Management Review.</p> <p>ii. Continue trainings on safety to Smallholders as part of the Smallholder Agricultural Advisory Services programs. This is an established program that is already in place.</p> <p>iii. Continued training for plantation spray teams as per Plantation training plan.</p> <p>Audit team verification with audit facilitator:</p> <ul style="list-style-type: none"> - Hargy Oil Palms Limited performed review and updated "Plantation Operation Risk Assessment REG-SUS-OHS-002-12" in 23 November 2021, loose fruit collection has been reviewed with Low Risk. - Review HIRADC/risk register for smallholder (reviewed and updated in parallel) in form of "Smallholders (SHAAS) Operation Risk Assessment REG-SUS-OHS-002-12" have been reviewed and updated 23 November 2021, loose fruit collection has been reviewed with Low Risk. - Personal Protective Equipment (PPE) Matrix as part of Personal Protective Equipment (PPE) SOP No. PRO-SUS-OHS-003-06 reviewed and updated; Fertiliser Handling (Application) requires gloves and apron. In accordance with "Plantation Operation Risk Assessment REG-SUS-OHS-002-12" dated 23 November 2021, the risk related to skin burns. - Procedure of Chemical Weeding has been reviewed. - Sustainability Department and Smallholder Department prepared OHS Training Plan for all sprayers, mixers, driver, including smallholders (including suspended smallholders) into Training Plan. - Sprayers, mixers, drivers, and smallholder blocks have been provided with training on identification and control of risks and health and safety training. - Field visit to Navo Estate – Kiba Plantation, audit team made interview with sprayers confirm that no inner clothing wore inside the sprayer's coverall. Field visit and verification to Navo Estate chemical shed, there are locker to keep clean clothing and shower for worker to cleanse after work. - Internal audit and inspection have been carried out to check consistent implementation.
Assessment Conclusion:	Correction and corrective action have been implemented. Internal audit and inspections carried out as mechanism to prevent reoccurrence. The action plan by company is effective. NC Major closed out.

NCR Ref #	2104903-202108-M3	Date Issued	15 September 2021
Due Date	14 December 2021	Date of nonconformity Closure	7 December 2021
Clause & Category (Critical / Minor)	7.1.1 / Critical		
Statement of Nonconformity:	Organization cannot demonstrate implementation of IPM in smallholder area.		
Requirement Reference:	(C) IPM plans are implemented and monitored to ensure effective pest control.		

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	<p>Smallholder requirements: Organization managing the smallholders to manage IPM program for smallholders.</p>
Objective Evidence:	<p>Based on field visit to Block 031470 (John Wapa), 031471 (Rodney Bui Yuku), 031472 (Waimal Kepo), 380150 (Augustine Kautu), there was no evident of IPM plans being implemented.</p>
Corrections:	<p>i. Training & awareness to relevant staff on requirements for suspended blocks. ii. Conduct Training & Awareness on IPM for all suspended blocks.</p>
Root Cause Analysis:	<p>Lack of understanding of the requirements for suspended smallholders in the scope extension of the audit.</p>
Corrective Actions:	<p>i. Include suspended blocks in the IPM program in place for Smallholders. This is an established system already in place that consists of awareness/training, reporting of pest incidences to HOPL and further to OPRA and pest treatment & management by HOPL based on OPRA advice. ii. Quarterly internal audits by Sustainability to include check on effectiveness of IPM system in place.</p> <p>Audit team verification:</p> <ul style="list-style-type: none"> - Hargy Oil Palms Limited performed review and updated "Smallholders Integrated Pest Management Flowchart PRO-SAD-SHA-010-01" in 23 November 2021. The flowchart triggered with "pest is suspected in smallholder block by grower". - Sustainability Department and Smallholder Department provided training to field officer related to requirement for suspended blocks. Record sighted: 14 October 2021 to 20 sustainability officers, smallholder assistant, GIS assistant, Lands Office assistant, etc. - Sustainability Department and Smallholder Department prepared smallholder Training Plan, including best management practice and integrated pest management for smallholders (including suspended smallholders) into Training Plan. - Sustainability Department and Smallholder Department provided training and field days to suspended smallholders. Record sighted: 4 October 2021 to Ambusah Independent Estate; 8 October 2021 to 9 suspended smallholders in Ewasse village; 17 November 2021 to 38 suspended smallholders; - Field visit to sampled smallholders, audit team made interview and found the smallholder now understands the Integrated Pest Management, company policy with pesticide handling and pesticide container disposal.
Assessment Conclusion:	<p>Correction and corrective action have been implemented. Internal audit and inspections carried out as mechanism to prevent reoccurrence. The action plan by company is effective. NC Major closed out.</p>

NCR Ref #	2104903-202108-M4	Date Issued	15 September 2021
Due Date	14 December 2021	Date of nonconformity Closure	7 December 2021

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Clause & Category (Critical / Minor)	7.2.8 / Critical
Statement of Nonconformity:	In Smallholders area, Organization cannot demonstrated that pesticide containers are punctured before being disposed. Escalated from previous Minor NC: 1992828-202012-N1
Requirement Reference:	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. Smallholder requirements: The requirements fully applicable to smallholders.
Objective Evidence:	Audit team found: Based on field Visit to Smallholder 010398 (Barnabas Kua), 010380 (L. Imaran Mogosa A. – Mathias Arombi), 010292 (Kotbundi Masip), observed that pesticide containers disposed in landfill were not cut or punctured.
Corrections:	Empty containers punctured and disposed into the pit as per SOP. Photos provided to audit facilitators onsite.
Root Cause Analysis:	Concerned smallholders have been trained & made aware of the requirements of chemical handling, usage & storage; the latest in 2020, however understanding of the specific requirements not fully understood by growers.
Corrective Actions:	<ul style="list-style-type: none"> i. Review Waste disposal SOP to simplify and clarify on the waste disposal practices in smallholder blocks. ii. Continue trainings on Chemical Usage and Storage to Smallholders as part of the Smallholder Agricultural Advisory Services (SHAAS) programs. This is an established program that is already in place. iii. Continue Block inspections and internal audits on smallholder blocks and take appropriate actions on inspections and audits outcomes. iv. Quarterly internal audits by Sustainability to verify effectiveness of established program in place. <p>Audit team verification:</p> <ul style="list-style-type: none"> - Hargy Oil Palms Limited performed review and updated "Waste Management Pan PLN-SUS-EMS-001-13" in 30 October 2021. Revision: "All empty chemical containers after use are collected triple rinsed and re-used for chemical mixing, punctured or cut and disposed into the chemical waste pit located within the smallholder block". - Audit team verified the record of training for smallholders; Block Inspection Reports and Internal Audit Reports. - Audit team made visit to smallholder block previously identified with nonconformity: Barnabas Kua No.010398, Imaran Mogosa No.010380, Kotbundi Masip No.010292; and expanded the visit to new smallholder not sampled before: Susan Takun No.010364, Tabitha Kamule No.111175, Raymond Sana No.010306. Interview with the smallholder, they now understood empty chemical container to be cut/destroyed before disposed of to the chemical pit. The smallholders attended

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	training on 27 September 2021. Verified handling of used chemical container: cut in and disposed of into chemical pit.
Assessment Conclusion:	Correction and corrective action have been implemented. Internal audit and inspections carried out as mechanism to prevent reoccurrence. The action plan by company is effective. NC Major closed out.

NCR Ref #	2104903-202108-M5	Date Issued	15 September 2021
Due Date	14 December 2021	Date of nonconformity Closure	7 December 2021
Clause & Category (Critical / Minor)	7.3.2 / Critical		
Statement of Nonconformity:	Segregation of waste is not implemented properly by Plantation Escalated into Major NC from previously Minor NC 1992828-202012-N2.		
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:	In year 2021, during ASA2_3 - based on field visit to Navo Estate - Kiba Plantation, contaminated rags and contaminated gloves disposed of into domestic waste pit. The corrective action is not effective - escalated into Major NC.		
Corrections:	Contaminated rags removed from domestic pit and placed correctly in the hydrocarbon pit. Evidence of corrections done, sent to audit facilitators.		
Root Cause Analysis:	<p>All processes and procedures are in place for waste management, however lack of training, awareness and understanding of these process and procedures including:</p> <ul style="list-style-type: none"> i. Waste segregation ii. Absence of land fill attendant at landfill site iii. Rubbish being dumped outside of landfill operating times. 		
Corrective Actions:	<ul style="list-style-type: none"> i. Review Waste Management plan to simplify and clarify on the waste disposal practices at landfill. ii. Conduct Training/awareness to all relevant staff of sites that use Atata landfill. iii. Enforce the landfill operating hours from 8am to 3pm with a permanent landfill attendant manning the landfill during these operating hours. iv. Monitoring of landfill practices shall be conducted on a monthly basis as part of the monthly Workplace inspection (WPI) by the Plantation Manager. Results of this inspection shall be communicated to Division managers responsible for the landfill area to address issues raised. 		

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	<p>v. Quarterly internal audits by Sustainability shall verify the effectiveness of the implementation of Waste management plan.</p> <p>Audit team verification:</p> <ul style="list-style-type: none"> - Hargy Oil Palms Limited performed review and updated "Waste Management Plan PLN-SUS-EMS-001-13" in 30 October 2021. - Audit team verified the record of training for landfill requirement – waste segregation; Work Place Inspection Reports and Internal Audit Reports, including the corrective action reports. - Audit team made visit Navo Estate’s Waste Pits; found No contaminated rags or contaminated glove in the domestic waste pit; No domestic waste in hydrocarbon waste pit. Interview with the Waste Pit Attendant, stating He have received training on waste type, waste handling, waste segregation, PPE use and no burning policy.
Assessment Conclusion:	Correction and corrective action have been implemented. Internal audit and inspections carried out as mechanism to prevent reoccurrence. The action plan by company is effective. NC Major closed out.

NCR Ref #	2104903-202108-N1	Date Issued	15 September 2021
Due Date	Next ASA	Date of nonconformity Closure	Next ASA
Clause & Category (Critical / Minor)	1.1.5 / Minor		
Statement of Nonconformity:	Current list of contact and details of stakeholders are not up-to-date.		
Requirement Reference:	There is a current list of contact and details of stakeholders and their nominated representatives.		
Objective Evidence:	Unit of Certification has a List of Interested Parties (REG-SUS-GEN-001-10, issue No.10, issue date 18 March 2021) consisting details and contact of stakeholders. However, when audit team selecting one of stakeholder namely Live and Learn Environmental Education Inc. to be contacted, it was informed that organization is inactive or no longer operated in West New Britain Province. While, it still available in stakeholders list.		
Corrections:	List of Interested parties have been update with the specific stakeholder (Live & Learn Environmental Education Inc. removed).		
Root Cause Analysis:	List of Interested Parties is updated once annually. Should there be any changes after the list is updated, the register would not capture that.		
Corrective Actions:	<ul style="list-style-type: none"> i. List of interested parties to be updated on an annual basis or as and when advised by exiting stakeholder, so that only active stakeholders are on the list ii. Revise the Communication Procedure to reflect the frequency of update. iii. Quarterly review of annual workplans (planned vs done) by Assistant Sustainability Manager. Annual workplans shall capture the updating of the List of Interested Parties. Results of review shall be discussed with the relevant staff and actions taken by the relevant staff, if required. 		

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Assessment Conclusion:	Corrective Action implemented will be verified for effectiveness during subsequent Annual Surveillance Assessment.
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NCR Ref #	2104903-202108-N2	Date Issued	15 September 2021
Due Date	Next ASA	Date of nonconformity Closure	Next ASA
Clause & Category (Critical / Minor)	3.2.2 / Minor		
Statement of Nonconformity:	Untimely submission of the RSPO metrics template.		
Requirement Reference:	As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the RSPO metrics template.		
Objective Evidence:	The RSPO metrics template was submitted three days after audit commencement date on 3 September 2021. According to RSPO Metrix standard, version 2.1, Hargy Oil Palms Limited is allowed to provide data up to two months before audit month. This has taken into consideration that it will need to submit the metrics template to CB prior to an Audit, of which it might not be able to provide data up to one month before audit.		
Corrections:	<ul style="list-style-type: none"> i. Sites not fully aware of the requirements and specific data to be submitted to be included into the RSPO Metrics. RSPO Metrics requirements was communicated but was not clearly explained for them to be fully aware. ii. Current data collection points does not have the information in the format required by RSPO Metrics, thus more time required to convert into appropriate format for input. iii. The RSPO Matrix is a totally new requirement and was not fully aware on some of the information's/data to be collected and put in thus slowing progress. iv. Untimely submission of data from the sites. 		
Root Cause Analysis:	<ul style="list-style-type: none"> 1. Sites not fully aware of the requirements and specific data to be submitted to be included into the RSPO Metrics. RSPO Metrics requirements was communicated but was not clearly explained for them to be fully aware. 2. Current data collection points does not have the information in the format required by RSPO Metrics, thus more time required to convert into appropriate format for input. 3. The RSPO Matrix is a totally new requirement and was not fully aware on some of the information's/data to be collected and put in thus slowing progress. 4. Untimely submission of data from the sites. 		
Corrective Actions:	<ul style="list-style-type: none"> i. Training to site managers/clerks on data required for the compilation of RSPO Metrics. ii. Develop RSPO Metrics SOP that provides a guide on RSPO metrics compilation and reporting. iii. Schedule data collection for RSPO Metrics on a monthly basis for submission 2 months prior to external audit. iv. Quarterly review of annual workplans (planned vs done) by Assistant Sustainability Manager. Annual workplans shall capture the data collection for 		

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	RSPO metrics compilation. Results of review shall be discussed with the relevant staff and actions taken by the relevant staff, if required.
Assessment Conclusion:	Corrective Action implemented will be verified for effectiveness during subsequent Annual Surveillance Assessment.

NCR Ref #	2104903-202108-N3	Date Issued	15 September 2021
Due Date	Next ASA	Date of nonconformity Closure	Next ASA
Clause & Category (Critical / Minor)	3.3.2 / Minor		
Statement of Nonconformity:	Organization has not check consistent implementation of Pollution Control Device/PCD at Mill; and Organization has not demonstrate field day records of suspended smallholders.		
Requirement Reference:	A mechanism to check consistent implementation of procedures is in place. Smallholder requirements: Organization that is managing the smallholders maintains production records and field day attendance records as evidence of improved performance.		
Objective Evidence:	<p>- Monitoring of Pollution Control Device was not performed regularly. Based on field visit to Navo POM, in the Pollution Control Device, rubbish skimmed from the trap have been dumped outside of the fence. Inconsistent with SOP Waste Management Plan No.PLN-SUS-EMS-001-011 Section 7.0 Hargy Palm Oil Mills stating "Storm water from the mill, drains to a main trap to capture any traces of oil and grease from the milling processes before being discharged. The traps are cleaned regularly and checked by the Mill Upkeep Supervisor. The grease traps in particular are inspected each day and cleaned when necessary".</p> <p>- Based on review to suspended smallholder documents Block 031470 (John Wapa), 031471 (Rodney Bui Yuku), 031472 (Waimal Kepo), there are no records of field day attendance.</p>		
Corrections:	<p>i. Clean up action conducted on the spot and silt/debris removed from PCD and dumped outside the fence have been cleaned up. Evidence of correction provided to audit facilitators.</p> <p>ii. In order to prevent unnecessary disposal of rubbish skimmed off from oil & grease trap to the environment, L-structure steel plate was fabricated and welded along the fence.</p> <p>iii. Discussed with Ponds Effluent & Upkeep supervisors to contain rubbish removed from Grease/Oil trap and load them into plastic drums ready for transport to Landfill site and disposed properly.</p> <p>iv. Training & awareness to relevant staff on requirements for suspended blocks.</p>		
Root Cause Analysis:	i. Navo Mill Upkeep Team not fully aware of the PCD cleaning requirements including frequency of cleaning.		

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	<p>ii. Lack of awareness from workers on proper disposal of rubbish skimmed off from the triple interceptor</p> <p>iii. Incorrect procedures used to disposed rubbish captured from oil & grease.</p> <p>iv. Lack of understanding of the requirements for suspended smallholders in the scope extension of the audit. No clear requirements on auditing of smallholder suspended blocks.</p>
Corrective Actions:	<p>i. Update Waste Management Plan and related procedures to clearly outline the process for disposal of waste from Mill PCD's.</p> <p>ii. Conduct training to Mill's Upkeep workers on proper wastes disposal.</p> <p>iii. Regular PCD inspections and keep records on Mill PCD Verification checklist: FOR-SUS-EMS-004 -06</p> <p>iv. Regular PCD cleanup based on inspections and file all cleaning records using the record form: FOR- SUS-EMS -001 –06</p> <p>v. Monthly update shall be given on PCD cleaning schedule (planned vs done) by relevant mill supervisors at RSPO monthly meeting. This shall be documented in the RSPO Monthly meeting minutes.</p> <p>vi. Going forward, all suspended blocks to be fully maintained and kept up to standard including awareness/trainings on RSPO requirements prior to audits.</p>
Assessment Conclusion:	Corrective Action implemented will be verified for effectiveness during subsequent Annual Surveillance Assessment.

NCR Ref #	2104903-202108-N4	Date Issued	15 September 2021
Due Date	Next ASA	Date of nonconformity Closure	Next ASA
Clause & Category (Critical / Minor)	3.7.2 / Minor		
Statement of Nonconformity:	Hargy Oil Palms Limited has not provided evidence training records for suspended smallholders.		
Requirement Reference:	<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>		
Objective Evidence:	Hargy Oil Palms Limited has not provided evidence training records for suspended smallholders.		
Corrections:	<p>i. Conduct training for all suspended blocks on RSPO requirements.</p> <p>ii. Complete training records for the suspended small holder blocks as evidence that they have attended trainings.</p>		
Root Cause Analysis:	Lack of understanding of the requirements for suspended smallholders in the scope extension of the audit. No clear requirements on auditing of smallholder suspended blocks.		

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Corrective Actions:	<ul style="list-style-type: none"> i. Conduct field day trainings to the small holder suspended blocks. ii. Complete training records for the suspended small holder blocks as evidence that they have attended trainings. iii. Quarterly internal audits by Sustainability to verify effectiveness of established smallholder training program in place.
Assessment Conclusion:	Corrective Action implemented will be verified for effectiveness during subsequent Annual Surveillance Assessment.

NCR Ref #	2104903-202108-N5	Date Issued	15 September 2021
Due Date	Next ASA	Date of nonconformity Closure	Next ASA
Clause & Category (Critical / Minor)	4.3.1 / Minor		
Statement of Nonconformity:	<p>Hargy Oil Palms Limited made community development projects, however it has not demonstrated evidence the contribution made based on the results of consultation with local communities.</p> <p>In addition, Hargy Oil Palms Limited has not demonstrated field days and other extension activities was conducted by organization to suspended smallholders.</p>		
Requirement Reference:	Contributions to community development that are based on the results of consultation with local communities are demonstrated.		
Objective Evidence:	<ul style="list-style-type: none"> - Hargy Oil Palms Limited made community development projects, however it has not demonstrate evidence the contribution made based on the results of consultation with local communities. - Hargy Oil Palms Limited has not demonstrated field days and other extension activities was conducted by organization to suspended smallholders. 		
Corrections:	<ul style="list-style-type: none"> i. Provide the evidence for latest community development projects. ii. Conduct field day/training sessions for suspended blocks. 		
Root Cause Analysis:	<ul style="list-style-type: none"> i. Evidence available for community development projects based on results of consultation with local communities, however not provided as request was interpreted as seeking evidence for Community Assistance only which is one component of HOPLs CSR. ii. Lack of understanding of the requirements for suspended smallholders in the scope extension of the audit. 		
Corrective Actions:	<ul style="list-style-type: none"> i. Annual stakeholder meetings with key stakeholders. ii. Collate the information received from Request for Assistance as one of the sources of data for informing decision making on HOPL CSR. 		
Assessment Conclusion:	Corrective Action implemented will be verified for effectiveness during subsequent Annual Surveillance Assessment.		

NCR Ref #	2104903-202108-N6	Date Issued	15 September 2021
Due Date	Next ASA	Date of nonconformity Closure	Next ASA

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Clause & Category (Critical / Minor)	6.5.3 / Minor
Statement of Nonconformity:	Assessment and consultation of new mother needs has not demonstrated.
Requirement Reference:	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.
Objective Evidence:	Hargy Oil Palms Limited has not demonstrate record of assessment and consultation of new mother.
Corrections:	Maintain records for the following processes; i. Pre and antenatal clinics conducted at all clinics on scheduled days of the week. ii. Clinics continued support on the progress for both new mothers and expecting mothers; through pregnancy and into the early stages of the child's development.
Root Cause Analysis:	Initial assessment & consultation of new mothers done as evidenced by process and Maternity Leave and Breastfeeding policies currently in place, however no proper records kept. The current process in place includes; a) All Clinics have specific days in the week for both pre and antenatal clinics. This includes conducting reviews, pregnancy progression, health and wellbeing of the mother and baby and referral to the Company Doctor should next level care be required. This is further supported by 2 x Ultra Sound units specifically purchased to support expectant mothers throughout their pregnancy. b) All clinics continue to support the progress for both new mothers and expecting mothers throughout their pregnancy and into the early stages of the child's development. The latter is however acted upon the mothers request with the exception of immunization. c) HOPL also have a Maternity Leave and Breastfeeding Policy in place to support new mothers at the latter stage of their pregnancy and after the birth with Breastfeeding needs. Both policies are in line with the PNG Employment Act 1975.
Corrective Actions:	i. All clinics to follow their weekly schedules for both pre and antenatal clinics and keep records. ii. Family Planning are conducted to assist families with safe motherhood and number of children they wish to have.
Assessment Conclusion:	Corrective Action implemented will be verified for effectiveness during subsequent Annual Surveillance Assessment.

NCR Ref #	2104903-202108-N7	Date Issued	15 September 2021
Due Date	Next ASA	Date of nonconformity Closure	Next ASA
Clause & Category (Critical / Minor)	7.12.7 / Minor		
Statement of Nonconformity:	Hargy Oil Palms Limited has not provided evidence to demonstrate monitoring upon natural ecosystems, peatland conservation areas and RTE species in the suspended smallholder blocks.		

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Requirement Reference:	The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan.
Objective Evidence:	Hargy Oil Palms Limited has not provided evidence to demonstrate monitoring upon natural ecosystems, peatland conservation areas and RTE species in the suspended smallholder blocks.
Corrections:	i. Training & awareness to relevant staff on requirements for suspended blocks. ii. Conduct monitoring of all suspended blocks on presence of RTE species, peatlands, natural ecosystems and keep records of such monitoring.
Root Cause Analysis:	Lack of understanding of the requirements for suspended smallholders in the scope extension of the audit. No clear requirements on auditing of smallholder suspended blocks.
Corrective Actions:	Continue block inspection on Smallholders blocks as part of the Smallholder Agricultural Advisory Services programs. This is an established program that is already in place.
Assessment Conclusion:	Corrective Action implemented will be verified for effectiveness during subsequent Annual Surveillance Assessment.

Opportunity for Improvements	
OFI #	Description
OFI 1	Indicator 3.3.3 Hargy Oil Palms Limited monitored the smallholder performance. Organization provides evidence of monitoring upon smallholder blocks in implementing best agricultural practices where oil palm upkeep not consistent; bushes and weed overgrown; and palm pruning was not performed.
OFI 2	Indicator 4.4.1 Smallholder 440055 (Teddy Male), 041188 (Jerry Mera), 050230 (Graham AINU), 321100 (Wesly Aliai), 321158 (Joe Gaelo) with Application or Tender Form to Department of Lands and Physical Planning completed the lease application process.
OFI 3	Indicator 7.12.4 Hargy Oil Palms Limited prepared document "HCV/HCS, Peatlands and Conservation Area Management Plan", dated 30 March 2021. The generic recommendations for conservation areas within all the plantations and smallholders are: Demarcate boundaries of HCV/HCS, other conservation areas and peatlands; Collaborate with local communities to establish and maintain appropriate riparian buffers; Maintain or improve water quality in all rivers in the area of operations. Abulmosi Reserve Buffer Zone in Pandi Estate consistently equipped with conservation signage.
OFI 4	Indicator 7.12.8 Based on document review, visit and interview with smallholder 380150 (Augustine Kautu) and 350050 (Michael Waula), there was no oil palm planted. New development or land clearing requires HCV assessment since November 2005, or prior HCV-HCSA assessment since 15 November 2018. Smallholder block not yet planted, Planning consistently with HCV/HCS assessment carried out.

Positive Findings	
PF #	Description
PF 1	N/A

3.3.1 Status of Nonconformities Previously Identified and Observations

Non-conformity			
NCR Ref #	1992828-202012-N1	Date Issued	15 December 2020
Due Date	15 September 2021	Date of nonconformity Closure	Not close and escalated to NC Major 2104903-202108-M4
Clause & Category (Critical / Minor)	7.2.8 / Minor		
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 re-used for chemical solution transport - no triple rinse, no visual identification; - 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-ESD-SUS-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). 		

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	<ol style="list-style-type: none"> 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. Smallholders 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. <p>Note: 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>The CAP is accepted by the audit team, and subject to review effectiveness during 2021 annual surveillance assessment.</p> <p>In year 2021, during ASA2_3 - Based on field Visit to Smallholder Block 01380 (Imaran Mogosa), 010398 (Barnabas Kua), 010292 (Kotbundi Masip), observed that pesticide containers disposed in landfill were not cut or punctured. The corrective action is not effective - escalated into Major NC.</p> <p>See 2104903-202108-M4.</p>

NCR Ref #	1992828-202012-N2	Date Issued	15 December 2020
Due Date	15 September 2021	Date of nonconformity Closure	Not close and escalated to NC Major 2104903-202108-M5

Clause & Category (Critical / Minor)	7.3.2 / Minor
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:	<ol style="list-style-type: none"> 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-COM-EMS-001-10) Issued No. 10 date 21 March 2020. 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.
Corrections:	<p>Bakada Plantation:</p> <ol style="list-style-type: none"> Fertilizer bags and chemical containers removed from the domestic pit and correctly disposed into plastic pit. Training and awareness conducted to compound upkeep workers and employees and their dependents on rubbish segregation. <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"> Negligence and ignorance by worker and supervisor to comply with waste management procedures regarding rubbish segregation. 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"> 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. 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>

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	<p>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.</p> <p>2. Compile a RSPO pamphlet for smallholder field days to include all relevant RSPO requirements for smallholders including waste management.</p>
Assessment Conclusion:	<p>The CAP is accepted by the audit team, and subject to review effectiveness during 2021 annual surveillance assessment.</p> <p>In year 2021, during ASA2_3 - based on field visit to Navo Estate - Kiba Plantation, contaminated rags and contaminated gloves disposed of into domestic waste pit. The corrective action is not effective - escalated into Major NC. See 2104903-202108-M5.</p>

NCR Ref #	1992828-202012-N3	Date Issued	15 December 2020
Due Date	15 September 2021	Date of nonconformity Closure	15 September 2021
Clause & Category (Critical / Minor)	7.3.3 / Minor		
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.		
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:	<p>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.</p> <p>2. Lack of knowledge and awareness on RSPO requirements on use of fire for waste disposal and its impacts.</p>		
Corrective Actions:	<p>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.</p> <p>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.</p>		

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Assessment Conclusion:	<p>The CAP is accepted by the audit team, and subject to review effectiveness during 2021 annual surveillance assessment visit.</p> <p>In year 2021, during ASA2_3 - based on field visit to 73 sampled smallholder and 15 suspended smallholders - audit team found no signs of fire used for waste disposal. NC Minor closed effectively.</p>
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Opportunity for Improvement	
OFI#	Description
OFI 1	<p>OFI Statement: 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.</p> <p>Verification / Follow-up actions: Based on assisted visit with audit facilitators to Hargy Estate - Barema compound (GL 103, GL 84 and GL 13), Navo Estate compound, Kiba Plantation compound, noted the company provides adequate housing with sanitation facilities, water supply, and electricity. Families are getting sufficient room in housing.</p>
OFI 2	<p>OFI Statement: 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.</p> <p>Verification / Follow-up actions: There is no new development, no new planting. CH is waiting for the review and finalization process.</p>

3.3.2 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)

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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)
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	Escalated to NC Major 2104903-202108-M4
1992828-202012-N2	Minor	7.3.2	15/12/2020	Escalated to NC Major 2104903-202108-M45
1992828-202012-N3	Minor	7.3.3	15/12/2020	07/12/2021 (closed)
2104903-202108-M1	Major	3.1.1	15/09/2021	07/12/2021 (closed)
2104903-202108-M2	Major	3.6.1	15/09/2021	07/12/2021 (closed)
2104903-202108-M3	Major	7.1.1	15/09/2021	07/12/2021 (closed)
2104903-202108-M4	Major	7.2.8	15/09/2021	07/12/2021 (closed)
2104903-202108-M5	Major	7.3.2	15/09/2021	07/12/2021 (closed)
2104903-202108-N1	Minor	1.1.5	15/09/2021	Open
2104903-202108-N2	Minor	3.2.2	15/09/2021	Open
2104903-202108-N3	Minor	3.3.2	15/09/2021	Open
2104903-202108-N4	Minor	3.7.2	15/09/2021	Open
2104903-202108-N5	Minor	4.3.1	15/09/2021	Open
2104903-202108-N6	Minor	6.5.3	15/09/2021	Open
2104903-202108-N7	Minor	7.12.7	15/09/2021	Open

3.4 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.

Stakeholders contacted		
Type of Stakeholder (e.g. Internal, Union, Contractor, Governmental Department, NGO, External, Communities)	Stakeholder name / organization	Means of communication (e.g. face to face interview, email, phone interview, comment from public notice)
Internal Stakeholders	<ul style="list-style-type: none"> - Social Issues Committee - Grievance Register Officer - Sampled workers in mills and estates 	Phone call/voice call using Whatsapp assisted by audit facilitators
Government Departments	<ul style="list-style-type: none"> - Division of Fisheries & Marine Resources - Department of Lands and Physical Planning - East Nakanai Local Level Government 	Phone call/voice call using Whatsapp assisted by audit facilitators
Union/Contractors/Local Communities	Worker Union	Phone call/voice call using Whatsapp assisted by audit facilitators
NGO	Mahoni Na Dari	Email

Stakeholders comment	
1	<p>Feedbacks: Social Issues Committee (Mrs. Marqueritte Masing)</p> <ul style="list-style-type: none"> - Task of SOC is to accommodate the employees and its social issues, including welfare and gender issues. Referred to as social issues because of all their diverse issues that both male, female and employees encounter in our daily web, web of life, and even including our children as well. So, we do understand that it is brought into a bigger, diverse form of social welfare for employees. - This committee is established this year 2021 as required in new RSPO standard and we aware of that. - This committee has representatives in each department and conduct quarterly meeting. This meeting not involved to all employees, but only invited or interested to attend the meeting. If employee interest attends to meeting, then he/she must fill the form to join the meeting. - Last meeting on June 2021 discussed the issues that will come to us and how we are going to address those issues and present to the management. Those were some of the things and we also looked at an

	<p>early childhood settings in the compounds cause of the issue of a lot of this increased number of children in the compounds that are not attending schools. So we were thinking of starting the early childhood in each compound, so did it caters for the kids that do not go to school and just roaming around in the compounds when their parents go to work so that was under the child protection. That was one that we also discussed and then we moved into our project on the playground. Because we find that a lot of our children do not have a proper playground in the compound, so they end up following their parents and doing some things that they're not supposed to do and copying their parents.</p> <ul style="list-style-type: none"> - Social issue committee and grievance committee is different procedure. Social issues committee also have boundary, whatever issues that come, it goes to the security. If there's a grievance, then following the grievance procedure and it goes to our grievance officer or register it. And then it's handled separately. But for social issue, we are mostly do not actually end all cases, but we anything just come up with ideas source to mitigate some social issues and bring it to management side attention. - HR manager looks at our program. So currently we have a donation drive, but we put it on hold because of the audit, so maybe after audit will continue will collect all the donations and then we will donate them to our external stakeholders who have given their piece of land to do business in the remote areas. - And we have another task that all the committees are to do is the child census to be carried out in a different compound. So we have a few program, and we estimated that from August to December we anticipate to have the all covered, including two more meetings to fulfil the meeting requirements for this year 2021.
	<p>Audit Team verification and response: Audit team reported the stakeholder comment into criterion 6.5.</p>
<p>2</p>	<p>Feedbacks: Hargy Worker Union Representative (Mr. John Jeffrey)</p> <ul style="list-style-type: none"> - Deduction of 2 Kina each union member is aim to support union program and activities such as attending the union meeting out town, to buying bus ticket, meals and other logistics. Because if we request to borrow Hargy vehicle, that was not permissible. Those money (2 Kina/worker as union member) will collected into one account named Hargy's Workers account and it's secure. - He had incident in 6 June 2020 and caused the legs in serious treatment. He must rest for 1 year 6 months for healing. When the incident happened because unprofessional person when operate heavy vehicle. The fork lift operator has no license when operate the vehicle. This incident occurs due to company did not implement procedure properly.
	<p>Audit Team verification and response:</p> <ul style="list-style-type: none"> - Audit team interview with the Human Resources on the K2.00 union levy. Explanation reported under indicator 6.3.3 and 6.6.1. - Audit team follow up report from the worker representative and investigation result under indicator 6.7.2. The audit team also review the current training regime under criterion 3.7.
<p>3</p>	<p>Feedbacks: Grievance Registers Officer (Mrs. Evelyn Maya)</p> <ul style="list-style-type: none"> - Task for grievance registers officer is only input all grievances issues receives from the filled form into database system. Also making an update or progress for any grievance process. - As the grievance register officer is suggested to recognize and understand each status before input into the system. However, grievance register officer cannot decide and resolved the issues. <p>Audit Team verification and response: Audit team reported the sampled information on grievance handling under indicator 6.5.3. All grievances received, either internally or externally, are registered by the Grievance Officer and then sent to the concerned HOD or relevant Department Manager to investigate and resolve in accordance with the HOPL Grievance Policy.</p>
<p>4</p>	<p>Feedbacks: Sampled workers during interview at Mill and Estates</p>

	<ul style="list-style-type: none"> - Claimed that she/he never signed the employment contract and never informed the content of its contract. - Workers feeling confuse on 2 Kina’s deduction on their payslip, which is for union levy. But the workers feeling disappointed because no actual program for union to support the worker condition.
	<p>Audit Team verification and response:</p> <ul style="list-style-type: none"> - Audit team verified the comment; check document and interview; recorded in indicator 6.2.2. - Audit team interview with the Human Resources on the K2.00 union levy. Explanation reported under indicator 6.3.3.
<p>5</p>	<p>Feedbacks: Division of Fisheries & Marine Resources (Snr. Marine Officer, Mr. Sebastian Kautu)</p> <ul style="list-style-type: none"> - Our organization not involved directly within Hargy operation and activities, because our tasks are focused in marine and fisheries resources. - The organization know that Hargy Mill located near seaside of Bismarck Sea, which where an effluent from Mill operation discharge to the sea. However, after Hargy certified by RSPO there is no more complaint from local communities regarding seawater pollution in last 10 years. Our institution never received any negative issues on Hargy operation. - Hargy consistently analysing their effluent before discharge to the ocean. This company have Palm Oil Mill Effluent Pond to monitoring effluent until comply with threshold required. - Hargy are very cooperative, if organization need certain data that aims to monitor sea water quality and its habitat then Division of Fisheries & Marine Resources will contact to the company. - Division of Fisheries & Marine Resources and Hargy are in good relationship. <p>Audit Team verification and response: Audit team takes note as positive input.</p>
<p>6</p>	<p>Feedbacks: Department of Lands and Physical Planning - Mr. Kasen Dumui (Related to 17 suspended blocks)</p> <ul style="list-style-type: none"> - Department of Lands and Physical Planning has their view related to status of Village Oil Palms/VOP on state land. This would be seen as illegal. VOP can only happen on customary land. It is also illegal as VOPs are not pay land rental to the government. - When smallholder submitting Application of Tender Form, the application is only the start of the process to getting a land title. It can be disputed during the process. The applications goes through the Land Board to decide. The same piece of land can have others also applying for it as well. The Land Board then decides and Department of Lands and Physical Planning will then issue the Land Title to the persons deemed rightful by the Land Board. - Upon application, and issued with Notice for Exempt from Advertisement – whereby the Notice of Exemption will be given regarding a portion of land that has already been improved over time with no dispute over that land. It will go straight to the Land Board. The Notice of Exemption is still not the same as a Land Title and cannot be equated to. <p>Audit Team verification and response:</p> <ul style="list-style-type: none"> - Audit team verified and reported under indicator 4.4.1; all VOP blocks on government vacant lands especially in the Central Nakanai divisions are covered by Notice of Exemptions from Advertisements. This notices gives ample time for the locals forming and registering their community associations and applying for the proper lease title. The targeted VOP groups have registered their association and have prepared documentations for Land Board deliberations.
<p>7</p>	<p>Feedbacks: Mahoni Na Dari (Marine Conservation NGO)</p> <p>As a stakeholder of Hargy Oil Palm and an NGO that does conservation work in and around Biella (where HOPL operates), Mahoni Na Dari would like to inform you of our interactions with HOPL. Mahoni Na Dari work is mainly based around marine conservation and this usually consists of schools and community</p>

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	<p>awareness programs. We do branch out into providing environmental surveys from time to time but that is seldom and far between.</p> <p>Mahoni Na Dari are happy to report that all interactions with Hargy have been mainly positive and they ALWAYS assist us in any way possible, especially with logistics and accommodation (as our base is quite far from Biiala). Recent (2021) interactions between HOPL & Mahoni Na Dari are as follows:</p> <ul style="list-style-type: none"> - Mangrove seedlings from Mahoni Na Dari have been planted in front of the main Hargy Mill to assist with coastal erosion (April, 2021) - Logistical support (fuel & tyre maintenance as well as letter drop-offs to schools and communities) provided for MND team during our Biiala Outreach program (May, 2021) - Consultation for Kiba plantation Mangrove rehabilitation (on-going) - GIS support for Environmental survey conducted at Baikakea community (on-going) <p>Mahoni Na Dari mention that the Hargy Personnel worked closely with have been extremely helpful and are always approachable. To us, this indicates that they are very supportive of our conservation efforts and this shows how much Hargy aims to be a company that also practices conservation.</p>
	<p>Audit Team verification and response:</p> <p>Audit team verified the data and incorporated into indicator 4.3.1. Audit team noted as positive inputs.</p>

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. James Laula – East Nakanai Local Level Government	current		Yes	Yes	In compliance. See stakeholders comment and checklist indicator 4.4.1 and 4.4.2
Mr. Ellison Toirima – Ewasse Landowners Association	current		Yes	Yes	In compliance. See stakeholders comment and checklist indicator 4.4.1 and 4.4.2

Previous land owner / user comment	
1	<p>Feedbacks: East Nakanai Local Level Government - Mr. James Laula (Previous Land Owner – related to 17 suspended blocks)</p> <ul style="list-style-type: none"> - East Nakanai LLG view on 9 blocks in government vacant land; can continue to harvests, when government wants to develop – the 9 block users shall return to government. - For Portion 11, Section 21 – East Nakanai LLG gives temporary use of the land. - For Portion 2067, East Nakanai LLG and Hargy Oil Palms Limited have Memorandum of Agreement; section 1 stipulates the Memorandum shall commence upon its signing by both parties and shall remain in force until all palm trees are felled for replanting; section 3 stipulates HOPL shall rehabilitate the palms at its own cost and pay a monthly royalty fee at ten percent (10%) of the Smallholder Price for FFB in PGK value to East Nakanai LLG for the duration of the Memorandum. - There is no complaint reported. - East Nakanai LLG stated Hargy Oil Palms Limited assist the local level government in repairing and maintaining road condition for better access to FFB/crop sales. <p>Audit Team verification and response:</p> <ul style="list-style-type: none"> - East Nakanai LLG as the custodian of state lands in Biiala township area, has the authority to grant the 9 blocks a temporary occupancy rights to use the land for a certain period of time until the LLG revokes

	<p>user rights for the purpose of its own development plans i.e. Town expansion, other public service development etc. An Authorisation letter from LLG is in place for the 9 blocks concerned.</p> <ul style="list-style-type: none"> - A Memorandum of Agreement is signed between HOPL and LLG for LLG block to be harvested by HOPL and pay a 10% monthly royalty into the LLG account. Audit team verified the FPIC process and payment of royalty under indicator 4.4.1 and 4.4.2.
<p>2</p>	<p>Feedbacks: Ewasse Landowners Association (Mr. Ellison Toirima, Previous Landowner)</p> <ul style="list-style-type: none"> - Some of smallholders suspended blocks are located in Ewasse. The suspension of those blocks is due to land dispute issues that unclearly resolved between local government and block holders. - Some of smallholders suspended blocks has block type status is VOP that need agreement letter from local clan/tribe, whereas those area located in state land area. Therefore, no land certificate or legality of land ownership that can be issued on those blocks. - Progress of those land title issues did not followed in detail. Less information on those case. <p>Audit Team verification and response:</p> <ul style="list-style-type: none"> - East Nakanai LLG as the custodian of state lands in Bialla township area, has granted the 9 blocks a temporary occupancy rights to use the land for a certain period of time until the LLG revokes user rights for the purpose of its own development plans i.e. Town expansion, other public service development etc. An Authorisation letter from LLG is in place for the 9 blocks. - This is being progressed in this audit. Audit team takes note of this information and incorporate into indicator 4.4.1.



3.5 Impartiality and conflict of interest

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

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Formal Signing-off of Assessment Conclusion and Recommendation

The audit objectives have been achieved and the certificate scope is appropriate. Based on the results of this audit, it is concluded that Hargy Oil Palms Limited has complied with the PNG & Solomon Islands National Interpretation 2019 of the RSPO P&C 2018 and audit criteria identified within the audit report. It is deemed that the management system has achieved its intended outcomes. Therefore, it is recommended that Hargy Oil Palms Limited is remain certified.

Report prepared by	Acceptance of Assessment Conclusion
Name: Pratama Agung Sedayu	Name: Darren Stott
Company Name: PT. BSI Group Indonesia On behalf BSI Services Malaysia Sdn Bhd	Company Name: Hargy Oil Palms Limited
Title: Lead Auditor	Title: Acting General Manager
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: 18/12/2021	Date: 22/12/2021

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>Hargy Oil Palm Limited as Certified Management Unit has List of Publicly Available Documents (REG-SUS-SUS-001-14, issue No.14, dated 20 July 2021). SOP for Dissemination of Company Information & Documents (Doc. No.: PRO-COM-SUS-002-04, Issue No.: 4 dated 25 March 2021) 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-COMSUS-001-14, Issue No.: 14 dated 20 July 2021) approved by General Manager. The documents are available in the notice board on sites, employee handbook and on request approved by GM. The documents i.a:</p> <ul style="list-style-type: none"> - Company’s policies (Environment, OHS, Human rights, Forced and Trafficked Labour, etc.) - SEIA and EAI Register - HCV documentation, certification assessment reports, pollution prevention and reduction plan, land title and negotiation procedure. <p>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

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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)</p> <p>- Minor compliance -</p>	<p>All documented information is available in English. Company made available policy in Tok Pisin: Freedom of Association Policy No.POL-HRDGEN-009-04, dated 7 June 2019. General language in PNG is using English, however in some procedure also translated in Tok Pisin.</p> <p>Audit team sighted records of Field Day Report dated 8 August 2021, venue Block number 627 Malasi, explanation provided in Tok Pisin, reported in English. Attendance list recorded 50 smallholders.</p>	Complied
1.1.3	<p>(C) Records of requests for information and responses are maintained.</p> <p>- 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>Since 2019, there is no more request for information received from interested parties. The last record is in 5 May 2019 at Barema Mill. Information requested related process of the oil and to know how it goes in process to the end of getting oil. Action taken by mill processing assistant to response immediately.</p>	Complied
1.1.4	<p>(C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by a nominated management official.</p> <p>- Critical (Major) compliance -</p>	<p>Communication Policy (Doc. No.: POL-HRD-GEN-002-07, Issue No.: 7 dated 30 June 2021) 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.</p> <p>Beside the policy, Certified Management Unit also established the procedure of communication (PRO-SUS-EMS-006-14), issued No.14, dated 8 March 2021. The procedure describing appointing of communication responsible persons at each level.</p> <p>General Manager: Responsible for approving these procedures, receiving, documenting, and responding to the relevant communication from external interested parties.</p>	Complied

		<p>Smallholders Affairs Department: Maintaining awareness of stakeholder attitudes and identifying any issues of potential concern. Ensuring that officers of the department travel to communities who are, or may reasonably be, affected by Company operations to ensure good two-way communication.</p> <p>Department Managers: Reporting any communication issues to Smallholder Affairs and any environmental issues to the Sustainability Manager. Department Managers are also responsible for responding to EMS requirements.</p> <p>Sustainability Managers: Assists effective communication of all environmental issues, coordinates all internal and external communication, communicates internal audit reports to relevant management, reports the Management Review.</p> <p>Supervisors: Conduct team briefings for departmental personnel, report environmental concerns to Department Managers.</p> <p>All personnel: Report environmental concerns and external communication to Supervisor/Manager.</p> <p>The policy is communicated to the workers and seen the briefing records dated 10 August 2021 in Kiba Plantation (attended by 17 workers), 11 August 2021 in Navo Mill (attended by 4 workers), 17 March 2021 in Barema Mill (attended by 19 workers).</p> <p>The Extension Officers will conduct Field Day with smallholders to disseminate information and communicate with the smallholders.</p> <p>Contractors have signed on contract agreement and briefed on the policy.</p>	
1.1.5	<p>There is a current list of contact and details of stakeholders and their nominated representatives.</p> <p>- Minor compliance -</p>	<p>List of Interested Parties (Doc. No.: REG-COM-GEN-001-10, Issue No.: 10 dated 18 March 2021) 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.</p>	<p>Non-compliance</p>

		<p>However, when audit team selecting one of stakeholder namely Live and Learn Education Inc. to be contacted, it was informed that organization is inactive or no longer operated in West New Britain Province. While, it still available in stakeholders list.</p> <p>Minor Non-Conformity raised against this indicator.</p> <p>Current list of contact and details of stakeholders are not up-to-date.</p>	
<p>Criterion 1.2 The unit of certification commits to ethical conduct in all business operations and transactions.</p>			
<p>1.2.1</p>	<p>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.</p> <p>Smallholder Requirement:</p> <p>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</p> <p>- Minor compliance -</p>	<p>Unit of Certification has had ETHICAL CONDUCT POLICY (POL-HRD-GEN-003-04), issue No: 4, issued date: 30 June 2021.</p> <p>Awareness of this policy:</p> <ol style="list-style-type: none"> 1. Kiba Plantation: 29 July 2021, attended by 119 employees. 2. Barema POM: 26 August 2021, attended by 9 employees. 3. Navo POM: 12 July 2021, attended by 76 employees 4. Hargy POM: 17 February 2021, attended by 14 employees <p>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.</p> <p>This policy also cascading into relevant procedures, such as Contract Management Process (PRO-LEG-CON-001-01), dated 25 October 2021.</p> <p>Smallholders:</p> <p>Associated smallholders have had Policy Concerning Ethical Conduct that issued by OPIC since 19 July 2017. This policy containing: Basic Principles; Conflict of Interest; Illegal Gratification and Corrupt Practice; Gifts and Internal Controls.</p>	<p>Complied</p>

1.2.2	<p>A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice.</p> <p>- 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 Triangulation 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>An internal audit conducted at each unit to ensure implementation of the policy and overall ethical business practice. Internal audit report are recorded and well maintained.</p> <ol style="list-style-type: none"> 1. Barema Mill: internal audit conducted on 10 March 2021 2. Bakada Plantation and Compound: conducted on 7 June 2021 3. Hargy Mill: conducted on 11 March 2021 4. Kiba Plantation and Compound: conducted on 16 June 2021 5. Navo Mill: conducted on 8 June 2021 6. Hargy Plantation: conducted on 22 March 2021 <p>Smallholders: Internal audit for Smallholders Affairs conducted on 11 March 2021.</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</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. Sampled referenced regulation:</p> <ul style="list-style-type: none"> - PNG Environment Act (Amendment) 2014 - PNG Environmental Code of Practices – Vehicle Workshop & Hydrocarbons, 	Complied

	<p>activities. Block inspection reports to provide evidence of compliance.</p> <p>- Critical (Major) compliance -</p>	<p>Storage, Resale and Usage</p> <ul style="list-style-type: none"> - 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.</p> <p>Environment Permit No.WD-L2(56) date of issue 13 October 1993, date of amendment 16 May 2005 and 26 May 2006, date of expiry 31 December 2028 – for Hargy Oil Palms Limited to carry out works at portions 9, 14, 15, 1081, 1492, 1494 at Bialla District of West New Britain Province; to discharge waste into environment from its premises while carrying out a level 2. The list of licenses comprise of:</p> <ul style="list-style-type: none"> - "Certificate of Registration as a Factory – Mill Processing Plant No.10316 for Hargy Oil Palms Limited Hargy Mill, based on Industrial Safety, Health and Welfare Act 1961-1969", until 31 December 2021. - "Certificate of Registration as a Factory No.10317 – Water Treatment Plant for Hargy Oil Palms Limited Hargy Mill, based on Industrial Safety, Health and Welfare Act 1961-1969", until 31 December 2021. - "Certificate of Registration of a Boiler Pressure Vessel No.14301, Registered No.B.1895 for PT. Atmindro Bidrum WT Boiler in Hargy Oil Palms Limited Hargy Mill, based on Industrial Safety, Health and Welfare Act 1961", dated 25 January 2021 until 25 January 2022. - "Certificate of Registration of a Boiler Pressure Vessel No.14291, Registered No.PV.955 for Sterilizer-2 in Hargy Oil Palms Limited Hargy Mill, based on Industrial Safety, Health and Welfare Act 1961", dated 25 January 2021 until 25 January 2022. - "Certificate of Registration of a Boiler Pressure Vessel No.14294, Registered No.PV.2675 for Back Pressure in Hargy Oil Palms Limited Hargy Mill, based on Industrial Safety, Health and Welfare Act 1965", dated 25 January 2021 until 25 January 2022. - "Certificate of Registration of a Boiler Pressure Vessel No.14305, Registered 	
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		<p>No.PV.1899 for Horizontal Air Receiver in Hargy Oil Palms Limited Hargy Mill, based on Industrial Safety, Health and Welfare Act 1961”, dated 25 January 2021 until 25 January 2022.</p> <p>---</p> <p>In Barema POM, Environment Permit No.WD-L2(60) date of issue 30 May 2005, date of amendment 19 November 2012, 14 August 2017, date of expiry 26 June 2030 – for Hargy Oil Palms Limited to carry out works at portions 2038, Milinch Ulawun, Fourmil Talasea West New Britain Province; to capture methane gas from anaerobic wastewater treatment for Barema POM; to discharge waste into environment from its premises while carrying out a level 2 activity associated with agriculture cultivation, Level 2 activity associated with palm oil extraction and processing, Level 2 activity associated with treatment and disposal of industrial waste.</p> <p>The list of licenses comprises of:</p> <ul style="list-style-type: none"> - “Certificate of Registration as a Factory – Mill Processing Plant No.10358 for Hargy Oil Palms Limited Barema Mill, based on Industrial Safety, Health and Welfare Act 1961- 1969”, until 31 December 2021. - “Certificate of Registration as a Factory No.10362 – Biogas Plant for Hargy Oil Palms Limited Barema Mill, based on Industrial Safety, Health and Welfare Act 1961-1969”, until 31 December 2021. - “Certificate of Registration as a Factory No.10361 – Mill Maintenance and Electrical Workshop for Hargy Oil Palms Limited Barema Mill, based on Industrial Safety, Health and Welfare Act 1961-1969”, until 31 December 2021. - “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 25 January 2021 until 25 January 2022. - “Certificate of Registration of a Boiler Pressure Vessel No.14337, Registered No.PV.1361 for Horizontal Air Receiver in Hargy Oil Palms Limited Barema 	
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		<p>Mill, based on Industrial Safety, Health and Welfare Act 1961”, dated 25 January 2021 until 25 January 2022.</p> <ul style="list-style-type: none"> - “Certificate of Registration of a Boiler Pressure Vessel No.14344, Registered No.PV.1357 for Gas Blower 1 in Hargy Oil Palms Limited Barema Mill-Biogas Plant, based on Industrial Safety, Health and Welfare Act 1961”, dated 25 January 2021 until 25 January 2022. - “Certificate of Inspection of a Boiler Pressure Vessel No.14329, Certified No.PV.1334 for Sterilizer 1, address Hargy Oil Palms Limited Barema Mill, based on Industrial Safety, Health and Welfare Act 1961”, dated 25 January 2021 until 25 January 2022. <p>---</p> <p>In Navo POM, Environment Permit No. WD-L2B (104) to Hargy Oil Palms Limited, date of issue 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; to discharge waste into environment carrying out level 2 activities associated with agricultural cultivation and palm oil extraction. The list of legal compliance comprises of: Environment</p> <ul style="list-style-type: none"> - “Certificate of Registration as a Factory – Mill Processing Plant No.10351 for Hargy Oil Palms Limited Navo Mill, based on Industrial Safety, Health and Welfare Act 1961-1969”, until 31 December 2021. - “Certificate of Registration of a Boiler Pressure Vessel No.14321, Registered No.PV.2129 for Sand Filter 1 in Hargy Oil Palms Limited Navo Mill, based on Industrial Safety, Health and Welfare Act 1961”, dated 25 January 2021 until 25 January 2022. - “Certificate of Registration of a Boiler Pressure Vessel No.14323, Registered No.B.3132 for PT. Atmino Bidrum Boiler 1 in Hargy Oil Palms Limited Navo Mill, based on Industrial Safety, Health and Welfare Act 1961”, dated 25 January 2021 until 25 January 2022. - “Certificate of Registration of a Boiler Pressure Vessel No.14317, Registered 	
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		<p>No.PV.1337 for Back Pressure Vessel in Hargy Oil Palms Limited Navo Mill, based on Industrial Safety, Health and Welfare Act 1961”, dated 25 January 2021 until 25 January 2022.</p> <ul style="list-style-type: none"> - “Certificate of Registration of a Boiler Pressure Vessel No.14318, Registered No.PV.1338 for Steam Separator 1 in Hargy Oil Palms Limited Navo Mill, based on Industrial Safety, Health and Welfare Act 1961”, dated 25 January 2021 until 25 January 2022. - “Certificate of Inspection of a Boiler Pressure Vessel No.14314, Certified No.PV.2123 for Sterilizer-1 in Hargy Oil Palms Limited Navo Mill, based on Industrial Safety, Health and Welfare Act 1961”, dated 25 January 2021 until 25 January 2022. <p>---</p> <p>In Hargy Estate, the list of legal compliance consist of:</p> <ul style="list-style-type: none"> - “Certificate of Registration as a Factory – Powerhouse No.10380 for Hargy Oil Palms Limited Hargy Estate Urumaili, based on Industrial Safety, Health and Welfare Act 1961-1969”, until 31 December 2021. - “License to Keep a Store where Inflammable Liquids and/or Dangerous Goods May Be Kept – Chemical Storage Shed & Mixing Bay, Fertilizer Storage Shed No.28612 for Hargy Oil Palms Limited Hagy Estate Makakiwa Plantation, based on Industrial Safety, Health and Welfare Act 1961-1969”, until 30 September 2021. - “License to Keep a Store where Inflammable Liquids and/or Dangerous Goods May Be Kept – Chemical Storage Shed & Mixing Bay No.28611 for Hargy Oil Palms Limited Hagy Estate Urumaili Plantation, based on Industrial Safety, Health and Welfare Act 1961-1969”, until 30 September 2021. - “License to Keep a Store where Inflammable Liquids and/or Dangerous Goods May Be Kept – Oil Diesel Storage Tank 3,000 liters No.10739 for Hargy Oil Palms Limited Hagy Estate Makakiwa Plantation, based on Industrial Safety, Health and Welfare Act 1961-1969”, until 30 September 2021. 	
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		<ul style="list-style-type: none"> - "License to Keep a Store where Inflammable Liquids and/or Dangerous Goods May Be Kept – Oil Diesel Storage Tank 3,000 liters No.10739 for Hargy Oil Palms Limited Hagy Estate Urumaili Plantation, based on Industrial Safety, Health and Welfare Act 1961-1969", until 30 September 2021. <p>---</p> <p>In Navo Estate, Environment Permit No.WD-L2(60) date of issue 11 January 2001, date of amendment 16 June 2006, date of expiry 31 December 2053 – for Hargy Oil Palms Limited to extract water from Ibana River within Portion 624, West New Britain Province.</p> <p>The list of legal compliance consist of:</p> <ul style="list-style-type: none"> - "Certificate of Registration as a Factory – Powerhouse No.10376 for Hargy Oil Palms Limited Navo Estate Kiba Plantation, based on Industrial Safety, Health and Welfare Act 1961-1969", until 31 December 2021. - "License to Keep a Store where Inflammable Liquids and/or Dangerous Goods May Be Kept – Oil Diesel Storage Tank 3,000 liters No.10733 for Hargy Oil Palms Limited Navo Estate Kiba Plantation, based on Industrial Safety, Health and Welfare Act 1961-1969", until 30 September 2021. <p>---</p> <p>In Pandi Estate, Environment Permit No. WD-L2B (224) to Hargy Oil Palms Limited, date of issue 9 November 2009, expiry on 9 December 2034. The permit to carry out works at Portion 733, Milinch Ulawun, Fourmil Talasea, West New Britain Province; to discharge waste into environment carrying out level 2 activities associated with agricultural cultivation and palm oil extraction.</p> <p>The list of legal compliance consist of:</p> <ul style="list-style-type: none"> - "Certificate of Registration as a Factory – Vehicle Maintenance No.10338 for Hargy Oil Palms Limited Pandi Estate Vehicle Workshop, based on Industrial Safety, Health and Welfare Act 1961-1969", until 31 December 2021. - "License to Keep a Store where Inflammable Liquids and/or Dangerous Goods May Be Kept – Chemical Storage Shed, Chemical Mixing Bay, Fertilizer 	
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		<p>Storage Shed, Lubricant Storage, Oxygen & Acetylene Storage No.28062 for Hargy Oil Palms Limited Pandi Estate Bakada Plantation, based on Industrial Safety, Health and Welfare Act 1961-1969”, until 30 September 2021.</p> <p>For lease fee, Hargy Oil Palms Limited paid the fee to government.</p> <ul style="list-style-type: none"> - Government Receipt No.R00001280111 dated 30 March 2021 for Annual Land Rental Fee Portion 14 of PGK 1,250. - Government Receipt No.R00001280113 dated 30 March 2021 for Annual Land Rental Fee Portion 624 (Navo Estate) of PGK 2,500. - Government Receipt No.R00001280117 dated 30 March 2021 for Annual Land Rental Fee Portion 2038 (Barema Plantation) of PGK 14,500. - Government Receipt No.R00001280112 dated 30 March 2021 for Annual Land Rental Fee Portion 9 (Hargy Estate) of PGK 3,710. 	
<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.</p> <ul style="list-style-type: none"> - Minor compliance - 	<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/consol_act/ - 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-SUS-GEN-002-12, issue No.10, dated 10 May 2021. The PNG Applicable Legislations comprise of 109 Legislations and PNG Code of Practices. This is an update from last year’s 79 legislation and Code of Practices.</p>	<p>Complied</p>

		<p>Some of the newest legislation: National Pandemic Act 2020; reviewed on 21 April 2021; status certified on 16 June 2020 – new legislation. Legal Compliance Checklist, latest version 14 August 2020.</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; 	<p>Hargy Oil Palms Limited demonstrated that in Navo Estate the boundary stones are maintained:</p> <ul style="list-style-type: none"> - Boundary stone No.1 coordinate 05⁰ 05' 52.25" S and 151⁰ 11' 00.52" E. - Boundary stone No.5 coordinate 05⁰ 05' 49.83" S and 151⁰ 10' 46.72" E. - Boundary stone No.17 coordinate 05⁰ 06' 02.08" S and 151⁰ 9' 49.70" E. <p>Smallholders</p> <ul style="list-style-type: none"> - Boundary stone smallholder No. 090908 Gideon Waisisi coordinate 05⁰ 16' 50.70" S and 151⁰ 03' 10.65"E; - Boundary stone smallholder No.090953 Peter Ruru coordinate 05⁰ 17' 00.65" S and 151⁰ 03' 19.40" E; - Boundary stone smallholder No.121259 Josephine Gaa coordinate 05⁰ 18' 10.85" S and 151⁰ 02" 17.00" E; - Boundary stone smallholder No.131324 Ropa Matamuli coordinate 05⁰ 16' 50.54" S and 151⁰ 01' 49.83" E; - Boundary stone smallholder No.111151 Albert Thomas coordinate 05⁰ 25' 23.90" S and 151⁰ 02' 58.70" E; - Boundary stone smallholder No.170107 Lavinia Toua coordinate 05⁰ 20' 51.70" S and 151⁰ 00' 47.20" E; <p>Smallholders 020689 Uklu Tawakla, LSS 6 Ha.</p> <ul style="list-style-type: none"> - Agricultural Lease under Section 56, to Ulaku Tawakla, dated 24 November 1978, Portion 689, Milinch Ulawun, Fourmil Talasea, area of 8.29 Ha, West New Britain Province. Land title completed with map of Survey Plan Portion 	<p>Complied</p>

	<ul style="list-style-type: none"> • Smallholder allotments, boundaries may be identified by traditional means provided that boundary locations are agreed by all neighbouring parties that share common boundaries. - Minor compliance - 	<p>689, Catalogue 15/382. Based on interview assisted by Audit Facilitator, the smallholder does not have dispute over tenure.</p> <p>Smallholders 021153 Nime Kal, LSS 5.41 Ha.</p> <ul style="list-style-type: none"> - Survey Plan Portion 1153, Catalogue 15/376. Based on interview assisted by Audit Facilitator, the smallholder does not have dispute over tenure. <p>Smallholders 020798 Nani Bun, LSS 6 Ha.</p> <ul style="list-style-type: none"> - Survey Plan Portion 798, Catalogue 15/382. Based on interview assisted by Audit Facilitator, the smallholder does not have dispute over tenure. <p>Smallholders 021156 Suapi Akameau, LSS 6 Ha.</p> <ul style="list-style-type: none"> - Agricultural Lease under Section 56, to Suapi Akameau, dated 24 November 1978, Portion 1156, Milinch Ulawun, Fourmil Talasea, area of 6.64 Ha, West New Britain Province. Land title completed with map from Survey Plan Portion 1156, Catalogue 15/376. Based on interview assisted by Audit Facilitator, the smallholder does not have dispute over tenure. <p>Smallholders 031395 Andrew Kenga, LSS 6 Ha.</p> <ul style="list-style-type: none"> - Survey Plan Sale 1:7,500 for Portion 1395, Catalogue 15/412 indicating 6.4 Ha. Based on interview assisted by Audit Facilitator, the smallholder does not have dispute over tenure. <p>Smallholders 031429 Kauba Guria, LSS 6 Ha.</p> <ul style="list-style-type: none"> - Copy of Agricultural Lease under Section 56, to Kauba Guala, dated 20 September 1979, Portion 1429, Milinch Ulawun, Fourmil Talasea, area of 6.54 Ha, West New Britain Province period 99 years. Land title completed with map Survey Plan scale 1:6,000 Portion 1429, Catalogue 15/406. Based on 	
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		interview assisted by Audit Facilitator, the smallholder does not have dispute over tenure.	
Criterion 2.2: All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements			
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> <p>- Minor compliance -</p>	<p>Unit of Certification has "2021 Contractors Listings" for all HOPL operating sites. According to the list, there were 22 contracts for Mill and Estates, and 5 contractors for FFB cartage. Sample of contract seen are:</p> <ul style="list-style-type: none"> - HOPL2021-031. Provision of Transport for Workers – Kiba Plantation. Contractor name: Dyrah Trading. Dated 5 February 2021. - HOPL2021-053. Loose Fruit Collection – Smallholders VOP Blocks and Independent Estates. Contractor name: Rebs Trading. Dated 12 May 2021. - HOPL2021-066. FFB Cartage Self Delivery – Independent Estates. Contractor name: Endy Estate Ltd. Dated 26 July 2021. - HOPL2021-064. FFB Cartage Self Delivery – Independent Estates. Contractor name: Kijomhal Transport. Dated 26 July 2021. <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> <p>- Minor compliance -</p>	<p>Sample of contract:</p> <ul style="list-style-type: none"> - HOPL2021-031. Provision of Transport for Workers – Kiba Plantation. Contractor name: Dyrah Trading. Dated 5 February 2021. - HOPL2021-053. Loose Fruit Collection – Smallholders VOP Blocks and Independent Estates. Contractor name: Rebs Trading. Dated 12 May 2021. - HOPL2021-066. FFB Cartage Self Delivery – Independent Estates. Contractor name: Endy Estate Ltd. Dated 26 July 2021. - HOPL2021-064. FFB Cartage Self Delivery – Independent Estates. Contractor name: Kijomhal Transport. Dated 26 July 2021 	Complied

		<p>Within these contracts already mentioned specific clause on meeting applicable legal requirements.</p> <p>On clause 17. Statutory Requirements: "the contractor must have the following valid statutory documents and shall provide copies upon request by HOPL as and when required:</p> <ul style="list-style-type: none"> i. Certificate of registration issued by the investment promotion authority (IPA); ii. Taxpayer's registration certificate issued by internal revenue commission (IRC); iii. Certificate of compliance issued by internal revenue commission (IRC); iv. Trading license issued by East Nakanai Local Level Government (ENLLG); v. MVIL Registration certificate and road worthiness safety stickers for vehicle usage under this contract; vi. Workers Compensation Insurance Cover; <p>Other relevant certificates.</p>	
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 contracts taken:</p> <ul style="list-style-type: none"> - HOPL2021-031. Provision of Transport for Workers – Kiba Plantation. Contractor name: Dyrah Trading. Dated 5 February 2021. - HOPL2021-053. Loose Fruit Collection – Smallholders VOP Blocks and Independent Estates. Contractor name: Rebs Trading. Dated 12 May 2021. - HOPL2021-066. FFB Cartage Self Delivery – Independent Estates. Contactor name: Endy Estate Ltd. Dated 26 July 2021. - HOPL2021-064. FFB Cartage Self Delivery – Independent Estates. Contactor name: Kijomhal Transport. Dated 26 July 2021 <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. - Critical (Major) compliance -</p>	<p>Hargy Oil Palms Limited consist of three Palm Oil Mill which supplied by 3 Own Estates (Hargy Estate, Navo Estate and Pandi Estate) and Smallholders. The land titles for lands that was developed by HOPL are available and kept onsite. There is no changes of directly source FFB from previous certificate under Hargy scope.</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>			
3.1.1	<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. - 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> <ul style="list-style-type: none"> - 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. 	Non-compliance

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The projected crop for a duration of 2019 - 2029 was sighted and summarised below:

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

The breakdown of crop for the mill processing as shown above budgeted at 61.42% for plantation FFBs and 38.58% for Smallholder FFBs.

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 maintained in The CEO's Office. It is treated with full confidentiality released on discretion of the management.

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.

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.

Based on 2021 Business Plan Overview, the HOPL 2021 targets are:

Description	2021 Target
FFB	
• Company	311,359 Tons
• Smallholders	230,245 Tons
Total FFB	541,604 Tons
Extraction Rates	
• OER	24.44%
• PKOER	2.06%
FFA	<4%
Oil Loses	1.57%
Oil Production	
• CPO	132,363 Tons
• PK	11,157 Tons
Planting	
• New Planting	0
• Replant (HP)	873 Ha
• Replant (SH)	563 Ha

		<p>Critical Non-Conformity raised against this indicator.</p> <p>The data and document for smallholder planted area are not consistent, for projection contribution of FFB supplied by smallholders within the unit of certification.</p> <ul style="list-style-type: none"> - The submitted RSPO Pre Audit information submitted 30 August 2021, stated smallholder total area is 13,892.73 Ha; - The smallholder block listing 2021 dated 9 August 2021, total planted area from 3,647 smallholders is 14,876.72 Ha - Based on field visit and document review, audit team found "ghost block" block not existing and not planted (nil production) on smallholder No. 380150 (Augustine Kautu) and 350030 (Michael Waula) block was not planted with oil palm, however the smallholder block listing 2021 dated 9 August 2021, stated it was planted. 																													
<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>The information of annual replanting program for the entire estates in the Hargy Palm Oil Limited (HOPL) is available. Below is the latest revision of replanting program, issued by General Manager of HOPL on 27 May 2021, based on HOPL 5 years Development & Replant 2021.</p> <p>Contents of which were sighted and shown below; figures in hectares otherwise stated.</p> <p>Replanting</p> <table border="1" data-bbox="1025 1082 1814 1356"> <thead> <tr> <th>Estate/ Plantation</th> <th>2021</th> <th>2022</th> <th>2023</th> <th>2024</th> <th>2025</th> <th>2026</th> </tr> </thead> <tbody> <tr> <td>Hargy Estate / Hargy Plantation</td> <td>426.56</td> <td>81.00</td> <td>-</td> <td>235.19</td> <td>-</td> <td>-</td> </tr> <tr> <td>Hargy Estate / Brema Plantation</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> </tr> <tr> <td>Navo Estate / Atata-Kiba Plantation</td> <td>275.74</td> <td>750.13</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> </tr> </tbody> </table>	Estate/ Plantation	2021	2022	2023	2024	2025	2026	Hargy Estate / Hargy Plantation	426.56	81.00	-	235.19	-	-	Hargy Estate / Brema Plantation	-	-	-	-	-	-	Navo Estate / Atata-Kiba Plantation	275.74	750.13	-	-	-	-	<p>Complied</p>
Estate/ Plantation	2021	2022	2023	2024	2025	2026																									
Hargy Estate / Hargy Plantation	426.56	81.00	-	235.19	-	-																									
Hargy Estate / Brema Plantation	-	-	-	-	-	-																									
Navo Estate / Atata-Kiba Plantation	275.74	750.13	-	-	-	-																									

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		<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 25%;">Navo Estate / Ibona Plantation</td> <td style="width: 10%; text-align: center;">-</td> <td style="width: 10%; text-align: center;">-</td> <td style="width: 10%; text-align: center;">534.63</td> <td style="width: 10%; text-align: center;">200.41</td> <td style="width: 10%; text-align: center;">566.85</td> <td style="width: 10%; text-align: center;">602.48</td> </tr> <tr> <td>Total</td> <td style="text-align: center;">702.30</td> <td style="text-align: center;">831.13</td> <td style="text-align: center;">534.63</td> <td style="text-align: center;">525.60</td> <td style="text-align: center;">566.85</td> <td style="text-align: center;">602.48</td> </tr> </table> <p>Replanting 2021 sighted in Hargy Estate Area 7 and Area 13 covers 119.48 Ha. Replanting in Smallholders are managed incorporation with Oil Palm Industry Corporation (OPIC). There is proposed smallholder plantings consist of 500.00 Ha in 2021; 683.00 Ha in 2022; 683.00 Ha in 2023, 683.00 Ha in 2024; 683.00 Ha in 2025; and 683.00 Ha in 2026. Replanting in smallholders area sighted in Block #321105 (John Goru), #331854 (Miriam G. Simon) and #332003 (Agnes Lawrence).</p>	Navo Estate / Ibona Plantation	-	-	534.63	200.41	566.85	602.48	Total	702.30	831.13	534.63	525.60	566.85	602.48	
Navo Estate / Ibona Plantation	-	-	534.63	200.41	566.85	602.48											
Total	702.30	831.13	534.63	525.60	566.85	602.48											
<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.</p> <p>- Minor compliance -</p>	<p>There is Procedure of Management Review (PRO-SUS-EMS-017-07) Issue no.7 dated 8 March 2021. The management review is conducted annually at planned intervals, to confirm that the standard implementation is suitable, adequate and effective for meeting the desired level performance and to identify and plan future improvement.</p> <p>Hargy Oil Palms Limited have conducted the 2020 Management Review – Hargy Oil Palms Limited (HOPL), on 26 March 2021. The management review attended by the GM HOPL, VWS HOD, Finance, HOD Stores, HOD Plantations, SHAAS Manager, HOD HR, HOD Engineering (Acting), HOD Sustainability.</p> <p>The management review agenda, as recorded in minutes of management review meeting dated 26 March 2021 has included:</p> <ul style="list-style-type: none"> • Actions/Follow up from previous management review. • Changes to the Management System. • Environmental Objectives & Targets / Environments Performances. • Process Performance and Product Conformity. • Results of Internal Auidts / Status of preventive and corrective actions. • Customer feedback from interested parties. • Adequacy resources: ISO 14001, RSPO P&C, RSPO SCCS. • Opportunities/recommendation for improvement 	<p>Complied</p>														

		<ul style="list-style-type: none"> Continuing Suitability & Adequacy of the Management & Certification System. 	
<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.18, dated 14 March 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 14/03/2021 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 unit of certification has sent the RSPO metrics template to CB during audit. There are three palm oil mills certified under Hargy Oil Palms Limited, consists of Hargy POM, Barema POM and Navo POM, and there are three estates consists of Hargy Estate, Navo Estate and Pandi Estate. All data requested have been filled in, including</p> <ul style="list-style-type: none"> Economic indicators: Total production volume of FFB; all FFB are certified since all supply bases are certified under HOPL; Yield (land productivity); Total production volume of certified PO and PK; Total sales volume of certified PO and certified PK; Social indicators: Demographic breakdown for workers/labour; Training for workers and smallholders; Inclusion of smallholders; Lost time injury frequency rate (LTIFR); Complaints and Grievances. 	Non-compliance

		<ul style="list-style-type: none"> Environmental indicators: Pesticide use; Freshwater usage; Biodiversity. <p>Minor Non-Conformity raised against this indicator. Untimely submission of the RSPO metrics template. The RSPO metrics template was submitted three days after audit commencement date on 3 September 2021. According to RSPO Metrix standard, version 2.1, Hargy Oil Palms Limited is allowed to provide data up to two months before audit month. This has taken into consideration that it will need to submit the metrics template to CB prior to an Audit, of which it might not be able to provide data up to one month before audit.</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="1032 959 1727 1007"> <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-002-017), documented information for the whole operation of HOPL are divided into sections as follow, including samples of procedures:</p> <ul style="list-style-type: none"> - Manuals: - MAN-SUS-EMS-001-12; EMS Manual; Rev.12; dated 10 March 2021. - MAN-SUS-SCC-001-03; HOPL SCC Manual; Rev.3; dated 10 March 2021. - MAN-PLT-HAR-001-04; Harvesting Manual; Rev.4; dated 23 April 2021. - MAN-PLT-UPK-002-01; Oil Palm Inorganic Fertilizer Management Practices Manual; Rev.1; dated 31/03/2021. 	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"> - MAN-HRD-GEN-001-02; HR Operations Manual; Rev.2; dated 1 June 2021. - General Procedures: - PRO-SUS-GEN-001-11; New Development Procedure; Rev.11; dated 12 May 2021. - PRO-SUS-GEN-003-10; Upkeep Management; Rev.10; dated 12 May 2021. - PRO-SUS-GEN-004-12; Pesticides Management SOP; Rev.12; dated 12 May 2021. - PRO-SUS-GEN-005-10; SOP for Nursery Practices; Rev.10; dated 12 May 2021. - PRO-SUS-GEN-006-12; SOP for CPO Milling; Rev.12; dated 12 May 2021. - PRO-SUS-GEN-007-12; SOP for PKO Milling Practices; Rev.12; dated 12 May 2021. - PRO-SUS-GEN-008-12; SOP for Waste Management Practice; Rev.12; dated 12 May 2021. - PRO-SUS-GEN-009-10; SOP for Compost Management; Rev.10; dated 12 May 2021. - PRO-SUS-GEN-010-11; SOP for Hydrocarbons Management; Rev.11; dated 12 May 2021. - PRO-SUS-GEN-011-12; SOP for Palm Oil Mill Effluent Management; Rev.12; dated 12 May 2021. - PRO-SUS-GEN-012-14; SOP for Shipping; Rev.14; dated 12 May 2021. - PRO-SUS-GEN-013-11; SOP for Transport; Rev.11; dated 12 May 2021. - PRO-SUS-GEN-014-11; SOP for Compound Management; Rev.11; dated 12 May 2021. - PRO-SUS-GEN-015-11; SOP for Central Stores; Rev.11; dated 12 May 2021. - PRO-SUS-GEN-016-10; SOP for Construction; Rev.10; dated 12 May 2021. 	
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		<ul style="list-style-type: none"> - EMS Procedures: - PRO-SUS-EMS-001-11; Environmental Aspects; Rev.11; dated 8 March 2021. - PRO-SUS-EMS-002-11; Compliance Obligation; Rev.11; dated 8 March 2021. - PRO-SUS-EMS-003-10; Environmental Objectives; Rev.10; dated 8 March 2021. - PRO-SUS-EMS-004-10; Oragnizational Roles, Responsibilities and Authorities; Rev.10; dated 8 March 2021. - Sustainability Procedures: - PRO-SUS-SUS-001-03; Mechanism to Check Consistent Implementation of Procedures; Rev.3; dated 8 March 2021. - PRO-SUS-SUS-002-04; Dissemination of Company Information & Documents; Rev.4; dated 25 March 2021. - Supply Chain Certification Procedures: - PRO-SUS-SCC-005-02; Out Sourcing Activities; Rev.2; dated 10 March 2021. - PRO-SUS-SCC-006-02; Sales and Goods Out; Rev.2; dated 10 March 2021. - PRO-SUS-SCC-011-03; Claims; Rev.3; dated 10 March 2021. - PRO-SUS-SCC-013-02; Management Review; Rev.2; dated 10 March 2021. - PRO-SUS-SCC-014-02; Production of CPO; Rev.2; dated 10 March 2021. - PRO-SUS-SCC-015-02; Receive of Fresh Fruit Bunch (FFB); Rev.2; dated 10 March 2021. - PRO-SUS-SCC-016-02; Collection and Transport of Fresh Fruit Bunch (FFB); Rev.2; dated 10 March 2021. - OHS Procedures: - PRO-SUS-OHS-001-03; First Aid Handling; Rev.3; dated 26 March 2021. 	
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		<ul style="list-style-type: none"> - PRO-SUS-OHS-002-02; Basic Operating Operators Guide for Garbage Truck; Rev.3; dated 26 March 2021. - PRO-SUS-OHS-003-05; PPE; Rev.5; dated 18 March 2021. - ERP-SUS-GEN-001-10; Volcano Eruption Evacuation Response Plan; Rev.10; dated 22 May 2021. - ERP-SUS-GEN-002-10; Flooding Rivers Evacuation Response Plan; Rev.10; dated 22 May 2021. - ERP-SUS-GEN-003-10; Mills Factories Fire Evacuation Response Plan; Rev.10; dated 22 May 2021. - ERP-SUS-GEN-004-10; Bialla Tank Farm Tanker Terminal Fire Emergency Standard Response Procedure; Rev.10; dated 22 May 2021. - ERP-SUS-GEN-005-10; Bialla Tanker Terminal Oil Spill Standard Response (Involving People) Procedure; Rev.10; dated 22 May 2021. - Procedures Engineering Department – Laboratory. - Procedures Engineering Department – Process. - Procedures Engineering Department – Biogas. - Procedures Engineering Department – Maintenance. - Procedures Engineering Department – Shipping. - Procedures Engineering Department – General. - Procedures Vehicle Workshop. - Procedures Community Affairs Department – General. - Procedures Community Affairs Department – Security. - Procedures Community Affairs Department – Lands. - Procedures Smallholders Affairs Department – Community Engagement. - Procedures Smallholders Affairs Department – Smallholder Agriculture Advisory Services. - Procedures Smallholders Affairs Department – Smallholder Transport. 	
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		<ul style="list-style-type: none"> - Procedures Human Resource Department – Health. - Procedures Human Resource Department – General. - Procedures Construction Department – Joinery. - Procedures Plantation – General. - Procedures Plantation – Ancillary. - Procedures Plantation – Upkeep. - Procedures Plantation – Harvesting. - Procedures Legal. - Procedures Finance Department – General. <p>Il 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 measures have already been introduced to support the government’s intent to restrict COVID-19 spreading. These measures are constantly being reviewed and adjusted 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. - FOR-HRD-HEA-005-01; Rules and Services for Persons Undergoing Quarantine; Issue no.1; dated 22 April 2021. - PRO-HRD-HEA-006-03; HOPL Quarantine Procedure - COVID 19; Issue no.3; dated 22 April 2021. 	
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		<p>- PRO-HRD-HEA-007-01; Standard Operating Procedure Management of COVID 19 In The Workplace; Issue no.1; dated 22 April 2021.</p>	
<p>3.3.2</p>	<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> <p>- Minor Compliance -</p>	<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 checklist forms sighted during the audit 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 The Head of 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. 	<p>Non-compliance</p>

		<ul style="list-style-type: none"> • Harvesters productivity / standards • Upkeep standard / Pest & Diseases • RSPO related requirement • Documentation compliance. <p>Smallholders:</p> <p>HOPL by its Smallholders Affairs has conducted field day to maintain knowledge of smallholders of sustainable production and best agriculture practices. Available records of field day facilitated by HOPL – PNGOPRA, e.g. Field day dated 25 August 2021 located in Tiauru Section 03, facilitator Peter Mula; dated 10 August 2021 located in Malassi Block 04-0627, facilitator OPIC, PNG OPRA, HOPLA SHAAS and LANDS, attended by 50 smallholders; dated 20 July 2021 located in Uasilau Village, facilitator OPIC, Transport, PNG OPRA, NASFUND REP-Bialla, Compliance, BOPGA, HOPLA SHAAS and LANDS, attended by 111 smallholders; dated 29 January 2021 located in Kiava Village, facilitator Peter Mula, Karen Rickian, Evelyn Maya, Stephanie Silik, attended by 41 smallholders.</p> <p>Improved performance of smallholders can be seen on production records. Production records available starting year 2017.</p> <p>Minor Non-Conformity raised against this indicator.</p> <p>Organization cannot demonstrate field day attendance records of sample smallholders.</p> <p>Based on review to smallholder documents Block 031470 (John Wapa), 031471 (Rodney Bui Yuku), 031472 (Waimal Kepo), there are no records of field day attendance.</p> <p>- Monitoring of Pollution Control Device was not performed regularly. Based on field visit to Navo POM, in the Pollution Control Device, rubbish skimmed from the trap have been dumped outside of the fence. Inconsistent with SOP Waste Management Plan No.PLN-SUS-EMS-001-011 Section 7.0 Hargy Palm Oil Mills</p>	
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		<p>stating "Storm water from the mill, drains to a main trap to capture any traces of oil and grease from the milling processes before being discharged. The traps are cleaned regularly and checked by the Mill Upkeep Supervisor. The grease traps in particular are inspected each day and cleaned when necessary".</p>	
<p>3.3.3</p>	<p>Records of monitoring and any actions taken are maintained and available. - 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 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 examples: Hargy Mill: <ul style="list-style-type: none"> • Hargy POM RSPO Internal Audit report 11 Mar 2021. There are 1 (one) Major NC regarding awareness record; there are 2 (two) minor NC regarding training plan and unattended hazard. • Chief Engineer Report - HPOM, dated 18 Feb 2021; observation regarding low PKOER and high losses; need repair on blower; to conduct video call with Demag Crane to check on condition prior make arrangement for technical visit; desander seems discharging oil while blowdown; roofing repair; I Beam and whole mill structure to repair; Turbine no. 1 oil leaking from filter. Barema Mill: <ul style="list-style-type: none"> • Barema POM RSPO Internal Audit report 10 Mar 2021. There are 3 (three) Major NC identified regarding PCD Inspection, significant pollutant, and </p>	<p>Complied</p>

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		<p>record regarding clear water. There are 7 (seven) minor NC identified regarding training records, pay query, safety sling, MSDS, PPE, and BOD monitoring.</p> <ul style="list-style-type: none"> Chief Engineer Report - BPOM, dated 25 August 2021; observation regarding chemical are outside from chemical stores exposing to risk of leakages; eld expired chemical still in store; one of the tank in biogas plant overflow water is brownish color and flowing through monsoon drain; poor housekeeping at workshop area; condensate pedestal badly leaking; no sign of greasing sterilizer pivots and bearings. <p>Navo Mill:</p> <ul style="list-style-type: none"> Navo POM RSPO Internal Audit report 8 Jun 2021. There are 8 (eight) Major NC identified regarding PPE in Lab, transport arrangement, staff order issuance, monthly inspection, gas arrester, electrical and fire hazard, workers rest room, hygienic conditions. There is 5 (five) minor NC identified regarding training plan and records, grievance awareness, mill effluent, reverse beeper, belt covers. Chief Engineer Report - NPOM, dated 24 August 2021; observation regarding poor housekeeping lubricant store; ensure nil spillage goes to monsoon drain; repair and modification trap near workshop entrance door in front sterilizer to complete; outstanding grievance to follow up; leakages effluent piping from mill to effluent leakages to get fix. <p>Plantation:</p> <p>Head of 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 	
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		<ul style="list-style-type: none"> • Upkeep standard / Pest & Diseases • RSPO related requirement • Documentation compliance. <p>There are several visit related estate performances conducted to the plantation in 2021, such as:</p> <ul style="list-style-type: none"> • Senior Plantation Manager Visit Report for Hargy Division 3 dated 13 January 2021. There are several observation noted regarding 9 cutters out of 12 in F9 didn't have gum boots on for work; sprayers were spraying in A7/tall palms had no cap on during spraying; genset attendant was not wearing company PPE. • Group Manager Inspection dated 23 April 2021 to Kiba Division 1, regarding Health & Safety (First Aid Kits, Eyewash, Fire Extinguisher, Emergency Response Procedures, Emergency Assembly point and fire exit), general housekeeping - compound (floors are clear, spills and leaks, thrash containers, toilets, lighting, litter), environmental (waste management, spill kits, drains, pollution control device, chemicals, walkways). • RSPO P&C PNG & SI NI 2019 Internal Audit Report of Hargy Plantation, on 22 March 2021. There are 4 (four) Major NC regarding policy awareness, buffer encroachment, shower and toilet facilities, earth wire. There are 6 (six) minor NC regarding specific training plan, awareness on rate, inappropriate disposal of records, sprayers training records, safety hazard to housing occupants, diesel storage tank valve. • RSPO P&C PNG & SI NI 2019 Internal Audit Report of Kiba Plantation, on 16 June 2021. There is 4 (four) Major NC regarding construction of additional shower room, grievance policy awareness, short term contract employed more than 3 months, awareness on RTE policy. There are 5 (five) minor non-conformities regarding training record signature, awareness related piece rate, monthly housing inspections, awareness on ethical conduct, chemical weeding SOPs refreshment training. 	
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		<ul style="list-style-type: none"> • RSPO P&C PNG & SI NI 2019 Internal Audit Report of Bakada Plantation, on 7 June 2021. There are 4 (four) Major NC regarding grievance process awareness, standard boundary maps, hand gloves for wheelers, shower facility for sprayers. There is 1 (one) minor NC regarding triple interceptor through maintenance. <p>Smallholder:</p> <ul style="list-style-type: none"> • RSPO P&C PNG & SI NI 2019 Internal Audit Report of Smallholders Affairs, on 11 March 2021. There is 1 (one) Major NC regarding diversion of crop and 1 (one) minor NC regarding awareness record on Ethical Conduct and Sexual Harassment. • RSPO P&C PNG & SI NI 2019 Internal Audit Report of Smallholders Affairs (Extension Services), on 15 June 2021. There are 2 (two) Major NC regarding growers interviewed are not well aware of the HOPL grievance mechanism and Soi Primary School ancillary staff doing FFB harvesting but are not paid fairly based on 30/70 (mobile card). There are 3 (three) minor non-conformities regarding diversion of FFB from Block #77254 to #77244; Block #21158 observed to improve sanitation, upkeep, boundary peg visibility and stop FFB diversion; LSS Block #390089 identified scout harvesting with poor pruning and harvesting practices. <p>Minor Non-Conformities:</p> <p>Organization failed to provide evidence of monitoring and any action taken to the blocks which not implementing best agricultural practices.</p> <p>Based on field visit to Smallholders Block 031470 (John Wapa), 031471 (Rodney Bui Yuku), 031472 (Waimal Kepo), found that the blocks were not in good conditions, bushes everywhere and no pruning.</p>	
<p>Criterion 3.4: 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> <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>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 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 Bialla 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>	<p>Complied</p>
<p>3.4.2</p>	<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</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>	<p>Complied</p>

	<p>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. - Minor Compliance -</p>														
<p>3.4.3</p>	<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. - Critical (Major) compliance -</p>	<p>Hargy Oil Palms Limited established HOPL Environmental Monitoring Program No. PLN-COM-EMS-002-08 with its latest status as of 24 April 2021:</p> <table border="1" data-bbox="1032 711 1944 1276"> <thead> <tr> <th>Activity/Aspect</th> <th>Monitoring</th> <th>Target</th> <th>Status at 24 April 2021</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> </tbody> </table>	Activity/Aspect	Monitoring	Target	Status at 24 April 2021	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.	<p>Complied</p>
Activity/Aspect	Monitoring	Target	Status at 24 April 2021												
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.												

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		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.
		POME treatment; POME irrigation Impact: Effluent quality; Overflow from reactor tank & ponds; Run offs & valve leakage; Inadequate treatment & overflow; Anaerobic digestion	Lab. analysis POME testing (internal) POME testing (external) POME monitoring (weekly)	pH:5-9 BOD: 100mg/L Oil &grease: 50mg/L DO: <6mg/L 0 (zero) overflows	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 2021 due to heavy rainfall. Improvement to the pond include bunding and additional holding pond.
		Petroleum hydrocarbons Impact:	Visual Site monthly EHS inspections	0 (zero) major spills	Complies, continue monitoring

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		Leaks & Spillages	Internal audit – bi annual			
		Fuel and lubricant storage Impact: fuel/lubricant spills	Visual Site monthly EHS inspections Internal audit – bi annual	0 (zero) spills	Complies, continue monitoring	
		Fuel transfer from ship to bulk fuel tank Impact: Spillage	Visual 24 hours supervision during loading Site monthly EHS inspections Internal audit – bi annual	0 (zero) spills	Complies, continue monitoring	
		Fuel transport by road tanker Impact: Road accident/ spillage	Visual Site monthly EHS inspections Internal audit – bi annual	0 (zero) major spills	Complies, continue monitoring	
		Process Effluent Transfer Impact: Sludge tank & pit overflow	Visual Site monthly EHS inspections Internal audit – bi annual	0 (zero) overflows	Complies, continue monitoring	
		CPO Transport by road tanker Impact: Road accident/ spillage	Visual Site monthly EHS inspections Internal audit – bi annual	0 (zero) spills	No spills in the last 12 months	
		CPO Transfer to ship	Visual	0 (zero) spills	No spills in the last 12 months	

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		Impact: Spillages into sea	24 hours supervision during loading Site monthly EHS inspections Internal audit – bi annual			
		Workshop Operation Impact: Storm water run offs	Visual Site monthly EHS inspections Internal audit – bi annual	0 (zero) spills	Complies, monitoring	continue
		Gravel extraction Impact: Vegetation removal	Visual Environmental Permit Compliance Evaluation - annual	Within boundaries	Complies, monitoring	continue
		Use of fossil fuel Impact: Spill, leakage	Visual Site monthly EHS inspections Internal audit – bi annual	0 (zero) major spills	Complies, monitoring	continue
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-001-02, Issue No.: 2 dated 1 June 2021) to outline the recruitment and probation/ promotion process. Based on interview with sample of workers, employment procedure has been disseminated clearly through the employment contract.				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.				Complied

		<p>Employment files reviewed did not show any discrimination of medical fitness for employment. Employment contract consist of:</p> <p>Position; Grade/Level; Remuneration (fortnightly basis);</p> <p>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); 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>In 2021, based on sample, there is one status of worker termination recorded at Navo POM, name Jerome Waira (pond attendant). Termination process against this worker was followed Certificate Holder procedure. All records are documented and available with the worker.</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:</p> <p>Organization managing the smallholders to provide advice and training on identification and control of risks through extension activities.</p> <p>- 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 2021 (issue No.11) 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,</p>	<p>Non-compliance</p>

		<p>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 2021) covering all units, Mills, Estates and Smallholders.</p> <p>In document of Plantation Operation Risk Assessment 2021, Loose Fruit Collection activity was not identify, while in PPE Matrix (PPE SOP PROSUS-OHS-003-05, issue No.5, date 18 March 2021) this activity was listed. One risk of fertilizer application within document of Plantation Operation Risk Assessment 2021 that were identified is inhalation of vapors.</p> <p>However, within in PPE Matrix (PPE SOP PRO-SUS-OHS-003-05, issue No.5, date 18 March 2021) face mask or respirator was not required for Fertiliser Handling (application).</p> <p>Training on identification and control of risks for smallholders suspended blocks was not available and not implemented.</p> <p>Procedure of Chemical Weeding (PRO-PLT-UPK-006-03) dated 24 March 2021, SOP #04 – Chemical Mixing in Safety part stated no personal clothing to be worn underneath the overalls whilst working with chemical.</p> <p>This covers both the Mixer and the Sprayers. Based on field observation and interview with sprayers at Hargy Estate (Hargy Plantation) and Navo Estate (Kiba Plantation), all sprayers still worn personal clothing underneath overalls.</p> <p>The Health and Safety risk assessment, training and implementation was not consistently implemented.</p> <ul style="list-style-type: none"> - Risk assessments, mitigation plans and H&S issues of all operations are not thoroughly identified. - Training on identification and control of risks for smallholders suspended blocks was not available. 	
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		<ul style="list-style-type: none"> - Procedure was not implemented properly. <p>Critical Non-Conformity raised against this indicator.</p> <p>The Health and Safety risk assessment, training and implementation was not consistently implemented.</p> <ul style="list-style-type: none"> - Risk assessments, mitigation plans and H&S issues of all operations are not thoroughly identified. - Training on identification and control of risks for smallholders suspended blocks was not available. - Procedure was not implemented properly. 	
3.6.2	<p>(C) The effectiveness of the H&S plan to address health and safety risks to people is monitored.</p> <ul style="list-style-type: none"> - Critical (Major) compliance - 	<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"> - Kiba Plantation, carried out on 13 May 2021; inspected by Clement Duhaut. - Alaba Plantation, carried out on 26-27 July 2021; conducted Terence Muge. - Barema Palm Oil Mill, carried out on 3 July 2021; conducted by Daniel Kolinjim. - Gamupa. Magalona, carried out on 24 June 2021. Inspected by Patrick Mungore. - Atata Plantation, Division 1 & 2, carried out on 4 February 2021; 	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:</p>	<p>All workers involved in the operation have been adequately trained in safe working practices. 2021 HOPL Workforce Development Training Calendar was established. There are 22 courses title in January 2021; 29 courses title in February 2021; 22 courses title in March 2021; April and May (all training was cancelled due to COVID19 pandemic); 33 courses title in June 2021; 42 courses title in July 2021.</p>	Complied

	<p>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>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> <ul style="list-style-type: none"> - Safety regarding work safety and how to use mask and glass. Location: Atata plantation, conducted on 19 August 2021. - Safety at Workplace and Update of LFC Bags Rate. Location: Bakada Plantation, dated 31 January 2021. - Identifying Hazard. Location: Barema POM, dated 24 April 2021. - How to Use Fire Hydrant. Location: Navo POM, dated 13 May 2021. - Safe working method and PPE usage at all times. Location: Barema Plantation, dated 27 April 2021. 	
<p>3.7.2</p>	<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 2021. - Safety at Workplace and Update of LFC Bags Rate. Location: Bakada Plantation, dated 31 January 2021. - Identifying Hazard. Location: Barema POM, dated 24 April 2021. - How to Use Fire Hydrant. Location: Navo POM, dated 13 May 2021. - Safe working method and PPE usage at all times. Location: Barema Plantation, dated 27 April 2021. <p>Minor Non-Conformity raised against this indicator. Training records for suspended smallholders were not available.</p>	<p>Non-compliance</p>

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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 records verified:</p> <ul style="list-style-type: none"> - Oil Dispatch SOP/RSPO SCCS Requirements for Dispatch and Emergency Oil Spill to 7 workers in Oil Dispatch Bay, 28 April 2021. Training facilitator: Jeffrey Penias. Training participant: Albert Toirima, John Jeffrey, Gregory Robin, Hojn Lau, Lonard Nurune, Henson Kling, Johny Gunal, - Training RSPO SCCS Standard to 10 workers in Hargy POM, 10 June 2021. Training facilitator: Fidelis Hiamangi. Training participant: Nathan Niahory, Joe Tanpia, Devan Mamu, George Robin, Wayne Sareo, Nelson Rabbie (drivers), Leila Lepakot (Superintendent Lab./Shipping), Davia Tantek (OHS Officer), Demas Gusa (Pump Attendant), Peterson Changel (Shipping Clerk). - Training RSPO SCCS Standard to 11 workers in Barema POM, 11 June 2021. Training topic: Purchasing Goods In/Sales Goods Out. Training facilitator: Fidelis Hiamangi. Training participant: Richard Karek, Mek Tangu (Laboratory Analyst), Douglas Patiken, Darel Taupia (FFB Grader), Sapak Papah (Biogas Plant), Santon Meingo, Esrom Yapan (KCP), Thomas Tade David Yawe (OHS Officer), Rachel Sapeuru, Ezekiel Pais (Weighbridge Operator). 	Complied
<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>			
3.8.1	<p>Identity Preserved 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> <p>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</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 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>	Complied

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	and uncertified FFB without physically separating them, then only Mass Balance Module is applicable.	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 form. A scissors tractor with trailer then picks up the FFB/loose fruit 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/loose fruit 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>	<p>HOPL implement Identity Preserved. This indicator is not applicable.</p> <p>Not applicable.</p>	Non-compliance
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 submitting 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 10 March 2021. The procedures are:</p> <ul style="list-style-type: none"> - PRO-SUS-SCC-016-02, Receipt of Fresh Fruit Bunch – Collection of FFB/Loose Fruit in Company Estate/Smallholders Block by Company Truck or Contractor, update 10 March 2021. - PRO-SUS-SCC-015-02, Receipt of Fresh Fruit Bunch, update 10 March 2021. - PRO-SUS-SCC-014-02, Production of Crude Palm Oil, Update 10 March 2021. - PRO-SUS-SCC-004-02, Non Conformance, update 10 March 2021; - PRO-SUS-SCC-005-02, Outsourcing Activities, update 10 March 2021; - PRO-SUS-SCC-006-02, Sales and Goods Out, update 10 March 2021; - PRO-SUS-SCC-007-02, Receipt of Transaction, update 10 March 2021; - PRO-SUS-SCC-008-02, Training, update 10 March 2021; 	Complied

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		<ul style="list-style-type: none"> - PRO-SUS-SCC-009-02, Record Keeping, update 10 March 2021; - PRO-SUS-SCC-010-02, Conversion Factors, update 10 March 2021; - PRO-SUS-SCC-011-03, Claims, update 10 March 2021; - PRO-SUS-SCC-012-02, Complaint, update 10 March 2021; - PRO-SUS-SCC-013-02, Management Review, update 10 March 2021. <p>Training records verified:</p> <ul style="list-style-type: none"> - Oil Dispatch SOP/RSPO SCCS Requirements for Dispatch and Emergency Oil Spill to 7 workers in Oil Dispatch Bay, 28 April 2021. Training facilitator: Jeffrey Penias. Training participant: Albert Toirima, John Jeffrey, Gregory Robin, Hojn Lau, Lonard Nurune, Henson Kling, Johny Gunal, - Training RSPO SCCS Standard to 10 workers in Hargy POM, 10 June 2021. Training facilitator: Fidelis Hiamangi. Training participant: Nathan Niahory, Joe Tanpia, Devan Mamu, George Robin, Wayne Sareo, Nelson Rabbie (drivers), Leila Lepakot (Superintendent Lab./Shipping), Davia Tantek (OHS Officer), Demas Gusa (Pump Attendant), Peterson Changel (Shipping Clerk). - Training RSPO SCCS Standard to 11 workers in Barema POM, 11 June 2021. Training topic: Purchasing Goods In/Sales Goods Out. Training facilitator: Fidelis Hiamangi. Training participant: Richard Karek, Mek Tangu (Laboratory Analyst), Douglas Patiken, Darel Taupia (FFB Grader), Sapak Papah (Biogas Plant), Santon Meingo, Esrom Yapan (KCP), Thomas Tade David Yawe (OHS Officer), Rachel Sapeuru, Ezekiel Pais (Weighbridge Operator), 	
3.8.6	<p>Internal Audit</p> <p>i. The mill shall have a written procedure to conduct annual internal audit to determine whether the mill;</p> <p>a. Conforms to the requirements in the RSPO Supply Chain</p>	<p>HOPL has a written procedure of Internal Audit No.PRO-SUS-EMS-016-12 dated 8 March 2021 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. 	Complied

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	<p>Certification Standard and the RSPO Market Communications and Claims Documents.</p> <p>b. Effectively implements and maintains the standard requirements within its organisation.</p> <p>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>	<ul style="list-style-type: none"> - 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. The internal audit have been carried out by Compliance Department for Hargy POM, Navo POM and Barema POM.</p> <p>The internal audit have been carried out by Sustainability Department for Hargy POM, Barema POM and Navo POM.</p> <ul style="list-style-type: none"> - Internal audit for Hargy POM carried out 11 March 2021. The auditor is Fidelis Hiamangi, Douglas Morris, Stephanie Silik, Florence Jicki. 1 NC Major and 2 NC Minor related to operation and OHS. No NC related to supply chain; - Internal Audit for Barema POM, carried out 10 March 2021. The auditor Fidelis Hiamangi, Douglas Morris, Stephanie Silik, Florence Jicki. All 3 NC Major and 7 NC Minor related to Operation and OHS. No NC related to supply chain. - Internal audit for Navo POM carried out 8 June 2021. The auditor Douglas Morris, Angelus Palik, Florence Jicki, Stephanie Silik. All 8 NC Major and 5 NC Minor related to operation, EMS and other. No NC related to supply chain. 	
3.8.7	<p>Purchasing and Goods In</p> <p>i. The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.</p> <p>ii. The mill shall inform the CB immediately if there is a projected overproduction of certified tonnage.</p> <p>iii. The mill shall have a mechanism in place for handling non-conforming FFB and/or documents.</p>	<p>Hargy Oil Palms Limited established RSPO Supply Chain Certification Manual No. MAN-SUS-SCC-001-03 dated 10 March 2021.</p> <p>SOP Receipt of Fresh Fruit Bunch (FFB) No.PRO-SUS-SCC-015-02 dated 10 March 2021.</p> <ul style="list-style-type: none"> - All FFB/LF from the company plantations and smallholders within the unit of certification are received by each mill through the weighbridge. 	Complied

		<ul style="list-style-type: none"> - On arrival, the weighbridge clerks check the documentation accompanying the FFB brought in to verify it comes from the certified supply base (company or smallholder). If, for any reason, a smallholder within the certified supply base has been suspended for compliance reasons, their identity is provided to the weighbridge operator on a list of suspended smallholders. The Weighbridge operator checks that none of the documentation is for FFB from a suspended smallholder on that list. If it is, the FFB is not accepted. - The weighbridge operator further verifies that relevant documentation have the 'IP' notation. - Should FFB be brought in not signifying the supply chain module (IP) then the FFB is to be deemed uncertified material and is to be rejected after investigation to identify the source and determine the reason for IP to be omitted from the documentation. If the reason is a clerical error, the PK may be accepted after receipt of corrected documentation. - Under no circumstances will any FFB that does not meet IP requirements be processed in a Hargy Mill. <p>Hargy Oil Palms Limited have a mechanism in place for handling non-conforming oil palm products and/or documents under Non-Conformance Procedure No.PRO-SUS-SCC-004-02 dated 10 March 2021.</p>	
3.8.8	<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> <p>a. The name and address of the buyer;</p>	<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-SUS-SCC-006-02 dated 10 March 2021. 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-8e530a0c-0a4a:</p> <ul style="list-style-type: none"> • Contract No.PHO-10771 dated 29 July 2020. Product: New Britain Crude Sustainable Unbleached Palm Oil in Bulk SG. Quantity: 500 MT. Seller: 	Complied

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	<ul style="list-style-type: none"> b. The name and address of the seller; c. The loading or shipment / delivery date; d. The date on which the documents were issued; e. RSPO certificate number; f. A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations); g. The quantity of the products delivered; h. Any related transport documentation; i. A unique identification number. 	<p>Hargy Oil Palms Limited. Seller Address: PO Box 21 Bialla, West New Britain, Papua New Guinea. Buyer: SIPEF – Antwerp; End Buyer: Cargil B.V.; Buyer Address: NL-1118 CZ Schiphol.</p> <ul style="list-style-type: none"> • Tanker Bill of Lading No.BIA/ROT-09, dated 30 December 2020. Shipper: Hargy Oil Palms Limited, Private Mail Bag Kimbe, West New Britain Province, Papua New Guinea. Notify Address: Cargil B.V. Croe Inbound, 21st Floor Evert Van De Beekstraat 378 NL-2311 CZ, Schiphol. Tanker: MT Stena Impression. Voyage: V2010. Loaded at port: Bialla, Papua New Guinea. Delivered to port: Rotterdam. Commodity: Crude Sustainable Palm Kernel Oil/SG RSPO Certificate No.RSPO535739. Volume 490.00 MT. Reference to Contract No.PHO-10771 SG. • Shipping Announcement No.TR-8e530a0c-0a4a. Date 07 January 2021. Seller: Navo Palm Oil Mill – SIPEF, Papua New Guinea. Member ID: RSPO_PO1000000105. Buyer: Cargil B.V. Refined Oil Europe. Member ID: RSPO_PO1000000031. Product name: CSPO. Supply Chain Model: Segregated. Volume 490 MT. Confirmation date 10 February 2021. <p>Information for RSPO certified products made available:</p> <ul style="list-style-type: none"> • The name and address of the buyer: Cargil B.V. 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: 30 December 2020; • The date on which the documents were issued: 30 December 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: 490.00 MT; • Any related transport documentation: Bill of Lading No.BIA/ROT-09, dated 30 December 2020; 	
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		<ul style="list-style-type: none"> • Supply chain certificate number of the seller: RSPO535739; • A unique identification number: Contract No.PHO-10771 SG. <p>Sales of CPO under PalmTrace transaction No.TR-9b74b5aa-2f4f:</p> <ul style="list-style-type: none"> • Contract No.PHO-10911 dated 29 January 2021. 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: Cargil B.V.; Buyer Address: NL-1118 CZ Schiphol. • Tanker Bill of Lading No.BIA/ROT-21, dated 5 Mar 2021. Shipper: Hargy Oil Palms Limited, Private Mail Bag Kimbe, West New Britain Province, Papua New Guinea. Notify Address: Cargil B.V. Croe Inbound, 21st Floor Evert Van De Beekstraat 378 NL-2311 CZ, Schiphol. Tanker: M.T. Nord Majestic. Voyage: V.2101. Loaded at port: Bialla, Papua New Guinea. Delivered to port: Rotterdam. Commodity: Crude Sustainable Palm Oil/SG RSPO Certificate No.RSPO535739. Volume 501.525 MT. Reference to Contract No.PHO-10911 SG. • Shipping Announcement No.TR-9b74b5aa-2f4f. Date 08/04/2021. Seller: SIPEF - Barema POM, Papua New Guinea. Member ID: RSPO_PO1000001655. Buyer: Cargil B.V. Refined Oil Europe. Member ID: RSPO_PO1000000031. Product name: CSPO. Supply Chain Model: Segregated. Volume 501.52 MT. Confirmation date 30 April 2021. <p>Information for RSPO certified products made available:</p> <ul style="list-style-type: none"> • The name and address of the buyer: Cargil B.V.; Buyer Address: NL-1118 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: 5 March 2021; 	
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		<ul style="list-style-type: none"> • The date on which the documents were issued: 29 January 2021; • 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: 501.525 MT; • Any related transport documentation: Bill of Lading No.BIA/ROT-21, dated 5 March 2021; • Supply chain certificate number of the seller: RSPO535739; • A unique identification number: Contract No.PHKO-10911 SG. <p>Sales of CPO under PalmTrace transaction No.TR-cf10b65f-bd6d:</p> <ul style="list-style-type: none"> • Contract No.PHKO-10101 dated 12 May 2021. Product: New Britain Crude Sustainable Unbleached Palm Kernel 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. • Tanker Bill of Lading No.BIA/ROT-19, dated 29 June 2021. Shipper: Hargy Oil Palms Limited, Private Mail Bag Kimbe, West New Britain Province, Papua New Guinea. Notify Address: Fuji Oil Europe N.V. Kulhmannlaan 96 900 Gent. Tanker: MT. Stena Immortal. Voyage: V.2103. Loaded at port: Bialla, Papua New Guinea. Delivered to port: Rotterdam. Commodity: Crude Sustainable Palm Kernel Oil/SG RSPO Certificate No.RSPO633028 (Hargy KCP). Volume 500.109 MT. Reference to Contract No.PHKO-10101 SG. • Contract No.PHKO-10102 dated 11 June 2021. Product: New Britain Crude Sustainable Unbleached Palm Kernel Oil in Bulk SG. Quantity: 800 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-20, dated 29 June 2021. Shipper: Hargy Oil Palms Limited, Private Mail Bag Kimbe, West New Britain Province, Papua New Guinea. Notify Address: Cargil B.V. Croe Inbound, 21st Floor Evert Van De Beekstraat 378 NL-2311 CZ, Schiphol. Tanker: MT. Stena Immortal. Voyage: V.2103. Loaded at port: Bialla, Papua New Guinea. Delivered to port: Rotterdam. Commodity: Crude Sustainable Palm Kernel Oil/SG RSPO Certificate No.RSPO633028 (Hargy KCP). Volume 800.00 MT. Reference to Contract No.PHKO-10102 SG. • Shipping Announcement No.TR-cf10b65f-bd6d. Date 05/07/2021. Seller: Hargy Palm Oil Mill – SIPEF, Papua New Guinea. Member ID: RSPO_PO1000000053. Buyer: Hargy Oil Palms – Kernel Crushing Plant. Member ID: RSPO_PO1000002567. Product name: CSPK. Supply Chain Model: Segregated. Volume 2,889.13 MT. Confirmation date 5 July 2021 <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 June 2021; • The date on which the documents were issued: 29 June 2021; • A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations): Crude Sustainable Palm Kernel/SG; • The quantity of the products delivered: 2,889.13 MT; • Any related transport documentation: Bill of Lading No.BIA/ROT-19 and No.BIA/ROT-20, dated 29 June 2021; • Supply chain certificate number of the seller: RSPO535739; 	
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		<ul style="list-style-type: none"> • A unique identification number: Contract No.PHKO-10101 SG and PHKO-10102 SG. 	
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> <p>a. The mill has legal ownership of all input material to be included in outsourced processes</p> <p>b. The mill has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the mill to ensure that certification body (CB) has access to the outsourcing contractor or operation if an audit is deemed necessary.</p> <p>c. The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</p> <p>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 this is announced in advance.</p>	<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 2021-053. Contract Type: Loose Fruit Collection and Delivery Contract as Instructed and Approved by Head of Department and the General Manager of Hargy Oil Palms Limited and Rebs Trading. Vehicle Rego No.KAI 823. Agreement period 1 May – 31 December 2021. Location of Services: Smallholder Division III and be supervised by an approved manager or supervisor of HOPL. Schedule of Rates available. Sign date 12 March 2021 and ends 31 December 2021 for delivery contract. The signee from Rebs Trading is Mr. Rebon Gavuli.</p> <p>Section 17. RSPO Compliance – Contractor shall adhere to RSPO Principle and Criteria during performance of contract: a) implement RSPO supply chain certification standards including principles and criteria, provide access to accredited certification bodies to undertake regular audit and investigation into business operations-system-company information when necessary.</p> <p>Contract No.HOPL 2021-066. Contract Type: Self Delivery Contract between Hargy Oil Palms Limited and Endy Estate Limited. MVIL Registration No.RAP 611. Agreement period valid for 12 months period. Schedule of Rates available. The signee from Endy Estate Limited is Mr. Senis Awe.</p> <p>Section 16. RSPO Compliance – Contractor shall adhere to RSPO Principle and Criteria during performance of contract: a) implement RSPO supply chain certification standards including principles and criteria, b) provide access to accredited certification bodies to undertake regular audit and investigation into business operations, Schedule of Rates available. Sign date 6 August 2021 “we have read and understood this contract No.HOPL2021/066 and agree to the terms and conditions”. The signee from Endy Estate Limited is Mr. Senis Awe.</p>	Complied

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		Hargy Oil Palms Limited has procedure PRO-ESD-SCC-005-01, Outsourcing Activity to regulate the outsourcing activity. Hargy Oil Palms 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>Kijomhal Transport (FFB cartage contract)</td> <td>Allan Zairere</td> <td>PO BOX 98, Bialla West New Britain</td> </tr> <tr> <td>Endy Estate (FFB Cartage Contract)</td> <td>Mr. Senis Awe</td> <td>PO BO 129, Bialla, West New Britain, Ph: 79784842</td> </tr> <tr> <td>Remailing Independent Estate (FFB Cartage Contract)</td> <td>Alois Gonggi</td> <td>Mobile No. (+675) 72148***</td> </tr> <tr> <td>Alaba Development Corporation (FFB Cartage Contract)</td> <td>Nixon Volele</td> <td>PO BOX 172, Bialla 624</td> </tr> <tr> <td>Rebs Trading (Loose Fruit Cartage)</td> <td>Mr. Rebon Gavuli</td> <td>PO BOX 172, Bialla, West New Britain, Ph: 79314065</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	Kijomhal Transport (FFB cartage contract)	Allan Zairere	PO BOX 98, Bialla West New Britain	Endy Estate (FFB Cartage Contract)	Mr. Senis Awe	PO BO 129, Bialla, West New Britain, Ph: 79784842	Remailing Independent Estate (FFB Cartage Contract)	Alois Gonggi	Mobile No. (+675) 72148***	Alaba Development Corporation (FFB Cartage Contract)	Nixon Volele	PO BOX 172, Bialla 624	Rebs Trading (Loose Fruit Cartage)	Mr. Rebon Gavuli	PO BOX 172, Bialla, West New Britain, Ph: 79314065	Complied
Contractor	Contact Person	Contact Number/Address																			
Kijomhal Transport (FFB cartage contract)	Allan Zairere	PO BOX 98, Bialla West New Britain																			
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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	Record keeping	Hargy POM, Barema POM and Navo POM maintains accurate, complete, up-to-date and accessible records and reports covering all aspects of RSPO Supply	Complied																		

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	<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 regulatory requirements and be able to confirm the certified status of raw materials or products held in stock. 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. iv. For Mass Balance Module, the mill: <ul style="list-style-type: none"> 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. 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. 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>Chain Certification Standard requirements. The organization has implemented RSPO Supply Chain Certification Standard based on RSPO Supply Chain Certification Manual (MAN-SUS-SCC-001-03 Issue no.3 dated 10 March 2021; SOP SCCS Internal Audit (FOR-SUS-SUS-001-03 dated 25 March 2021). Hargy Oil Palms Limited can demonstrate that all 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 29 August 2021, mentioned that FFB Stock before is 108.416 Tons; FFB received is 466.880 Tons; FFB processed is 437.596 Tons; stock carry forward is 137.700 Tons; FFB processed year to date is 106,020.999 Tons. CPO IP Stock B/F is 12,263.918 Tons; Produced is 108.617 Tons; Stock C/F is 12,372.535 Tons. PK IP Stock B/F is 53.029 Tons; Produced is 20.940 Tons; Stock C/F is 65.884 Tons. Mill Throughput month to date is 47.37 ton/hour; year to date is 47.20 ton/hour. CPO Extraction Rate month to date is 25.40%; year to date is 24.91%. PK Extraction Rate month to date is 5.29%; year to date is 5.29%. - Daily Production Figure of Barema POM for 29 August 2021, mentioned that FFB Stock B/F is 558.600 Tons; FFB received is 560.020 Tons; FFB processed is 1,022.620 Tons; stock C/F is 96.000 Tons; FFB processed year to date is 111,274.660 Tons. CPO IP Stock B/F is 415.186 Tons; Produced is 235.989 Tons; Stock C/F is 534.615 Tons. PK IP Stock B/F is 1.000 Ton; Received is 32.100 Ton²; Produced is 53.020 Tons; Stock C/F is 14.532 Tons. Mill Throughput month to date is 46.12 ton/hour; year to date is 44.37 ton/hour. CPO Extraction Rate month to date is 24.40%; year to date is 25.18%. PK Extraction Rate month to date is 5.22%; year to date is 5.16%. - Daily Production Figure of Navo POM for 29 August 2021, mentioned that FFB Stock B/F is 104.95 Tons; FFB received is 345.60 Tons; FFB processed is nil; stock C/F 450.55 Tons; FFB processed year to date is 150,322.991 Tons. CPO IP Stock B/F is 1,006.59 Ton; Produced is nil; Stock C/F is 1,006.59 Tons. PK IP Stock B/F is 117.83 Tons; Despatched is 16.12 Tons; 	
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		<p>Produced is nil; Stock C/F is 101.71 Tons. Mill Throughput month to date is 49.09 ton/hour; year to date is 50.74 ton/hour. CPO Extraction Rate month to date is 26.30%; year to date is 26.06%. PK Extraction Rate month to date is 4.90%; year to date is 5.13%.</p> <ul style="list-style-type: none"> - Quarterly Balance Report period January to March 2021 and April to June 2021. Based on the record, CPO stock at June 2021 in Hargy POM Opening stock SG is 2,428.039 MT; Production IP is 3,693.140 MT; Transfer in IP is 9,589.680 MT; Shipped SG is 10,359.661 MT, Closing stock SG is 5,351.198 MT. in Barema POM Opening stock IP is 3,225.724 MT; Production IP is 4,895.875 MT; Shipped IP is 4,959.160 MT, Closing stock IP is 3,162.439 MT. in Navo POM Opening stock IP is 2,042.68 MT; Production IP is 5,025.67 MT; Shipped IP is 4,630.52 MT, Closing stock IP is 2,437.83 MT. <p>"HOPL RSPO Supply Chain Certification Manual No.MAN-COM-SCC-001-03 dated 10 March 2021". In section 5.9.2 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.</p> <p>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 2020 can be retrieved.</p> <p>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>The OER and KER are applied to provide reliable estimate of amount of certified CPO and PK from each palm oil mills. CPOER and PKER are monitored and documented in Daily Production Figure.</p> <p>Based on Mill Daily Production Figure dated 29 August 2021, the mills have recorded extraction rate daily, as in Hargy POM: CPO Extraction Rate month to date is month to date is 25.40%; year to date is 24.91%. PK Extraction Rate month to date is 5.29%; year to date is 5.29%. In Barema POM CPO Extraction</p>	Complied

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		Rate month to date is 24.40%; year to date is 25.18%. PK Extraction Rate month to date is 5.22%; year to date is 5.16%. In Navo POM CPO Extraction Rate month to date is 26.30%; year to date is 26.06%. PK Extraction Rate month to date is 4.90%; year to date is 5.13%.	
3.8.14	Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.	HOPL Mills have updated CPO and PK extraction in daily basis to ensure accuracy against actual performance.	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 products, including during transport and storage to strive for 100% separation.</p>	<p>The procedure for production recording as in PRO-SUS-SCC-009-02, Record Keeping dated 10 March 2021 - has rules out a record keeping for RSPO certified FFB CPO and PK.</p> <p>At the moment, all FFB sources are certified. There are no non-certified FFB sources coming to Hargy POM, Barema POM and Navo POM.</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>	Complied
3.8.16	<p>Registration of Transactions</p> <p>i. Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date.</p> <p>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.</p> <p>Barema POM PalmTrace ID: RSPO_PO10000 01655.</p> <p>Navo POM PalmTrace ID: RSPO_PO10000 00105.</p> <p>Sales of CPO under PalmTrace transaction No.TR-8e530a0c-0a4a:</p> <ul style="list-style-type: none"> Contract No.PHO-10771 dated 29 July 2020. 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 	Complied

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		<p>Britain, Papua New Guinea. Buyer: SIPEF – Antwerp; End Buyer: Cargil B.V.; Buyer Address: NL-1118 CZ Schiphol.</p> <ul style="list-style-type: none"> • Tanker Bill of Lading No.BIA/ROT-09, dated 30 December 2020. Shipper: Hargy Oil Palms Limited, Private Mail Bag Kimbe, West New Britain Province, Papua New Guinea. Notify Address: Cargil B.V. Croe Inbound, 21st Floor Evert Van De Beekstraat 378 NL-2311 CZ, Schiphol. Tanker: MT Stena Impression. Voyage: V2010. Loaded at port: Bialla, Papua New Guinea. Delivered to port: Rotterdam. Commodity: Crude Sustainable Palm Kernel Oil/SG RSPO Certificate No.RSPO535739. Volume 490.00 MT. Reference to Contract No.PHO-10771 SG. • Shipping Announcement No.TR-8e530a0c-0a4a. Date 07/01/2021. Seller: Navo Palm Oil Mill – SIPEF, Papua New Guinea. Member ID: RSPO_PO1000000105. Buyer: Cargil B.V. Refined Oil Europe. Member ID: RSPO_PO1000000031. Product name: CSPO. Supply Chain Model: Segregated. Volume 490 MT. Confirmation date 10 February 2021. <p>Information for RSPO certified products made available:</p> <ul style="list-style-type: none"> • The name and address of the buyer: Cargil B.V. 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: 30 December 2020; • The date on which the documents were issued: 30 December 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: 490.00 MT; • Any related transport documentation: Bill of Lading No.BIA/ROT-09, dated 30 December 2020; 	
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		<ul style="list-style-type: none"> Supply chain certificate number of the seller: RSPO535739; A unique identification number: Contract No.PHO-10771 SG. <p>Sales of CPO under PalmTrace transaction No.TR-9b74b5aa-2f4f:</p> <ul style="list-style-type: none"> Contract No.PHO-10911 dated 29 January 2021. 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: Cargil B.V.; Buyer Address: NL-1118 CZ Schiphol. Tanker Bill of Lading No.BIA/ROT-21, dated 5 March 2021. Shipper: Hargy Oil Palms Limited, Private Mail Bag Kimbe, West New Britain Province, Papua New Guinea. Notify Address: Cargil B.V. Croe Inbound, 21st Floor Evert Van De Beekstraat 378 NL-2311 CZ, Schiphol. Tanker: M.T. Nord Majestic. Voyage: V.2101. Loaded at port: Bialla, Papua New Guinea. Delivered to port: Rotterdam. Commodity: Crude Sustainable Palm Oil/SG RSPO Certificate No.RSPO535739. Volume 501.525 MT. Reference to Contract No.PHO-10911 SG. Shipping Announcement No.TR-9b74b5aa-2f4f. Date 8 April 2021. Seller: SIPEF - Barema POM, Papua New Guinea. Member ID: RSPO_PO1000001655. Buyer: Cargil B.V. Refined Oil Europe. Member ID: RSPO_PO1000000031. Product name: CSPO. Supply Chain Model: Segregated. Volume 501.52 MT. Confirmation date 30 April 2021. <p>Information for RSPO certified products made available:</p> <ul style="list-style-type: none"> The name and address of the buyer: Cargil B.V.; Buyer Address: NL-1118 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: 5 March 2021; 	
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		<ul style="list-style-type: none"> • The date on which the documents were issued: 29 January 2021; • 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: 501.525 MT; • Any related transport documentation: Bill of Lading No.BIA/ROT-21, dated 5 March 2021; • Supply chain certificate number of the seller: RSPO535739; • A unique identification number: Contract No.PHKO-10911 SG. <p>Sales of CPO under PalmTrace transaction No.TR-cf10b65f-bd6d:</p> <ul style="list-style-type: none"> • Contract No.PHKO-10101 dated 12 May 2021. Product: New Britain Crude Sustainable Unbleached Palm Kernel 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. • Tanker Bill of Lading No.BIA/ROT-19, dated 29 June 2021. Shipper: Hargy Oil Palms Limited, Private Mail Bag Kimbe, West New Britain Province, Papua New Guinea. Notify Address: Fuji Oil Europe N.V. Kulhmannlaan 96 900 Gent. Tanker: MT. Stena Immortal. Voyage: V.2103. Loaded at port: Bialla, Papua New Guinea. Delivered to port: Rotterdam. Commodity: Crude Sustainable Palm Kernel Oil/SG RSPO Certificate No.RSPO633028 (Hargy KCP). Volume 500.109 MT. Reference to Contract No.PHKO-10101 SG. • Contract No.PHKO-10102 dated 11 June 2021. Product: New Britain Crude Sustainable Unbleached Palm Kernel Oil in Bulk SG. Quantity: 800 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-20, dated 29 June 2021. Shipper: Hargy Oil Palms Limited, Private Mail Bag Kimbe, West New Britain Province, Papua New Guinea. Notify Address: Cargil B.V. Croe Inbound, 21st Floor Evert Van De Beekstraat 378 NL-2311 CZ, Schiphol. Tanker: MT. Stena Immortal. Voyage: V.2103. Loaded at port: Bialla, Papua New Guinea. Delivered to port: Rotterdam. Commodity: Crude Sustainable Palm Kernel Oil/SG RSPO Certificate No.RSPO633028 (Hargy KCP). Volume 800.00 MT. Reference to Contract No.PHKO-10102 SG. • Shipping Announcement No.TR-cf10b65f-bd6d. Date 05/07/2021. Seller: Hargy Palm Oil Mill – SIPEF, Papua New Guinea. Member ID: RSPO_PO1000000053. Buyer: Hargy Oil Palms – Kernel Crushing Plant. Member ID: RSPO_PO1000002567. Product name: CSPK. Supply Chain Model: Segregated. Volume 2,889.13 MT. Confirmation date 5 July 2021 <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 June 2021; • The date on which the documents were issued: 29 June 2021; • A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations): Crude Sustainable Palm Kernel/SG; • The quantity of the products delivered: 2,889.13 MT; • Any related transport documentation: Bill of Lading No.BIA/ROT-19 and No.BIA/ROT-20, dated 29 June 2021; • Supply chain certificate number of the seller: RSPO535739; 	
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		<ul style="list-style-type: none"> A unique identification number: Contract No.PHKO-10101 SG and PHKO-10102 SG. <p>Information are available in across range of document, such as Sales Contract, Tanker Bill of Lading, Shipping Announcement.</p> <p>There is no remove implemented, because all RSPO certified product sold and registered into RSPO PalmTrace.</p>	
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>	<p>The mechanism for claims is stated in Hargy Oil Palms Limited RSPO Supply Chain Certification Manual No.MAN-SUS-SCC-001-03 dated 10 March 2021. Sample of document verified, Daily Production Figure, Weighbridge Card, Sales Contract, Tanker Bill of Lading, company letter head, website and emails 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.</p>	Complied
General corporate communications			
4.1	<p>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>	<p>The following was communicated in the group website: https://www.sipef.com/ 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> <ol style="list-style-type: none"> Display its RSPO membership status Display the RSPO web address (www.rspo.org) State that the member supports the work of the RSPO State the member's history with regard to the RSPO. 	<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.</p>	Complied

	<p>e. Use the RSPO trademark to promote its membership of the RSPO.</p> <p>Additionally, where an RSPO member displays the RSPO trademark in digital format this must be accompanied by the text 'Check our progress at www.rspo.org' where the link must lead to the member's profile page.</p>		
4.3	<p>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.</p>	<p>The communication in https://www.sipef.com/ does not do that.</p> <p>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.</p>	Complied
4.4	<p>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.</p>	<p>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.</p>	Complied
4.5	<p>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.</p>	<p>There is no RSPO corporate logo has been used in the website, official documents, or official letterhead template.</p>	Complied
Business to business communications			
5.1	<p>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.</p>	<p>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.</p>	Complied
5.2	<p>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.</p>	<p>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.</p>	Complied

5.3	<p>Where a distributor or wholesaler takes title to products containing certified sustainable oil palm products, the requirements of the RSPO SCCS can follow either of two options:</p> <p>a. If the distributor or wholesaler holds only a Distributor license, it may only communicate RSPO-certified oil palm products by linking the product to the manufacturer using the manufacturer's SCCS certificate number. This covers both brand and own brand products. However, in the case of own brand products it is essential that customers are aware that the product has been made on behalf of the distributor or wholesaler, with specific evidence either through on-pack claims or documentation.</p> <p>b. If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2.</p>	<p>HOPL is not a distributor or wholesaler. Not Applicable.</p>	<p>Not Applicable</p>
Business to consumer communication			
6.1	<p>Only RSPO members that have supply chain certification are allowed to make business to consumer claims about the certified sustainable oil palm products contained within product(s), which are known as 'product-specific' claims. Product-specific claims are voluntary.</p>	<p>There is no business to consumer communication as this is an upstream activity certification.</p>	<p>Not Applicable</p>
6.2	<p>Only RSPO members who have supply chain certification are authorised to use the RSPO trademark and/or RSPO label, with the exception of RSPO Credits and of retailers in accordance with 6.8 below.</p>	<p>There is no business to consumer communication as this is an upstream activity certification.</p>	<p>Not Applicable</p>
6.3	<p>When on-pack claims on RSPO-certified sustainable oil palm products are used, the RSPO trademark and associated identification number must be present.</p>	<p>There is no business to consumer communication as this is an upstream activity certification.</p>	<p>Not Applicable</p>
6.4	<p>Business to consumer communication shall not include information about the claimant's RSPO membership status.</p>	<p>There is no business to consumer communication as this is an upstream activity certification.</p>	<p>Not Applicable</p>

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)

	<p>For IP, 95% or above of the oil palm content must be RSPO IP-certified.</p>	<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 downgraded from "IP" into "SG". Hargy Oil Palms Limited sold their RSPO certified product as SG (multi mill).</p>	<p>Complied</p>
	<p>For SG, 95% or above of the oil palm content must be SG, or a combination of SG and IP.</p>	<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 downgraded from "IP" into "SG". Hargy Oil Palms Limited sold their RSPO certified product as SG (multi mill).</p>	<p>Complied</p>
	<p>Where there is any percentage of non-certified oil palm within the product, the reason for this must be fully justified and an action plan for moving to fully certified oil palm must be in place, in accordance with the requirements of the RSPO SCCS. In addition, the volume of non-certified oil palm products must be covered by the purchase of RSPO Credits of equivalent volume.</p>	<p>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.</p>	<p>Complied</p>
<p>Labelling and trademark (IP)</p>			
	<p>Members are allowed to use the RSPO label in one of the following ways:</p> <p>a. RSPO trademark which includes the tag 'CERTIFIED' or</p>	<p>There was no on product label claims for the certification of HOPL mills.</p>	<p>Not Applicable</p>

	<p>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.</p>		
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>
Principle 4: Respect community and human rights and deliver benefits			
Criterion 4.1: The unit of Certification respects human rights, which includes respecting the rights of Human Rights Defenders.			

4.1.1	<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 June 2021) 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 and contracted services. The policy is communicated to the workers and seen the briefing records dated 5 February 2021 in Atata Plantation (Navo Estate), 21 June 2021 in Kiba Plantation (Hargy Estate), 5 March 2021, 9 March 2021 and 12 May 2021 in Barema POM, 17 July 2021 in Hargy POM and 18 June 2021 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>	Complied
4.1.2	<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.</p> <p>- 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>	Complied
<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>			
4.2.1	<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.</p> <p>- Critical (Major) compliance -</p>	<p>The new procedure of Grievance Mechanism (PRO-ESD-GEN-017-04, issued 22 February 2021). 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>	Complied

<p>4.2.2</p>	<p>Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties. - Minor compliance -</p>	<p>Grievance Mechanism (Doc. No.: PRO-COM-GEN-017-04, Issue No.: 4 dated 19 June 2021) 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>Complied</p>
<p>4.2.3</p>	<p>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 -</p>	<p>Reviewed the Grievance Records Jul 2020 – June 2021 for the closed issues. Sampled the following Complaints, Grievance & Disputes Register Form and records of the closure of complaint as below:</p> <ol style="list-style-type: none"> 1. Issue 305: Workers strike on pay issues at Navo Estate (Atata Plantation) on 16 June 2021 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 June 2021 and 16 June 2021 and made payment accordingly. 2. Issue Jerome Waira (pond attendant Navo POM) related disciplinary. 	<p>Complied</p>

		Action taken: Management has taken action to investigate the complaint and had meeting with the relevant parties on 17 August 2021 and a warning letter was issued to the defendant on 27 August 2021 as he admitted his wrongdoing.	
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: Smallholder should participate in Field days and other extension activities delivered by organization managing the smallholders. All records shall be maintained. - Minor compliance -	Hargy Oil Palms Limited made community development projects. - Hargy Oil Palms Limited made assistance in form of water cartages to schools in Bialla, time on-going. - Hargy Oil Palms Limited made donation of books and other materials in Cenaka, Maututu and Meramera area, year 2020-2021. - Donation of materials for the construction of teacher houses in Bialla town, year 2020. - Donation of water bottlers to Elementary Schools in Cenaka, Maututu and Meramera area, June-August 2021. - Construction and renovation of Navo Primary School, year 2020. - Fuel supply to Local Level Government and Government Departments; these donation are requested through engagement and participatory meeting with Government Representative mostly travelling up from Kimbe, time on-going. - Financial Literacy Training to East Nakanai Local Level Government, time on-going. - Partnership with West New Britain Province Government for the Construction of Tiauru Community Hall, in Tiauru Community, completed 2021. - Cleaning and grass slashing of Bialla Police Station, time on-going.	Non-compliance

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		<ul style="list-style-type: none"> - Livelihood Training Programs (Wash & Sanitation) in Meramera and Maututu area, time on-going. - Support and procurement of Diesel fuel supply to Ulamona Health Center. Hargy Oil Palms continues to keep the health center operational with 200 liters of diesel fuel every month and undertake free maintenance service, time on-going. - New Bialla Maternity Ward – completed 2021. - Mangrove seedlings from Mahoni Na Dari have been planted in front of the main Hargy Mill to assist with coastal erosion (April, 2021) - Logistical support (fuel & tyre maintenance as well as letter drop-offs to schools and communities) provided for MND team during our Bialla Outreach program (May, 2021) <p>Minor Non-Conformity raised against this indicator.</p> <p>Hargy Oil Palms Limited made community development projects, however cannot demonstrate evidence the contribution made based on the results of consultation with local communities.</p> <p>In addition, field days and other extension activities was not conducted by organization to suspended smallholders.</p>	
<p>Criterion 4.4: 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. 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>Hargy Oil Palms Limited demonstrated the legal ownership of the land for its estates, mills, offices, workshops, housing/camp and wharf.</p> <ul style="list-style-type: none"> - Hargy Mill/Workshop, Portion 15 & Portion 633: Agricultural Lease under Section 56, to Hargy Oil Palms Limited, dated 2 February 1978 for 99 years, Portion 633 & 1044 consolidated, Milinch Ulawun, Fourmil Talasea, area of 16.99 Ha, West New Britain Province. Land title completed with map scale 1:7500 Survey Plan Catalogue No.15/282 & 15/341. 	<p>Complied</p>

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		<ul style="list-style-type: none"> - Hargy Estate, Portion 2046; State Lease Hargy Oil Palms Limited Portion 2046, Milinch Ulawun, Fourmil Talasea, West New Britain Province for area 321.67 Ha, Survey Plan Catalogue 15/805; dated 5 April 2007 for 99 years. - Hargy Effluent – Mill, Portion 14: Lease - Hargy Estate, Portion 9: Agricultural Lease under Section 56, to Hargy Oil Palms Limited, dated 25 March 1977 for 95 years, Portion 9, Milinch Ulawun, Fourmil Talasea, area of 2,967 Ha, West New Britain Province. Land title completed with map scale 1:50,000 Survey Plan Catalogue No.15/289. - Hargy Beach Front, Portion 1045: State Lease Hargy Oil Palms Limited Portion 1045, Milinch Ulawun, Fourmil Talasea, West New Britain Province for area 0.72 Ha, Survey Plan Catalogue 17/140; dated 5 April 2007 for 99 years. - Hargy Beach Front, Portion 1046: State Lease Hargy Oil Palms Limited Portion 1046, Milinch Ulawun, Fourmil Talasea, West New Britain Province for area 0.24 Ha, Survey Plan Catalogue 17/150; dated 5 April 2007 for 99 years. - Hargy Beach Front, Portion 1047: State Lease Hargy Oil Palms Limited Portion 1047, Milinch Ulawun, Fourmil Talasea, West New Britain Province for area 0.50 Ha, Survey Plan Catalogue 17/144; dated 5 April 2007 for 99 years. - Hargy Beach Front, Portion 1048: State Lease Hargy Oil Palms Limited Portion 1048, Milinch Ulawun, Fourmil Talasea, West New Britain Province for area 0.426 Ha, Survey Plan Catalogue 17/147; dated 5 April 2007 for 99 years. - Hargy Beach Front, Portion 1049: State Lease Hargy Oil Palms Limited Portion 1049, Milinch Ulawun, Fourmil Talasea, West New Britain Province for area 0.56 Ha, Survey Plan Catalogue 17/143; dated 5 April 2007 for 99 years. 	
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		<ul style="list-style-type: none"> - Hargy Beach Front, Portion 1050: State Lease Hargy Oil Palms Limited Portion 1050, Milinch Ulawun, Fourmil Talasea, West New Britain Province for area 0.42 Ha, Survey Plan Catalogue 17/148; dated 5 April 2007 for 99 years. - Hargy Beach Front, Portion 1051: State Lease Hargy Oil Palms Limited Portion 1051, Milinch Ulawun, Fourmil Talasea, West New Britain Province for area 0.1 Ha, Survey Plan Catalogue 17/145; dated 5 April 2007 for 99 years. - Hargy Beach Front, Portion 1052: State Lease Hargy Oil Palms Limited Portion 1052, Milinch Ulawun, Fourmil Talasea, West New Britain Province for area 0.1 Ha, Survey Plan Catalogue 17/145; dated 5 April 2007 for 99 years. - Hargy Beach Front, Portion 1053: State Lease Hargy Oil Palms Limited Portion 1053, Milinch Ulawun, Fourmil Talasea, West New Britain Province for area 0.1 Ha, Survey Plan Catalogue 17/141; dated 5 April 2007 for 99 years. - Hargy Beach Front, Portion 1054: State Lease Hargy Oil Palms Limited Portion 1054, Milinch Ulawun, Fourmil Talasea, West New Britain Province for area 0.1 Ha, Survey Plan Catalogue 17/146; dated 5 April 2007 for 99 years. - Hargy Beach Front, Portion 1055: State Lease Hargy Oil Palms Limited Portion 1055, Milinch Ulawun, Fourmil Talasea, West New Britain Province for area 0.1 Ha, Survey Plan Catalogue 17/149; dated 5 April 2007 for 99 years. - Wharf and Under Water, Portion 1494: Lease for Papua New Guinea Harbours Board, Portion 1494, Milinch Ulawun, Fourmil Talasea, West New Britain Province; dated 27 October 1991 for 99 years. - Adjacent Area 6, Portion 2045: State Lease Hargy Oil Palms Limited Portion 2045, Milinch Ulawun, Fourmil Talasea, West New Britain Province for area 364 Ha, Survey Plan Catalogue 15/811; dated 20 June 2014 for 99 years. 	
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		<ul style="list-style-type: none"> - Bush Camp, Portion 2044: State Lease Hargy Oil Palms Limited Portion 2044, Milinch Ulawun, Fourmil Talasea, West New Britain Province for area 18.372 Ha, Survey Plan Catalogue 15/811; dated 20 June 2014 for 99 years. - Barema Estate, Portion 2038: State Lease Hargy Oil Palms Limited Portion 2038, Milinch Ulawun, Fourmil Talasea, West New Britain Province for area 2,900 Ha, Survey Plan Catalogue 15/773; dated 1 August 2002 for 99 years. - Barema, Portion 1431: State Lease Yanaiwi Managu Portion 1431, Milinch Ulawun, Fourmil Talasea, West New Britain Province for area 5.79 Ha, Survey Plan Catalogue 15/540; dated 23 October 1980 for 99 years. <p>For Hargy Estate, audit team reviewed that Hargy was still having the hectares for Ivule Estate which has been taken back by owners thus hectares have returned under smallholder area. In addition, there is 2 Ha difference at Hargy due to area not being replanted due to area being too steep.</p> <ul style="list-style-type: none"> - Navo Estate, Portion 624: Agricultural Lease under Section 56, to Hargy Oil Palms Limited, dated 7 July 1983 valid for 99 years, Portion 624, Milinch Ulawun, Fourmil Talasea, area of 6,460 Ha, West New Britain Province. Land title completed with map scale 1:60,000 Survey Plan Catalogue No.15/147. - Navo Estate: Agricultural Lease under Section 56, to Hargy Oil Palms Limited, dated 17 February 2005 for 25 years, Portion 2040, Milinch Ulawun, Fourmil Talasea, area of 26 Ha, West New Britain Province. Land title completed with map scale 1:60,000 Survey Plan Catalogue No.15/932. <p>Audit team noted in Navo Estate, there is a 7 Ha difference due to replant at Kiba Plantation which when was verified during mapping for replant.</p> <ul style="list-style-type: none"> - Pandi Estate: State Lease Sulvuse Estates Limited, Portion 1; Milinch Ulawun, Fourmil Talasea, East New Britain; Survey Plan Catalogue No. 25/181; for 383 Ha; date 21 February 2018 valid 99 years. 	
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		<ul style="list-style-type: none"> - Pandi Estate, Portion 3: State Lease Hargy Oil Palms Limited Portion 3, Milinch Ulawun, Fourmil Talasea, East New Britain Province for area 146 Ha, Survey Plan Catalogue 15/946; dated 21 February 2018 for 99 years. - Sabalbala 2, Portion 6: State Lease Hargy Oil Palms Limited Portion 6, Milinch Ulawun, Fourmil Talasea, East New Britain Province for area 35 Ha, Survey Plan Catalogue 15/936; dated 21 February 2018 for 99 years. - Pandi, Portion 7: State Lease Hargy Oil Palms Limited Portion 7, Milinch Ulawun, Fourmil Talasea, East New Britain Province for area 65 Ha, Survey Plan Catalogue 15/935; dated 21 February 2018 for 99 years. - Pandi Estate: State Lease Gamupa Oil Palm Development, Portion 4; Milinch Ulawun, Fourmil Talasea, East New Britain; Survey Plan Catalogue No. 25/183; for 27.89 Ha; dated 21 February 2018 valid 99 years. - Pandi Estate: State Lease Gamupa Oil Palm Development, Portion 5; Milinch Ulawun, Fourmil Talasea, East New Britain; Survey Plan Catalogue No. 25/184; for 186.59 Ha; dated 21 February 2018 valid 99 years. - Pandi Estate: State Lease Gamupa Oil Palm Development, Portion 9; Milinch Ulawun, Fourmil Talasea, East New Britain; Survey Plan Catalogue No. 25/187; for 20.90 Ha; dated 21 February 2018 valid 99 years. - Pandi Estate: State Lease Gamupa Oil Palm Development, Portion 10; Milinch Ulawun, Fourmil Talasea, East New Britain; Survey Plan Catalogue No. 25/188; for 92.91 Ha; dated 21 February 2018 valid 99 years. - Pandi Estate: State Lease Gamupa Oil Palm Development, Portion 11; Milinch Ulawun, Fourmil Talasea, East New Britain; Survey Plan Catalogue No. 25/189; for 20.70 Ha; dated 21 February 2018 valid 99 years. - Pandi Estate: State Lease Gamupa Oil Palm Development, Portion 12; Milinch Ulawun, Fourmil Talasea, East New Britain; Survey Plan Catalogue No. 25/190; for 27.15 Ha; dated 21 February 2018 valid 99 years. 	
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		<ul style="list-style-type: none"> - Pandi Estate: State Lease Gamupa Oil Palm Development, Portion 13; Milinch Ulawun, Fourmil Talasea, East New Britain; Survey Plan Catalogue No. 25/191; for 614 Ha; dated 21 February 2018 valid 99 years. - Portion 2071 Magalona: Located on state land. State Lease Title currently in the process of Registration and Issuance by the Lands Department. Sighted Notice of Acceptance of a Lease by a Successful Applicant for Portion 2071 Milinch Ulawun, Fourmil Talasea, West New Britain Province, 1 June 2021. - Pandi Estate: Certificate of Title Abunava Incorporated Land Group, Portion 2108C, Milinch Ulawun, Fourmil Talasea, West New Briatin; Survey plan catalogue No.15/1051; for 318 Ha Land name Sena, East Nakanai Local Level Government; dated 30 October 2017. - Portion 2077 Ibana: Certificate of Recognition of Incorporated Land Group Abunava Land Group Incorporated on 21 April 2016 for Portion 2077 based on Survey Plan Map Catalogue No.15/952. Currently In progress of meeting the requirements to apply for the registration and issuance of customary land title over Portion 2077 to Abunava ILG. - Pandi Estate: Special Agricultural and Business Lease for Vamukuma Land Group Inc., Portion 2062C, Milinch Ulawun, Fourmil Talasea, East New Britain; Survey Plan Catalogue No. 15/910; for 731 Ha; dated 13 August 2010 - valid 99 years. - Pandi Estate: State Lease Alaba Development Corporation Limited, Portion 2061; Milinch Ulawun, Fourmil Talasea, West New Britain; Survey Plan Catalogue No. 15/866; for 1,906.40 Ha; dated 13 November 2008 valid 99 years. - Portion 2091C Remaling: Certificate of Recognition of Incorporated Land Group Remaling Land Group Incorporated on 14 July 2017 for Portion 2091C based on Survey Plan Map Catalogue No.15/1008. Currently In progress of meeting the requirements to apply for the registration and issuance of customary land title over Portion 2091C to Remaling ILG. 	
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		<p>Sample of Smallholder’s Legal Ownership of the Land:</p> <p>Smallholders 010254 Junior Paul Willy, LSS 6Ha. Land title available for 99 years.</p> <ul style="list-style-type: none"> - Agricultural Lease under Section 56, to Paul Willy, dated 3 July 1979, Portion 254, Milinch Nakanai, Fourmil Talasea, area of 9.10 Ha, West New Britain Province. Land title completed with map. - OPIC Incident Report Form dated 10 October 2016, reported by Junior Paul Willy: Original Title Lost/applied for replacement title; transmission will be done last will by deceased father. - Application for a Replacement Title, for Portion 254. - Transmission Application (Death) for portion 254, Milinch Nakanai, Fourmil Talasea, West New Britain Province, by Transferee Junior Pauly Willy, dated 25 June 2019. - Bialla Cash Office Official Receipt Land Lease Rental portion 254 Milinch Nakanai, Fourmil Talasea, paid PGK 300 dated 6 March 2017: by Paul Willie. <p>No dispute during cultivation, no dispute currently.</p> <p>Smallholders 010292 Masip Kotbundi, LSS 6Ha. Land title available for 99 years.</p> <ul style="list-style-type: none"> - OPIC Incident Report Form dated 11 August 2016, reported by Masip Kotbundi: No title issue during lease application. - Application for a Replacement Title, for Portion 292, Milinch Nakanai, Fourmil Talasea, name Masip Kotbundi. Circumstances of loss: lost and cannot be located since settled on land. <p>Smallholders 010341 Daniel Petau, LSS 6Ha. Land title available for 99 years.</p> <ul style="list-style-type: none"> - Agricultural Lease under Section 56, to Petau Jarkula, dated 20 September 1979, Portion 341, Milinch Nakanai, Fourmil Talasea, area of 6.59 Ha, West New Britain Province. Land title completed with map. 	
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		<ul style="list-style-type: none"> - Transmission Application (Death) for portion 341, Milinch Nakanai, Fourmil Talasea, West New Britain Province, by Transferee Daniel Petau, dated 25 June 2019. Completed with Statutory Declaration signed by Daniel Petau. - Medical Certificate of Death of Petau Jarkula with disease or condition directly asthma dated 4 February 2014. - Bialla Cash Office Official Receipt Land Lease Rental portion 341 Milinch Nakanai, Fourmil Talasea, On 5 September 2016 paid PGK 300 by Peter Au Jarkula for Transmission Fee and Valuation Fee. <p>No dispute during cultivation, no dispute currently.</p> <p>Smallholders 010380 Imaran Mogosa Arunbi, LSS 6Ha. Land title available for 99 years.</p> <ul style="list-style-type: none"> - Agricultural Lease under Section 56, to Arunbi Kania, dated 17 November 1977, Portion 380, Milinch Nakanai, Fourmil Talasea, area of 6.75 Ha, West New Britain Province. Land title completed with map. - Transmission Application (Death) for portion 341, Milinch Nakanai, Fourmil Talasea, West New Britain Province, by Transferee Daniel Petau, dated 25 June 2019. Completed with Statutory Declaration signed by Daniel Petau. - Medical Certificate of Death of Petau Jarkula with disease or condition directly asthma dated 4 February 2014. - Bialla Cash Office Official Receipt Land Lease Rental portion 341 Milinch Nakanai, Fourmil Talasea, On 5 September 2016 paid PGK 300 by Peter Au Jarkula for Transmission Fee and Valuation Fee. <p>No dispute during cultivation, no dispute currently.</p> <p>Smallholders 010398 Barnabas Kua, LSS 6Ha. Land title available for 99 years.</p>	
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		<ul style="list-style-type: none"> - Agricultural Lease under Section 56, to Arunbi Kania, dated 17 November 1977, Portion 380, Milinch Nakanai, Fourmil Talasea, area of 6.75 Ha, West New Britain Province. Land title completed with map. - Transmission Application (Death) for portion 341, Milinch Nakanai, Fourmil Talasea, West New Britain Province, by Transferee Daniel Petau, dated 25 June 2019. Completed with Statutory Declaration signed by Daniel Petau. - Medical Certificate of Death of Petau Jarkula with disease or condition directly asthma dated 4 February 2014. - Bialla Cash Office Official Receipt Land Lease Rental portion 341 Milinch Nakanai, Fourmil Talasea, On 5 September 2016 paid PGK 300 by Peter Au Jarkula for Transmission Fee and Valuation Fee. <p>No dispute during cultivation, no dispute currently.</p> <p>Smallholders 020689 Uklu Tawakla, LSS 6 Ha.</p> <ul style="list-style-type: none"> - Agricultural Lease under Section 56, to Ulaku Tawakla, dated 24 November 1978, Portion 689, Milinch Ulawun, Fourmil Talasea, area of 8.29 Ha, West New Britain Province. Land title completed with map. - Survey Plan Portion 689, Catalogue 15/382. <p>Smallholders 021153 Nime Kal, LSS 5.41 Ha.</p> <ul style="list-style-type: none"> - Survey Plan Portion 1153, Catalogue 15/376. - Identification and Support Letter from National Development Bank Ltd., dated 8 August 2016 the lease title was under mortgage. Title owner Kal Nime, portion 1153, section 8, Milinch Ulawun, Fourmil Talasea. <p>Smallholders 020798 Nani Bun, LSS 6 Ha.</p> <ul style="list-style-type: none"> - Survey Plan Portion 798, Catalogue 15/382. 	
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		<ul style="list-style-type: none"> - Evidence of PNG LIS Extract Print Out for Lease to Kaim Ehpa, dated 24 November 1978, Portion 0798, Milinch Ulawun, Fourmil Talasea. Application for Replacement Title Portion 0798, Milinch Ulawun, Fourmil Talasea, Weset New Britain Province, Name Owner Kaim Ehpa – Statutory Declaration Title never obtain by owners. Submitted by Nani Kaim. <p>Smallholders 021156 Suapi Akameau, LSS 6 Ha.</p> <ul style="list-style-type: none"> - Agricultural Lease under Section 56, to Suapi Akameau, dated 24 November 1978, Portion 1156, Milinch Ulawun, Fourmil Talasea, area of 6.64 Ha, West New Britain Province. Land title completed with map. - Survey Plan Portion 1156, Catalogue 15/376. <p>Smallholders 021449 Joseph Robin, LSS 6 Ha.</p> <ul style="list-style-type: none"> - State Lease under Section 56, to Robin Saol, dated 24 November 1978, Portion 1449, Milinch Ulawun, Fourmil Talasea, area of 6.64 Ha, West New Britain Province. Land title completed with map scale 1:25,000. - Probate Jurisdiction in the late Robin Saol, dated 17 September 2013. Receipt of PGK100 from Joesph Robin Saol for Registration for Transfer Portion 1449, dated 14 June 2012. <p>Smallholders 021483 Samuel James, LSS 6 Ha.</p> <ul style="list-style-type: none"> - State Lease under Section 56, to James Beka, dated 14 January 1982, Portion 1483, Milinch Ulawun, Fourmil Talasea, area of 7.1 Ha, West New Britain Province. Period 99 years. - Transmission Application (Death) for Portion 1483, Milinch Ulawun, Fourmil Talasea, from deceased James Beka to Samuel James; dated 29 May 2013. <p>Smallholders 031395 Andrew Kenga, LSS 6 Ha.</p>	
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		<ul style="list-style-type: none"> - Survey Plan sale 1:7,500 for Portion 1395, Catalogue 15/412 indicating 6.4 Ha. - Application for Replacement Title Portion 1395, Milinch Ulawun, Fourmil Talasea, West New Britain Province – Owner Andrew Kenga. Statutory Declaration title was lost/misplaced. Dated 11 August 2016 <p>Smallholders 031429 Kauba Guria, LSS 6 Ha.</p> <ul style="list-style-type: none"> - Copy of Agricultural Lease under Section 56, to Kauba Guala, dated 20 September 1979, Portion 1429, Milinch Ulawun, Fourmil Talasea, area of 6.54 Ha, West New Britain Province period 99 years. Land title completed with map Survey Plan scale 1:6,000 Portion 1429, Catalogue 15/406. <p>Smallholder 39001 Loli Birou, shows Memorandum of Agreement between Gamupa Oil Palm Development Ltd and Loli Birou (deceased) replaced with Anna Loli, dated 26 July 2018. Gamupa Oil Palm Development Ltd has title over Agricultural State Lease Title as Volume 25, Folio 184, Portion 5, Milinch Ulawun, Fourmil Talasea, West New Britain Province. Gamupa Oil Palm Development Ltd consents to release 2 Ha of its oil palm estate to Loli Birou. The agreement expires 30 July 2025.</p> <p>Smallholder 390054 Martin Ragute, shows Memorandum of Agreement between Gamupa Oil Palm Development Ltd and Martin Ragute, dated 26 July 2018. Gamupa Oil Palm Development Ltd has title over Agricultural State Lease Title as Volume 25, Folio 184, Portion 5, Milinch Ulawun, Fourmil Talasea, West New Britain Province. Gamupa Oil Palm Development Ltd consents to release 2 Ha of its oil palm estate to Loli Birou. The agreement expires 30 April 2028.</p> <p>Smallholder 390080 Robin Leo, shows Memorandum of Agreement between Gamupa Oil Palm Development Ltd and Robin Leo 390080, dated 26 July 2018. Gamupa Oil Palm Development Ltd has title over Agricultural State Lease Title as Volume 25, Folio 188, Portion 5, Milinch Ulawun, Fourmil Talasea, West New</p>	
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		<p>Britain Province. Gamupa Oil Palm Development Ltd consents to release 2 Ha of its oil palm estate to Patrick Deri. The agreement expires 30 April 2028.</p> <p>Smallholders 440055 Teddy Male, VOP 1.65 Ha on state land.</p> <ul style="list-style-type: none"> - Application or Tender Form to Department of Lands and Physical Planning. Advertisement Number N/A (Notice Under Sec.69 (2) 01) Land Act 1996). Application Noau Oil Palm Growers. Type of Lease applied Agricultural Lease. Proposed Purpose: part of the land parcel developed by members with 2 Ha block oil palm planting. Description of Land Portion 740, Milinch Lolobau, Fourmil Ubili, <p>Smallholders 041188 Jerry Mera, 2 Ha on state land.</p> <ul style="list-style-type: none"> - Application or Tender Form to Department of Lands and Physical Planning dated 19 May 2017. Advertisement Number N/A (Notice Under Sec.69 (2) 01) Land Act 1996). Application Jerry Mera. Type of Lease applied Agricultural Lease. Proposed Purpose: developed part of the land parcel with oil palm planting currently at maturity state. Description of Land Portion 1188, Milinch Banga, Fourmil Talasea, West New Britain Province. Survey Plan Portion 1188, Catalogue 15/673. <p>Smallholders 292904 Daniel Kaitale, 2 Ha on state land.</p> <ul style="list-style-type: none"> - Application or Tender Form to Department of Lands and Physical Planning dated 21 July 2020. Advertisement Number N/A (Notice Under Sec.69 (2) 01) Land Act 1996). Application Sale Community Association. Type of Lease applied Agricultural Lease. Proposed Purpose: fully developed oil palm blocks ny the members of the association. Description of Land Portion 728, Milinch Banga, Fourmil Talasea, West New Britain Province. - Exemption Notice Under Section 69(2)(d) by Tiri Wanga, a delegate of Minister of Lands and Physical Planning exempt from advertisement the land 	
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		<p>described in the Schedule referred to. The special reason attached to this decision being for the expansion of oil palm industry by Sale Community Association. Schedule all parcel of land known as Portion 728 Milinch Banga, Fourmil Talasea, West New Britain Province – containing the land area of 37 Ha on Survey Plan Catalogue No.15/212. Land File Reference 19038/0728; dated 21 July 2017.</p> <p>Smallholders No.292930 Jack Luo with 1.65 Ha and No.292942 Mulagu Vuvu, 1.96 Ha on state land.</p> <ul style="list-style-type: none"> - Application or Tender Form to Department of Lands and Physical Planning dated 21 July 2020. Advertisement Number N/A (Notice Under Sec.69 (2) 01) Land Act 1996). Application Malasi Gule Community Association. Type of Lease applied Agricultural Lease. Proposed Purpose: fully developed oil palm blocks by the members of the association. Description of Land Portion 839, Milinch Banga, Fourmil Talasea, West New Britain Province. - Exemption Notice Under Section 69(2)(d) by Tiri Wanga, a delegate of Minister of Lands and Physical Planning exempt from advertisement the land described in the Schedule referred to. The special reason attached to this decision being for the expansion of oil palm industry by Malasi Gule Community Association. Schedule all parcel of land known as Portion 839 Milinch Banga, Fourmil Talasea, West New Britain Province – containing the land area of 1188.5 Ha on Survey Plan Catalogue No.15/494. Land File Reference 19038/0839; dated 21 July 2017. <p>Smallholder No.260550 Elizabeth Vaimuli</p> <ul style="list-style-type: none"> - Agricultural Lease under Section 56, to Elizabeth Wemuli, dated 30 October 1968, Portion 550, Milinch Banga, Fourmil Talasea, area of 11.7 Ha, West New Britain Province period 99 years. Land title completed with map Survey Plan scale 1:8,000 Portion 550, Catalogue 15/237. 	
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		<p>Smallholders 26002 Peter Siagau, 2 Ha on state land.</p> <ul style="list-style-type: none"> - Application or Tender Form to Department of Lands and Physical Planning dated 21 July 2020. Advertisement Number N/A (Notice Under Sec.69 (2) 01) Land Act 1996). Application Sege Community Association. Type of Lease applied Agricultural Lease. Proposed Purpose: fully developed oil palm blocks by the members of the association. Description of Land Portion 836, Milinch Banga, Fourmil Talasea, West New Britain Province. - Exemption Notice Under Section 69(2)(d) by Tiri Wanga, a delegate of Minister of Lands and Physical Planning exempt from advertisement the land described in the Schedule referred to. The special reason attached to this decision being for the expansion of oil palm industry by Sege Community Association. Schedule all parcel of land known as Portion 836 Milinch Banga, Fourmil Talasea, West New Britain Province – containing the land area of 524.80 Ha on Survey Plan Catalogue No.15/494. Land File Reference 19038/0836; dated 21 July 2017. <p>Smallholders 050164 Kaikou Maisu, LSS 6Ha. Land title available for 99 years.</p> <ul style="list-style-type: none"> - Agricultural Lease under Section 56, to Beibwari Komanai, dated 29 July 1965, Portion 164, Milinch Banga, Fourmil Talasea, area of 29 acres, West New Britain Province. Land title completed with map. - Transmission Application (Death) for portion 164, Milinch Banga, Fourmil Talasea, West New Britain Province, by Transferee Kaikou Maisu, dated 25 June 2019. Completed with Statutory Declaration signed by Ruth Maisu dated 1 July 2016. <p>Smallholders 050184 Penias Lolome Tuga, LSS 6Ha. Land title available for 99 years.</p>	
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		<ul style="list-style-type: none"> - Agricultural Lease under Section 56, to Lolome Tuxe, dated 29 July 1965, Portion 184, Milinch Banga, Fourmil Talasea, area of 15 acres, West New Britain Province. Land title completed with map Survey Plan Catalogue 15/23. - Transmission Application (Death) for portion 164, Milinch Banga, Fourmil Talasea, West New Britain Province, by Transferee Penias Lolome Tauga, dated 25 June 2019. <p>Smallholders 050230 Graham AINU, 4 Ha on state land.</p> <ul style="list-style-type: none"> - Application or Tender Form to Department of Lands and Physical Planning dated 28 August 2020. Advertisement Number N/A (Notice Under Sec.69 (2) 01) Land Act 1996). Application Graham AINU. Type of Lease applied Agricultural Lease. Proposed Purpose: developed part of the land with oil palm currently at mature stage. Description of Land Portion 230, Milinch Banga, Fourmil Talasea, West New Britain Province. <p>Smallholders 321100 Wesley Aliai, 4 Ha on state land.</p> <ul style="list-style-type: none"> - Application or Tender Form to Department of Lands and Physical Planning dated 5 May 2017. Advertisement Number N/A (Notice Under Sec.69 (2) 01) Land Act 1996). Application Wesley Aliai. Type of Lease applied Agricultural Lease. Proposed Purpose: developed part of the land with oil palm currently at mature stage. Description of Land Portion 1100, Milinch Banga, Fourmil Talasea, West New Britain Province. <p>Smallholders 321055 John Goru, LSS 6 Ha.</p> <ul style="list-style-type: none"> - State Lease under Section 56, to John Garu, dated 8 September 1994, Portion 1105, Milinch banga, Fourmil Talasea, area of 7.64 Ha, West New Britain Province. Period 99 years. 	
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		<p>Smallholders 321158 Joe Gaelo, 2 Ha on state land.</p> <ul style="list-style-type: none"> - Application or Tender Form to Department of Lands and Physical Planning dated 15 March 2017. Advertisement Number N/A (Notice Under Sec.69 (2) 01) Land Act 1996). Application Joe Gaelo. Type of Lease applied Agricultural Lease. Proposed Purpose: fully developed with mature oil palm. Description of Land Portion 1158, Milinch Banga, Fourmil Talasea, West New Britain Province. <p>Suspended blocks</p> <p>Smallholder 770034 Bialla LLG</p> <ul style="list-style-type: none"> - State Lease Hargy Oil Palms Limited Portion 1431, Milinch Ulawun, Fourmil Talasea, West New Britain Province for area 5.79 Ha, Survey Plan Catalogue 15/540; dated 23 October 1980 for 99 years. - Memorandum of Agreement between Hargy Oil Palms Limited and East Nakanai Local Level Government. Hargy Oil Palms Limited is the titleholder of Portion 2067, it is further acknowledged that the oil palm trees growing on the land was donated by HOPL and planted by the East Nakanai Local Level Government for their benefit. Hargy Oil Palms Limited has expressed its interest to rehabilitate and harvest the rundown oil palm trees by the East Nakanai Local Level Government on Portion 2067. East Nakanai Local Level Government has agreed to this proposal. The Memorandum is subject to renewal upon actual date of replant. HOPL shall rehabilitate the palms at its own cost and pay a monthly royalty fee at 10% FFB in Kina value to ENLLG. - Located under East Nakanai LLG's title. Issue resolved with East Nakanai LLG, plantation established under the LLG mainly with motive of preventing squatters. - Department of Lands & Physical Planning Regional Office – Islands Alienated Land Division, issued Letter No.DLRO-I-SCO/012/017 Subject: VOP Blocks 	
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		<p>upon Vacant State Reserve – Portion 11 Section 29 Milinch Ulawun, Fourmil Talasea, dated 5 June 2017. As per inspection there are nine (9) farmers occupying and developing between 1 to 2 hectares palm oil within Portion 11 Section 29. Since the area is a vacant state land, proper formal procedure have to be followed in seeking approval to have the developed blocks registered to the current developers.</p> <ul style="list-style-type: none"> - Department of Lands & Physical Planning Regional Office – Islands Alienated Land Division, State Land Improvement Status Report dated 3 July 2017. The current usage of executing Clan Land Use Agreement (CLUA) over the State Lease should cease as these agreements are considered null and void. Recommendation: For Section 29 Allotment 21, Biälla Town and Portion 11 Milinch Ulawun, Fourmil Talasea, West New Britain: A submission be made to Provincial Physical Board seeking approval for Non-confirming use to the nine (9) growers until such time the land is required for the town’s new development; Seek approval from the Alienated Land Division, Lands Department Waigani for the issuance of licenses to the nine (9) growers until such time the land is required for the town’s new development; identify suitable vacant state reserve for subdivision and allocation to the nine (9) growers in consideration of their current development. - Pauline Kuvi and 8 others made payment: Biälla Cash Office Official Receipt No.C07-000507 dated 20 March 2017 for Application Fee for Planning Permission Portion 1 & 11 Section 249 Biälla Town of PGK 500 in cash. - East Nakanai Local Level Government issued letter with subject: Authorization for Temporary Use of Government Land for VOP Oil Palm Plantings – Portion 11 & Lot 21 Section 29 (Town of Biälla), Milinch of Ulawun, Forumil Talasea, West New Britain – dated 14 May 2021. “As stipulated under Section 4 of Lands Act 1996, the East Nakanai Local Level Government as a lower arm of the state government is the custodian over the portion of land Portion 11 & Lot 21 Section 29 (Town of Biälla), Milinch Ulawun, Fourmil Talasea covering a total area of 23.09 Ha and 21.96 Ha respectively on which the nine (9) VOP have been established. We therefore 	
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		<p>give temporary Authorization to Use The Land for the sole intended purpose agricultural activities until such time in future whereby the land will be recalled and reallocated for development purposes". Letter signed by East Nakanai LLG Manager and President.</p> <ul style="list-style-type: none"> - Smallholder Ambusah Limited - Ambusa Limited issued Letter subject Authorization for Temporary Use, Harvesting and Sales of FFB on Ambusa Lot 22 621, Milinch Ulawun, Fourmil Talasea, West New Britain – dated 27 August 2021. Stipulated the Ambusa Limited has the legal land title over the land Lot 22 Portion 621, Milinch Ulawun, Fourmil Talasea, covering a total 490 Ha was planted with oil palm. The Director therefore give temporary Authorization to use the Ambusa Land to those concerned local villages for sole intended purpose for agricultural activities until such time in future whereby the land will be reallocated. 	
	<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 sighted and verified:</p> <ul style="list-style-type: none"> - 040447 Ari Silau: Clan Land Use Agreement No. 040447 for Ari Silau, to use the land known as Aliu and which allocated 2 Ha as the VOP Block of Malasi VOP area from representative of Gobolo Clan; dated 20 July 2017 and period 25 years. - 161606 Eron Marisa: Clan Land Use Agreement No. 1616-06 for Aron Marisa, to use the land known as Mapa Maliso and which allocated 2 Ha as the VOP Block of Kaiamu VOP area from representative of Gararua Clan; dated 15 September 2018 and period 25 years. - 161651 Brown Paga: Clan Land Use Agreement No. 1616-51 for Brown Paga, to use the land known as Lasilali and which allocated 2 Ha as the VOP Block of Kaiamu VOP 	

		<p>area from representative of Keakea Clan; dated 16 April 2018 and period 20 years.</p> <ul style="list-style-type: none"> - 161664 Luisa Tululu: Clan Land Use Agreement No. 1616-64 for Luisa Tululu, to use the land known as keke and which allocated 2 Ha as the VOP Block of Kaiamu VOP area from representative of Keakea Clan; dated 28 June 2018 and period 19 years. - 077115 March Saeke: Clan Land Use Agreement No. 077115 for March Saeke, to use the land known as North Ulamona and which allocated 2 Ha as the VOP Block of Noau VOP area from representative of Abunana Clan; dated 31 August 2016 and period 25 years. - 077119 Carolina Saeke: Clan Land Use Agreement No. 077119 for Carolina Saeke, to use the land known as North Ulamona and which allocated 2 Ha as the VOP Block of Noau VOP area from representative of Abunana Clan; dated 31 August 2016 and period 25 years. - 077122 Stanis Male Valu: Clan Land Use Agreement No. 077122 for Stanis Male Valu, to use the land known as Madudua and which allocated 2 Ha as the VOP Block of Noau VOP area from representative of Abulmosi Clan; dated 31 August 2016 and period 25 years. - 077130 Henry Malisa: Clan Land Use Agreement No. 077130 for Henry Malisa, to use the land known as Madudua and which allocated 2 Ha as the VOP Block of Noau VOP area from representative of Abulmosi Clan; dated 31 August 2016 and period 25 years. - 077305 Exson Paile: 	
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		<p>Clan Land Use Agreement No. 077305 for Exson Paile, to use the land known as North Ulamona and which allocated 2 Ha as the VOP Block of Noau VOP area from representative of Abunana Clan; dated 31 August 2016 and period 25 years.</p> <p>- 077305 Peter Ubiale: Clan Land Use Agreement No. 077305 for Peter Ubiale, to use the land known as Madudua and which allocated 2 Ha as the VOP Block of Noau VOP area from representative of Abulmosi Clan; dated 31 August 2016 and period 25 years.</p> <p>- 380006 Mathias Valuka: Clan Land Use Agreement No. 380006 for Mathias Valuka, to use the land known as Ibana and which allocated 2 Ha as the VOP Block of Tianepou VOP area from representative of Abunava Clan; dated 15 November 2016 and period 20 years.</p> <p>- 380076 Clara Lagisa (0.6 Ha): Clan Land Use Agreement No. 380076 for Clara Lagisa, to use the land known as Buo and which allocated 2 Ha as the VOP Block of Tianepou VOP area from representative of Buali/Abulmosi Clan; dated 5 November 2016 and period 20 years.</p> <p>- 380088 Hubertina Lagisa (1.13 Ha): Clan Land Use Agreement No. 380088 for Hubertina Lagisa, to use the land known as Alui and which allocated 2 Ha as the VOP Block of Tianepou VOP area from representative of Buau/Abulmosi Clan; dated 5 November 2016 and period 20 years.</p> <p>- 380142 Joachim Lauo: Clan Land Use Agreement No. 380142 for Joachim Lauo, to use the land known as Tauka and which allocated 2 Ha as the VOP Block of Tianepou VOP</p>	
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		<p>area from representative of Buali/Abulmosi Clan; dated 9 November 2016 and period 20 years.</p> <ul style="list-style-type: none"> - 380150 Augustine Kautu: Clan Land Use Agreement No. 380150 for Augustine Kautu, to use the land known as Tianepou and which allocated 2 Ha as the VOP Block of Tianepou VOP area from representative of Nagoa Clan; dated 6 August 2018 and period 15 years – block not existing and not planted (nil production). - 410036 Rodney Malisa: Clan Land Use Agreement No. 410036 for Rodney Malisa, to use the land known as Mauba and which allocated 2 Ha as the VOP Block of Mauba VOP area from representative of Buali Clan; dated 3 November 2016 and period 20 years. - 410042 Constantine Maela (4 Ha): Clan Land Use Agreement No. 410042 for Ben Malai, to use the land known as Mauba and which allocated 2 Ha as the VOP Block of Bu-o VOP area from representative of Buali Clan; dated 3 November 2016 and period 20 years. - 44006 Jerom Bitai: Clan Land Use Agreement No. 450006 for Jerom Bitai, to use the land known as Malaso and which allocated 2 Ha as the VOP Block of Ibana VOP area from representative of Abunana Clan; dated 11 November 2016 and period 20 years. - 090908 Gideon Waisisi: Clan Land Use Agreement No. 090908 for Gideon Waisisi, to use the land known as Kaivege and which allocated 2 Ha as the VOP Block of Baikakea VOP area from representative of Raviriviri Clan; dated 13 April 2015 and period 15 years. - 090953 Peter Ruru: 	
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		<p>Clan Land Use Agreement No. 090953 for Peter Ruru, to use the land known as Kavavato and which allocated 2 Ha as the VOP Block of Baikakea VOP area from representative of Loulou Clan; dated 5 October 2016 and period 17 years.</p> <p>- 101073 Michael Walau: Clan Land Use Agreement No. 101073 for Michael Walau, to use the land known as Silali and which allocated 2 Ha as the VOP Block of Mataururu VOP area from representative of Uge uge Clan; dated 13 May 2016 and period 20 years.</p> <p>- 111105 Ipa Walau: Clan Land Use Agreement No. 111105 for Ipa Walau, to use the land known as Malaulau and which allocated 2 Ha as the VOP Block of Kiava VOP area from representative of Kabulubulu Clan; dated 6 May 2016 and period 15 years.</p> <p>- 111122 Vunais Taba: Clan Land Use Agreement No. 111122 for Vunais Taba, to use the land known as Umu umu and which allocated 2 Ha as the VOP Block of Kiava VOP area from representative of Kabulubulu Clan; dated 6 May 2016 and period 20 years.</p> <p>- 131324 Ropa Matamuli: Clan Land Use Agreement No. 131324 for Ropa Matamuli, to use the land known as Malamabe and which allocated 2 Ha as the VOP Block of Apupul VOP area from representative of Uge uge Clan; dated 2 October 2015 and period 20 years.</p> <p>- 121212 Gideon Migu: Clan Land Use Agreement No. 121212 for Gideon Migu, to use the land known as Poe and which allocated 2 Ha as the VOP Block Gomu/Urumaili VOP area from representative of Kawabulubulu Balobolobo Clan; dated 21 December 2020 and period 25 years.</p>	
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		<ul style="list-style-type: none"> - 121213 Selin Mou Martin: Clan Land Use Agreement No. 121213 for Selin Martin, to use the land known as Poe and which allocated 2 Ha as the VOP Block Gomu VOP area from representative of Kawabulubulu Clan; dated 25 August 2016 and period 15 years. - 121220 Patrick Wale: Clan Land Use Agreement No. 121220 for Walo Kame, to use the land known as Urumaili and which allocated 2 Ha as the VOP Block of Urumaili VOP area from representative of Ugeuge Clan; dated 14 May 2017 and period 25 years. - 121257 Enos Taubute: Clan Land Use Agreement No. 121257 for Enos Taubute, to use the land known as Atua and which allocated 2 Ha as the VOP Block of Gomu VOP area from representative of Kabuliala Clan; dated 23 August 2016 and period 15 years. - 120054 Josephine Gaa: Clan Land Use Agreement No. 120054 for Josephine Gaa, to use the land known as Urumaili and which allocated 2 Ha as the VOP Block of Urumaili VOP area from representative of Urumaili Clan; dated 14 May 2017 and period 25 years. - 170107 Lavinia Toua: Clan Land Use Agreement No. 170117 for Lavinia Toua, to use the land known as Paliavu and which allocated 2 Ha as the VOP Block of Matililiu VOP area from representative of Gararua Clan; dated 14 October 2016 and period 15 years. - 171753 Sebulon Boka: Clan Land Use Agreement No. 171753 for Sebulon Boka, to use the land known as Makakiwa and which allocated 2 Ha as the VOP Block of Matililiu VOP area from representative of Vauvatu Clan; dated 31 October 2016 and period 15 years. 	
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		<p>- 350068 Eremas Lare: Clan Land Use Agreement No. 350068 for Eremas Lare, to use the land known as Mamalo and which allocated 2 Ha as the VOP Block of Ewase VOP area from representative of Mararea Clan; dated 3 May 2016 and period 25 years.</p> <p>- 060610 Albert Gove: Clan Land Use Agreement No. 060610 for Albert Gove, to use the land known as Gigipuna and which allocated 2 Ha as the VOP Block of Gigipuna VOP area from representative of Sava Sigeni Kormo Clan; dated 4 April 2016 and period 25 years. The CLUA signed by Clan Leader Mathew Kulela, Markus Vavage, Elizabeth Marou, witnessed by OPIC Field Manager Reuben Taukaro and Smallholder Affairs John Mayo.</p>	
	<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>N/A</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</p>	<p>Complied</p>

		<p>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>Agreement making process for use of Incorporated Land Group/ILG as part of lease-lease back process.</p> <ul style="list-style-type: none"> - Stakeholder Communication Record Abulmosi Project, represented by Ignatius Kaukea and Joachim Baliau, dated 18 April 2015. The topic and record of communication related to ILG Registration, Lease-lease Back, Agricultural Sub-lease, Explanation on RSPO principle and criteria and Free Prior Inform Consent. The planned MoU was also discussed the group highlighting update on annual rate per hectare on plantable land and 10% FFB kina value to the landlords oer MoU for 25 years. In addition, rate per hectare to be paid by HOPL to the landlord on signing of the Agricultural Sub-lease agreement. The meeting/communication attended by Chairman and Vice Chairman and 9 members of Abulmosi. - Memorandum of Understanding between Abulmosi land Group Inc., and Hargy Oil Palms Limited to ltease the land for oil palm development and pay royalty to the Landlord. The landlord will sublease Portion 2076, Milinch Ulawun, Fourmil Talasea containing 1,390 hectare undeveloped land to the Tenant. The tenant to develop the land at its cost and pay annual rent of K75 per hectare of plantable land, K20 per hectare on reserved land and monthly royalty of 10% FFB Kina value to the landlord for a period of 25 years. In addition, a cash grant of K150 per hectare of plantable land is to be paid by the Tenant on the signing of Sublease Agreement. Signed by both parties 13 December 2013. - Stakeholder Communication Record Gamupa Oil Palm Development Limited, represented by Lawrence Wana and Peter Toselde, dated 14 August 2012. The topic and record of communication related to intention to develop the 	
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		<p>remainder vacant government land at Gamupa as per invitation letter to HOPL. ILG Registration submission done to IPA. The meeting/communication attended by Chairman and Vice Chairman and 18 members of Gamupa.</p> <ul style="list-style-type: none"> - Stakeholder Communication Record Gamupa Oil Palm Development Limited, represented by Lawrence Wana and Peter Toselde, dated 6 September 2013. The topic and record of communication related to cash grant paid after Agriculture Sub The meeting/communication attended by Chairman and Vice Chairman of Gamupa. - Memorandum of Understanding between Gamupa Oil Palm Development Limited, and Hargy Oil Palms Limited to lease the land for oil palm development and pay royalty to the Landlord. The landlord by the provision of section 87 of Land Act o.45 of 1996 is a legal State Lease Holder of the whole land 614 Ha described as Gamupa Catalogue 15, Milinch Ulawun, Fourmil Talasea. The tenant to develop the land at its cost and pay rent of K75 per hectare of plantable land and K20 per hectare buffer land and monthly royalty of 10% FFB Kina value to the landlord for a period of 25 years. Signed by both parties 19 June 2013. <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>	
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> <ul style="list-style-type: none"> - Stakeholder Communication Record Abulmosi Project, represented by Ignatius Kaukea and Joachim Baliau, dated 18 April 2015. The topic and record of communication related to ILG Registration, Lease-lease Back, Agricultural Sub-lease, Explanation on RSPO principle and criteria and Free 	Complied

		<p>Prior Inform Consent. The planned MoU was also discussed the group highlighting update on annual rate per hectare on plantable land and 10% FFB kina value to the landlords oer MoU for 25 years. In addition, rate per hectare to be paid by HOPL to the landlord on signing of the Agricultural Sub-lease agreement. The meeting/communication attended by Chairman and Vice Chairman and 9 members of Abulmosi.</p> <ul style="list-style-type: none"> - Stakeholder Communication Record Gamupa Oil Palm Development Limited, represented by Lawrence Wana and Peter Toselde, dated 14 August 2012. The topic and record of communication related to intention to develop the remainder vacant government land at Gamupa as per invitation letter to HOPL. ILG Registration submission done to IPA. The meeting/communication attended by Chairman and Vice Chairman and 18 members (male and female) of Gamupa. - Stakeholder Communication Record Gamupa Oil Palm Development Limited, represented by Lawrence Wana and Peter Toselde, dated 6 September 2013. The topic and record of communication related to cash grant paid after Agriculture Sub The meeting/communication attended by Chairman and Vice Chairman of Gamupa. 	
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>Hargy Oil Palms Limited made consultations and meeting with the Incorporated Land Groups and its member to discuss the terms for land's sublease agreement.</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</p>	Complied

		<p>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> <ul style="list-style-type: none"> - Stakeholder Communication Record Gamupa Oil Palm Development Limited, represented by Lawrence Wana and Peter Toselde, dated 14 August 2012. The topic and record of communication related to intention to develop the remainder vacant government land at Gamupa as per invitation letter to HOPL. ILG Registration submission done to IPA. The meeting/communication attended by Chairman and Vice Chairman and 18 members of Gamupa. - Memorandum of Understanding between Gamupa Oil Palm Development Limited, and Hargy Oil Palms Limited to lease the land for oil palm development and pay royalty to the Landlord. Signed by both parties 19 June 2013. The memorandum has taking into consideration the meeting with landlord on 14 August 2012. - Hargy Oil Palms Limited demonstrate payment of FFB Royalty Payment remittance – period June 2021 to Abulmosi Incorporated Land Group of PGK 67,***; - Hargy Oil Palms Limited demonstrate payment of FFB Royalty Payment remittance – period July 2021 to Abulmosi Incorporated Land Group of PGK 66,***; Gamupa Oil Palm Development of PGK 55,***; - Hargy Oil Palms Limited demonstrate payment of FFB Royalty Payment remittance – period August 2021 to Abulmosi Incorporated Land Group of PGK 58,***; Gamupa Oil Palm Development of PGK 49,***; - Payment of FFB royalty also made to Magalona Oil Palm Estate, Remaling Incorporated Land Group, Vamukuma Land Group, etc. 	
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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.</p> <p>Example of map of Incorporated Land Group/ILG on customary land: Certificate of Title Under Section 34L of the Land Registration (Amendment) Act 2009, The Minister for Lands & Physical Planning Hereby Grant to the Lessee Abunava Incorporated Land Group; Portion 2108C, Milinch Ulawun, Fourmil Talasea, West New Britain Province, Land area of 318 Ha from Survey Plan map Catalogue 15/1051 with map scale 1:12,500.</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 in 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</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</p>	Complied

	<p>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>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>	
<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>			
<p>4.5.1</p>	<p>(C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available.</p> <p>- 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> <p>No new planting was developed by unit of certification within last 12 months.</p>	<p>Not Applicable</p>
<p>4.5.2</p>	<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 resourced access to independent advice through a documented, long-term and two-way process of consultation and negotiation.</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</p>	<p>Not Applicable</p>

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	- Critical (Major) compliance -	<p>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>No new planting was developed by unit of certification within last 12 months.</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: 020689; 020798; 021153; 021156; 021449; 021483; 041188; 292904, 292930, 292942 and VOP: 040447; 161606; 161664; 090953; 121259; 131324), 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>	Not Applicable
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: 020689; 020798; 021153; 021156; 021449; 021483; 041188; 292904, 292930, 292942 and VOP: 040447; 161606; 161664; 090953; 121259; 131324), 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>	Not Applicable
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, economic, environmental and social implications of the proposed operations on their lands.</p> <p>- Minor compliance -</p>	<p>According to interview with sample of smallholders (LSS: 020689; 020798; 021153; 021156; 021449; 021483; 041188; 292904, 292930, 292942 and VOP: 040447; 161606; 161664; 090953; 121259; 131324), 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>	Not Applicable

		At the time, no new development after 15 November 2018 in scope of certificate holder.	
4.5.6	Evidence is available that the communities (or their representatives) gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator - Minor compliance -	According to interview with sample of smallholders (LSS: 020689; 020798; 021153; 021156; 021449; 021483; 041188; 292904, 292930, 292942 and VOP: 040447; 161606; 161664; 090953; 121259; 131324), 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. At the time, no new development after 15 November 2018 in scope of certificate holder.	Not Applicable
4.5.7	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. - Minor compliance -	No new development after 15 November 2018 in scope of certificate holder.	Not Applicable
4.5.8	(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. - Critical (Major) compliance -	No new development after 15 November 2018 in scope of certificate holder.	Not Applicable
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.			
4.6.1	(C) A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place. - Critical (Major) compliance -	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.	Complied

<p>4.6.2</p>	<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> <ul style="list-style-type: none"> - Memorandum of Understanding between Abulmosi Land Group Inc., and Hargy Oil Palms Limited to ltease the land for oil palm development and pay royalty to the Landlord. The landlord will sublease Portion 2076, Milinch Ulawun, Fourmil Talasea containing 1,390 hectared undeveloped land to the Tenant. The tenant to develop the land at its cost and pay annual rent of K75 per hectare of plantable land, K20 per hectare on reserved land and monthly royalty of 10% FFB Kina value to the landlord for a period of 25 years. In addition, a cash grant of K150 per hectare of plantable land is to be paid by the Tenant on the signing of Sublease Agreement. Signed by both parties 13 December 2013. - Memorandum of Understanding between Gamupa Oil Palm Development Limited, and Hargy Oil Palms Limited to lease the land for oil palm development and pay royalty to the Landlord. The landlord by the provision of section 87 of Land Act o.45 of 1996 is a legal State Lease Holder of the whole land 614 Ha described as Gamupa Catalogue 15, Milinch Ulawun, Fourmil Talasea. The tenant to develop the land at its cost and pay rent of K75 per hectare of plantable land and K20 per hectare buffer land and monthly royalty of 10% FFB Kina value to the landlord for a period of 25 years. Signed by both parties 19 June 2013. 	<p>Complied</p>
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<p>4.6.3</p>	<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>- Minor compliance -</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 smallholders. Ex:</p> <ul style="list-style-type: none"> - Clan Land Use Agreement No. 1616-64 for Luisa Tululu, to use the land known as keke and which allocated 2 Ha as the VOP Block of Kaiamu VOP area from representative of Keakea Clan; dated 28 June 2018 and period 19 years. - Clan Land Use Agreement No. 077119 for Carolina Saeke, to use the land known as North Ulamona and which allocated 2 Ha as the VOP Block of Noau VOP area from representative of Abunana Clan; dated 31 August 2016 and period 25 years. - Clan Land Use Agreement No. 380076 for Clara Lagisa, to use the land known as Buo and which allocated 2 Ha as the VOP Block of Tianepou VOP area from representative of Buali/Abulmosi Clan; dated 5 November 2016 and period 20 years. - Clan Land Use Agreement No. 120054 for Josephine Gaa, to use the land known as Urumaili and which allocated 2 Ha as the VOP Block of Urumaili VOP area from representative of Urumaili Clan; dated 14 May 2017 and period 25 years. - Agricultural Lease under Section 56, to Elizabeth Wemuli, dated 30 October 1968, Portion 550, Milinch Banga, Fourmil Talasea, area of 11.7 Ha, West New Britain Province period 99 years. Land title completed with map Survey Plan scale 1:8,000 Portion 550, Catalogue 15/237. 	<p>Complied</p>
<p>4.6.4</p>	<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</p>	<p>Complied</p>

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		<ul style="list-style-type: none"> - Memorandum of Understanding between Abulmosi land Group Inc., and Hargy Oil Palms Limited to lease the land for oil palm development and pay royalty to the Landlord. The landlord will sublease Portion 2076, Milinch Ulawun, Fourmil Talasea containing 1,390 hectared undeveloped land to the Tenant. Signed by both parties 13 December 2013. - The landlord by the provision of section 87 of Land Act o.45 of 1996 is a legal State Lease Holder of the whole land 614 Ha described as Gamupa Catalogue 15, Milinch Ulawun, Fourmil Talasea. Signed by both parties 19 June 2013. - Hargy Oil Palms Limited demonstrate payment of Land Rental from Hargy Oil Palms Limited – period 2020 to Abulmosi Incorporated Land Group of PGK 59,***; to Gamupa Oil Palm Development of 36,***. Payment made 27 January 2020. - Hargy Oil Palms Limited demonstrate payment of Land Rental from Hargy Oil Palms Limited – period 2020 to Abulmosi Incorporated Land Group of PGK 59,***; to Gamupa Oil Palm Development of 36,***. Payment made 27 January 2020. - Hargy Oil Palms Limited demonstrate payment of FFB Royalty Payment remittance – period June 2021 to Abulmosi Incorporated Land Group of PGK 67,***; - Hargy Oil Palms Limited demonstrate payment of FFB Royalty Payment remittance – period July 2021 to Abulmosi Incorporated Land Group of PGK 66,***; Gamupa Oil Palm Development of PGK 55,***; - Hargy Oil Palms Limited demonstrate payment of FFB Royalty Payment remittance – period August 2021 to Abulmosi Incorporated Land Group of PGK 58,***; Gamupa Oil Palm Development of PGK 49,***; - Payment of FFB royalty also made to Magalona Oil Palm Estate, Remaling Incorporated Land Group, Vamukuma Land Group, etc. 	
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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", issue #2 dated 25 March 2021. The procedure explaining type of land acquisition: - Alienated land - Customary land - Incorporated land groups A mutually agreed procedure for calculating and distributing fair compensation are describes within the procedure.</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>	Complied
<p>Criterion 4.8: 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>			
4.8.1	<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>Based on interview with stakeholders and document review, there is no land acquisition by HOPL since the last assessment.</p>	Complied

	<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>		
4.8.2	<p>(C) Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms.</p> <p>- Critical (Major) compliance -</p>	<p>HOPL has established Grievance Mechanism (Doc. No.: PRO-COM-GEN- 001-06, Issue No.: 6 dated 25/03/2021), it was developed to provide a 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 channeled 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>	Complied
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.			
5.1.1	<p>Current and previous period prices paid for FFB are publicly available and accessible by smallholders.</p> <p>- 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 – See 5.1.3.</p> <p>The FFB price are publicly available and accessible by smallholders in notice boards of HOPL smallholder offices, Village’s notice board, etc.</p> <ul style="list-style-type: none"> - Sighted documented evidence of FFB price placed on Soi LSS office for December 2020 farm gate price at PGK 350.84/ton. - Sighted FFB price placed on Smallholder Transport Office for August 2021 farm gate price at PGK 475.39/ton - Sighted FFB price placed on HOPL Sustainability Office for August 2021 farm gate price at PGK 475.39/ton. - Sighted FFB price placed on Wilelo LSS office for August 2021 farm gate price at PGK 475.39/ton. 	Complied
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>Hargy Oil Palms Limited established document FFB Price Calculation Mechanism – Communication, dated 14 May 2021. The document lines out the FFB price factors comprise of world price of oil, FOB factor, extraction ratio, exchange rate, 57% payout ratio (determined by national government through Palm Oil Board), levies, transport cost and sample of FFB price calculation. Hargy Oil Palms Limited made the document in Tok Pisin.</p> <p>Hargy Oil Palms Limited made several training/meetings with topic FFB price calculation.</p> <ul style="list-style-type: none"> - In Tiauru Section 8 Portion 01-0352, dated 12 April 2021, the “FFB Price Calculation Training” whereby attended by 28 smallholder members including Carolyne Arumbi (Block 010380). 	Complied

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<p>5.1.3</p>	<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. - Critical (Major) compliance -</p>	<p>Hargy Oil Palms Limited provided evidence of Smallholders FFB Price Calculation for period December 2020 – August 2021.</p> <table border="1"> <thead> <tr> <th></th> <th>Dec 2020</th> <th>Jan 2021</th> <th>Feb 2021</th> </tr> </thead> <tbody> <tr> <td>US\$ Price CPO Rotterdam</td> <td>US 898.91</td> <td>US 995.44</td> <td>US 1,063.95</td> </tr> <tr> <td>US\$ Price for PKO Rotterdam</td> <td>US 1,161.89</td> <td>US 1,325.74</td> <td>US 1,453.42</td> </tr> <tr> <td>Average extraction rate for CPO</td> <td>23.39%</td> <td>23.40%</td> <td>23.44%</td> </tr> <tr> <td>Average extraction rate for PKO</td> <td>1.94%</td> <td>1.94%</td> <td>1.94%</td> </tr> <tr> <td>Palm product value of 1MT of FFB US\$ into PGK</td> <td>PGK 712.92</td> <td>PGK 804.50</td> <td>PGK 881.11</td> </tr> <tr> <td>Farmer pay out ratio at 57%</td> <td>PGK 406.37</td> <td>PGK 458.56</td> <td>PGK 502.24</td> </tr> <tr> <td>Add 1% VAT</td> <td>PGK 4.06</td> <td>PGK 4.59</td> <td>PGK 5.02</td> </tr> <tr> <td>Less OPRA Levy</td> <td>PGK -2.20</td> <td>PGK -2.20</td> <td>PGK -2.20</td> </tr> <tr> <td>Less Sexava Levy</td> <td>PGK -2.50</td> <td>PGK -2.50</td> <td>PGK -2.50</td> </tr> <tr> <td>Less OPIC Levy</td> <td>PGK -4.00</td> <td>PGK -4.00</td> <td>PGK -4.00</td> </tr> <tr> <td>Less VAT 10% OPIC Levy</td> <td>PGK -0.40</td> <td>PGK -0.40</td> <td>PGK -0.40</td> </tr> <tr> <td>Mill Gate Price</td> <td>PGK 401.33</td> <td>PGK 454.04</td> <td>PGK 498.16</td> </tr> <tr> <td>Farm Gate Price</td> <td>PGK 350.84</td> <td>PGK 403.74</td> <td>PGK 446.77</td> </tr> </tbody> </table> <table border="1"> <thead> <tr> <th></th> <th>Mar 2021</th> <th>Apr 2021</th> <th>May 2021</th> </tr> </thead> <tbody> <tr> <td>US\$ Price CPO Rotterdam</td> <td>US 1,127.27</td> <td>US 1,169.83</td> <td>US 1,200.97</td> </tr> <tr> <td>US\$ Price for PKO Rotterdam</td> <td>US 1,447.04</td> <td>US 1,045.88</td> <td>US 1,556.63</td> </tr> <tr> <td>Average extraction rate for CPO</td> <td>23.51%</td> <td>23.56%</td> <td>23.59%</td> </tr> </tbody> </table>		Dec 2020	Jan 2021	Feb 2021	US\$ Price CPO Rotterdam	US 898.91	US 995.44	US 1,063.95	US\$ Price for PKO Rotterdam	US 1,161.89	US 1,325.74	US 1,453.42	Average extraction rate for CPO	23.39%	23.40%	23.44%	Average extraction rate for PKO	1.94%	1.94%	1.94%	Palm product value of 1MT of FFB US\$ into PGK	PGK 712.92	PGK 804.50	PGK 881.11	Farmer pay out ratio at 57%	PGK 406.37	PGK 458.56	PGK 502.24	Add 1% VAT	PGK 4.06	PGK 4.59	PGK 5.02	Less OPRA Levy	PGK -2.20	PGK -2.20	PGK -2.20	Less Sexava Levy	PGK -2.50	PGK -2.50	PGK -2.50	Less OPIC Levy	PGK -4.00	PGK -4.00	PGK -4.00	Less VAT 10% OPIC Levy	PGK -0.40	PGK -0.40	PGK -0.40	Mill Gate Price	PGK 401.33	PGK 454.04	PGK 498.16	Farm Gate Price	PGK 350.84	PGK 403.74	PGK 446.77		Mar 2021	Apr 2021	May 2021	US\$ Price CPO Rotterdam	US 1,127.27	US 1,169.83	US 1,200.97	US\$ Price for PKO Rotterdam	US 1,447.04	US 1,045.88	US 1,556.63	Average extraction rate for CPO	23.51%	23.56%	23.59%	<p>Complied</p>
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		Average extraction rate for PKO	1.99%	1.99%	1.99%
		Palm product value of 1MT of FFB US\$ into PGK	PGK 927.14	PGK 964.34	PGK 981.93
		Farmer pay out ratio at 57%	PGK 528.47	PGK 549.67	PGK 559.70
		Add 1% VAT	PGK 5.28	PGK 5.49	PGK 5.59
		Less OPRA Levy	PGK -2.20	PGK -2.20	PGK -2.20
		Less Sexava Levy	PGK -2.50	PGK -2.50	PGK -2.50
		Less OPIC Levy	PGK -4.00	PGK -4.00	PGK -4.00
		Less VAT 10% OPIC Levy	PGK -0.40	PGK -0.40	PGK -0.40
		Mill Gate Price	PGK 524.65	PGK 546.06	PGK 556.19
		Farm Gate Price	PGK 473.65	PGK 495.43	PGK 505.98
			Jun 2021	Jul 2021	Aug 2021
		US\$ Price CPO Rotterdam	US 1,288.16	US 1,094.05	US 1,171.90
		US\$ Price for PKO Rotterdam	US 1,591.74	US 1,452.36	US 1,341.70
		Average extraction rate for CPO	23.61%	23.64%	23.72%
		Average extraction rate for PKO	1.99%	1.99%	2.00%
		Palm product value of 1MT of FFB US\$ into PGK	PGK 1,060.57	PGK 887.90	PGK 927.37
		Farmer pay out ratio at 57%	PGK 604.52	PGK 506.10	PGK 528.60
		Add 1% VAT	PGK 6.04	PGK 5.06	PGK 5.28
		Less OPRA Levy	PGK -2.20	PGK -2.20	PGK -2.20

		Less Sexava Levy	PGK -2.50	PGK -2.50	PGK -2.50	
		Less OPIC Levy	PGK -4.00	PGK -4.00	PGK -4.00	
		Less VAT 10% OPIC Levy	PGK -0.40	PGK -0.40	PGK -0.40	
		Mill Gate Price	PGK 601.46	PGK 502.06	PGK 524.78	
		Farm Gate Price	PGK 551.08	PGK 452.09	PGK 475.39	
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>Based on onsite interview with smallholders assisted by Audit Facilitator;</p> <ul style="list-style-type: none"> - Smallholder Caroline Saeke (077119), Clara Lagisa (380076), Hubertina Lagisa (380088) stated Hargy Oil Palms Limited and OPIC extension officers provide explanation on the FFB quality, FFB price and the calculation, payment terms including deduction. 				Complied
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.</p> <p>- Minor compliance -</p>	<p>Based on onsite interview with smallholders assisted by Audit Facilitator;</p> <ul style="list-style-type: none"> - Smallholder Loli Birou (390001), Martin Ragute (390054), Robin Leo (390080) and Teddy Male (440055) stated Hargy Oil Palms Limited's and OPIC extension officers provide explanation on the FFB quality, FFB price and the calculation, payment terms including deduction. - LSS smallholder Ulku Tawakla (020689), Nime Kal (021153), Andrew Kenga (031395) and Kauba Guria (031429) stated Hargy Oil Palms Limited's and OPIC extension officers provide explanation on the FFB quality, FFB price and the calculation, payment terms including deduction. 				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>Payment for smallholder's FFB:</p> <ul style="list-style-type: none"> - Block 010254 – Paul Willie. FFB collected on 4 August 2021 of 1.696 MT (docket No.08106); Paid PGK 806.26 from price PGK 475.39/MT FFB 				Complied

	<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.</p> <p>- Critical (Major) compliance -</p>	<p>(farmgate price) x 1.696 MT and total deduction of PGK 83.77 (loans & BOGA levy) on 8 August 2021.</p> <ul style="list-style-type: none"> - Block 010292 – Masip Kotbundi. FFB collected on 3 August 2021 of 1,600 MT (docket No.016261) + on 5 August 2021 of 2.527 MT (docket No.016320). Paid PGK 1,953.70 from price PGK 475.39/MT FFB (farmgate price) x 4.127 MT and total deduction of PGK 8.25 on 8 August 2021. - Block 010341 – Daniel Petau. FFB collected on 11 August 2021 of 1,976 MT (docket No.08282) + 2,109 MT (docket No.8287). Paid PGK 1,941.97 from price PGK 475.39/MT FFB (farmgate price) x 4.085 MT and total deduction of PGK 491.91 (HOSD Tools Loan) , net pay PGK 1,451.05 on 15 August 2021. - Block 010380 – Carol Arumbi. FFB collected on 12 August 2021 of 1,930 MT (docket No.027043) + on 15 August 2021 of 0.668 MT (docket No.08402). Paid PGK 1,235.05 from price PGK 475.39/MT FFB (farmgate price) x 2,598 MT and total deduction of PGK 5.20 on 15 August 2021. <ul style="list-style-type: none"> - Hargy Oil Palms Limited carried out RSPO Awareness in Barema area, located in block 031249, dated 28 April 2021 – attended by 13 smallholders. Meeting Minutes: All RSPO criteria to smallholder discussed, including FFB price at K495.43/tonnes; FFB price changes on 10th of each month per year; no new planting on marginal land area, buffer zone; protection of rare-threatened-endangered species. Farmers Note of the Meeting Agendas; why did company stop allowing new planting? Because of the forest alliance conservation law and needs more assessment before new plant should permitted. - Hargy Oil Palms Limited carried out RSPO Awareness in Kabaiya area, dated 26 July 2021 – attended by smallholders 331806, 331807, 332029, 332023, 332021. Meeting Minutes: HOPL has a form Grievance Form to register any complaint or dispute you have. IT is then forwarded to Smallholders Affairs at Hargy for registration and screening by Grievance Officer. Your complaints or dispute are then sent to respective departments concerned to close off 	
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		<p>your complaints or disputes. Debt recovery scale as passed through the Local Planning Committees meeting with OPRA, OPIC, BOGA and Hargy Oil Palms Limited – the scale decided</p> <table border="1" data-bbox="1025 467 1655 715"> <thead> <tr> <th>Farm Gate Price</th> <th>Percentage of Debt Recovery</th> </tr> </thead> <tbody> <tr> <td>< PGK 100</td> <td>15%</td> </tr> <tr> <td>PGK 100 - 200</td> <td>20%</td> </tr> <tr> <td>PGK 200 – 400</td> <td>30%</td> </tr> <tr> <td>>PGK 400</td> <td>50%</td> </tr> </tbody> </table>	Farm Gate Price	Percentage of Debt Recovery	< PGK 100	15%	PGK 100 - 200	20%	PGK 200 – 400	30%	>PGK 400	50%	
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<p>5.1.7</p>	<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:</p> <ul style="list-style-type: none"> - In Hargy POM: Independent Consumer Competition Commission – Certificate of Inspection No.ICCC1928 dated 12 June 2021 for weighbridge model JC 320 NUWEIGH capacity 60 tonnes in Hargy Oil Palms Limited – Hargy Mill. Next inspection date 12 June 2022. - In Barema POM, sighted Independent Consumer Competition Commission – Certificate of Inspection No.ICCC1929 dated 12 June 2021 for weighbridge model R420 RINSTRUM capacity 60 tonnes, in Hargy Oil Palms Limited – Barema Mill. Next inspection date 12 June 2022. - In Navo POM, the Independent Consumer Competition Commission – Certificate of Inspection No.ICCC1930 dated 12 June 2021 for weighbridge model E1110 capacity 60 tonnes in Hargy Oil Palms Limited – Navo Mill. Next inspection date 12 June 2022. <p>Hargy Oil Palms Limited performed smallholder FFB truck weighing scale calibration at regular period.</p> <ul style="list-style-type: none"> - Smallholder VC Truck Variance Form for Truck VC 18, dated 18 August 2021. High variance record (- 450 kg). The truck weigh checked and recalibrate faulty scale and tested OK. 	<p>Complied</p>										

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		<ul style="list-style-type: none"> - Smallholder VC Truck Variance Form for Truck VC 17, dated 6 August 2021. High variance record (+ 425 kg). The truck weigh checked and repaired and do variances calibration and tested OK. Tested with printing weigh docket No.008179 – result 0 kg (normal). - Smallholder VC Truck Variance Form for Truck VC 17, dated 12 July 2021. High variance record (+ 590 kg). The truck weigh checked and calibrate variance and tested OK. Tested with printing weigh docket No.007691 – result 0 kg (normal). - Smallholder VC Truck Variance Form for Truck VC 08, dated 9 July 2021. High variance record (+ 519 kg). The truck weigh checked for load difference, wiring malfunction repaired, calibrate and tested OK. Tested with printing weigh docket No.007622 – result 0 kg (normal). 	
5.1.8	<p>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.</p> <p>- Minor compliance -</p>	<p>The smallholder in PNG is associated smallholder.</p> <p>Internal Control System-function was performed by HOPL in cooperation with OPIC.</p>	Complied
5.1.9	<p>(C) The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner.</p> <p>- Critical (Major) compliance -</p>	<p>HOPL implementing the Procedure Grievance Mechanism No.PRO-SAD-GEN-001-06 dated 25 March 2021. 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.</p> <p>Hargy Oil Palms Limited maintained Grievances logbook. Sampled grievance/appeal handling reviewed:</p> <ul style="list-style-type: none"> - Grievance ID 360; title Block 100100 Matururu, raised by smallholder Elizabeth Betty Neinaka; date complaint received 30 January 2021; assigned to Morgane Commans; due date 17 February 2021; category external Communities Affairs – Other Social Issues; Details: FFB harvested but wasn't picked up by contractors. She informed the contractor to pick up the FFB but 	Complied

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		<p>they said her name wasn't on the list for pick up. In her previous harvests the contractors usually pick up the fruits but recently did not. Also mentioned the contractors asking them K20 for transport fee. There is no road access to her block; Corrective Action/Response taken: Block 100100 is added to the list for pick up and road access will be considered this year (2021), contractors will be warned. Elizabeth agreed to the response provided and signed off the meeting attendance record - 4 February 2021; status closed;</p> <ul style="list-style-type: none"> - Grievance ID 372; title deduction block 370054; raised by smallholder Francis Bai; date complaint received 16 March 2021; assigned to Morgane Commans; due date 31 March 2021; category External Communities Affairs-Compensation; Details: Continuous deduction on fertilizer loan since 2017 until now. He confess that he have not received any fertilizer bags but still the deduction occurred; Corrective Action/Response taken: Based on document review, Smallholder Community Engagement explains the smallholder owns two blocks 07713 Galelolo and 370054 Noau. In 2015 fertilizer bags were delivered to his block 077103. Due to poor production in block 077103 debt was transferred to his another block 370054; status closed 	
<p>Criterion 5.2: The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.</p>			
<p>5.2.1</p>	<p>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.</p> <ul style="list-style-type: none"> - Minor compliance - 	<p>HOPL made regular consultation and communication meeting with interested smallholders within the unit of certification, including women. Consultation and communication performed in field day, where HOPL representative visit the village or smallholder area to assess their needs for support to improve their livelihoods and their interest in RSPO certification.</p> <p>Available records of field day such as attendance record and meeting agenda, facilitated by HOPL – PNGOPRA, e.g. Field day in Milikima VOP on 30 January 2021, attended by 25 Smallholders, training regarding Block Upkeep – Sexava Outbreak; Field day dated 25 August 2021 located in Tiaru Section 03, facilitator Peter Mula; field day dated 10 August 2021 located in Malassi Block 04-0627, facilitator OPIC, PNG OPRA, HOPLA SHAAS and LANDS, attended by 50 smallholders; field day dated 20 Jul 2021 located in Uasilau Village, facilitator</p>	<p>Complied</p>

		OPIC, Transport, PNG OPRA, NASFUND REP-Bialla, Compliance, BOPGA, HOPLA SHAAS and LANDS, attended by 111 smallholders; field day dated 29 January 2021 located in Kiava Village, facilitator Peter Mula, Karen Rickian, Evelyn Maya, Stephanie Silik, attended by 41 smallholders.	
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>	HOPL and OPIC provide extension services through SHAAS (Smallholder Agricultural Advisory Services) to support the development and implementation of livelihood improvement programmes, including capacity building. This SHAAS through Extension Officer provided smallholder growers with knowledge regarding best agricultural practices to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification. SHAAS Extension Officers are in charge of providing all necessary documentations and do the physical checks during the process. Capacity building of SHAAS extension officers for example held in Ewase Room on 11 March 2021, attended by 27 SHAAS Extension Officers, for training regarding Targeted Trunk Injection (TTI) Treatment and Integrated Pest Management (IPM).	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. Smallholders 010254 Junior Paul Willy.</p> <ul style="list-style-type: none"> - Department of Lands Application for a Replacement Title for land portion 254, Milinch Nakanai, Fourmil Talasea, under name Paul Willy; the title was lost. Declared at Bialla, 6 March 2017. - Agricultural Lease Under Section 56 dated 3 July 1979, mentioned that The Minister For Lands grants to Palu Willy a farmer in Block 282 Kafore, a lease for period ninety nine (99) years from 17 November 1977 for Agriculture purpose; Portion 254, Milinch Nakanai, Fourmil Talasea, area 9.10 Ha, Province West New Britain. <p>This process was assisted by HOPL and OPIC.</p>	Complied

		<p>Smallholders 050164 Kaikou Maisu.</p> <ul style="list-style-type: none"> - Department of Lands Application for Transfer for land portion 164, Milinch Banga, Fourmil Talasea, WNBPN; name Kaikou Maisu. Declared at Boroko, 25 June 2019. - Medical Certificate of Death of Komane Maisu 55 years old, Uasilau Village, died on 16 July 1997 at Uasilau Village. - Statutory Declaration by Ruth Maisu, Stanis Maisu, and Wolly Maisu of Portion 164, Uasilau LSS, Cenaka, Bialla declared that without any grievance agree to her/his brother Kaikou Maisu to be the next of Kin and the registered proprietor of the subject portion; dated 1 July 2016. <p>This process was assisted by HOPL and OPIC.</p> <p>Smallholders 332043 Kabaiya Primary School</p> <ul style="list-style-type: none"> - Application or Tender Form Notice under Sec 69 (2)(d) Land Act 1996 for Kabaiya Primary School, type of lease applied Agriculture Lease, for Allotment 15 Section 1, Kabaiya Community Center, WNBPN, dated 27 August 2020. <p>This process was assisted by HOPL and OPIC.</p> <p>Smallholders 260550 Elizabeth Vaimuli</p> <ul style="list-style-type: none"> - Agricultural Lease under Section 56, The Minister for Lands and Physical Planning grants to Elizabeth Wemuli a lease under section 56 for the period of ninety nine (99) years; Portion 550, Milinch Banga, Fourmil Talasea, area 11.7 Ha, Province Wset New Britain; dated 13 Oct 1986. <p>This process was assisted by HOPL and OPIC.</p> <p>Smallholders 332003 Agnes Lawrence</p> <ul style="list-style-type: none"> - The Minister on behalf of the Independent State of Papua New Guinea grants to the Lessee Agnes Lawrence, under section 49 of the Land Act chapter 185 	
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		for a period of 99 years for Agriculture purpose; Portion 2003, Milinch Ulawun, Fourmil Talasea, WNB Province, area 6.90 Ha; dated 25 March 1993. This process was assisted by HOPL and OPIC.	
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. Sampled smallholders has Certificate of Herbicide Training, e.g.:</p> <ul style="list-style-type: none"> - Smallholder No.010254, Junior Paul Willy has Certificate of Attendance, for Training on Agricultural Safety and Crop Spraying Methods at Tiauru LSS Subdivision of Biiala District, West New Britain Province, on 2 December 2020; valid for 3 years. - Smallholder No.260550, Leonard Ken (Son of Elizaberth Vaimuli) has Certificate of Attendance, for Training on Agricultural Safety and Crop Spraying Methods at Maumau Village Subdivision of Biiala District, West New Britain Province, on 14 September 2020; valid for 3 years. - Smallholder No.332003, Lawrence Apis (Husband of Agnes Lawrence) has Certificate of Attendance, for Training on Agricultural Safety and Crop Spraying Methods at Kabaiya LSS Subdivision of Biiala District, West New Britain Province, on 11 November 2020; valid for 3 years. - Smallholder No.332043, Edward Kalal (Care-taker of Kabaiya Primary School) has Certificate of Attendance, for Training on Agricultural Safety and Crop Spraying Methods at Kabaiya LSS Subdivision of Biiala District, West New Britain Province, on 10 April 2021; valid for 3 years. - Smallholder No.121259, Josephine Gaa has Certificate of Attendance, for Training on Agricultural Safety and Crop Spraying Methods at Urumaili Village Subdivision of Biiala District, West New Britain Province, on 10 February 2021; valid for 3 years. 	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 Biiala Local Planning Committee Meeting. Due to Covid-19 pandemic, meeting for 2021 is postponed. Biiala Local Planning Committee Meeting No.01/2020 dated 19 May 2020 attended by HOPL General Manager, OPIC representative, Biiala</p>	Complied

		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.	
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 June 2021) 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 77% of male and 23% 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. 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 January 2021) and Equal Employment</p>	Complied

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	capabilities, qualities and medical fitness necessary for the jobs available. - Minor compliance -	Opportunity Policy (Doc. No.: POL-HRD-GEN-008-06, Issue No.: 6 dated 7 June 2021) 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. Sampled records of promotion such as Staff Order – General with the details of appointment/ transfer with new grade level and basic wages included. 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.	
6.1.4	Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women. - Minor compliance -	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.	Complied
6.1.5	(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. - Critical (Major) compliance -	Complied	Complied
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	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	Complied

	<p>to the workers in the English language and verbally explained to them in language they understand.</p> <p>- Critical (Major) compliance -</p>	<p>Employment and acknowledged by the employees. Details of the Contract of Employment are such as:</p> <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 	
6.2.2	<p>(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 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</p>	<p>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 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> <p>Based on interview with sample of workers at Barema Mill and Barema Compound (new employee/gardener), informed that those workers never signed contract and no explanation of employee contract in details. Verified and interview with HR, Employees upon recruitment are provided with all the</p>	Complied

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	<p>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>necessary employment forms to complete. They are also provided with a Contract of Employment which details their terms and conditions of employment. The HR Officer or representative as part of the employee's induction, explains the conditions of service to the employees.</p> <p>Once the forms and contract is signed the Company retains a copy on file in the HR Office which is accessible to the employee should they request a copy at any time. Given the large number of employees, the lack of secure facilities within their housing compounds, the requirement for confidentiality and the high level of turnover experienced, especially in the lower grade levels this is process is far more practical and addressed the above risks.</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.</p> <p>Sample Payslip that verified by auditor on August 2021 related overtime paid appropriately:</p> <ul style="list-style-type: none"> - Barema POM: ID: 03270 (male worker); ID 03602 (male worker); ID 03995 (female worker); ID 04521 (female worker); ID: 05054 (male worker). - Hargy Plantation = ID16737 (female worker); ID16725 (female worker); ID16733 (female worker); ID16337 (female worker); ID17019 (female worker). - Hargy POM = ID: 02626 (male worker); ID 02968 (male worker) - Kiba Plantation = ID20376 (male worker); ID29375 (male worker), ID29815 (male worker), ID29854 (male worker); ID81708 (male worker) 	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)</p>	<p>Based on assisted visit with audit facilitators to Hargy Estate - Barema compound (GL 103, GL 84 and GL 13), Navo Estate compound, Kiba Plantation compound, noted the company provides adequate housing with sanitation facilities, water supply, and electricity. Families are getting sufficient room in housing.</p> <p>Amenities such as medical centre/clinic and welfare amenities (sport court, crops gardening) also available.</p>	Complied

	<p>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>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>	
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>- Minor compliance -</p>	<p>The company provides canteen in each compound as part of business of opportunities to the local community. The canteen management is by rental system to the local communities with the agreement.</p> <p>Based on interview and visit by audit facilitators; crops gardening also allocated by the company in every housing/compound.</p>	Complied
6.2.6	<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</p>	<p>HOPL has established the prevailing wage calculation to include all the in-kind benefits provided to the workers. The in-kind benefits for local workers are such as</p> <p>housing, electricity & water, education, healthcare, transport, food and sport & recreation facilities.</p> <p>Based on the calculations:</p> <ul style="list-style-type: none"> - The total cost of in-kind benefits is K664.81. - Average monthly THP salary/worker: K667.33. - Total monthly remuneration (incl benefits): K1332.14 or K6.99/hr 	Complied

	<p>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), this should be used as the foundation for the gradual implementation of the living wage payment • 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: 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 2021, 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). 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 2021. Awareness on Policy at Barema Plantation. - 15 June 2021. Awareness on Policy at Barema Mill - 18 June 2021. Awareness on Policy at Navo Mill 	Complied
6.3.2	<p>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.</p> <p>- Minor compliance -</p>	<p>Based on interview with representative of Human Resource, the trade union meeting is carried out periodically. The latest minutes of meeting conducted on 27 July 2021 at 10 am – 10.30 am and attended by 7 participants.</p>	Complied
6.3.3	<p>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.</p> <p>- Minor compliance -</p>	<p>According to information from HR Department, the company gives freedom for association to all workers for joining any trade/labour union. Audit team received stakeholder comment; he confuse on K2.00 deduction on their payslip, which is for union levy. But the workers feeling disappointed because no actual program for union to support the worker. Audit team seeks confirmation from Hargy Oil Palms Limited. The response: The K2.00 Union fee is only deducted from the employee’s salary if the employee gives his/her authority by completing and signing the relevant Union Membership form provided by the Company Union Representative. The company facilitates on a fortnightly basis the payment of the fees to the Union bank account. As per the earlier statement, HOPL Management do not interfere with Union matters or influence an employee’s choices when it comes to their Freedom of Association.</p>	Complied

Criterion 6.4: Children are not employed or exploited.			
6.4.1	<p>A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements.</p> <p>- Minor compliance -</p>	<p>Policy on Child Labour (Doc. No.POL-HRD-GEN-007-06, Issue No.6 dated 7 June 2021) 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.</p>	Complied
6.4.2	<p>(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.</p> <p>- Critical (Major) compliance -</p>	<p>HOPL has developed Human Resource Operations Manual (Doc. No.: MAN-HRD-GEN-001-01, Issue No.1 dated 10 January 2021) 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, clinic book, national identity card or others such as best facial judgement or professional curriculum vitae.</p>	Complied
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 years 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.</p>	<p>Based on direct interview with 16 smallholders block owner, no child labour policy is frequently communicated through field days. Smallholders block owner understood that child labour is disallowed employed both at the company and smallholders block.</p>	Complied

	It promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live. - Minor compliance -		
Criterion 6.5: There is no harassment or abuse in the workplace, and reproductive rights are protected.			
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. - Critical (Major) compliance -</p>	Sexual Harassment Policy (Doc. No.: POL-HRD-GEN-011-06, Issue No.: 6 dated 7 June 2021) was available where the company is committed to ensure a harmonious and productive work environment for its employees. This commitment recognized that the workplace 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 June 2021 in Atata Plantation (Navo Estate), 17 March 2021 in Barema Plantation (Hargy Estate), 28 May 2021, 5 June 2021, 24 June 2021 in Barema POM, 8 July 2021 in Pandi Estate (Bakada Plantation) and 18 June 2021 in Navo POM.	Complied
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>	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 June 2021) 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 June 2021 in Barema Plantation (Hargy Estate), 28 February 2021, 18 March 2021, 15 June 2021 and 17 June 2021 in Barema POM and 18 June 2021 in Navo POM	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.</p> <p>- Minor compliance -</p>	<p>Hargy Oil Palms Limited has not demonstrate record of assessment and consultation of new mother.</p> <p>Minor Non-Conformity raised against this indicator. Assessment and consultation of new mother needs was not demonstrated.</p>	Non-compliance

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.</p> <p>- 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> <p>Based on Grievance record period December 2020 – August 2021, there are 13 grievances (5 external, 8 internal) recorded that still open status/not resolved and still under investigation with relevant department.</p>	Complied
Criterion 6.6: No forms of forced or trafficked labour are used.			
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 • 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.</p> <p>- Critical (Major) compliance -</p>	<p>All the estates and mills have recorded all the overtime and productivity of the workers in Check roll 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> <p>Audit team received stakeholder comment; he confuse on K2.00 deduction on their payslip, which is for union levy. But the workers feeling disappointed because no actual program for union to support the worker. Audit team seeks confirmation from Hargy Oil Palms Limited. The response: The K2.00 Union fee is only deducted from the employee’s salary if the employee gives his/her authority by completing and signing the relevant Union Membership form provided by the Company Union Representative. The company facilitates on a fortnightly basis the payment of the fees to the Union bank account. As per the earlier statement, HOPL Management do not interfere with Union matters or influence an employee’s choices when it comes to their Freedom of Association.</p>	Complied

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.</p> <p>- 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>- Critical (Major) compliance -</p>	<p>Unit of Certification has appointed responsible person for H&S at each unit. There are:</p> <p>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. 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/training or RSPO related activities are carried out as required. 5. Conduct site induction for new employees. <p>H&S meeting conducted in monthly basis at each unit. Several records seen are:</p>	Complied

		<ul style="list-style-type: none"> - NAVO Mill: H&S meeting conducted on 1 May 2021. 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 2021. Meeting agenda is reviewing previous meeting. There is no H&S case raised. - Bakada Plantation: H&S meeting conducted on 27 March 2021. 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. - Hargy Mill: H&S meeting conducted on 25 June 2021. 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. 	
6.7.2	<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 2021. 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>	Complied

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		<ul style="list-style-type: none"> - HOPL Statement from CEO regards to Covid19, dated 23 March 2021. - SOP Infection Prevention Control Guideline for COVID-19 Treatment/Isolation Centre (Area 8), dated 13 April 2021. - 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 COVID-19 Surveillance Plan 2021 Flowchart - Summary Report FINAL related HOPL COVID-19, dated 28 May 2021. <p>Records of all accidents are kept and periodically reviewed in monthly basis.</p> <p>Audit team followed up report from worker union representative about follow up post-work accident.</p> <ul style="list-style-type: none"> - The incident involving Mr. John Jeffery on 6 June 2020 was investigated and all corrective actions recommended have been implemented. The action taken against the employees concerned was determined and agreed to by management in line with the findings and recommendations of the Investigation Officer. - Mr. Jeffery's Workers Compensation claim was processed and an amount awarded in accordance with the PNG Workers Compensation Act based on their assessment of the injury received. - Mr. Jeffery has raised several grievances regarding this same matter and on each occasion received a response. <p>Audit team noted Management statement: the matter to be closed and Mr. Jeffery has been given guidance on what options he can consider should he remain unsatisfied.</p>	
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<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>Unit of certification established Personal Protective Equipment (PPE) SOP (PRO-SUS-OHS-003-03, issue No.5, dated 18 March 2021) including PPE Matrix attachment. Based on sample activities during virtual visit, unit of certification are using PPE properly to all workers.</p>	<p>Complied</p>
<p>6.7.4</p>	<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. - 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. 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. 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). 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</p>	<p>Complied</p>

		dependants on application including natural parents. (2) Persona; Accident (Death by Accident), covering 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>Certified Management Unit able to demonstrate Incident/Accident Report 2021 (up to July). From the summary YTD 2021 OHS Monthly KPI Rates, 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>Jul</th> <th>YTD</th> </tr> </thead> <tbody> <tr> <td>LTI case</td> <td>30</td> <td>54</td> <td>36</td> <td>26</td> <td>13</td> <td>30</td> <td>18</td> <td>207</td> </tr> <tr> <td>No. workers</td> <td>4,619</td> <td>4,786</td> <td>4,992</td> <td>4,896</td> <td>4,982</td> <td>4,843</td> <td>4,898</td> <td>34,016</td> </tr> <tr> <td>Workday lost</td> <td>57</td> <td>93</td> <td>70</td> <td>44</td> <td>46</td> <td>52</td> <td>43</td> <td>405</td> </tr> </tbody> </table> <p>Sample of injuries/incident records are:</p> <ul style="list-style-type: none"> - 8 February 2021. Mr. Bobby Dangah as Harvester at Barema Plantation got injury type cut/laceration on his right leg. The incident occurs cause by staking and suddenly stock knife missed the bunch. Days off given is 4 days (9 February 2021 to 12 February 2021). - 10 April 2021. Mrs. Grace Badai as Leaf Fruit Collector at Ibana got injury type Palm nail injury on his Leftleg-toe. The incident occurs cause by accidently stepped onto a palm nail and got injured. Days off given is for 4 days (8 April 2021 to 11 April 2021). 		Jan	Feb	Mar	Apr	May	Jun	Jul	YTD	LTI case	30	54	36	26	13	30	18	207	No. workers	4,619	4,786	4,992	4,896	4,982	4,843	4,898	34,016	Workday lost	57	93	70	44	46	52	43	405	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.</p>	<p>HOPL Integrated Pest Management Plan is available in document No.PLN-SUS-SUS-001-06 dated 23 June 2021, therein includes: Methods of Reducing Pesticides use, justification of agrochemical use, integrated pest management plan safety with chemicals, describes:</p> <ol style="list-style-type: none"> 1. Pest survey & monitoring; 2. Safety and effective use of pesticides; 	Non-Compliance																																				

	<p>- Critical (Major) compliance -</p>	<p>3. Insect control; 4. Weed control; 5. Disease control.</p> <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>Latest IPM training held on 11 August 2021 located in Hargy Training Room. IPM training focused on Targeted Trunk Injection (TTI) attended by Sexava-TTI operators, facilitated by Research Associated and Head of Entomology. Training discussed about safety, awareness, overall pest and disease situation,</p>	
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		<p>matter arise from meeting, pest survey and monitoring, update on monitoring and treatment/control.</p> <p>Smallholder: IPM program in smallholder area are guided by HOPL and PNGOPRA through SHAAS Extension officers. Available records of training and field day facilitated by HOPL – PNGOPRA, e.g. training in Milikima VOP on 30 January 2021, attended by 25 Smallholders, training regarding Block Upkeep – Sexava Outbreak; in Ewase Room on 11 March 2021, attended by 27 SHAAS Officer, training regarding Targeted Trunk Injection (TTI) Treatment and Integrated Pest Management (IPM). Field day dated 25 August 2021 located in Tiauru Section 03, facilitator Peter Mula; dated 10 August 2021 located in Malassi Block 04-0627, facilitator OPIC, PNG OPRA, HOPLA SHAAS and LANDS, attended by 50 smallholders; dated 20 July 2021 located in Uasilau Village, facilitator OPIC, Transport, PNG OPRA, NASFUND REP-Bialla, Compliance, BOPGA, HOPLA SHAAS and LANDS, attended by 111 smallholders; dated 29 January 2021 located in Kiava Village, facilitator Peter Mula, Karen Rickian, Evelyn Maya, Stephanie Silik, attended by 41 smallholders.</p> <p>Critical Non-Conformity raised against this indicator. Organization cannot demonstrate implementation of IPM in suspended smallholder area.</p>	
7.1.2	<p>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).</p> <p>- Minor compliance -</p>	<p>Based on HOPL Integrated Pest Management Plan (PLN-SUS-SUS-001-06) Issue No.6 dated 23 June 2021 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. Procedure consist of pest identification, understanding the biology and ecology of pest, monitoring of pest populations and related</p>	Complied

		activities, determine action threshold – economic injury level, choosing appropriate combination of management controls, prevention and intervention.	
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 -	<p>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.</p> <p>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) 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 Hargy Division 1, Hargy Estate and Kiba Division 2, Navo 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 is 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>	Complied

		<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>																																	
<p>7.2.2</p>	<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 including toxicity in whole HOPL area for 2021 (to-date July) based on OMP Report.</p> <p>Hargy Estate (Hargy Plantation):</p> <table border="1" data-bbox="1025 730 1921 1262"> <thead> <tr> <th>Pesticides</th> <th>Active Ingredients (kg)</th> <th>Sprayed Area (Ha)</th> <th>Tox/Ha (kg_BM50/Ha)</th> </tr> </thead> <tbody> <tr> <td>Ally 20DF – <i>Metyl Metsulfuron 20%</i> (Program: Circle and Path, Selective weeding)</td> <td>0.67</td> <td>9,175.9</td> <td>0.01</td> </tr> <tr> <td>Asulox – <i>Alkylethersulfate, sodium s 20%</i> (Program: Circle and Path, Selective weeding)</td> <td>2.07</td> <td>219.4</td> <td>1.88</td> </tr> <tr> <td>Glyphosate – 45% (Program: Circle and Path, Selective)</td> <td>48.77</td> <td>9,623.6</td> <td>1.01</td> </tr> <tr> <td>Li-700 (<i>Propionic Acid 40%</i>)</td> <td>10.39</td> <td>9,555.7</td> <td>0.22</td> </tr> <tr> <td>Li-700 (<i>Phosphatidylcholine 40%</i>)</td> <td>10.39</td> <td>9,555.7</td> <td>-</td> </tr> <tr> <td>Li-700 (<i>Alkyl phenol – hydroxypoly 20%</i>)</td> <td>5.19</td> <td>9,555.7</td> <td>-</td> </tr> <tr> <td>Tri-Ester (<i>Triclopyr-butotyl 32%</i>)</td> <td>0.12</td> <td>235.1</td> <td>0.26</td> </tr> </tbody> </table> <p>Navo Estate (Kiba Plantation):</p>	Pesticides	Active Ingredients (kg)	Sprayed Area (Ha)	Tox/Ha (kg_BM50/Ha)	Ally 20DF – <i>Metyl Metsulfuron 20%</i> (Program: Circle and Path, Selective weeding)	0.67	9,175.9	0.01	Asulox – <i>Alkylethersulfate, sodium s 20%</i> (Program: Circle and Path, Selective weeding)	2.07	219.4	1.88	Glyphosate – 45% (Program: Circle and Path, Selective)	48.77	9,623.6	1.01	Li-700 (<i>Propionic Acid 40%</i>)	10.39	9,555.7	0.22	Li-700 (<i>Phosphatidylcholine 40%</i>)	10.39	9,555.7	-	Li-700 (<i>Alkyl phenol – hydroxypoly 20%</i>)	5.19	9,555.7	-	Tri-Ester (<i>Triclopyr-butotyl 32%</i>)	0.12	235.1	0.26	<p>Complied</p>
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Pesticides	Active Ingredients (kg)	Sprayed Area (Ha)	Tox/Ha (kg_BM50/Ha)
Ally 20DF – <i>Metyl Metsulfuron 20%</i> (Program: Circle and Path, Selective weeding)	1.33	8,151.2	0.03
Glyphosate – 45% (Program: Circle and Path, Selective)	69.01	8,799.9	1.57
Li-700 (<i>Propionic Acid 40%</i>)	10.62	8,295.2	0.26
Li-700 (<i>Phosphatidylcholine 40%</i>)	10.62	8,295.2	-
Li-700 (<i>Alkyl phenol – hydroxypoly 20%</i>)	5.31	8,295.2	-

Pandi Estate (Bakada Plantation):

Pesticides	Active Ingredients (kg)	Sprayed Area (Ha)	Tox/Ha (kg_BM50/Ha)
Ally 20DF – <i>Metyl Metsulfuron 20%</i> (Program: Circle and Path, Selective weeding)	0.33	4,828.1	0.01
Dimehypo – <i>Bisultap 25%</i>	0.32	29.5	22.94
Glyphosate – 45% (Program: Circle and Path, Selective)	39.53	6,138.9	1.29
Li-700 (<i>Propionic Acid 40%</i>)	5.37	6,119.6	0.10
Li-700 (<i>Phosphatidylcholine 40%</i>)	5.37	6,119.6	-
Li-700 (<i>Alkyl phenol – hydroxypoly 20%</i>)	2.68	6,119.6	-
Li-700 (<i>Soyal Phospholipids 35%</i>)	0.02	19.3	-
Li-700 (<i>Sel_LI-700 1%</i>)	-	19.3	-

		Li-700 (<i>Propionic Acid</i>)	0.02	19.3	0.22	
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>Smallholders: Records of pesticide use in smallholders available in Smallholder Pesticides 2021. It mentioned that smallholder only use Glyphosate as herbicide for controlling weed. Data period January to July 2021 described that Glyphosate used in D1_Cenaka is 845 L; in D2_Maututu is 1275 L; in D3_Meramera is 35 L and in IE_Cenaka is 40 L. No other agrochemical used in smallholders.</p> <p>The use of pesticide is minimized as part of Continuous Improvement Plan. Integrated Pest Management Plan is to manage oil palm pests and the pesticides used for their treatment and control in order to alleviate pest problems with the least possible hazard to people, property, and the environment. In plantations and nursery, insecticides are not use in prophylactic treatment but only when insect outbreak is identified and suspected to provoke major damages.</p> <ul style="list-style-type: none"> • 0-12 months after planting; No herbicide is to be applied. Allow only hand weeding to promote young palm and LCP growth. • 1-2 Years; Apply pre-mixed herbicide around the palm base to 3m wide whilst lifting up the fronds as illustrated. • 2-4 Years; Apply pre-mixed herbicide around the edge of the frond drips to prevent creepers growing onto the palm as illustrated. • > 4 YAP; The circle must be sprayed using double circuit method. In this method, the sprayer sprays to the palm circle in the direction of his left hand towards the palm base. Once he completes the first loop, he turns back to the direction of the spray, steps about half a metre away and continue spraying until he completes the second loop as illustrated. <p>Smallholders:</p>				Complied

		<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> <p>IPM program in smallholder area are guided by HOPL and PNGOPRA through SHAAS Extension officers. Available records of training and field day facilitated by HOPL – PNGOPRA, e.g. training in Milikima VOP on 30 January 2021, attended by 25 Smallholders, training regarding Block Upkeep – Sexava Outbreak; in Ewase Room on 11 March 2021, attended by 27 SHAAS Officer, training regarding Targeted Trunk Injection (TTI) Treatment and Integrated Pest Management (IPM). Field day dated 25 August 2021 located in Tiauru Section 03, facilitator Peter Mula; dated 10 August 2021 located in Malassi Block 04-0627, facilitator OPIC, PNG OPRA, HOPLA SHAAS and LANDS, attended by 50 smallholders; dated 20 July 2021 located in Uasilau Village, facilitator OPIC, Transport, PNG OPRA, NASFUND REP-Bialla, Compliance, BOPGA, HOPLA SHAAS and LANDS, attended by 111 smallholders; dated 29 January 2021 located in Kiava Village, facilitator Peter Mula, Karen Rickian, Evelyn Maya, Stephanie Silik, attended by 41 smallholders.</p>	
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>	<p>Based on interview with workers and smallholders, there is no prophylactic use of pesticides in whole are of Hargy Oil Palms Limited. The use of pesticide is minimized as part of Continuous Improvement Plan. Integrated Pest Management Plan is to manage oil palm pests and the pesticides used for their treatment and control to alleviate pest problems with the least possible hazard to people, property, and the environment. In plantations and nursery, insecticides are not use in prophylactic treatment but only when insect outbreak is identified and suspected to provoke major damages.</p>	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</p>	<p>There are 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.</p>	Complied

	<p>circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks.</p> <p>The due diligence refers to:</p> <ul style="list-style-type: none"> 7.2.5a Judgment of the threat and verify why this is a major threat 7.2.5b Why there is no other alternative which can be used 7.2.5c Which process was applied to verify why there is no other less hazardous alternative 7.2.5d What is the process to limit the negative impacts of the application 7.2.5e Estimation of the timescale of the application and steps taken to limit application to the specific outbreak. <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>Training of pesticide handling and application are routinely conducted, e.g. Refreshment on spraying standard in Hargy Plantation on 7 July 2021, attended by 5 spraying workers; on 19 July 2021 attended by 5 spraying workers; on 1 April 2021 attended by 19 spraying workers; on 13 March 2021 attended by 9 spraying workers; in Bakada Plantation on 26 May 2021 attended by 10 spraying workers; on 23 June 2021 attended by 17 workers; on 25 February 2021 attended by 12 workers; on 19 September 2021 attended by 3 workers;</p>	Complied

	<p>Smallholder requirements: Smallholders using and/or storing pesticides must demonstrate knowledge of the correct handling, storage, application and disposal requirements. - Critical (Major) compliance -</p>	<p>in Kiba Plantation on 5 May 2021 attended by 8 spraying workers; on 19 April 2021 attended by 8 workers; on 7 May 2021 attended by 9 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, e.g. Certificate of Junior Paul Willy (owner of portion 01-0254 Tiauru) valid until 12 February 2023; Certificate of Aleksander Francis (son of the owner - Ulku Tawakla of portion 02-0689 Wilelo) valid until 19 May 2024; Certificate of Joshua Kanga (owner of portion 03-1395 Barema); Certificate of Adolfa Valuka (wife of the owner – Mathis Valuka of portion 38-00006 Tianepou).</p> <p>Record of training are available such as in Milikima VOP on 30 Jan 2021, attended by 25 Smallholders, training regarding Block Upkeep – Sexava Outbreak; in Ewase Room on 11 March 2021, attended by 27 SHAAS Officer, training regarding Targeted Trunk Injection (TTI) Treatment and Integrated Pest Management (IPM). Smallholders; in Kaiamu VOP on 2 June 2020, attended by 31 Smallholders; in Kiava VOP on 3 March 2020 attended by 24 Smallholders.</p>	
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. - Critical (Major) compliance -</p>	<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</p>	Complied

		<p>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. Chemical shed is locked when not in used.</p>	
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>Critical Non-Conformity raised against this indicator. In Smallholders area, Organization cannot demonstrate that pesticide containers are punctured before being disposed.</p>	Non-compliance
7.2.9	<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>There are no pesticides applied aerially in whole area of HOPL including in Smallholders area.</p>	Complied

	<p>Smallholder requirements: The requirements fully applicable to smallholders. - Critical (Major) compliance -</p>		
7.2.10	<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. Yami Toni Tongi and Nelson Bolowe, fitness classification are fit.</p> <p>Annual Medical surveillance in Navo Estate – Kiba Plantation were evident for spraying worker, e.g. Basi Alex, Moses Koni and Lalam George, all are good for conducting chemical spraying. In Hargy Estate – Division 1 were evident for interviewed sprayer Yami Toni Tongi and Nelson Bolowe, both are good for conducting chemical spraying. Medical surveillance for Saxava TTI team has been done annually. Last medical surveillance conducted on 30 April 2021 requested by Dr. Deboy. Record seen for example Henry Jegeso (age 30 years); Walter Dulin (age 49 years); James Simbe (age 35 years); Rudolf Kamu (age 25 years); Ben Sakuk (age 33 years), comments are satisfactory to continue sexava control activity.</p> <p>Smallholders: The medical surveillance includes trunk injector for smallholder area. The latest medical surveillance conducted on 12 May 2021, based on Biochemical Laboratory Results, requested by Dr. Karaiye. Record seen: Ben Medison (age 33 years); Davidson Sonny (age 26 years); Ipako Habe (age 36 years) and Maxon Kundi (age 36 years).</p>	Complied
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</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</p>	Complied

<p>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>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. Pesticide training has been done to all worker interview at the field.</p> <p>Smallholders: At the smallholder blocks, pesticides are only applied by those that have attend the Agriculture Safety and Crop Spraying conducted by OPIC and HOPL. Targeted Trunk Injection (TTI) is only applied by HOPL employees. There was no evidence observed that spraying was conducted by other parties, such as women or children.</p> <p>Herbicide training certificate of smallholders are available, e.g.:</p> <ul style="list-style-type: none"> - Smallholder No.010254, Junior Paul Willy has Certificate of Attendance, for Training on Agricultural Safety and Crop Spraying Methods at Tiauru LSS Subdivision of Bialla District, West New Britain Province, on 2 December 2020; valid for 3 years. - Smallholder No.260550, Leonard Ken (Son of Elizaberth Vaimuli) has Certificate of Attendance, for Training on Agricultural Safety and Crop Spraying Methods at Maumau Village Subdivision of Bialla District, West New Britain Province, on 14 September 2020; valid for 3 years. - Smallholder No.332003, Lawrence Apis (Husband of Agnes Lawrence) has Certificate of Attendance, for Training on Agricultural Safety and Crop Spraying Methods at Kabaiya LSS Subdivision of Bialla District, West New Britain Province, on 11 November 2020; valid for 3 years. - Smallholder No.332043, Edward Kalal (Care-taker of Kabaiya Primary School) has Certificate of Attendance, for Training on Agricultural Safety and Crop Spraying Methods at Kabaiya LSS Subdivision of Bialla District, West New Britain Province, on 10 April 2021; valid for 3 years. - Smallholder No.121259, Josephine Gaa has Certificate of Attendance, for Training on Agricultural Safety and Crop Spraying Methods at Urumaili 	
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		Village Subdivision of Bialla District, West New Britain Province, on 10 February 2021; valid for 3 years.	
Criterion 7.3: Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.			
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>Hargy Oil Palms Limited established a Waste Management Plan No.PLN-SUS-EMS-001-11 dated 21 April 2021. The generation and management of wastes within Hargy Oil Palms Ltd project sites would be in accordance with the waste minimization and cleaner production principles (waste-avoidance, reduction, segregation, reuse, recycling, treatment and disposal), as well as relevant PNG Industry Environmental Code Of practices, guidelines, and other best environmental management practices & procedures applicable to the industry. Hargy Oil Palms Limited have identified source of waste activities:</p> <ul style="list-style-type: none"> - Land Clearing & Preparation (vegetation clearing, exposed topsoil); - Road Construction (exposed topsoil 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, pesticide containers, storm water runoff, offensive odor, litter, medical waste, construction waste, landfill construction); - 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); 	Complied

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- Palm Oil Mills (POME, EFB, expeller, sterilizer condensate, smoke from boiler, boiler ash, used hydrocarbons, waste water from mill cleaning, used hydrocarbons, fuels and lubricants, used lead acid batteries, empty chemical containers, machinery parts, FFB cages, packaging material, domestic wastes, used rope from cages).
- Mill equipment servicing (waste oil, oil/fuel spillages, used filters, litter);
- Office wastes (waste/used papers, empty boxes/packaging material, old equipment, air conditioning system).
- CPO and PKO Bulk Storage Tanks

Hargy POM using fiber and palm kernel shell as boiler fuel

Month	Fiber (MT)	Palm Kernel Shell (MT)
Jan 2021	2,175.04	1,087.52
Feb 2021	1,871.36	935.68
Mar 2021	2,228.02	1,114.01
Apr 2021	2,169.48	1,048.74
May 2021	2,115.35	1,057.68
Jun 2021	2,358.23	1,179.11
Jul 2021	2,265.29	1,128.15

Barema POM using fiber and palm kernel shell as boiler fuel

Month	Fiber (MT)	Palm Kernel Shell (MT)
Jan 2021	2,779.91	1,388.95
Feb 2021	2,759.60	1,379.80
Mar 2021	2,642.22	1,321.11

Apr 2021	2,899.77	1,449.88
May 2021	2,812.49	1,406.25
Jun 2021	3,060.85	1,530.43
Jul 2021	2,573.11	1,286.56

FF43 Chemical Container Recycling Record Hargy Estate:

- On 11 January 2021 recycled 6 containers from 20 l Glyphosate – triple rinsed, label removed, painted red recycled in the field.
- On 15 May 2021 recycled 10 containers from 20 l Glyphosate – triple rinsed, label removed, painted red recycled in the field.
- On 15 July 2021 recycled 1 container from 20 l Li700 – triple rinsed, label removed, painted red recycled in the field.
- On 26 August 2021 recycled 4 containers from 20 l Glyphosate – triple rinsed, label removed, painted red recycled in the field.

FF43 Chemical Container Recycling Record Pandi Estate:

- On 12 February 2021 recycled 3 containers from 20 l Glyphosate – triple rinsed, label removed, painted red recycled in the field.
- On March 2021 recycled 3 containers from 20 l Glyphosate – triple rinsed, label removed, painted red recycled in the field.
- On 5 August 2021 recycled 12 containers from 20 l Glyphosate, 1 20 l Dimehipo, 2 Li700; total 15 containers – triple rinsed, label removed, painted red recycled in the field.

Landfill record Hargy Estate:

- Vehicle LI09 disposed of 1 load of septic waste from Makakiwa Division to Septic pit dated 9 April 2021.

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		<ul style="list-style-type: none"> - Vehicle L138 disposed of 1 load of plastic & tin waste dated 14 July 2021. <p>Landfill record Bakada Plantation:</p> <ul style="list-style-type: none"> - Vehicle L136 disposed of 2 loads of inner plastic and domestic waste on 17 June 2021. - Vehicle L136 disposed of 2 loads of store waste on 29 July 2021. <p>Landfill record Navo Estate:</p> <ul style="list-style-type: none"> - Vehicle TE04 disposed of 1 loads of scrap metal from Navo POM to Scrap Metal Landfill; Vehicle TE324 disposed of 1 load store rubbish from Estate to General Landfill dated 30 April 2021. - Vehicle E71 disposed of 1 load of empty plastic waste dated 5 May 2021. - Vehicle TE36 disposed of 1 load of empty chemical containers to plastic pit dated 20 May 2021. <p>Navo Workhop Scheduled Waste Record 2021</p> <ul style="list-style-type: none"> - In January 2021; disposed of 1000 liters waste oil; 138 filters; 1 N50 battery; 3 N70 batteries; 1 N150 battery - In April 2021, disposed of 1000 liters waste oil; 127 filter; 3 N50 batteries; 9 N70 batteries; 4 N120 batteries; N150 batteries; - In August 2021, disposed of 5 N70 batteries; N150 batteries; 2 N200 batteries. 	
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>Navo Estate Medical Waste Disposal Records 2021</p> <ul style="list-style-type: none"> - On 13 August 2021, vehicle C168 pick up and disposed of 3 biobags from Health Office clinic; 1 biobag from Barema POM clinic; 4 biobags and 1 box medical waste from Barema Plantation clinic; 2 biobags and 1 sharp box medical waste from Kerakera Division clinic; 2 biobags and 1 sharp box medical waste from Urumaili Division clinic; - On 14 August 2021, vehicle C165 pick up and disposed of 3 bags and 15 boxes medical waste from Atata Division clinic; 1 bag and 15 boxes medical 	Non-compliance

	<p>Smallholder requirements: The requirements fully applicable to smallholders. - Minor compliance -</p>	<p>waste from Ibana Division clinic; 1 bag and 15 boxes medical waste from Kiba Division clinic; 1 bag and 15 boxes medical waste from Navo POM clinic; 1 bag and 15 boxes medical waste from Vamakuma Division clinic;</p> <p>Critical Non-Conformity raised against this indicator. Segregation of waste is not implemented properly by Plantation.</p>	
7.3.3	<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. - Minor compliance -</p>	<p>During site visit assisted by audit facilitators, audit team did not find use of fire for waste disposal in company-owned plantation and/or smallholder's block.</p>	Complied
<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>			
7.4.1	<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. - Minor compliance -</p>	<p>HOPL has established and implemented procedures for good agriculture practices in maintaining the soil fertility, e.g. MAN-PLT-UPK-001-09, Oil Palm Organic Fertilizer Management Practices Manual, Issue no.2 dated 31 March 2021. The manual comprises of manual and mechanical inorganic fertilizer application; Empty Fruit Bunch Application (PRO-PLT-UPK-002-02, Issue no.2 dated 24 March 2021) related organic fertilizer through Empty Fruit Bunches (EFB) application for estates whereby the land application is in practice. Procedure for Soil Sampling in HOPL Plantations are following the PNG OPRA Technical Note 36, September 2018, The OPRA World – Soil Sampling in Oil Palm Plantations. Procedure for leaf sampling is using The OPRA World Scientific Note, e.g. Scientific Note 1, February 2005 – Analysis of Potassium in Oil Palm leaf and Rachis Samples. HOPL use fertilizer recommendation issued by OPRA as guidance to maintain soil fertility.</p> <p>Smallholders are implementing good agricultural practices as communicated through extension services delivered by HOPL. Available attendance list and</p>	Complied

		<p>minutes of field day, e.g. dated 25 August 2021 located in Taiuru Section 03, facilitator Peter Mula; dated 10 August 2021 located in Malassi Block 04-0627, facilitator OPIC, PNG OPRA, HOPLA SHAAS and LANDS, attended by 50 smallholders; dated 20 July 2021 located in Uasilau Village, facilitator OPIC, Transport, PNG OPRA, NASFUND REP-Bialla, Compliance, BOPGA, HOPLA SHAAS and LANDS, attended by 111 smallholders; dated 29 January 2021 located in Kiava Village, facilitator Peter Mula, Karen Rickian, Evelyn Maya, Stephanie Silik, attended by 41 smallholders.</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>Smallholder requirements: Organization that is managing the smallholders to take tissue samples from representative Smallholders annually. - Minor compliance -</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; • Leaf sampling/sampling methodology/leaf sampling density; • Leaf sample processing; • Frequency & timing; • Deficiency symptoms. <p>Document seen: Foliar Analysis Result by Applied Agricultural Resources Sdn. Bhd. dated 10 November 2020, Lab reference PC20/PNGHOPL 125 to 172. Major element checked (% on DM) are Ash, N, P, K, Ca, Mg. Minor element checked are Cl (%), S (%) and B (ppm).</p> <p>Fertilization Visit Report, by F. Dumortier, October 2019; Visit to Hargy Plantations by Palm Oil Consulting Ltd, 28 October to 9 November 2019; Bialla AAR Leaf Data 2019;</p> <p>Soil Analysis Result by Hill Laboratories, dated 4 July 2019; Quote No.97058; sample type is Soil Oil Palm (S73); comprise of 27 samples; analysis type: pH, Olsen Phosphorus, Anion Storage Capacity, Potassium, Magnesium, Sodium,</p>	<p>Complied</p>

		<p>CEC, Total Base Saturation, Volume Weight, Organic matter, total carbon, total nitrogen, C/N ration, total saturation and MAF units.</p> <p>Volcanic Ash Analysis by Hill Laboratories, 2019.</p> <p>Smallholder:</p> <p>Tissue sampling analysis in smallholder are performed by PNG OPRA. Available PNGOPRA letter dated 30 August 2021 regarding advice from PNGOPRA on Bialla Smallholders leaf sampling and subsequent laboratory analysis for 2020 and 2021 that smallholder leaf sampling for 2020 and 2021 has been conducted respectively, however there will be a delay in getting the laboratory result.</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.</p> <p>- 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 2021 at Hargy Plantation, YTD 18,102 Tons; at Kiba Plantation, YTD 5,660 Tons; at Bakada Plantation, YTD nil. Palm Kernel Expeller application in Hargy Plantation, YTD 13 Tons. EFB and PKE 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:</p> <p>Organization that is managing the smallholders to maintain records of fertiliser distribution.</p> <p>- 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 2021 up to July.</p> <p>Hargy Estate (Hargy Plantation):</p> <table border="1"> <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>390</td> </tr> <tr> <td>P - Source</td> <td>DAP</td> <td>Manual</td> <td>120</td> </tr> </tbody> </table>	Fertiliser Group	Fertiliser	Application Method	Total (ton)	N - Source	Urea	Manual	390	P - Source	DAP	Manual	120	Complied
Fertiliser Group	Fertiliser	Application Method	Total (ton)												
N - Source	Urea	Manual	390												
P - Source	DAP	Manual	120												

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K - Source	MOP	Manual	12
Others	Fertibor 25kg	Manual	1
	Kieserite	Manual	133
Crop Residue	EFB	Mechanical	18,102
	Expeller	Mechanical	13

Navo Estate (Kiba Plantation):

Fertiliser Group	Fertiliser	Application Method	Total (ton)
N - Source	Urea	Manual	223
P - Source	DAP	Manual	92
K - Source	MOP	Manual	0
Others	Fertibor 25kg	Manual	0
	Kieserite	Manual	52
Crop Residue	EFB	Mechanical	5,660

Pandi Estate:

Fertiliser Group	Fertiliser	Application Method	Total (ton)
N - Source	Urea	Manual	413
P - Source	DAP	Manual	83
K - Source	MOP	Manual	0
Others	Fertibor 25kg	Manual	20
	Kieserite	Manual	36

		<p>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 workers are well trained.</p> <p>Smallholder: Records of fertilizer input in smallholder are available, e.g.</p> <ul style="list-style-type: none"> - Smallholder No.010254 - Junior Paul Willy; Outgrowers Department Goods & Services Delivery Docket, Tiauru; dated 16 April 2021; Fertilizer Urea; quantity 10 bags; unit price K100; total cost K1000. - Smallholder No.121259 - Josephine Gaa; Outgrowers Department Goods & Services Delivery Docket; dated 14 May 2021; Fertilizer Urea; quantity 4 bags; unit price K100; total cost K400. - Smallholder No.050164 - Kaikou Maisu; Outgrowers Department Goods & Services Delivery Docket, Uasilau; dated 14 May 2021; Fertilizer Urea; quantity 4 bags; unit price K100; total cost K400. - Smallholder No.260550 - Elizaberth Vaimuli; Outgrowers Department Goods & Services Delivery Docket, Sege LSS; dated 24 May 2021; Fertilizer Urea; quantity 6 bags; unit price K100; total cost K600. - Smallholder No.332003 - Agnes Lawrence; Outgrowers Department Goods & Services Delivery Docket, Kabaiya LSS; dated 13 August 2021; Fertilizer Urea; quantity 12 bags; unit price K100; total cost K1200. 	
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 2020, scale 1:84,000, dated February 2020 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. Based on the soil map, soils in HOPL are Loam to sandy loam; heavy loam to sandy clay loam; organic loams, silty loam; sand to loamy sand; clay loam to silty clay loam, loamy sand/gravel.</p>	Complied

		<p>Based on Soil analysis issued by Hill Laboratories dated 10 April 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;</p> <p>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 is 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. • Bakada Plantation – Magalona Soils. Mengen Bakada Soils (HOPL expansion 2014), Scale 1:20,230. ± 65% is loamy sand/gravel; ± 35 % is loamy sand. 	
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		<ul style="list-style-type: none"> • 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 and interview by audit facilitator, there is no extensive replanting of oil palm on steep terrain in HOPL area including in smallholders.</p> <p>During field visit, there are LSS smallholders blocks at which performed replanting in 2021, one in Division 1 – Lalopo which is Block #321105 (John Goru) and two in Division 2 – Kabaiya which is Block #331854 (Miriam G. Simon) and #332003 (Agnes Lawrence), verified that 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>- Minor compliance -</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

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 2020, scale 1:84,000, dated February 2020 is available. The map consists of soil type and topography of Hargy Plantation, Barema Plantation, Karla Plantation, Ibana Plantation, Bakada Plantation, all smallholders and all Mills. Based on the soil map, soils in HOPL are Loam to sandy loam; heavy loam to sandy clay loam; organic loams, silty loam; sand to loamy sand; clay loam to silty clay loam, loamy sand/gravel.</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-001-11, issue No.11, dated 12 May 2021. 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:</p> <p>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>	Complied
7.6.2	<p>Extensive planting on marginal and fragile soils, is avoided, or, if necessary, done in accordance with the soil management plan for best practices.</p> <p>- Minor compliance -</p>	<p>Based on field observation and interview by audit facilitator, there is no extensive planting on marginal and fragile soils. Whole plantation located in mineral soil.</p>	Complied
7.6.3	<p>Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure.</p> <p>- Minor compliance -</p>	<p>Available Soil analysis issued by Hill Laboratories dated 10 April 2006 and HOPL Soil Map Bialla Project 2020. Soil surveys and topography information are used for site planning the establishment of new plantings, and the results are incorporated into plans and operations. Soil suitability map as result of soil surveys is adequate to establish the long-term suitability of land for oil palm</p>	Complied

		cultivation. Available topographic information that guide the planning of drainage and irrigation systems, roads, and other infrastructure.	
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 April 2006 and HOPL Soil Map Bialla Project 2020, 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 April 2006 and HOPL Soil Map Bialla Project 2020, 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 April 2006 and HOPL Soil Map Bialla Project 2020, 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 April 2006 and HOPL Soil Map Bialla Project 2020, there is no peat in whole HOPL Plantations including in Smallholders area. This indicator is not applicable.	Not Applicable
7.7.5	(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	Based on Soil analysis issued by Hill Laboratories dated 10 April 2006 and HOPL Soil Map Bialla Project 2020, there is no peat in whole HOPL Plantations including in Smallholders area. This indicator is not applicable.	Not Applicable

	<p>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>		
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 April 2006, there is no peat in whole HOPL Plantations including in Smallholders area. This indicator is not applicable.</p>	<p>Not Applicable</p>
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</p>	<p>Based on Soil analysis issued by Hill Laboratories dated 10 April 2006, there is no peat in whole HOPL Plantations including in Smallholders area. This indicator is not applicable.</p>	<p>Not Applicable</p>

	<p>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>																										
Criterion 7.8: Practices maintain the quality and availability of surface and groundwater.																											
<p>7.8.1</p>	<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>Hargy POM and Hargy Estate: Hargy Oil Palms Limited has permit for waste water discharge points based on Environment Permit No.WD-L2(56) dated 13 October 1993, date of amendment 16 May 2005 and 26 May 2006, date of expiry 31 December 2028 – for Hargy Oil Palms Limited to carry out works at portions 9, 14, 15, 1081, 1492, 1494 at Bialla District of West New Britain Province; to discharge waste into environment from its premises while carrying out a level 2.</p> <table border="1" data-bbox="1025 799 1944 1342"> <thead> <tr> <th>Discharge point</th> <th>Location of wastewater discharge; Annual discharge volume</th> <th>Discharge point</th> <th>Location of wastewater discharge; Annual discharge volume</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Urumaili Division 2. 8,640 m³/year</td> <td>7</td> <td>Hargy POM and office building. 4,320 m³/year</td> </tr> <tr> <td>2</td> <td>Residential premise Urumaili Division 2. 4,320 m³/year</td> <td>8</td> <td>Managers Residential Premise. 8,640 m³/year</td> </tr> <tr> <td>3</td> <td>Kerakera Area 12, Division 3. 8,640 m³/year</td> <td>9</td> <td>Oil-water separator from Fuel Storage Hargy POM. 1,920 m³/year</td> </tr> <tr> <td>4</td> <td>Kerakera Area 12, Division 3. 4,320 m³/year</td> <td>10</td> <td>Vehicle workshop at Hargy POM to Solomon sea. 960 m³/year</td> </tr> <tr> <td>5</td> <td>Kerakera Area 12, Division 3. 8,640 m³/year</td> <td>11</td> <td>Treated mill POME from Hargy POM. 259,200 m³/year</td> </tr> </tbody> </table>	Discharge point	Location of wastewater discharge; Annual discharge volume	Discharge point	Location of wastewater discharge; Annual discharge volume	1	Urumaili Division 2. 8,640 m ³ /year	7	Hargy POM and office building. 4,320 m ³ /year	2	Residential premise Urumaili Division 2. 4,320 m ³ /year	8	Managers Residential Premise. 8,640 m ³ /year	3	Kerakera Area 12, Division 3. 8,640 m ³ /year	9	Oil-water separator from Fuel Storage Hargy POM. 1,920 m ³ /year	4	Kerakera Area 12, Division 3. 4,320 m ³ /year	10	Vehicle workshop at Hargy POM to Solomon sea. 960 m ³ /year	5	Kerakera Area 12, Division 3. 8,640 m ³ /year	11	Treated mill POME from Hargy POM. 259,200 m ³ /year	<p>Complied</p>
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<p>Barema POM: Environment Permit No.WD-L2(60) date of issue 30 May 2005, date of amendment 19 November 2012, 14 August 2017, date of expiry 26 June 2030 – for Hargy Oil Palms Limited to carry out works at portions 2038, Milinch Ulawun, Fourmil Talasea West New Britain Province; to capture methane gas from anaerobic wastewater treatment for Barema POM; to discharge waste into environment from its premises while carrying out a Level 2 activity associated with treatment and disposal of industrial waste.</p>												
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<p>Navo POM: Environment Permit No. WD-L2B (104) to Hargy Oil Palms Limited, date of issue 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; to discharge waste into environment carrying out level 2 activities associated with agricultural cultivation and palm oil extraction.</p>												
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2	Worker compound Karla Plantation. 10,947 m ³ /year	8	Navo POM and Office building. 10,947 m ³ /year
3	Mill compound Karla Plantation, Division 3. 12,951 m ³ /year	9	Oil-water separator from Fuel Storage Navo POM. 900 m ³ /year
4	Kiba Division, Karla Plantation. 10,947 m ³ /year	10	Grease trap from Navo POM. 1,440 m ³ /year
5	Oil-water separator from Fuel Storage Karla Plantation. 900 m ³ /year	11	Grease trap from Navo POM. 1,440 m ³ /year
6	Oil-water separator from Fuel Storage Karla Plantation workshop. 900 m ³ /year	12	POM effluent Navo POM to land surface. 155,330 m ³ /year

Water extraction permit in Navo POM and Navo Estate, Environment Permit No.WD-L2B(60) date of issue 11 January 2001, date of amendment 16 June 2006, date of expiry 31 December 2053 – for Hargy Oil Palms Limited to extract water from Ibana River within Portion 624, West New Britain Province.

Extraction point	Location of extraction point; Annual extraction volume
1	Ibana Plantation Compound and Navo POM. Volume 180,000 m ³ /year
2	Ibana Oil Palm Plantation. Volume 47,520 m ³ /year

Water extraction permit in Pandi Estate, Environment Permit No.WD-L2B(166) date of issue 9 November 2009, date of expiry 9 December 2034 – for Hargy Oil Palms Limited to extract water from underground spring water within Portion 733, Milinch Ulawun, Fourmil Talasea, West New Britain Province.

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Colour, apparent <i>Max. level 50</i>	<1	10	21	<1
E. coli (colonies/100ml) <i>Max. level none</i>	0	0	0	0
Total Solids (mg/L) <i>Max. level 1500 mg/L</i>	240	250	200	250
Turbidity (NTU) <i>Max. level 25 NTU</i>	6.5	6.2	9.1	6.2

Hargy Estate – Makakiwa compound

Parameter	2020	2021		
	Oct	Jan	Apr	Jul
Total coliforms <i>Max. level <3 per 100 ml</i>	20	0	0	7
Colour, apparent <i>Max. level 50</i>	1	18	1	4
E. coli (colonies/100ml) <i>Max. level none</i>	0	0	0	0
Total Solids (mg/L) <i>Max. level 1500 mg/L</i>	140	280	270	290
Turbidity (NTU) <i>Max. level 25 NTU</i>	7.4	6.3	7.5	6.3

<p>7.8.2</p>	<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 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>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> <p>In smallholder, smallholder with the water courses at the back of their block maintain the natural vegetation.</p>	<p>Complied</p>						
<p>7.8.3</p>	<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) - 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 POM's POME quality</p> <table border="1" data-bbox="1032 1305 1924 1391"> <thead> <tr> <th>Month</th> <th>BOD External Analysis (mg/L)</th> <th>BOD Internal Analysis (mg/L)</th> </tr> </thead> <tbody> <tr> <td>Dec 2020</td> <td>370</td> <td>114.8</td> </tr> </tbody> </table>	Month	BOD External Analysis (mg/L)	BOD Internal Analysis (mg/L)	Dec 2020	370	114.8	<p>Complied</p>
Month	BOD External Analysis (mg/L)	BOD Internal Analysis (mg/L)							
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Jan 2021	39	78.3
Feb 2021	58	67.5
Mar 2021	67	48
Apr 2021	83	41.6
May 2021	74	89
Jun 2021	74	65.3
Jul 2021	51	85.3

**) Parameter limit is 100 mg/L for discharge to surface water*

Navo POM's POME quality

Month	BOD External Analysis (mg/L)	BOD Internal Analysis (mg/L)
Dec 2020	947	118
Jan 2021	198	116.3
Feb 2021	-	3035
Mar 2021	84	1655
Apr 2021	71	2130
May 2021	239	2168
Jun 2021	85	155.5
Jul 2021	263	136

**) Parameter limit is 4000 mg/L for discharge to land application*

Barema POM's POME quality

Month	BOD External Analysis (mg/L)	BOD Internal Analysis (mg/L)
Dec 2020	278	55

		<table border="1"> <tr><td>Jan 2021</td><td>122</td><td>40</td></tr> <tr><td>Feb 2021</td><td>101</td><td>3267</td></tr> <tr><td>Mar 2021</td><td>119</td><td>1812.5</td></tr> <tr><td>Apr 2021</td><td>47</td><td>1830</td></tr> <tr><td>May 2021</td><td>301</td><td>2069</td></tr> <tr><td>Jun 2021</td><td>98</td><td>1550</td></tr> <tr><td>Jul 2021</td><td>737</td><td>178.4</td></tr> </table> <p><i>*) Parameter limit is 4000 mg/L for discharge to land application</i></p>	Jan 2021	122	40	Feb 2021	101	3267	Mar 2021	119	1812.5	Apr 2021	47	1830	May 2021	301	2069	Jun 2021	98	1550	Jul 2021	737	178.4																				
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7.8.4	Mill water use per tonne of FFB is monitored and recorded. - Minor compliance -	<p>Hargy Oil Palms Limited monitors and recorded mill water use per tonne FFB processed.</p> <p>Hargy POM</p> <table border="1"> <thead> <tr> <th></th> <th>2019</th> <th>2020</th> <th>2021 (todate July)</th> </tr> </thead> <tbody> <tr><td>FFB processed (ton)</td><td>122,810</td><td>141,385</td><td>94,836</td></tr> <tr><td>Raw water (m³)</td><td>144,799</td><td>174,709</td><td>110,259</td></tr> <tr><td>Process water (m³)</td><td>46,381</td><td>61,262</td><td>49,949</td></tr> <tr><td>Boiler water (m³)</td><td>54,893</td><td>73,373</td><td>47,418</td></tr> <tr><td>Raw water/ton FFB (m³/ton)</td><td>1.18</td><td>1.24</td><td>1.16</td></tr> <tr><td>Process water/ton FFB (m³/ton)</td><td>0.38</td><td>0.43</td><td>0.53</td></tr> <tr><td>Boiler water/ton FFB (m³/ton)</td><td>0.45</td><td>0.52</td><td>0.50</td></tr> </tbody> </table> <p>Barema POM</p> <table border="1"> <thead> <tr> <th></th> <th>2019</th> <th>2020</th> <th>2021 (todate July)</th> </tr> </thead> <tbody> <tr><td>FFB processed (ton)</td><td>146,856</td><td>88,137</td><td>122,037</td></tr> </tbody> </table>		2019	2020	2021 (todate July)	FFB processed (ton)	122,810	141,385	94,836	Raw water (m ³)	144,799	174,709	110,259	Process water (m ³)	46,381	61,262	49,949	Boiler water (m ³)	54,893	73,373	47,418	Raw water/ton FFB (m ³ /ton)	1.18	1.24	1.16	Process water/ton FFB (m ³ /ton)	0.38	0.43	0.53	Boiler water/ton FFB (m ³ /ton)	0.45	0.52	0.50		2019	2020	2021 (todate July)	FFB processed (ton)	146,856	88,137	122,037	Complied
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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 -	Hargy Oil Palms Limited made Electrical Weekly Service Schedule as controls to minimise mileage and fuel usage by servicing the genset.	Complied																																																								

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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:

Hargy POM's diesel usage

Month	FFB processed (MT)	Diesel Budget (liter)	Diesel Actual (liter)
Jan 2021	13,593.97	40,886	60,000
Feb 2021	11,696.02	36,929	53,600
Mar 2021	13,925.14	40,886	53,200
Apr 2021	13,559.23	39,567	50,200
May 2021	13,220.96	40,886	51,900
Jun 2021	14,738.92	39,567	53,500
Jul 2021	14,101.82	40,886	54,000

Hargy POM's renewable energy from fiber and shell as fuel

Month	Fiber (MT)	Palm Kernel Shell (MT)
Jan 2021	2,175.04	1,087.52
Feb 2021	1,871.36	935.68
Mar 2021	2,228.02	1,114.01
Apr 2021	2,169.48	1,048.74
May 2021	2,115.35	1,057.68
Jun 2021	2,358.23	1,179.11
Jul 2021	2,265.29	1,128.15

Barema POM's diesel usage

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Month	FFB processed (MT)	Diesel Budget (liter)	Diesel Actual (liter)
Jan 2021	17,361.92	39,239	48,600
Feb 2021	17,247.52	33,646	51,000
Mar 2021	16,513.86	36,743	42,950
Apr 2021	18,123.56	36,528	29,350
May 2021	17,578.08	39,841	33,128
Jun 2021	19,130.34	37,260	31,600
Jul 2021	16,081.94	30,548	37,500

Barema POM's renewable energy from fiber and shell as fuel

Month	Fiber (MT)	Palm Kernel Shell (MT)
Jan 2021	2,779.91	1,388.95
Feb 2021	2,759.60	1,379.80
Mar 2021	2,642.22	1,321.11
Apr 2021	2,899.77	1,449.88
May 2021	2,812.49	1,406.25
Jun 2021	3,060.85	1,530.43
Jul 2021	2,573.11	1,286.56

Navo POM's diesel usage

Month	FFB processed (MT)	Diesel Budget (liter)	Diesel Actual (liter)
Jan 2021	20,420.62	38,245	44,410
Feb 2021	16,908.98	32,394	48,353

Mar 2021	20,825.24	38,804	65,240
Apr 2021	19,112.96	39,191	56,031
May 2021	19,447.20	42,589	60,508
Jun 2021	19,303.18	35,190	68,589
Jul 2021	18,827.48	27,877	69,461

Navo POM's renewable energy from fiber and shell used as fuel

Month	Fiber (MT)	Palm Kernel Shell (MT)
Jan 2021	3,267.30	1,633.65
Feb 2021	2,705.44	1,352.72
Mar 2021	3,244.68	1,612.34
Apr 2021	3,058.07	1,529.04
May 2021	3,111.55	1,555.78
Jun 2021	3,088.51	1,544.25
Jul 2021	3,012.40	1,506.20

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>- Critical (Major) compliance -</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 Methane Gas Capture from Mill effluent prior discharge to the plantation as Land Application.</p> <p>Company has prepared the PalmGHG calculator, based on database period July 2020 – June 2021.</p>	Complied
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7.10.2	<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>There is no new development, no new planting. This is explained to smallholders.</p>	Complied				
7.10.3	<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 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>Hargy POM's smoke emission monitoring record</p> <table border="1" data-bbox="1032 1278 1397 1361"> <thead> <tr> <th>Month</th> <th>Emission (%)</th> </tr> </thead> <tbody> <tr> <td>Dec 2020</td> <td>3.05</td> </tr> </tbody> </table>	Month	Emission (%)	Dec 2020	3.05	Complied
Month	Emission (%)						
Dec 2020	3.05						

Jan 2021	1.19
Feb 2021	3.94
Mar 2021	2.75
Apr 2021	4.43
May 2021	3.18
Jun 2021	3.61
Jul 2021	1.96

Barema POM's smoke emission monitoring record

Month	Emission (%)
Dec 2020	16
Jan 2021	23.2
Feb 2021	15.2
Mar 2021	15.91
Apr 2021	18.64
May 2021	13.45
Jun 2021	16.65
Jul 2021	15.7

Navo POM's smoke emission monitoring record

Month	Emission (%)
Dec 2020	22.37
Jan 2021	32.67

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Criterion 7.11: Fire is not used for preparing land and is prevented in the managed area															
7.11.1	(C) Land for new planting or replanting is not prepared by burning. - Critical (Major) compliance -	Based on field visit, document review and interview, there is no new planting or replanting preparation carried out by burning in HOPL area.	Complied												
7.11.2	The unit of certification establishes fire prevention and control measures for the areas directly managed by the unit of certification. - Minor compliance -	Based on field visit, document review and interview, there is no new planting or replanting preparation carried out by burning in HOPL area. Fire prevention and control as in Zero burning policy already stated within Hargy Oil Palms Limited prepared Environmental Aspects Impacts Master Register No.REG-SUS-EMS-001-19, latest review 30 April 2021 and Waste Management Plan (PLN-SUS-EMS-001-11, Issue No: 11, Issued dated: 21 April 2021).	Complied												
7.11.3	The unit of certification engages with adjacent stakeholders on fire prevention and control measures. - Minor compliance -	Fire prevention and control as in Zero burning policy already stated within Hargy Oil Palms Limited prepared Environmental Aspects Impacts Master Register No.REG-SUS-EMS-001-19, latest review 30 April 2021 and Waste Management Plan (PLN-SUS-EMS-001-11, Issue No: 11, Issued dated: 21 April 2021). HOPL regularly conducted communication to adjacent stakeholder regarding fire prevention and control measures in coordination with OPIC and PNG OPRA. Records seen fire awareness training at Barema Smallholder dated 10 July	Complied												

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		<p>2021, attended by 8 stakeholders; at Vainemasile on 17 August 2021, attended by 49 participants; at Malasi on 10 August 2021, attended by 62 participants. 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>Criterion 7.12: 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>- 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. Land Use Change Analysis (LUCA) is not yet required for the certificate holder due to NPP submitted to RSPO.</p> <p>Based on site visit, document review and interview with plantation managers and smallholders; there is no land clearing for new planting since 15 November 2018. Hargy Oil Palms Limited is implementing no new planting policy, including for smallholders.</p> <p>Data Hargy Oil Palms Limited 5 Years Development & Replant 2021 stated no new planting, only replanting of oil palm.</p> <table border="1" data-bbox="1028 1353 1818 1396"> <tr> <td></td> <td>YOP</td> <td>2021 (Ha)</td> <td>2022 (Ha)</td> <td>2023 (Ha)</td> <td>2024 (Ha)</td> </tr> </table>		YOP	2021 (Ha)	2022 (Ha)	2023 (Ha)	2024 (Ha)	Complied
	YOP	2021 (Ha)	2022 (Ha)	2023 (Ha)	2024 (Ha)				

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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>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>	Complied																																																																				

	<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>		
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> <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>	<p>No new development after 15 November 2018 in scope of certificate holder. 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>	Complied
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</p>	<p>Based on site visit, document review and interview with plantation managers and smallholders; there is no land clearing for new planting since 15 November 2018. Hargy Oil Palms Limited is implementing no new planting policy, including for smallholders.</p> <ul style="list-style-type: none"> - 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. - Based on Soil analysis issued by Hill Laboratories dated 10 April 2006, there is no peat in whole HOPL Plantations including in Smallholders area. 	Complied

	<p>considerations (where these are identified) that may result from the actions of the Unit of Certification.</p> <ul style="list-style-type: none"> - Critical (Major) compliance - 	<p>Hargy Oil Palms Limited prepared HCV/HCS, Peatlands and Conservation Area Management Plan, dated 30 March 2021. The management plan presents a summary of findings and recommendations from HCV assessments for Hargy Oil Palms Limited. The generic recommendations for conservation areas within all the plantations and smallholders are: Demarcate boundaries of HCV/HCS, other conservation areas and peatlands; Collaborate with the smallholder growers to create a simple management plan for each area; Collaborate with local communities to establish and maintain appropriate riparian buffers; Maintain or improve water quality in all rivers in the area of operations.</p> <table border="1" data-bbox="1032 660 1924 1374"> <thead> <tr> <th colspan="2">HCV 1, HCV 2 and HCV 3</th> </tr> </thead> <tbody> <tr> <td data-bbox="1032 708 1245 842">Threat</td> <td data-bbox="1245 708 1924 842">Conversion of forest areas to agriculture; Conversion of forest areas to fuelwood plantation area; Extraction of logs to meet demand for customary purposes; Routine plantation works; Unplanned fire events; Invasive species</td> </tr> <tr> <td data-bbox="1032 842 1245 1374">Management Recommendation</td> <td data-bbox="1245 842 1924 1374"> <ul style="list-style-type: none"> - Paying a lease on the conservation areas. Stop paying lease if evidence of subsequent clearing is observed. - Having a conservation area manager that socializes the purpose of conservation and gets conservation area projects running. - Agreement on forest boundaries with relevant communities and demarcation of all HCV areas. - Use of information signage that delineates HCV areas and details allowed usage. - Agreement on use of forest areas by tribe / clans (e.g. no clearing for agriculture, limited firewood extraction, but no tree felling allowed) - Communication and awareness on the importance of maintaining HCVs. - Demarcation. - Refer to relevant HOPL / SIPEF SOP's for routine works. </td> </tr> </tbody> </table>	HCV 1, HCV 2 and HCV 3		Threat	Conversion of forest areas to agriculture; Conversion of forest areas to fuelwood plantation area; Extraction of logs to meet demand for customary purposes; Routine plantation works; Unplanned fire events; Invasive species	Management Recommendation	<ul style="list-style-type: none"> - Paying a lease on the conservation areas. Stop paying lease if evidence of subsequent clearing is observed. - Having a conservation area manager that socializes the purpose of conservation and gets conservation area projects running. - Agreement on forest boundaries with relevant communities and demarcation of all HCV areas. - Use of information signage that delineates HCV areas and details allowed usage. - Agreement on use of forest areas by tribe / clans (e.g. no clearing for agriculture, limited firewood extraction, but no tree felling allowed) - Communication and awareness on the importance of maintaining HCVs. - Demarcation. - Refer to relevant HOPL / SIPEF SOP's for routine works. 	
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			- Develop a fire management plan for El Nino events. Develop and implement an estate-wide integrated pest and weed management plan.	
		Monitoring Recommendation	<ul style="list-style-type: none"> - Initial quarterly surveys of all HCVs to check for incursions of gardening or logging. Reducing frequency once incursions lessen. - Surveys include mapping of any further clearing and restoration activities within HCVMA. This should include Landsat image interpretation as well as infield GPS of boundaries. - Use of Monitoring Results to adapt management recommendations in the future - Use of information signage that delineates HCV areas 	
		Responsibility	GIS/Sustainability Dept /Plantation Management/CA-Lands	
		Status	Ongoing	
		HCV 1 RTE Species Flora and Fauna		
		Threat	<ul style="list-style-type: none"> - Harvesting of these species, affecting already restricted geographic extent of populations - Exploitation of Flora and Fauna spp by HOPL management / HOPL plantation workers / adjacent community members and squatters 	
		Management Recommendation	- Develop a conservation area management plan that specifically addresses the management requirements of ALL RTE species identified during this assessment	
		Monitoring Recommendation	- Develop a conservation area management plan that specifically addresses the monitoring requirements of ALL RTE species identified during this assessment	
		Responsibility	GIS/Sustainability Dept /Plantation Management/CA-Lands	

		Status	Ongoing	
		HCV 4		
		Threat	<ul style="list-style-type: none"> - Conversion of forest areas to fuelwood plantation area - Burning to assist agricultural development within the riparian buffer strip. - Lack of awareness by company employees and contractors about HCV 4, particularly small river riparian buffers and mismanagement of high risk activities within buffer areas (e.g building roads through riparian areas). - People constructing huts and living (permanently or temporarily) and making gardens in riparian areas. - Routine plantation works - Unplanned fire events - Invasive species 	
		Management Recommendation	<ul style="list-style-type: none"> - Follow the river and coastal area buffers specified in this assessment Prior to development, map all rivers and small watercourses within the development areas. Demarcate river buffers and coastal areas (which will be HCV areas) to ensure there is no accidental incursion into these areas by land clearing contractors. - Ensure that demarcation is done prior to any activities - Ensure all contractors are trained in rules of clearing, stopping at areas of demarcation and felling any vegetation into the plantation area and not into the protected areas. - Rivers / Coastal areas and associated buffers marked on HOPL operational maps. - Maintain and establish riparian buffers – this involves: <ul style="list-style-type: none"> - Planting appropriate vegetation to stabilize the riparian areas; - Ensuring vegetation cover is maintained; 	

			- Agreeing with the community on allowable use of vegetation in riparian areas.	
		Monitoring Recommendation	<ul style="list-style-type: none"> - Quarterly monitoring of riparian buffer condition. Use of adaptive management to evaluate and adjust management and monitoring activities as necessary - Extend current water quality monitoring program to include HCV 4 areas identified during this assessment, aiming to measure change in quality from where rivers enter and exit the estate. - Document all stabilisation works and monitor the effectiveness. 	
		Responsibility	GIS/Sustainability Dept /Plantation Management/CA-Lands	
		Status	Ongoing	
		HCV 5		
		Threat	<ul style="list-style-type: none"> - Site preparation and installation of infrastructure in readiness for oil palm cultivation. - Oil palm cultivation with application of agrichemicals. 	
		Management Recommendation	<ul style="list-style-type: none"> - Allocate at least 20m buffer protection for the sago swamps and limestone waterholes and enhance vegetation density with local species. - Install sediment and silt control structures at strategic locations. - Repair or upgrade sediment and silt control structures as required. - Develop and implement an estate wide integrated pest and weed management plan - Enrich buffer zone vegetation with native species. - Strictly regulate dosage of agrichemicals. - Adjust agrichemical dosage if PNG Drinking Water Quality 	

			Standards are exceeded. - Provide alternative community water supply if contamination level remains high.	
		Monitoring Recommendation	- Monitor buffer zone integrity regularly. - Carry out water quality monitoring within the area before site preparation and infrastructure installation starts. - Check sediment and silt control structures regularly. - Monitor buffer zone integrity regularly. - Monitor water quality every three months (quarterly intervals).	
		Responsibility	Lands/Plantation Management/GIS/Sustainability	
		Status	Ongoing	
		HCV 6		
		Threat	- Areas identified are disturbed or destroyed during site preparation - HOPL facilitating expeditions to Lake Lamo auro (Hargy) for research and recreational purposes.	
		Management Recommendation	- Establish appropriate buffers around HCV 6 areas identified, or exclude from development area. - Develop an MOU that formalises access arrangements to Traditional Owners	
		Monitoring Recommendation	- Monitor HCV 6 area quarterly to ensure integrity. - Review MOU annually to ensure it's working.	
		Responsibility	Plantation Management/ CA-Lands/Sustainability	
		Status	- Ongoing - Pending	

		Other Conservation Area		
		Threat	<ul style="list-style-type: none"> - Destruction of forested areas by locals and smallholder growers - Destruction to breeding sites of animals (crocodiles) - Use of fire for replanting is avoided - Degradation of marines' ecosystem and reduction in biodiversity 	
		Management Recommendation	<ul style="list-style-type: none"> - Conduct regular awareness to smallholder growers on importance of HCVs and conservation areas. - Install sign boards along buffer zones and coastlines at potential breeding sites for crocodile. - Awareness to smallholder growers not to burn vegetation and poisoned palm trees. - Establish and maintain appropriate buffer zones along shoreline. - Work with local stakeholders and NGO on marine conservation projects. 	
		Monitoring Recommendation	<ul style="list-style-type: none"> - Regular awareness through field days and visits on HCS/HCS areas to smallholder growers - Conduct regular monitoring of potential breeding sites within HOP plantation buffer zones - Awareness to growers and workers - Regular monitoring of replant blocks for signs/evidences of burning; - Regular monitoring of degraded areas for species regenerations; - Buffer zone established and maintained; - Survey and monitoring of shoreline buffer zones; 	

		<table border="1"> <tr> <td data-bbox="1016 363 1245 496"></td> <td data-bbox="1245 363 1957 496">Species regeneration and regrowth to resemble nearby forest types. - Ongoing monitoring of conservation sites for species regeneration</td> </tr> <tr> <td data-bbox="1016 496 1245 544">Responsibility</td> <td data-bbox="1245 496 1957 544">Plantation Management/Sustainability Dept/SHASS</td> </tr> <tr> <td data-bbox="1016 544 1245 592">Status</td> <td data-bbox="1245 544 1957 592">Ongoing</td> </tr> </table>		Species regeneration and regrowth to resemble nearby forest types. - Ongoing monitoring of conservation sites for species regeneration	Responsibility	Plantation Management/Sustainability Dept/SHASS	Status	Ongoing	
	Species regeneration and regrowth to resemble nearby forest types. - Ongoing monitoring of conservation sites for species regeneration								
Responsibility	Plantation Management/Sustainability Dept/SHASS								
Status	Ongoing								
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>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. No new development after 15 November 2018 in scope of certificate holder.</p> <ul style="list-style-type: none"> - Hargy Oil Palms Limited carried out RSPO Awareness in Barema area, located in block 031249, dated 28 April 2021 – attended by 13 smallholders. Meeting Minutes: no new planting on marginal land area, buffer zone; protection of rare-threatened-endangered species. Farmers Note of the Meeting Agendas; why did company stop allowing new planting? Because of the forest alliance conservation law and needs more assessment before new plant should permitted. - Hargy Oil Palms Limited carried out RSPO Awareness in Sale community, dated 23 February 2021 – attended by 49 VOP smallholders. Meeting Minutes: Buffer zone is inhabitant environment which is not touchable; purpose is for protection of water quality, conservation of biodiversity, flood protection and bank stabilization; inside the buffer zone there will be no hunting, gardening or building houses done in there; deforestation for palm 	Complied						

		<p>oil new planting is not allowed; all new plantings must be assessed by special assessors; Fire cannot be used for land preparation;</p> <ul style="list-style-type: none"> - Hargy Oil Palms Limited carried out RSPO Awareness in Tiauru, dated 24 February 2021 – attended by 50 smallholders. Meeting Minutes: People must not cut down trees in buffer zones, also no gardening activities and hunting. No new planting should be done unless assessed and certified – at the moment it is on hold. No primary forest should be cleared for planting of palms – only replants are allowed, no additional planting. 	
<p>7.12.6</p>	<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> <ul style="list-style-type: none"> - Minor compliance - 	<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 present.</p> <p>Hargy Oil Palms Limited prepared Annual Field Training Schedule 2021:</p> <ul style="list-style-type: none"> - Navo Estate – Bakada Plantation prepared Annual Field Training Programme 2021 with Buffer Zone/RTE training on February-August-December 2021. - Navo Estate, Bakada Plantation, Alaba Muster Point, Sabalbala Compound Meeting Minutes dated 5 August 2021 – attended by 25 workers; dated 14 May 2021 – attended by 57 workers. The explanation importance of the buffer zone areas. Employees are not allowed to disturb any species at the buffer areas as they will be dealt to company terms and conditions. All RTE species must not be sold at company resident. These animals should be left in the wild where they belong help protect our wildlife. - Hargy Estate made RTE Protection Training. Meeting Minutes and attendance dated 24 April 2021 – attended by 16 harvesters and compound upkeep; dated 28 April 2021 – attended by 15 tractor drivers, FFB loaders; dated 5 August 2021 – attended by 5 sprayers and overseer. The explanation on RTE species to protect: Muruk (Dwarf Cassowary - <i>Casuaris bennetti</i>), Balus (Red knobbed Imperial Pigeon - <i>Ducula rubricera</i>), Balus (Finsch's Imperial Pigeon - <i>Ducula finschii</i>), Balus (Yellow legged Pigeon - <i>Columba pallidiceps</i>), Torosel (Green Turtle - <i>Chelonia mydas</i>), Kalangar (Eclectus 	<p>Complied</p>

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		<p>parrot - <i>Electus roratus</i>), Batafly (Priamus Birdwing Butterfly - <i>Ornithoptera priamus</i>), Kokomo (Blyth's Hornbill - <i>Rhyticeros plicatus</i>), Koki (Blue-eyed Cockatoo - <i>Cacatua ophthalmica</i>), Tarangau (New Britain Buzzard - <i>Henicopernis infuscatus</i>), Owl (New Britain Boobok - <i>Ninox odiosa</i>).</p> <ul style="list-style-type: none"> - Hargy Oil Palms Limited carried out RTE policy awareness to Kiba Plantation worker, dated 23 June 2021 to 11 upkeep workers. The explanation related to endangered species policy. - Hargy Oil Palms Limited carried out RTE policy awareness to Navo Estate, dated 1 July 2021 to 13 workers, including upkeep, sprayer, chemical mixer, fertilizer applicator and overseer. The explanation no hunting and killing of wild animal in HOPL area and also reserve them for our future generation. - Hargy Oil Palms Limited carried out RTE policy awareness to Navo Estate, dated 1 July 2021 to 34 harvesters, loose fruit collectors and wheelers. The explanation no hunting and killing of wild animal in HOPL area and reserve them for our future generation. - Hargy Oil Palms Limited carried out RSPO Awareness in Barema area, located in block 031249, dated 28 April 2021 – attended by 13 smallholders. Meeting Minutes: All RSPO criteria to smallholder discussed, no new planting on marginal land area, buffer zone; protection of rare-threatened-endangered species. Farmers Note of the Meeting Agendas; why did company stop allowing new planting? Because of the forest alliance conservation law and needs more assessment before new plant should permitted. - Hargy Oil Palms Limited carried out RSPO Awareness in Sale community, dated 23 February 2021 – attended by 49 VOP smallholders. Meeting Minutes: protection of rare-threatened-endangered species; disturbance of area might result in chasing away the habitant; to avoid using catapult for shooting RTE species; Buffer zone is inhabitant environment which is not touchable; purpose is for protection of water quality, conservation of biodiversity, flood protection and bank stabilization; inside the buffer zone there will be no hunting, gardening or building houses done in there; 	
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		<p>deforestation for palm oil new planting is not allowed; all new plantings must be assessed by special assessors; Fire cannot be used for land preparation;</p> <ul style="list-style-type: none"> - Hargy Oil Palms Limited carried out RSPO Awareness in Tiauru, dated 24 February 2021 – attended by 50 smallholders. Meeting Minutes: Buffer zone are any are of land left out untouched. They are reserved purposively for water quality protection, bank stabilization and flood protection, gas exchange, biodiversity conservation. People must not cut down trees in buffer zones, also no gardening activities and hunting. No new planting should be done unless assessed and certified – at the moment it is on hold. No primary forest should be cleared for planting of palms – only replants are allowed, no additional planting. 	
7.12.7	<p>The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan.</p> <ul style="list-style-type: none"> - Minor compliance - 	<p>Based on site visit, document review and interview with plantation managers and smallholders; there is no land clearing for new planting since 15 November 2018. Hargy Oil Palms Limited is implementing no new planting policy, including for smallholders.</p> <ul style="list-style-type: none"> - 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. - Based on Soil analysis issued by Hill Laboratories dated 10 April 2006, there is no peat in whole HOPL Plantations including in Smallholders area. - Hargy Oil Palms Limited performed Buffer Zone Inspection to Pandi Estate dated 25 June 2021. Inspection result: encroachment to Portion 3 stopped, gardening activity for staple food, no illegal logging trespassing through Abulmosi Reserve Land and action taken negotiation for logger to quit, no firewood collection, illegal hunting by locals – awareness to be done, \ illegal squatters/settlement in Portion 3 and Portion 31 and action taken issuing eviction notice; no new development areas. RTE observed such as Kalangar 	Complied

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		<p>(Eclectus parrot - <i>Eclectus roratus</i>), Kokomo (Blyth's Hornbill - <i>Rhyticeros plicatus</i>), Koki (Blue-eyed Cockatoo - <i>Cacatua ophthalmica</i>).</p> <ul style="list-style-type: none"> - Hargy Oil Palms Limited performed Buffer Zone Inspection to Hargy Estate, Urumaili Division dated 31 July 2021. Inspection result: No encroachment, no gardening activity, no illegal logging, firewood collection at edge of buffer, no illegal hunting, no illegal squatters/settlement within the buffer zone; no new development areas. RTE observed Parrot (<i>Eclectus roratus</i>). - Hargy Oil Palms Limited performed Buffer Zone Inspection to smallholder Wilelo block No.1056 dated 10 April 2021. Inspection result: No encroachment, no gardening activity, no illegal logging, firewood collection at edge of buffer, no illegal hunting, no illegal squatters/settlement within the buffer zone; no new development areas. RTE observed such as Starling (<i>Aplonis metallica</i>), Kingfisher (<i>Alcedo atthis</i>), Cockatoo (<i>Cacatua ophthalmica</i>), Crow, Wagtail (<i>Rhipidura leucophrys</i>), Parrot (<i>Eclectus roratus</i>). - Hargy Oil Palms Limited performed Buffer Zone Inspection to smallholder Matiliu block No.171783 dated 25 July 2021. Inspection result: No encroachment, no gardening activity, no illegal logging, small quantity firewood collection, no illegal hunting, no illegal squatters/settlement within the buffer zone; no new development areas. RTE observed such as New Guinea Scrubfowl (<i>Megapodius decollatus</i>), Wagtail (<i>Rhipidura leucophrys</i>), Starling (<i>Aplonis metallica</i>), Cockatoo (<i>Cacatua ophthalmica</i>), Parrot (<i>Eclectus roratus</i>). - Hargy Oil Palms Limited performed Buffer Zone Inspection to smallholder Tiauru LSS/Section 8 block No. 332 dated 14 August 2021. Inspection result: No encroachment, no gardening activity, no illegal logging, no illegal hunting, no illegal squatters/settlement within the buffer zone; no new development areas. RTE observed such as Blyth's Hornbill (<i>Rhyticeros</i> 	
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		<p>plicatus), Cockatoo (Cacatua ophthalmica), Ground Fowl, Kingfisher (Alcedo atthis), Parrot (Eclectus roratus), Pigeon.</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>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>Hargy Oil Palms Limited demonstrated the explanation given to smallholder to prevent new land clearing without prior HCV-HCSA assessment.</p> <ul style="list-style-type: none"> - Hargy Oil Palms Limited carried out RSPO Awareness in Barema area, located in block 031249, dated 28 April 2021 – attended by 13 smallholders. Meeting Minutes: All RSPO criteria to smallholder discussed, no new planting on marginal land area, buffer zone; protection of rare-threatened-endangered species. Farmers Note of the Meeting Agendas; why did company stop allowing new planting? Because of the forest alliance conservation law and needs more assessment before new plant should permitted. - Hargy Oil Palms Limited carried out RSPO Awareness in Sale community, dated 23 February 2021 – attended by 49 VOP smallholders. Meeting Minutes deforestation for palm oil new planting is not allowed; all new plantings must be assessed by special assessors; Fire cannot be used for land preparation; - Hargy Oil Palms Limited carried out RSPO Awareness in Tiauru, dated 24 February 2021 – attended by 50 smallholders. Meeting Minutes: No new planting should be done unless assessed and certified – at the moment it is on hold. No primary forest should be cleared for planting of palms – only replants are allowed, no additional planting. 	<p>Complied</p>

Appendix B: GHG Reporting Executive Summary

The GHG emissions that were produced in 2021 for Hargy POM, Barema POM, Navo POM and supply base was calculated using the PalmGHG Calculator version 4. 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 **2021** for **Hargy POM** and supply base are as following:

Emission per product	tCO ₂ e/tProduct
CPO	1.09
PKO	1.09

Extraction	%
OER	24.64
KER	5.19

Production	t/yr
FFB Process	145,989.64
CPO Produced	35978,079
PK Produced	7571,922

Land Use	Ha
OP Planted Area	17028.72
OP Planted on peat	0.00
Conservation (forested)	0.00
Conservation (non-forested)	0.00
Total	17028.72

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	26052.56	0.44	0.00	0.00	44018.22	0.00	70070.78	0.47
CO ₂ Emission from fertilizer	1408.19	0.02	0.00	0.00	1076.11	0.00	2484.31	0.01
N ₂ O Emission	1741.10	0.03	0.00	0.00	1387.80	0.00	3128.90	0.02
Fuel Consumption	1439.33	0.02	0.00	0.00	0.00	0.00	1439.33	0.00
Peat Oxidation	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Sink								
Crop Sequestration	-24694.39	-0.41	0.00	0.00	-36606.72	0.00	-61301.11	-0.41
Conservation Sequestration	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total	5946.80	1.32	0.00	0.00	9875.42	0.00	15822.21	0.10

**Note: Includes both estates and smallholders*

Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	28616.44	0.20
Fuel Consumption	3135.78	0.02
Grid Electricity Utilization	0.00	0.00
Credit		
Export of Grid Electricity	0.00	0.00
Sales of PKS	0.00	0.00
Sales of EFB	0.00	0.00
Total	31752.22	0.22

Summary of Kernel Crusher Emission and Credit (if applicable)

Emissions	tCO₂e
PK from own mill	8341.56
PK from other source	0.00
Fuel Consumptions	0.00
Total Crusher emissions	8341.56

*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

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The summary of the Net GHG emitted in **2021** for **Barema POM** and supply base are as following:

Emission per product	tCO ₂ e/tProduct
CPO	1.55
PKO	1.55

Extraction	%
OER	25.55
KER	5.17

Production	t/yr
FFB Process	197,857.86
CPO Produced	50547,332
PK Produced	10228,18

Land Use	Ha
OP Planted Area	28399.90
OP Planted on peat	0.00
Conservation (forested)	0.00
Conservation (non-forested)	0.00
Total	28399.90

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	37404.78	0.38	0.00	0.00	51547.09	0.00	88951.87	0.44
CO ₂ Emission from fertilizer	1876.27	0.02	0.00	0.00	16415.95	0.00	18292.23	0.09
N ₂ O Emission	2344.41	0.02	0.00	0.00	21163.97	0.00	23508.39	0.11
Fuel Consumption	2154.70	0.02	0.00	0.00	131.45	0.00	2286.15	0.01
Peat Oxidation	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Sink								
Crop Sequestration	-35454.77	-0.36	0.00	0.00	-44868.59	0.00	-80323.36	-0.40
Conservation Sequestration	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total	8325.39	0.08	0.00	0.00	44389.88	0.00	52715.27	0.26

*Note: Includes both estates and smallholders

Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	38783.49	0.20
Fuel Consumption	2875.63	0.01
Grid Electricity Utilization	0.00	0.00
Credit		
Export of Grid Electricity	0.00	0.00

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Sales of PKS	0.00	0.00
Sales of EFB	0.00	0.00
Total	41659.12	0.21

Summary of Kernel Crusher Emission and Credit (if applicable)

Emissions	tCO₂e
PK from own mill	46846.87
PK from other source	0.00
Fuel Consumptions	0.00
Total Crusher emissions	46846.87

*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

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The summary of the Net GHG emitted in **2021** for **Navo POM** and supply base are as following:

Emission per product	tCO ₂ e/tProduct
CPO	0.38
PKO	0.38

Extraction	%
OER	24.56
KER	5.44

Production	t/yr
FFB Process	179,900.82
CPO Produced	47773.1
PK Produced	9792.41

Land Use	Ha
OP Planted Area	18,870.43
OP Planted on peat	0.00
Conservation (forested)	0.00
Conservation (non-forested)	0.00
Total	18,870.43

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	69597.23	0.44	0.00	0.00	20991.00	0.00	90588.24	0.50
CO ₂ Emission from fertilizer	3307.43	0.02	0.00	0.00	661.45	0.00	3968.88	0.02
N ₂ O Emission	4164.33	0.03	0.00	0.00	853.04	0.00	5017.36	0.02
Fuel Consumption	4354.04	0.03	0.00	0.00	0.00	0.00	4354.04	0.02
Peat Oxidation	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Sink								
Crop Sequestration	-65968.94	-0.42	0.00	0.00	-18479.19	0.00	-84448.13	-0.46
Conservation Sequestration	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total	15454.09	0.10	0.00	0.00	4026.30	0.00	19480.39	0.10

*Note: Includes both estates and smallholders

Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	0.00	0.00
Fuel Consumption	2341.77	0.01
Grid Electricity Utilization	0.00	0.00
Credit		
Export of Grid Electricity	0.00	0.00

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Sales of PKS	0.00	0.00
Sales of EFB	0.00	0.00
Total	2341.77	0.01

Summary of Kernel Crusher Emission and Credit (if applicable)

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

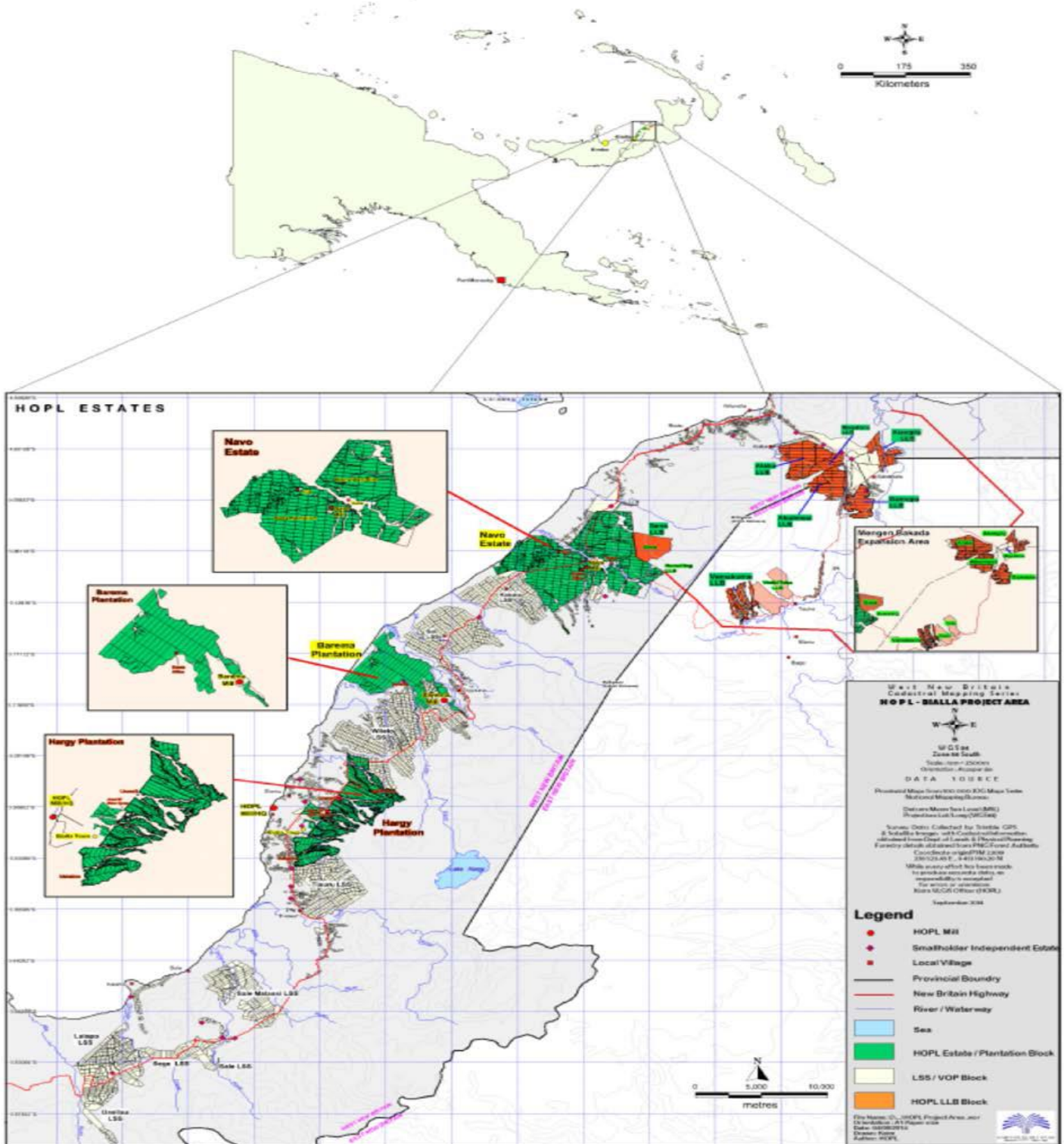
*This mill has no kernel crusher operation.

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

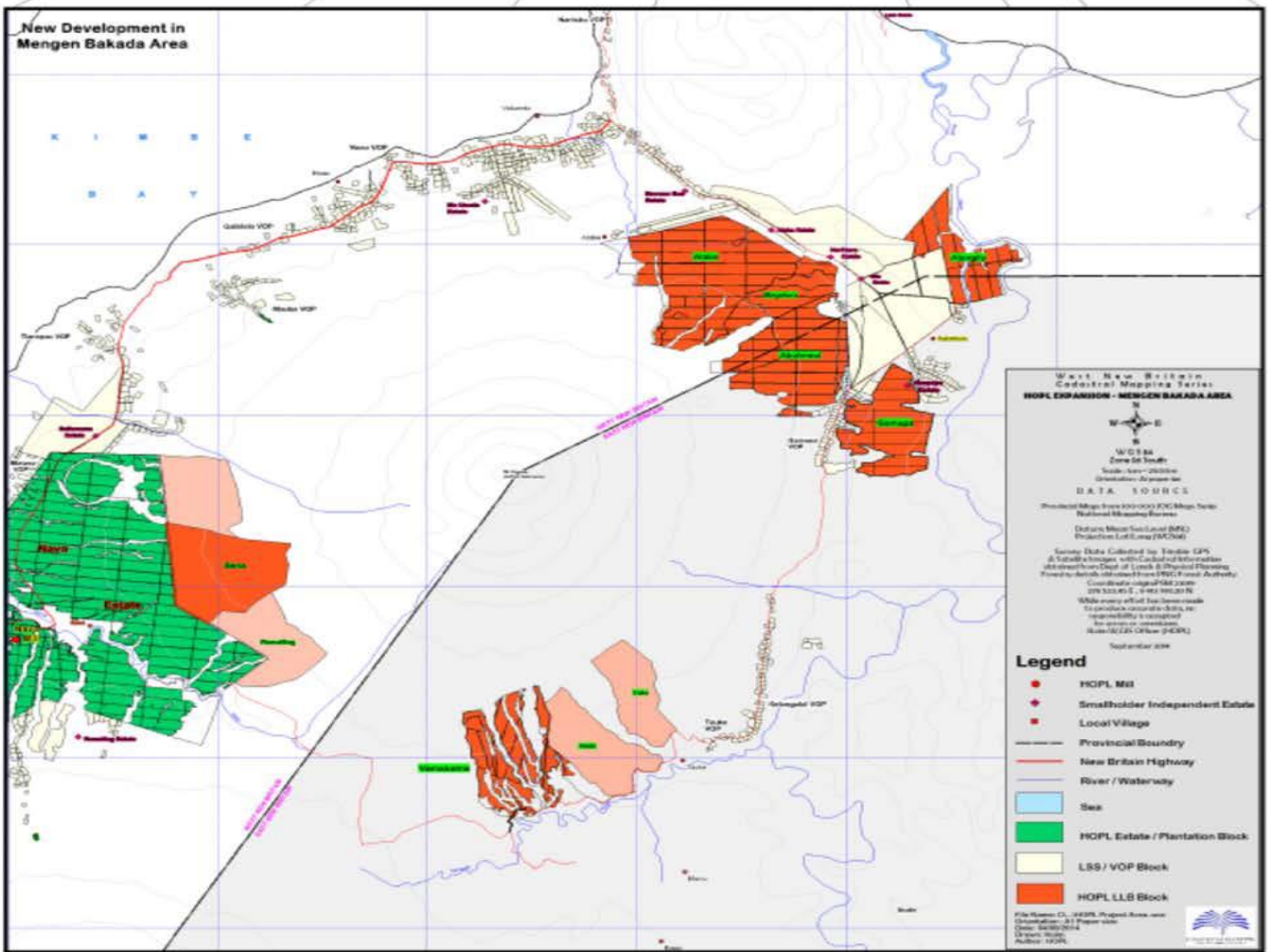
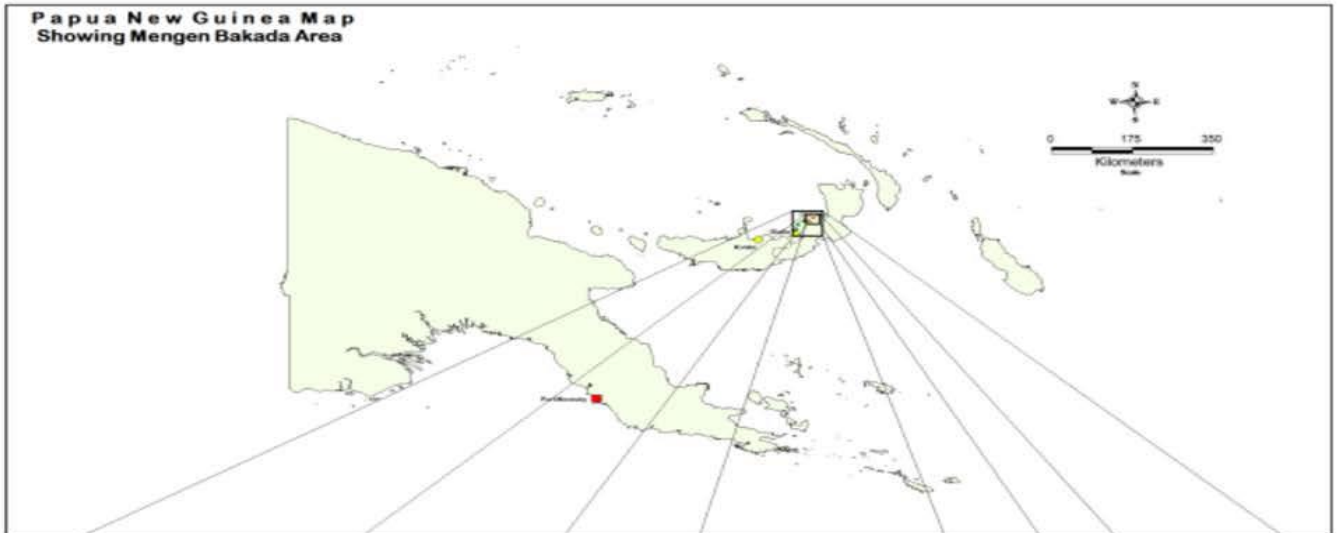
POME Diverted to Anaerobic Digestion:	
Divert to anaerobic pond (%)	100
Divert to methane captured (flaring) (%)	0
Divert to methane captured (energy generation) (%)	0

Appendix C: Location Map of Certification Unit and Supply bases

PNG Map Showing HOPL Estates



Appendix D: Estate Field Map



Appendix E: List of Smallholder Sampled

No	Name of farmer	Location	GPS Reference		Area Summary (Ha)		Forecasted annual FFB Production (MT)	Date of joining	Smallholder ID
			Latitude (N)	Longitude (E)	Total Certified Area	Planted Area			
1	ULKU TAWAKLA	Wilelo	05° 15' 16.40" S	151° 04' 16.39" E	6.67	6.67	99.9	11/1979	020689
2	NANI BUN	Wilelo	05° 14' 55.91" S	151° 04' 29.13" E	6	6	94.5	1979	020798
3	NIME KAL	Wilelo	05° 13' 16.65" S	151° 04' 59.18" E	4	4	67.5	1979	021153
4	SWAPI AKAMEAU	Wilelo	05° 13' 44.33" S	151° 05' 07.92" E	6	6	97.2	1978	021156
5	JOSEPH ROBIN	Wilelo	05° 15' 42.34" S	151° 06' 11.02" E	6	6	110.7	1979	021449
6	SAMUEL JAMES	Wilelo	05° 14' 28.24" S	151° 05' 02.15" E	6	6	97.2	1982	021483
7	ANDREW KENGA	Barema	05° 13' 21.95" S	151° 07' 59.18" E	6	6	103.0	1980	031395
8	KAUBA GURIA	Barema	05° 12' 08.79" S	151° 07' 11.37" E	6	6	76.2	1979	031429
9	ARI SILAU	Malasi	05° 28' 48.56" S	151° 01' 03.91" E	2	2	36	2004	040447
10	JERRY MERA	Malasi	05° 27' 36.41" S	150° 59' 03.49" E	1.98	1.98	32.1	1998	041188
11	ERON MARISA	Kaiamu	05 28 10.90" S	150° 55' 08.94" E	3.98	3.98	39.9	1995	161606
12	BROWN PAGA	Kaiamu	05° 28' 51.54" S	150° 55' 06.42" E	2	2	29.4	1999	161651
13	LUISA TULULU	Kaiamu	05° 29' 14.51" S	150° 55' 08.11" E	2.06	2.06	41.1	2001	161664
14	DANIEL KAITALE	Sale	05° 31' 15.73" S	150° 57' 50.22" E	5.58	5.58	104.0	1989	292904
15	JACK LUO	Sale	05° 30' 28.15" S	150° 58' 55.74" E	1.65	1.65	31.3	2002	292930
16	MULAGU VUVU	Sale	05° 30' 54.39" S	150° 58' 36.55" E	1.96	1.96	37.2	2002	292942
17	MARCH SAEKE	Noau	04° 58' 25.33" S	151° 18' 55.73" E	2.49	2.49	44.8	2004	077115
18	CAROLINE SAEKE	Noau	04° 58' 24.26" S	151° 18' 59.44" E	1.98	1.98	33.9	2001	077119
19	STANIS MALE VALU	Noau	04° 57' 23.01" S	151° 20' 53.38" E	4.76	4.76	79.2	2001	077122
20	HENRY MALISA	Noau	04° 58' 31.48" S	151° 19' 46.71" E	2	2	34.2	2003	077130
21	EXSON PAILE	Noau	04° 58' 10.15" S	151° 18' 53.89" E	1.96	1.96	33.5	2003	077305
22	PETER UBIALE	Noau	04° 57' 58.96" S	151° 20' 32.96" E	1.97	1.97	8.9	N/A	077391
23	LOLI BIROU	Gamupa	05° 01' 03.67" S	151° 25' 01.25" E	0.98	0.98	17.6	2000	390001
24	MARTIN RAGUTE	Gamupa	05° 00' 33.35" S	151° 25' 36.58" E	1.02	1.02	20.4	2004	390054
25	ROBIN LEO	Gamupa	05° 01' 51.59" S	151° 24' 11.04" E	0.9	0.90	17.1	2002	390080
26	TEDDY MALE	Nantabu	04°55'10.76" S	151°21'48.05" E	1.09	1.09	9.8	04/2016	440055
27	MATHIAS VALUKA	Tianepou	05° 03' 49.78" S	151° 13' 11.65" E	2	2	11.4	2001	380006
28	CLARA LAGISA	Tianepou	05° 00' 45.92" S	151° 14' 24.48" E	1.8	1.8	10.8	2005	380076
29	HUBERTINA LAGISA	Tianepou	05°00'55.99" S	151°14'25.77" E	1.13	1.13	6.8	2005	380088
30	JOACHIM LAUO	Tianepou	05° 00' 32.87" S	151° 14' 37.92" E	2	2	8.4	12/2015	380142
31	AUGUSTINE KAUTU	Tianepou	05° 02' 00.50" S	151° 15' 25.01" E	0	0	11.4	08/2012	380150
32	RODNEY MALISA	Mauba	05° 00' 08.88" S	151° 16' 11.54" E	1.5	1.5	15	2004	410036
33	CONSTANTINE MAELA	Mauba	05° 01' 09.16" S	151° 14' 36.38" E	3.91	3.91	39.1	2004	410042
34	JEROM BITAI	Malaso	05° 04' 11.10" S	151° 12' 30.17" E	1.25	1.25	11.9	2003	450006
35	JUNIOR PAUL WILLY	Tiauru	05° 22' 09.95" S	151° 02' 49.045" E	5.82	5.82	115.2	1994	010254
36	KOTBUNDI MASIP	Tiauru	05° 22' 50.11" S	151° 02' 32.68" E	5.3	5.3	99.2	1994	010292
37	DANIEL PETAU	Tiauru	05° 23' 09.35" S	151° 03' 40.36" E	5.5	5.5	129.8	2001	010341

No	Name of farmer	Location	GPS Reference		Area Summary (Ha)		Forecasted annual FFB Production (MT)	Date of joining	Smallholder ID
			Latitude (N)	Longitude (E)	Total Certified Area	Planted Area			
38	L. IMARAN MOGOSA A.	Tiauru	05° 23' 20.49" S	151° 02' 58.19" E	5.75	5.75	101.4	1995	010380
39	BARNABAS KUA	Tiauru	05° 23' 37.31" S	151° 03' 12.78" E	6	6	122.4	1978	010398
40	MICHAEL WALAU	Mataururu	05° 23' 10.66" S	151° 01' 26.89" E	1.6	1.60	41.0	2003	101073
41	IPA WALAU	Kiava	05° 25' 18.56" S	151° 02' 56.56" E	4	4	81.6	2006	111105
42	VUNAI TABA	Kiava	05° 24' 49.05" S	151° 02' 57.88" E	2	2	33.6	1989	111122
43	ALBERT THOMAS	Kiava	05° 25' 25.80" S	151° 03' 02.2" E	2	2	45.6	2001	111151
44	GIDEON WAISISI	Baekakea	05° 16' 53.14" S	151° 03' 09.03" E	3.67	3.67	21.3	1995	090908
45	PETER RURU	Baekakea	05° 17' 03.35" S	151° 03' 20.08" E	3.67	2	36	05/2016	090953
46	GIDEON MIGU	Gomu Urumaili	05° 17' 42.59" S	151° 02' 07.32" E	2.28	2.28	0	1995	121212
47	SELIN MOU MARTIN	Gomu Urumaili	05° 17' 43.32" S	151° 02' 11.26" E	2	2	48.6	1999	121213
48	PATRICK WALO	Gomu Urumaili	05° 17' 16.77" S	151° 02' 37.10" E	1.83	1.83	46.9	1985	121220
49	ENOS TAUBUTE	Gomu Urumaili	05° 17' 52.66" S	151° 01' 00.30" E	3	3	63.4	2003	121257
50	JOSEPHINE GAA	Gomu Urumaili	05° 18' 13.81" S	151° 02' 49.45" E	2	2	51.3	2003	121259
51	ROPA MATAMULI	Apupul	05° 16' 49.74" S	151° 01' 52.68" E	0.57	0.57	0	1987	131324
52	LAVINIA TOUA	Matililiu	05° 20' 50.48" S	151° 00' 46.77" E	2	2	54	02/2010	170107
53	SEBULON BOKA	Matililiu	05° 21' 29.38" S	151 00 44.47" E	2.80	2.80	37.8	1996	171753
54	EREMAS LARE	Ewasse	05° 19' 15.78" S	151° 00' 51.75" E	2	2	55.2	2006	350068
55	KAIKOU MAISU	Uasilau	05° 32' 23.99" S	150° 53' 18.89" E	6	6	72	1982	050164
56	PENIAS LOLOME TUGA	Uasilau	05° 32' 56.59" S	150° 53' 11.67" E	6.01	6.01	75.1	1998	050184
57	GRAHAM AINU	Uasilau	05° 32' 43.20" S	150° 53' 57.42" E	4	4	56.2	2003	050230
58	PETER SIAGAU	Sege	05° 31' 40.52" S	150° 56' 29.07" E	2.2	2.2	43.6	1999	260002
59	ELIZABERTH VAIMULI	Sege	05° 32' 18.99" S	150° 54' 27.20" E	6.04	6.04	124.0	1987	260550
60	WESLY ALEAI	Lalopo	05° 30' 58.34" S	150° 53' 39.06" E	4	4	81.4	2000	321100
61	JOHN GORU	Lalopo	05° 31' 04.31" S	150° 53' 54.07" E	6.62	6.62	85.9	1995	321105
62	JOE GAELO	Lalopo	05° 30' 36.66" S	150° 54' 35.37" E	2	2	40.7	2000	321158
63	ALBERT GOVE	Gigipuna	05° 12' 08.01" S	151° 08' 07.12" E	3.75	3.75	32.2	2011	060610
64	PAUL DEVOKU	Soi	05° 09' 25.12" S	151° 07' 14.13" E	6.07	6.07	79.6	1994	311500
65	NICK YUAS	Soi	05° 10' 15.45" S	151° 07' 15.88" E	6	6	70.2	1992	311541
66	JERRY SUANI KILANGI	Soi	05° 07' 56.44" S	151° 07' 18.97" E	3.79	3.79	54	1993	311736
67	KEVIN TIRUPIA	Soi	05° 08' 31.67" S	151° 06' 54.48" E	3.80	3.80	67.5	1992	311785
68	BEN KEWA	Kabaiya	05° 06' 33.32" S	151° 10' 08.58" E	2.41	2.41	35.4	1994	331823
69	MIRIAM G. SIMON	Kabaiya	05° 07' 06.84" S	151° 09' 15.25" E	3.79	3.79	39.9	1995	331854
70	FRED AFLA	Kabaiya	05° 06' 56.84" S	151° 10' 57.68" E	5.8	5.8	62.3	1994	331920
71	AGNES LAWRENCE	Kabaiya	05° 06' 33.16" S	151° 09' 54.09" E	4.19	4.19	62.3	1995	332003
72	GREGORY GABU	Kabaiya	05° 06' 03.85" S	151° 10' 28.45" E	5.79	5.79	118.2	1994	332021
73	KABAIYA PRIMARY SCHOOL	Kabaiya	05° 06' 37.39" S	151° 10' 14.95" E	3	3	67.8	2004	332043

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No	Name of farmer	Location	GPS Reference		Area Summary (Ha)		Forecasted annual FFB Production (MT)	Date of joining	Smallholder ID
			Latitude (N)	Longitude (E)	Total Certified Area	Planted Area			
1	JOHN KUVI**	Ewasse	05° 19' 40.65" S	151° 01' 44.97" E	2	2	0	N/A	353540
2	PARFREY PENI**	Ewasse	05° 19' 42.95" S	151° 01' 38.94" E	4.57	4.57	0	2005	350061
3	NASON TAUTELE**	Ewasse	05° 19' 38.27" S	151° 02' 07.2**" E	0.8	0.8	0	2006	350062
4	DAINAH MUGA ZAIRERE**	Ewasse	05° 19' 47.88" S	151° 02' 00.86" E	2.5	2.5	0	1996	350063
5	NANCY PINERY**	Ewasse	05° 19' 41.84" S	151° 01' 52.89" E	1.96	1.96	0	2006	350064
6	MARTHA PALANGA**	Ewasse	05° 19' 41.42" S	151° 01' 56.80" E	1.84	1.84	0	2006	350065
7	PAULINE KUVI**	Ewasse	05° 19' 46.03" S	151° 01' 57.10" E	1.78	1.78	0	N/A	350067
8	EXSON TOIRIMA**	Ewasse	05° 19' 43.33" S	151° 01' 48.90" E	1.83	1.83	0	2006	350069
9	JORDAN KATMALE**	Ewasse	05° 19' 44.2" S	151° 02' 02.60" E	2.05	2.05	0	2004	350071
10	BIALLA LLG DEV. AUTHORITY**	West IE	05° 19' 10.05" S	151° 02' 00.65" E	40	40	0	N/A	770034
11	JOHN WAPA**	Barema	05° 13' 03.12" S	151° 07' 00.66" E	1.95	1.95	0	N/A	031470
12	RODNEY BUI YUKU**	Barema	05° 12' 54.97" S	151° 06' 58.27" E	3.95	3.95	0	N/A	031471
13	WAIMAL KEPO**	Barema	05° 12' 44.86" S	151° 06' 56.80" E	1.99	1.99	0	N/A	031472
14	AMBUSAH**	West IE	05° 18' 16.98" S	151° 01' 47.89" E	39	39	0	N/A	770009
Total					106.22	106.22			

Note:
 * Smallholders sampled for this audit.
 ** Smallholders sampled for Extension to Scope

Appendix F: List of Abbreviations

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