

**RSPO PRINCIPLE AND CRITERIA
PUBLIC SUMMARY REPORT**

- Initial Assessment**
- Annual Surveillance Assessment (2_4)**
- Recertification Assessment (Choose an item.)**
- Extension of Scope**

<p>Client Company Name / Parent Company: Sime Darby Plantations Berhad</p>
<p>Client Company / Parent Company Address: New Britain Palm Oil Limited – West New Britain 3.5KM Bebere Road, Bebere Plantation, Mosa, New Britain Province, Papua New Guinea</p>
<p>Certification Unit: Mosa POM, Kumbango POM, Waraston POM, Kapiura POM and Nomundo POM and Supply Base Location of Certification Unit: 3.5KM Bebere Road, Bebere Plantation, Mosa, New Britain Province, Papua New Guinea</p>
<p>Date of Final Report: 24/12/2022</p>

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Section 1: Scope of the Assessment

1. Company Details			
Parent Company	Sime Darby Plantation Berhad		
RSPO Membership Number	1-0008-04-000-00	Membership Approval Date	06/09/2004
Address	Level 3A, Main Block, Plantation Tower, No. 2, Jalan PJU 1A/7, 47301 Ara Damansara, Selangor, Malaysia		
Palm Oil Mill / Group Manager / Estate (Certification Unit)	New Britain Palm Oil Limited – West New Britain Mosa Mill, Kumbango Mill, Waraston Mill, Kapiura Mill and Nomundo Mill and Supply Base		
Location / Address	3.5KM Bebere Road, Bebere Plantation, Mosa, New Britain Province, Papua New Guinea		
Website	www.simedarbyplantation.com		
Management Representative	Zaralyn Yakopa	E-mail	Zaralyn.Yakopa@simedarbyplantation.com
Telephone	+675 7107133	Facsimile	+675 9852003

2. Certification Information			
Certificate Number	RSPO 728122	Certificate Start Date	10/09/2018
Date of First Certification	10/09/2008	Certificate Expiry Date	09/09/2023
Scope of Certification	Production of Palm Oil and Palm Kernel		
Visit Objectives	The objective of the assessment is to conduct a combine Annual Surveillance Audit 2_4 to confirm that the elements of the proposed scope of registration and the management system are conforming the requirements of the assessment standard; to confirm that the organization has effectively implemented and addressed the management system and 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_4) <input type="checkbox"/> Recertification Assessment (Choose an item.) <input type="checkbox"/> Scope Extension		
Applicable Standards / Normative Reference	RSPO Certification System for P&C and RSPO ISH 2020 <input checked="" 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	Please refer table 4
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
RA-G-100813	RA Sustainability Agriculture Standard 2017	NEPCon	02/05/2023
NBPOL -111-212-C1/Y9	Halal Australian Standard	Halal Australia	01/05/2023

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base / Group Manager / Smallholders)	Location	GPS Coordinates	
		Latitude	Longitude
Mosa Oil Mill (60mt/hr)	Bebere Plantation, Mosa, West New Britain, Papua New Guinea	5° 37' 20.93"S	150° 14' 13.74"E
Kumbango Oil Mill (60mt/hr)	Kumbango Plantation, Mosa, West New Britain, Papua New Guinea	5° 35' 31.00"S	150° 12' 43.00"E
Kapiura Oil Mill (60mt/hr)	Bilomi Plantation, Kapiura, West New Britain, Papua New Guinea	5° 37' 25.00"S	150° 41' 03.00"E
Numundo Oil Mill (80mt/hr)	Healla Plantation, Healla, West New Britain, Papua New Guinea	5° 14' 00.00"S	150° 02' 01.00"E
Waraston Oil Mill (60mt/hr)	Numundo Plantation, Talasea, West New Britain, Papua New Guinea	5° 29' 02.00"S	150° 05' 12.00"E
Bebere Estate	Mosa, West New Britain, Papua New Guinea	5° 36' 50.69"S	150° 15' 03.60"E
Kumbango Estae	Mosa, West New Britain, Papua New Guinea	5° 36' 19.08"S	150° 11' 49.02"E
Togula Estate	Mosa, West New Britain, Papua New Guinea	5° 40' 02.53"S	150° 11' 11.00"E
Dami / Waisisi Estate	Hoskins, West New Britain, Papua New Guinea	5° 30' 51.05"S	150° 27' 07.41"E
Kautu Estate	Kapiura, West New Britain, Papua New Guinea	5° 31' 16.57"S	150° 03' 18.45"E
Kaurausu Estate	Kapiura, West New Britain, Papua New Guinea	5° 31' 14.88"S	150° 45' 09.36"E
Morao Estate	Kapiura West New Britain, Papua New Guinea	5° 31' 15.47"S	150° 45' 09.32"E
Bilomi / Loata Estate	Kapiura, West New Britain, Papua New Guinea	5° 37' 02.99"S	150° 40' 40.79"E
Healla Estate	Healla, West New Britain, Papua New Guinea	5° 31' 16.57"S	150° 2' 55.536"E
Garu Estate	Healla, West New Britain, Papua New Guinea	5° 30' 46.42"S	149° 59' 34.72"E
Daliavu Estate	Kulu, West New Britain, Papua New Guinea	5° 34' 18.56"S	150° 01' 21.42"E
Sapuri Estate	Kulu, West New Britain, Papua New Guinea	5° 34' 11.14"S	149° 59' 34.72"E
Malalimi Estate	Rigula, West New Britain, Papua New Guinea	5° 39' 26.64"S	150° 26' 29.39"E
Rigula Estate	Malilimi, West New Britain, Papua New Guinea	5° 37' 09.48"S	150° 47' 31.56"E
Numundo Estate	Talasea, West New Britain, Papua New Guinea	5° 29' 58.92"S	150° 05' 11.76"E

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Navarai / Karato Mini Estate / Kavugara Development Cooperation European Union	Talasea, West New Britain, Papua New Guinea	5° 21' 35.96"S	150° 02' 09.38"E
Volupai / Lotomgam Natupi / Goruru Estate	Talasea, West New Britain, Papua New Guinea	5° 15' 53.99"S	150° 00' 34.20"E
Lolokoru Estate	Talasea, West New Britain, Papua New Guinea	5° 06' 52.20"S	150° 03' 31.67"E
Ove Estate	Silovuti, West New Britain, Papua New Guinea	5° 34' 48.36"S	149° 41' 39.84"E
Tamare Estate	Silovuti, West New Britain, Papua New Guinea	5° 37' 32.88"S	149° 44' 07.08"E
Kaipura Division Smallholders	Kapiura, West New Britain, Papua New Guinea	5° 32' 56.01"S	150° 52' 6.63"E
Talasea Division	Talasea, West New Britain, Papua New Guinea	5° 16' 49.33"S	150° 00' 22.39"E
Nahavio Division	Mosa, West New Britain, Papua New Guinea	5° 35' 38.83"S	150° 13' 35.18"E
Kavui Division	Mosa, West New Britain, Papua New Guinea	5° 35' 37.32"S	150° 18' 39.24"E
Siki Division	Hoskins, West New Britain, Papua New Guinea	5° 28' 08.44"S	150° 27' 08.92"E
Buvussi Division	Malalimi, West New Britain, Papua New Guinea	5° 37' 42.96"S	150° 22' 46.02"E
Community Planting	West New Britain, Papua New Guinea	5° 30' 19.01"S	150° 32' 08.37"E
Independent Farms (more than 50 ha)	West New Britain, Papua New Guinea	5° 39' 03.38"S	150° 01' 22.43"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
Bebere Estate	1,881.00	0.00	345.71	2,226.71	84.47
Kumbango Estate	2,243.10	0.00	367.70	2,610.80	85.92
Togula Estate	1,364.30	0.00	144.90	1,509.20	90.40
Dami / Waisisi Estate	924.30	0.00	582.70	1,507.00	61.33
Kautu Estate	2,952.00	552.56	776.04	4,280.60	68.96
Kaurausu Estate	1,900.00	451.44	36.20	2,387.64	79.58
Moroa Estate	807.00	0.00	41.16	848.16	95.15
Bilomi / Loata Estate	2,572.50	225.00	954.29	3,751.79	68.57
Haella Estate	2,876.80	67.19	1,276.31	4,220.30	68.17
Garu Estate	2,562.40	596.00	551.20	3,709.60	69.07
Daliavu Estate	2,058.60	0.00	425.50	2,484.10	82.87

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Sapuri Estate	1,773.40	0.00	407.50	2,180.90	81.32
Malalimi Estate	2,527.00	63.00	1,247.00	3,837.00	65.86
Rigula Estate	2,519.60	952.00	248.40	3,720.00	67.73
Numundo Estate	1,509.40*	216.81	918.96	2,645.17	57.06
Navarai / Karato Mini Estate / Kavugara Development Cooperation European Union	687.40	0.00	416.37	1,103.77	62.28
Volupai / Lotomgam / Natupi / Goruru Estate	1,492.40	0.00	500.19	1,992.59	74.90
Lolokoru Estate	2,049.60	0.00	403.50	2,453.10	83.55
Ove Estate	2,374.50	0.00	1,166.50	3,541.00	67.06
Tamare Estate	1,957.90**	868.00	715.10	3,541.00	55.29
Kaipura Division Smallholders	4,096.09	128.57	1,348.53	5,573.19	73.50
Talasea Division Smallholders	2,804.10	0.00	0.00	2,804.10	100.00
Nahavio Division Smallholders	4,035.30	224.14	749.09	5,008.53	80.57
Kavui Division Smallholders	5,332.85	25.64	398.08	5,756.57	92.64
Siki Division Smallholders	4,566.38	1.84	756.15	5,324.37	85.76
Buvussi Division Smallholders	4,446.36	0.81	506.36	4,953.53	89.76
Community Planting	529.40	2.67	623.58	1,155.65	45.81
Independent Farms (>50 ha)	675.00	0.36	25.01	700.37	96.38
Total	65,518.28	4,376.03	15,932.03	85,826.74	76.34

Note: Conservation areas are included in Infrastructure & Others

6. Plantings & Cycle						
Estate / Smallholders	Age (Years) - ha				Mature	Immature
	0 - 3	4 - 14	15 - 25	>25		
Bebere Estate	0.00	1056.00	825.00	0.00	1,881.00	0.00
Kumbango Estate	233.1	469.60	1540.40	0.00	2,010.00	233.1
Togula Estate	0.00	0.00	1,364.30	0.00	1,364.30	0.00
Dami / Waisisi Estate	67	92.00	721.10	44.20	857.30	67
Kautu Estate	247.1	636.10	2,068.80	0.00	2,704.90	247.1
Kaurausu Estate	185	1,004.10	710.90	0.00	1,715.00	185
Moroa Estate	0.00	0.00	0.00	807.00	807.00	0.00
Bilomi / Loata Estate	180.6	565.40	1,826.50	0.00	2,391.90	180.6

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Haella Estate	1,215.07	206.40	454.00	1,001.33	1,661.73	1,215.07
Garu Estate	1,184.20	0.00	0.00	1,378.20	1,378.20	1,184.20
Daliavu Estate	0.00	0.00	761.30	1,297.30	2,058.60	0.00
Sapuri Estate	0.00	0.00	1,773.40	0.00	1,773.40	0.00
Malilimi Estate	302.9	350.80	1,629.50	243.80	2,224.10	302.9
Rigula Estate	0	0.00	2,519.60	0.00	2,519.60	0
Numundo Estate	392.1	0.00	210.80	906.50	1,117.30	392.1
Navarai / Karato Mini Estate / Kavugara Development Cooperation European Union	0.00	0.00	467.00	220.00	687.40	0.00
Volupai / Lotomgam / Natupi / Goruru Estate	0.00	0.00	312.60	1,179.80	1,492.40	0.00
Lolokoru Estate	0.00	0.00	2,049.60	0.00	2,049.60	0.00
Ove Estate	0.00	1749.90	624.60	0.00	2,374.50	0.00
Tamare Estate	595.2	1,362.70	0.00	0.00	1,362.70	595.2
Kaipura Division Smallholders	684.09	534.00	1,930.00	948.00	3,412.00	684.09
Talasea Division Smallholders	202.1	436.00	1,830.00	336.00	2,602.00	202.1
Nahavio Division Smallholders	514.3	480.00	1,923.00	1,118.00	3,521.00	514.3
Kavui Division Smallholders	598.85	375.00	2,666.00	1,693.00	4,734.00	598.85
Siki Division Smallholders	654.38	302.00	2,232.00	1,378.00	3,912.00	654.38
Buvussi Division Smallholders	1090.36	418.00	1,730.00	1,208.00	3,356.00	1090.36
Community Planting	95.4	235.00	115.00	84.00	434.00	95.4
Independent Farms (>50 ha)	44	148.00	428.00	55.00	631.00	44
Total (ha)	8,485.75	10,421	32,713.4	13,898.13	57,032.53	8,485.75

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

Estate / Smallholders	Tonnage (MT) / year			
	Estimated last year (Sept' 21 – Aug' 22)	Actual (Aug' 21-June' 22)		Forecast (Sept' 22 – Aug' 23)
		Previous license period (-)	Current license period (Aug' 21-June' 22)	
Bebere Estate	60,779.00		43,362.00	50,110.71
Kumbango Estate	65,612.00		46,299.00	45,420.34
Togula Estate	38,821.00		27,779.00	29,369.25
Dami / Waisisi Estate	28,645.50		5,382.00	9,653.00
Kautu Estate	81,224.00		58,012.00	62,092.00

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Kaurausu Estate	53,349.50		37,367.00	45,945.00
Moroa Estate	24,560.00		16,960.00	7,045.00
Bilomi / Loata Estate	78,693.00		56,838.00	60,849.00
Haella Estate	51,039.50		46,753.00	52,685.00
Garu Estate	48,226.50		29,689.00	28,381.00
Daliavu Estate	54,743.00		35,834.00	31,203.00
Sapuri Estate	49,608.00		35,669.00	25,104.00
Malilimi Estate	62,531.50		51,793.00	59,301.00
Rigula Estate	79,460.00		54,280.00	55,966.00
Numundo Estate	32,519.00		23,081.00	21,241.00
Navarai / Karato Mini Estate / Kavugara Development Cooperation European Union	24,917.00		13,527.00	11,010.00
Volupai / Lotomgam / Natupi / Goruru Estate	44,178.50		28,113.00	30,607.00
Lolokoru Estate	59,781.50		44,669.02	46,728.00
Ove Estate	72,786.50		53,919.00	54,834.00
Tamare Estate	11,602.50		28,482.00	36,028.00
Kaipura Division Smallholders	42,513.61		51,735.93	54,782.00
Talasea Division	36,255.00		37,169.93	71,455.00
Nahavio Division	63,500.06		32,119.93	52,210.00
Kavui Division	90,845.25		71,701.02	79,180.00
Siki Division	53,877.12		58,271.93	57,941.00
Buvussi Division	62,351.43		58,933.93	70,968.00
Community Planting	17,924.77		24,301.86	16,704.00
Independent Farms (>50 ha)	13,948.72		15,086.45	10,235.00
Total	1,404,293.46		1,087,129	1,177,047.30

8. Summary of Certified Tonnage of FFB (from other certified unit(s))				
Estate / Smallholders	Tonnage (MT) / year			
	Estimated last year (Sept' 21 – Aug' 22)	Actual (Aug' 21-June' 22)		Forecast (Sept' 22 – Aug' 23)
		Previous license period	Current license period	

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		(-)	(Aug' 21-June' 22)	
NIL				
Total		N/A		

9. Summary of Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)

Out growers / smallholders	Tonnage (MT) / year			
	Estimated last year (Sept' 21 – Aug' 22)	Actual (Aug' 21-June' 22)		Forecast (Sept' 22 – Aug' 23)
		Previous license period (-)	Current license period (Aug' 21-June' 22)	
NIL				
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	August 2021	98,017	-	98,017
2	September 2021	96,946	-	96,946
3	October 2021	102,746	-	102,746
4	November 2021	102,331	-	102,331
5	December 2021	94,762	-	94,762
6	January 2022	94,401	-	94,401
7	February 2022	83,566	-	83,566
8	March 2022	109,485	-	109,485
9	April 2022	94,271	-	94,271
10	May 2022	108,390	-	108,390
11	June 2022	102,214	-	102,214
TOTAL		1,087,129		1,087,129

10. Summary of Certified Tonnage (MT) (not applicable for ISS)

Estimated last year (Sept' 21 – Aug' 22)	Actual (Aug' 21-June' 22)		Forecast (Sept' 22 – Aug' 23)
	Previous license period (-)	Current license period (Aug' 21-June' 22)	
FFB	FFB		FFB
1,404,293.46 mt	-	1,087,129.20 mt	1,177,047.30 mt

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	TOTAL	1,087,129.20 mt	
CPO (OER: 22.86%)	CPO (OER: 22.37%)		CPO (OER: 24.30%)
321,021.50 mt	-	243,276.00 mt	290,154 mt
	TOTAL	243,276.00 mt	
PK (KER: 6.17%)	PK (KER: 4.68%)		PK (KER: 6.53%)
86,644.94 mt	-	66,102.00 mt	77,971 mt
	TOTAL	66,102.00 mt	

Estimated

Mill	FFB	Smallholder FFB	CPO	PK
Mosa Oill Mill	83,205.31	197,653.38	64,204.30	17,328.99
Kumbango Oill Mill	190,013.44	90,845.25	64,204.30	17,328.99
Numundo Oill Mill	300,775.43	36,255.00	77,045.16	20,794.78
Kapiura Oill Mill	224,396.36	56,462.33	64,204.30	17,328.99
Waraston Oill Mill	224,686.96	0	51,363.44	13,863.19
Total	1,023,077.50	381,215.96	321,021.50	86,644.94

Actual

Mill	FFB	Smallholder FFB	CPO	PK
Mosa Oill Mill	164,126.84	77,707.16	54,607	14,660.00
Kumbango Oill Mill	171,054.21	80,986.89	56,284	14,769.62
Numundo Oill Mill	203,133.15	96,174.95	63,586	15,286.27
Kapiura Oill Mill	167,871.12	79,479.88	59,155	18,497.22
Waraston Oill Mill	31,622.90	14,972.10	9,645	2,888.88
Total	737,808.22	349,320.98	243,276.00	66,102.00

Forecast

Mill	FFB	Smallholder FFB	CPO	PK
Mosa Oill Mill	164,411	87,089	61,114.50	16,422.95
Kumbango Oill Mill	170,001	90,050	63,192.39	16,981.33
Numundo Oill Mill	219,323	116,177	81,526.50	18,610.50
Kapiura Oill Mill	169,306	98,690	69,255.00	21,908.15
Waraston Oill Mill	40,531	21,469	15,066.00	4,048.60
Total	763,572	413,475	290,154	77,971.53

10A. Monthly Records of Certified CPO & PK since the last audit			
No.	Month - Year	Certified CPO (MT)	Certified PK (MT)
1	Aug-21	19,994	5,478
2	Sep-21	20,199	5,466
3	Oct-21	22,921	6,290
4	Nov-21	24,938	6,730
5	Dec-21	24,987	6,712
6	Jan-22	19,860	5,497
7	Feb-22	18,255	4,954
8	Mar-22	24,383	6,883
9	Apr-22	20,904	5,519
10	May-22	24,263	6,900
11	Jun-22	22,572	5,673
TOTAL		243,276.00	66,102.00

11. Summary of Actual Volume sold					
Current License period (Aug' 21-June' 22)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
CPO (MT)	182,971.05	-	-	7,156.64	190,127.69
PK (MT)	44,838.00	-	-	6,043.00	50,881.00
Credits	-	-	-	-	-
Previous License period (-)					
CPO (MT)	-	-	-	-	-
PK (MT)	-	-	-	-	-
Credits	-	-	-	-	-

Note: Conventional is RSPO certified material but sold as non-RSPO.

Period	Aug 2021 – June 2022	
	CPO	PK
Mosa Oill Mill	41,070.64	9,944.10
Kumbango Oill Mill	42,331.93	10,018.46
Numundo Oill Mill	47,823.86	10,368.91
Kapiura Oill Mill	44,491.25	12,546.95
Waraston Oill Mill	7,254.13	1,959.5

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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	Company SDKAPOM	Various Numbers consolidated	33,849.02	
2	Company SDKOM	Various Numbers consolidated	65,983.42	17,935.00
3	Company SDMOM	Various Numbers consolidated	83,138.61	26,903.00
TOTAL			182,971.05	44,838.00

11B. Records of certified CPO & PK Sold under other schemes since the last audit (if any)				
No.	Buyers Name	Scheme Name	Certified CPO Sold (MT)	Certified PK Sold (MT)
N/A	N/A	N/A	N/A	N/A
TOTAL			N/A	N/A

11C. Records of CPO & PK Sold as conventional since the last audit (if any)				
No.	Buyers Name	CPO Sold (MT)	PK Sold (MT)	
1	Company ABC	7,156.64	-	
2	Company DEF	-	6,043.00	
TOTAL		7,156.64	6,043.00	

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
	N/A	N/A	N/A
TOTAL			N/A

12. Independent Smallholders Certified Tonnage (MT) / Volume									
Phase	Estimated last year (Not Applicable)			Actual (Not Applicable)			Forecast (Not Applicable)		
	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									
IS-CSPO									

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IS-CSPKO								
IS-CSPKE								
CSPK								

12A. Monthly Records of Certified CPO, PK & PKE (equivalent) produced since the last audit						
No.	Month - Year	FFB (MT)	Certified CPO (MT)	Certified PK (MT)	Certified PKO (MT)	Certified PKE (MT)
	N/A	N/A	N/A	N/A	N/A	N/A
TOTAL		N/A	N/A	N/A	N/A	N/A

Note: -

13. Independent Smallholders Actual Sold Tonnage / Volume							
	FFB	FFB Conventional	FFB Other schemes	IS-CSPO	CSPK	IS-CSPKO	IS-CSPKE
Current License period (Not Applicable)							
Credits							
Physical							
Previous License period (Not Applicable)							
Credits							
Physical							

13A. Records of Certified FFB, CPO, PK & PKE (including credits) sold since the last audit							
No.	Buyers Name	PalmTrace Trading License Number	FFB Sold (MT)	Certified CPO Sold (MT/credit)	Certified PK Sold (MT/credit)	Certified PKO Sold (MT/credit)	Certified PKE Sold (MT/credit)
	N/A	N/A	N/A	N/A	N/A	N/A	N/A
TOTAL			N/A	N/A	N/A	N/A	N/A

Note:

Section 2: Assessment Process

Certification Body:

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

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 on-site assessment was conducted on **18/07-22/07/2022, 25/07-30/07/2022, and 01/08-04/08/2022**. The audit programme is included as Section 2.3. The approach to the audit was to treat the mill and supply base as an RSPO Certification Unit. A range of occupational health and safety, environmental, best practice management, and social factors were covered. This includes consideration of topography, palm age, proximity to areas with HCVs, declared conservation areas, local communities engagement and workers welfare and safety.

The methodology for collection of objective evidence included physical site inspections, observation of tasks and processes, interviews of staff, workers and their families and external stakeholders, review of documentation and monitoring data. 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.

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.

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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 (Re-certification)	Year 2 (ASA 2_1)	Year 3 (ASA 2_2)	Year 4 (ASA 2_3)	Year 5 (ASA 2_4)
Mosa Oil Mill	X	X	X	X	X
Kumbango Oil Mill	X	X	X	X	X
Kapiura Oil Mill	X	X	X	X	X
Numundo Oil Mill	X	X	X	X	X
Waraston Oil Mill	X	X	X	X	X
Bebere Estate			X	X	
Kumbango Estate		X			
Togula Estate	X				
Dami / Waisisi Estate					X
Kautu Estate		X			
Kaurausu Estate			X	X	
Moroa Estate			X	X	
Bilomi / Loata Estate			X	X	
Haella Estate	X				X
Garu Estate		X			
Daliavu Estate	X				X
Sapuri Estate		X			
Malilimi Estate	X				
Rigula Estate	X				
Numundo Estate					X
Navarai / Karato Mini Estate / Kavugara Development Cooperation European Union			X	X	
Volupai / Lotomgam / Natupi / Goruru Estate	X		X	X	
Lolokoru Estate		X	X	X	
Ove Estate			X	X	

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Tamare Estate	X				X
Kaipura Smallholders Division	X	X	X	X	X
Talasea Division	X	X	X	X	X
Nahavio Division	X	X	X	X	X
Kavui Division	X	X	X	X	X
Siki Division	X	X	X	X	X
Buvussi Division	X	X	X	X	X
Community Planting	X	X	X	X	X
Independent Farms (>50 ha)	X	X	X	X	X

Tentative Date of Next Visit: July 18, 2023 – July 29, 2023

Total Number of Mandays: 43.50 Mandays

2.2 BSI Assessment Team

Name	Role	Competency
Mohd. Razaleigh Mohamad (MRM)	Team Leader	<p>Education: Holds a Bachelor Degree in Plantation Management and Agrotechnology, University Technology Mara (UiTM).</p> <p>Work Experience: He has 5 years’ experience in Oil Palm Estate Management with Tradewinds Plantation Berhad. The last position held was Senior Assistant Manager. He has more than 4 years of experience in Third Party Certification Audit with Control Union (M) Sdn Bhd for RSPO P&C, MSPO P&C and GLOBALG.A.P. IFA Fruits and Vegetables. Qualified as RSPO Lead Auditor and approved to conduct Environmental and Social elements.</p> <p>Training attended: He has completed ISO 9001-2015 Lead Auditor Course, ISO14001- 2015 Lead Auditor Course, ISO45001-2018 Lead Auditor Course, Endorsed RSPO P&C Lead Auditor Course, Endorsed MSPO P&C Lead Auditor Course, Social Accountability SA8000 Auditor Course, RSPO Independent Smallholder (IHS) Auditor Training.</p> <p>Aspects covered in this audit: During this assessment, he assessed on the aspects of Policy and commitment, Social requirements, contract agreement, human rights, workers’ welfare, smallholder welfare, Stakeholder Consultation, Legal Requirements, land & Legal issue, smallholders field audits, smallholders training and records, GAP for smallholders.</p> <p>Language proficiency: Bahasa Malaysia and English</p>
Muhamad Naquiddin Mazeli (MNM)	Team Member	<p>Education: Holds a Bachelor of Science Horticulture, University Putra Malaysia</p> <p>Work Experience: He has 11 years working experience in oil palm industry managing sustainability implementation and certification of RSPO P&C, ISCC, and ISO9001 and ISO 18001 for the estates, mills, refineries and Smallholder</p>

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		<p>scheme. He also support in providing training related to RSPO and other certifications where applicable to the operations during previous company.</p> <p>Training attended: He has completed ISO 9001: 2015 Lead Auditor Course, ISO 14001: 2015 Lead Auditor Course, ISO 45001: 2018 Lead Auditor Course, HCV & HCS Introductory Training, Endorsed RSPO P&C Lead Auditor Course and Social Auditing & SMETA Training</p> <p>Aspect covered in this audit: During this assessment, he assessed on the aspects of mill and estate best practices, waste management, HCV, environmental</p> <p>Language proficiency: Fluent in in both verbal/written Bahasa Malaysia and English Language</p>
Vijay Kanna (VK)	Team Member	<p>Education: Holds a Bachelor Degree in Agribusiness Science Management with Honours, University Utara Malaysia.</p> <p>Work Experience: He has 10 years’ experience in Oil Palm Estate Management in leading Oil Palm Companies such as KL Kepong Bhd, IOI Plantations and United Plantations. The last position held was Senior Assistant Manager. His experience includes the day-to-day estate operations and ensured the implementation of RSPO, ISCC and MSPO certification. He has been an sustainable palm oil auditor since 2019.</p> <p>Training attended: He has completed ISO IMS 9001, 14001, 45001(OHS 18001) Lead Auditor Course, Endorsed RSPO P&C Lead Auditor Course, Endorsed RSPO SCCS Lead Auditor Course, Endorsed MSPO Lead Auditor Course, HCV & HCS Introductory Training g and SMETA Requirements Training, RSPO Independent Smallholder (IHS) Auditor Training.</p> <p>Aspect covered in this audit: During this assessment, he covers Smallholders field audits, smallholders training and records, GAP for smallholders.</p> <p>Language proficiency: He is fluent in English.</p>

Accompanying Persons:

Name	Role
Max Muakul Kuduk (MMK)	Local technical expert and translator. He holds a Master of Science Majoring in Modern Botanical Methods and a Bachelor of Science Majoring in Plant Science. He has experience in environmental and health & safety auditing. He has conducted conservation assessment for oil palm industry. His roles is as technical expert during the audit
Ipiso Junior Ipiso (IJ)	Local technical expert and translator. He holds a Master of Environment Management: The University of Queensland, Australia and Bachelor of Tropical Agriculture, University of Vudal, PNG. skilled and experienced in environment sustainability and, health and safety program management and monitoring, implementing legal and international standard audits such as Roundtable Sustainable Palm Oil (RSPO) and ISO 14001 (Environment Management Systems) standards.

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2.3 Assessment Plan

The Assessment plan was sent to the client prior to the assessment

Date	Time	Subjects	VKP	MNM / MMK	MRM / IJ
Monday 18/07/2022	0800-0830	Opening meeting: <ul style="list-style-type: none"> Opening presentation by audit team leader Confirmation of assessment scope and finalize audit plan (including stakeholder’s consultation) 	✓	✓	✓
	0830-1300	Smallholders office – documentation review	✓	✓	✓
	1000-1200	<u>Stakeholder consultation</u> Consultation with relevant stakeholders which consists of various categories such as government agencies/enforcers, NGO, contractors, suppliers, surrounding communities (e.g. neighbouring estates, smallholders, villages, workers representative, etc.)			✓
	1300-1400	Lunch break			
		Smallholders office – documentation review	✓	✓	✓
	1630-1700	Interim closing briefing	✓	✓	✓
Tuesday 19/07/2022		Smallholders field visit & interview – Kaus LSS (10 SH), Mamota LSS (5 SH), Ponini Agrotech and Ponravu	✓	✓	✓
	1000-1200	<u>Stakeholder consultation</u> Consultation with relevant stakeholders which consists of various categories such as government agencies/enforcers, NGO, contractors, suppliers, surrounding communities (e.g. neighbouring estates, smallholders, villages, workers representative, etc.)			✓
	1300-1400	Lunch break			
	1400-1630	Document Review P1 – P7: SOPs, Supply chain, Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation, etc.	✓	✓	✓
		Smallholders field visit & interview – continued	✓	✓	✓
1630-1700	Interim closing briefing	✓	✓	✓	
Wednesday 20/07/2022	0830-1300	Smallholders field visit & interview – Mosepa VOP (10 SH), Mamota LSS (5 SH), and Lilimo Project	✓	✓	✓
	1000-1200	<u>Stakeholder consultation</u> Consultation with relevant stakeholders which consists of various categories such as government agencies/enforcers, NGO, contractors, suppliers, surrounding communities (e.g.			✓

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		neighbouring estates, smallholders, villages, workers representative, etc.)			
	1300-1400	Lunch break			
		Smallholders field visit & interview – continued	✓	✓	✓
	1630-1600	Interim closing briefing	✓	✓	✓
Thursday 21/07/2022	0830-1300	Smallholders field visit & interview – Gule VOP (12 SH) and Wenge VOP (6 SH)	✓	✓	✓
	1000-1200	<u>Stakeholder consultation</u> Consultation with relevant stakeholders which consists of various categories such as government agencies/enforcers, NGO, contractors, suppliers, surrounding communities (e.g. neighbouring estates, smallholders, villages, workers representative, etc.)			✓
	1300-1400	Lunch break			
	1400-1630	Smallholders field visit & interview – continued	✓	✓	✓
	1630-1700	Interim closing briefing	✓	✓	✓
	Friday 22/07/2022	0830-1300	Smallholders field visit & interview – Pangalu VOP (10 SH), Wenge VOP (6 SH) and Pusiki Estate	✓	✓
1000-1200		<u>Stakeholder consultation</u> Consultation with relevant stakeholders which consists of various categories such as government agencies/enforcers, NGO, contractors, suppliers, surrounding communities (e.g. neighbouring estates, smallholders, villages, workers representative, etc.)			✓
1300-1400		Lunch break			
1400-1630		Smallholders field visit & interview – continued	✓	✓	✓
1630-1700		Interim closing briefing	✓	✓	✓
Monday 25/07/2022		0830-1300	Smallholders field visit & interview – Tamba LSS (10 SH) and Ngatia Estate	✓	✓
	1000-1200	<u>Stakeholder consultation</u> Consultation with relevant stakeholders which consists of various categories such as government agencies/enforcers, NGO, contractors, suppliers, surrounding communities (e.g. neighbouring estates, smallholders, villages, workers representative, etc.)	✓	✓	✓
	1300-1400	Lunch break			
	1400-1630	Smallholders field visit & interview – continued	✓	✓	✓
	1630-1600	Interim closing briefing	✓	✓	✓
	Tuesday	0830-1300	Mosa POM	✓	✓

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26/07/2022		Site visit: FFB receiving, workshop, wastes management, effluent treatment, OSH & ERP, environment issues, water treatment, staff, workers and contractor interviews, housing and facility inspection, clinic, etc.			
	1000-1200	<u>Stakeholder consultation</u> Consultation with relevant stakeholders which consists of various categories such as government agencies/enforcers, NGO, contractors, suppliers, surrounding communities (e.g. neighbouring estates, smallholders, villages, workers representative, etc.)			✓
	1300-1400	Lunch break			
	1400-1630	Mosa POM Document Review P1 – P7: SOPs, Supply chain, Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation, etc.	✓	✓	✓
	1630-1600	Interim closing briefing	✓	✓	✓
Wednesday 27/07/2022	0830-1300	Kapiura POM Site visit: FFB receiving, workshop, wastes management, effluent treatment, OSH & ERP, environment issues, water treatment, staff, workers and contractor interviews, housing and facility inspection, clinic, etc.	✓	✓	
		Smallholders field visit & interview –			✓
	1000-1200	<u>Stakeholder consultation</u> Consultation with relevant stakeholders which consists of various categories such as government agencies/enforcers, NGO, contractors, suppliers, surrounding communities (e.g. neighbouring estates, smallholders, villages, workers representative, etc.)			
	1300-1400	Lunch break	✓	✓	✓
	1400-1630	Kapiura POM Document Review P1 – P7: SOPs, Supply chain, Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation, etc.	✓	✓	✓
	1630-1600	Interim closing briefing	✓	✓	✓
Thursday 28/07/2022	0830-1300	Dami/Waisisi Estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, wastes management, workers’ housing, clinic, etc.	✓	✓	
	1000-1200	<u>Stakeholder consultation</u>			✓

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		Consultation with relevant stakeholders which consists of various categories such as government agencies/enforcers, NGO, contractors, suppliers, surrounding communities (e.g. neighbouring estates, smallholders, villages, workers representative, etc.)			
	1300-1400	Lunch break			
	1400-1630	Dami/Waisisi Estate Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc.).	✓	✓	✓
	1630-1600	Interim closing briefing	✓	✓	✓
Friday 29/07/2022	0830-1300	Tamare Estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, wastes management, workers’ housing, clinic, etc.	✓	✓	
	1000-1200	<u>Stakeholder consultation</u> Consultation with relevant stakeholders which consists of various categories such as government agencies/enforcers, NGO, contractors, suppliers, surrounding communities (e.g. neighbouring estates, smallholders, villages, workers representative, etc.)			✓
	1300-1400	Lunch break			
	1400-1630	Tamare Estate Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc.).	✓	✓	✓
	1630-1600	Interim closing briefing	✓	✓	✓
Saturday 30/07/2022	0830-1300	Warastom POM Document Review P1 – P7: SOPs, Supply chain, Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation, etc	✓	✓	
	1000-1200	<u>Stakeholder consultation</u> Consultation with relevant stakeholders which consists of various categories such as government agencies/enforcers, NGO, contractors, suppliers, surrounding communities (e.g.			✓

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		neighbouring estates, smallholders, villages, workers representative, etc.)			
	1300-1400	Lunch break			
	1400-1630	Warastom POM Document Review P1 – P7: SOPs, Supply chain, Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation, etc.	✓	✓	✓
		Smallholders field visit & interview – continued	✓	✓	✓
	1630-1600	Interim closing briefing	✓	✓	✓
Monday 01/08/2022	0830-1300	Haella Estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, wastes management, workers’ housing, clinic, etc.	✓	✓	
	1000-1200	<u>Stakeholder consultation</u> Consultation with relevant stakeholders which consists of various categories such as government agencies/enforcers, NGO, contractors, suppliers, surrounding communities (e.g. neighbouring estates, smallholders, villages, workers representative, etc.)			✓
	1300-1400	Lunch break			
	1400-1630	Numundo Estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, wastes management, workers’ housing, clinic, etc. and document review.	✓	✓	✓
	1630-1600	Interim closing briefing	✓	✓	✓
Tuesday 02/08/2022	0830-1300	Numundo POM Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, wastes management, workers’ housing, clinic, etc.	✓	✓	
	1000-1200	<u>Stakeholder consultation</u> Consultation with relevant stakeholders which consists of various categories such as government agencies/enforcers, NGO, contractors, suppliers, surrounding communities (e.g. neighbouring estates, smallholders, villages, workers representative, etc.)			✓

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	1300-1400	Lunch break			
	1400-1630	Numundo POM Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc.).	✓	✓	✓
	1630-1600	Interim closing briefing	✓	✓	✓
Wednesday 03/08/2022	0830-1300	Daliviu Estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc.), agrochemical mixing area, wastes management, workers' housing, clinic, etc.	✓	✓	
	1000-1200	<u>Stakeholder consultation</u> Consultation with relevant stakeholders which consists of various categories such as government agencies/enforcers, NGO, contractors, suppliers, surrounding communities (e.g. neighbouring estates, smallholders, villages, workers representative, etc.)			✓
	1300-1400	Lunch break			
	1400-1630	Daliviu Estate Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation etc.).	✓	✓	✓
	1630-1600	Interim closing briefing	✓	✓	✓
	Thursday 04/08/2022	0830-1300	Kumbango POM Site visit: FFB receiving, workshop, wastes management, effluent treatment, OSH & ERP, environment issues, water treatment, staff, workers and contractor interviews, housing and facility inspection, clinic, and documentation review.	✓	✓
1300-1400		Lunch break			
1400-1500		Audit team discussion & preparation for closing meeting	✓	✓	✓
1500-1600		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?	<p>Yes. SDP TBP has included all its operating units in Malaysia, Indonesia, Papua New Guinea and Solomon Island. Refer to the Time Bound Plan table.</p> <p>As at 16 Jan 2020, Sime Darby Plantation under its unit Sime Darby Plantation Investment (Liberia) Pte Ltd has completed its disposal of its entire interest in Sime Darby Plantation (Liberia) Inc (SDP Liberia) to Mano Palm Oil Industries Ltd (MPOI):</p> <p>http://www.simedarbyplantation.com/media/press-releases/sime-darby-plantation-completes-divestment-of-its-liberia-operations</p>	Complied
<p>Have all the estates and mills certified within five (5) years after obtaining RSPO membership?</p> <p>If no, has RSPO Secretariat approval obtained? Was the submission according to the template as announced by the RSPO Secretariat on 21/12/2021</p>	<p>Yes. All estates and mill has been certified with RSPO. Some units with exemption cases such as poor financial or sold as property development has been taken out from the certification unit. In Malaysia, Pekaka Mill is being mothballed and all the supply bases certified to it (Pekaka Estate; Ruai Estate, Dulang Estate, Paroh Estate & Chartquest Estate) has been transferred to SOU Lavang while for Bintang Oil Mill, SDP acquired Bintang Palm Oil Mill in Johor in April 2017. As at Dec 2017, the selling off process of this mill is being initiated hence the RSPO certification process for Bintang Oil Mill is being put on hold and on 1st Oct 2018, the mill has completed the selling off transaction.</p> <p>In Indonesia, PT Mitral Austral Sejahtera was sold and currently SDP have no control in the management.</p>	Complied
<p>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.</p> <p>If no, has RSPO Secretariat approval obtained? Was the submission according to the template as announced by the RSPO Secretariat on 21/12/2021.</p>	No. There is no new acquisitions as at latest TBP 2021.	Complied
Any deviations from the maximum periods requires approval by the RSPO Secretariat.	Although there are deviation has been identified at those Indonesia management units but it has been justified that these units are still awaiting to receive land titles.	Complied
Have there been any changes to the time-bound plan since the last audit (both new	<p>Yes.</p> <p>Indonesia - PT Swadaya Andika: Mill closed down and all the supply bases was transferred to Rantau Mill - PT</p>	Complied

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<p>acquisition and existing)? If yes, justification is required. Is this consistent with the ACOP reporting?</p>	<p>Laguna Mandiri. The Selabak Est, Randi Est, Sangkoh Est, Lanting Est is currently under PT Laguna Mandiri - Rantau Factory certification. PT Mitral Austral Sejahtera: The properties was sold and currently Sime Darby Plantation Berhad have no control in the management. The property was disposed on 25/06/2019 and an official letter on disposal of PT MAS was sent to RSPO Secretariat on 27/06/2019. Malaysia - Pekaka Mill is being mothballed in year 2018 and all the certified supply base Pekaka Estate; Ruai Estate, Dulang Estate, Paroh Estate & Chartquest Estate has been transferred to SOU Lavang. Bintang Oil Mill: Sime Darby Plantation Berhad acquired Bintang Palm Oil Mill in Johor in April 2017. As at Dec 2017, the selling off process of this mill is being initiated hence the RSPO certification process for Bintang Oil Mill is being put on hold. As at 01/10/2018, the mill has completed the selling off transaction.</p> <p>Papua New Guinea - Markham Farming Company Limited (MFCL)/Markham Agro Pte. Ltd: The Remediation and Compensation Process is at the submission of Compensation Plan. RSPO Main Assessment is planned on 10-14 March as public Notification letter: www.rspo.org/certification/public-announcement</p> <p>For Liberia operations: As at 16/01/2020, Sime Darby Plantation Berhad under its unit Sime Darby Plantation Investment (Liberia) Pte Ltd has completed its disposal of its entire interest in Sime Darby Plantation (Liberia) Inc (Sime Darby Plantation Liberia) to Mano Palm Oil Industries Ltd (MPOI): www.simedarbyplantation.com/media/pressreleases/sime-darby-plantation-completesdivestment-of-its-liberia-operations. ACOP 2020 has been cross-referenced as below: www.rspo.org/members/29</p>	
<p>Have there been any isolated lapses in implementation of the plan? If yes a Minor non-compliance shall be raised</p>	<p>Although there lapses has been identified at those Indonesia management units but it has been justified that these units are still awaiting to receive land titles.</p>	<p>Complied</p>
<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>No fundamental failure. Both Liberia and Indonesia (PT Mitral Austral Sejahtera) has been excluded in the latest TBP as these 2 assets were disposed.</p>	<p>Complied</p>
<p>Un-Certified Units or Holdings</p>		
<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>Based on the time-bound plan, it was not identified that those uncertified units are due to RaCP. Mainly are due to awaiting to receive land titles at the Indonesia management units</p>	<p>Complied</p>
<p>Any new plantings since January 1st 2010 shall comply with the RSPO New Plantings</p>	<p>New plantings within Sime Darby Plantation Berhad that have completed NPP notification</p>	<p>Complied</p>

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<p>Procedure.</p>	<ol style="list-style-type: none"> 1. NBPOL (Poliamba Limited) 23/05/2020 – no comments https://rspo.org/certification/new-plantingprocedure/public-consultations/sime-darbyplantation-berhad-nbpol-poliamba-limited 2. NBPOL (Guadalcanal Plain Palm Oil Ltd) 06/04/2018 – no comments https://rspo.org/certification/new-plantingprocedure/public-consultations/new-britainpalm-oil-a-subsiary-of-sime-darby-plantationbhd-guadalcanal-plain-palm-oil-ltd 3. NBPOL (Ragu Agri Industries Limited) 29/01/2018 – no comments https://rspo.org/certification/new-plantingprocedure/public-consultations/nbpol-ramuagri-industries-ltd 4. NBPOL (Ragu Agri Industries Limited) 02/09/2016 – no comments https://rspo.org/certification/new-plantingprocedure/public-consultations/new-britainpalm-oil-ltd-ramu-agri-industries-limited 5. NBPOL (Higaturu Oil Palms) 21/06/2016 – no comments https://rspo.org/certification/new-plantingprocedure/public-consultations/new-britainpalm-oil-ltd-higaturu-oil-palms 6. NBPOL (Poliamba Limited – Lamawan) 07/04/2014 – no comments captured in RSPO Website https://rspo.org/certification/new-plantingprocedure/public-consultations/nbpol-poliambalimited-lamawan-png 7. NBPOL (Poliamba Limited – Lamendauen) 07/04/2014 – no comments captured in RSPO Website https://rspo.org/certification/new-plantingprocedure/public-consultations/nbpol-poliambalimited-lamendauen-png 8. NBPOL (Roka Mini estate) 04/11/2013 – no comments captured in RSPO website https://rspo.org/certification/new-plantingprocedure/public-consultations/new-britainpalm-oil-ltd.-roka-mini-estate 9. NBPOL (J estate) 01/11/2013 – no comments captured in RSPO website https://rspo.org/certification/new-plantingprocedure/public-consultations/new-britainpalm-oil-ltd.-j-estate 10. NBPOL (Higaturu Oil Palm) 14/12/2012 – no comments captured in RSPO website
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	<p>https://rspo.org/certification/new-plantingprocedure/public-consultations/new-britainpalm-oil-limited-higaturu-oil-palm</p> <p>11. Sime Darby (Liberia) Plantation Inc 06/03/2012 – no comments captured in RSPO website</p> <p>https://rspo.org/certification/new-plantingprocedure/public-consultations/sime-darbyliberia-plantation-inc-new-planting-assessment</p> <p>12. Sime Darby (Liberia) Plantation Inc 06/03/2012 – no comments captured in RSPO website</p> <p>https://rspo.org/certification/new-plantingprocedure/public-consultations/sime-darbyliberia-plantation-inc.-new-planting-assessment1</p> <p>13. Sime Darby (Liberia) Plantation Inc 06/03/2012 – no comments captured in RSPO website</p> <p>https://rspo.org/certification/new-plantingprocedure/public-consultations/sime-darbyliberia-plantation-inc.-new-planting-assessment</p> <p>Management units for 11 – 13 above were disposed.</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><i>Note:</i></p>	<p>No land conflicts. Both Liberia and Indonesia (PT Mitral Austral Sejahtera) has been excluded in the latest TBP as both sites was disposed.</p> <p>The RaCP tracker was checked. There are 21 Management units that have potential liabilities. There are some discrepancy between RaCP tracker and actual scenario due possibility of assets disposal. As per the data audited, there are 19 management units for the Indonesia Operations that requires LUCA. All LUCAs were submitted but the review was delayed due to change of RSPO reviewer. As of 14/07/2021, 10 LUCAs were approved with 0 conservation liability and remaining 9 are still pending from RSPO.</p>	<p>Complied</p>
<p>Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 4.2</p>	<p>Sime Darby Plantation Berhad have published Grievance mechanism that is applied to all management units. Disputes related to labor, stakeholders and communities are to be dealt using this mechanism</p>	<p>Complied</p>
<p>Any Legal non-compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1</p>	<p>Sime Darby Plantation maintain corporate governance to monitor and address any legal non-compliances. Through the published Code of Business Conduct and charters, the company is committed to delivery their business complying to the laws and regulations of the country.</p>	<p>Complied</p>
<p>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>	<p>Yes. The sustainability unit has conducted internal audits the uncertified units and updated in the compliance status of uncertified management unit. There is no replacement of primary forest or HCV area and no new planting after January 1st 2010. The issue are mainly awaiting for Land Titles. The last audit was conducted between July 2020 – August 2020.</p>	<p>Complied</p>

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	The Head of Sustainability has concluded in the uncertified unit compliance report that there is no land disputes and legal compliance is monitored during the internal audit as the positive assurance.	
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?	No 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.	Complied
Have there been any stakeholder (including NGO) consultation conducted?	Respective sites maintained stakeholder engagements as part of the estates/mills operations. Especially in Indonesia, socialization of company	Complied

3.2 Progress of scheme smallholders and/or outgrowers

Progress of scheme smallholders or outgrowers towards compliance with relevant standards		
Requirement	Remarks	Compliance
Has 100% of scheme smallholders and/or scheme outgrowers comply with the standard within three years of the mill's initial certification? OFI shall be raised if after one year where 100% of the scheme smallholders and scheme outgrowers are not in compliance, a minor NC after two years, and a major NC if this requirement is not met after three years.	By the definition of the National Interpretation, the smallholders and outgrowers attached to NBPOL-WNB are considered as independent smallholders. However, NBPOL-WNB has ensure that these smallholders are certified together with the current certification.	Complied

Approved Time Bound Plan

SDP - RSPO Certification for Time Bound Plan - Malaysia Operations

No	Management Unit	Supply Base	Time Bound Plan	Location	Status	Certified Date	Remarks
	SOU Name						
1	Sungai Dingin	Sungai Dingin Oil Mill	-	Karangan, Kedah	Certified	12/08/2011	-
		Anak Kulim Estate					
		Sungai Dingin Estate					
		Somme Estate					
		Bukit Selarong Estate					
		Padang Buluh Estate					
		Bukit Hijau Estate					
		Jentayu Estate					
2	Chersonese	Chersonese Oil Mill	-	Kuala Kurau, Perak	Certified	05/10/2011	-
		Chersonese Estate					
		Kalumpong Estate					
		Tali Ayer Estate					
		Holyrood Estate					
3	Elphil	Elphil Oil Mill	-	Sungai Siput, Perak	Certified	16/08/2011	-
		Kamuning Estate					
		Elphil Estate					
		Kinta Kellas Estate					
4	Flemington	Flemington Oil Mill	-	Teluk Intan, Perak	Certified	05/10/2011	-
		Flemington Estate					
		Bagan Datoh Estate					

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		Sabak Bernam Estate					
		Sg. Samak Estate					
5	Seri Intan/Selaba	Seri Intan Oil Mill	-	Teluk Intan, Perak	Certified	03/03/2011	-
		Selaba Oil Mill					
		Seri Intan (+ Selaba) Estate					
		Sabrang Estate					
		Sogomana Estate					
		Sg. Wangi Estate					
		Bikam Estate					
		Cluny (+ Bedford) Estate					
6	Tennamaram	Tennamaram Estate					
		Sungai Buluh Estate					
		Bukit Talang Estate					
				Bukit Kerayong Oil Mill	-	Kapar Selangor	Certified
7	Bukit Kerayong	Bukit Kerayong Estate					
		Bukit Cheraka Estate					
		Elmina Estate					
				East Oil Mill	-	Carey Island, Selangor	Certified
8	East	East Estate					
		Sepang Estate					
		Dusun Durian Estate					
				West Oil Mill	-	Carey Island, Selangor	Certified
9	West	West Estate					

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10	Bukit Puteri	Bukit Puteri Oil Mill	-	Raub, Pahang	Certified	07/07/2011	-
		Bukit Puteri Estate					
11	Kerdau	Kerdau Oil Mill	-	Temerloh, Pahang	Certified	07/07/2011	Jentar Estate has merged with Kerdau Estate and reported to the CB in March/April 2021.
		Kerdau Estate					
		Jentar Estate					
		Mentakab Estate					
		Chenor Estate					
		Sg Mai Estate					
12	Jabor	Jabor Oil Mill	-	Kuantan, Pahang	Certified	07/07/2011	-
		Jabor Estate					
13	Labu	Labu Oil Mill	-	Nilai, Negeri Sembilan	Certified	30/12/2011	New Labu Estate has become a division of Labu Estate.
		Labu Estate					
14	Tanah Merah	Tanah Merah Oil Mill	-	Port Dickson, Negeri Sembilan	Certified	19/05/2010	-
		Tanah Merah Estate					
		Bukit Pelandok Estate					
15	Sua Betong	Sua Betong Oil Mill	-	Port Dickson, Negeri Sembilan	Certified	18/02/2014	Siliao Estate has now been merged into Salak Estate and Bradwall Estate.
		Sua Betong Estate					
		Sengkang Estate					
		Bradwall Estate					
		PD Lukut Estate					
		Tampin Linggi Estate					
		Sg. Bahru Estate					
		Salak Estate					
16	Kok Foh	Kok Foh Oil Mill	-		Certified	07/07/2011	

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		Muar River Estate		Bahau, Negeri Sembilan			Sg. Gemas Estate has now been merged into Sg. Senarut Estate.
		Sg. Senarut Estate					
		Sg. Gemas Estate					
		Kok Foh Estate					
		Bukit Pilah Estate					
		St. Helier Estate					
		Sungai Sabaling Estate					
		Pertang Estate					
17	Kempas	Kempas Oil Mill	-	Jasin, Melaka	Certified	19/05/2010	Serkam Estate, previously from SOU18 (Diamond Jubilee) is now part of SOU 17 (Kempas)
		Kempas Estate					
		Tangkah Estate					
		Kemuning Estate					
18	Diamond Jubilee	Diamond Jubilee Palm Oil Mill	-	Jasin, Melaka	Certified	05/10/2011	Serkam Estate, previously from SOU18 (Diamond Jubilee) is now part of SOU 17 (Kempas) Welch Estate, previously from SOU 19 (Pagoh) is now part of SOU 18 (Diamond Jubilee)
		Serkam Estate					
		Diamond Jubilee Estate					
		Bukit Asahan Estate					
19	Pagoh	Pagoh Oil Mill	-	Muar, Johor	Certified	28/1/2014	-
		Pagoh Estate					
		Welch Estate					
		Lanadron Estate					
		Pengkalan Bukit Estate					
20	Chaah	Chaah Oil Mill	-	Chaah, Johor	Certified	18/11/2010	-
		Chaah Estate					
		Sg. Simpang Kiri Estate					

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		North Labis Estate					
21	Gunung Mas	Gunung Mas Oil Mill	-	Kluang, Johor	Certified	19/05/2010	* SDP acquired Lian Seng Estate in Johor in April 2017. Lian Seng Estate is merged into Bkt Paloh Estate of SOU 21 Gunung Mas, Lian Seng has been incorporated in the RSPO Certification Scope of SOU Gunung Mas in 2018.
		Gunung Mas Estate					
		Kempas Klebang Estate					
		Bukit Paloh Estate					
		Yong Peng Estate					
22	Bukut Benut	Bukit Benut Oil Mill	-	Kluang, Johor	Certified	05/11/2011	* SDP acquired Talisman Estate in Johor in April 2017. Talisman Estate is merged into CEP Nyior Estate of SOU 22 Bk Benut and has been incorporated in the RSPO Certification Scope of SOU Bk Benut in 2018.
		Bukit Benut Estate					
		Lambak Elaeis Estate					
		CEP Nyior Estate					
23	Ulu Remis	Ulu Remis Oil Mill	-	Layang-Layang, Johor	Certified	11/04/2011	-
		Ulu Remis Estate					
		Cenas Estate					
		Bukit Badak Estate					
		Tun Dr. Ismail Estate					
		Pekan Estate					
		Sembrong Estate					
24	Hadapan	Hadapan Oil Mill	-	Layang-Layang, Johor	Certified	29/3/2011	-
		Sri Pulai Estate					
		Kulai Estate					
		Layang Estate					
		CEP Renggam Estate					
26	Sandakan Bay	Sandakan Bay	-	Sandakan, Sabah	Certified	01/10/2008	-
		Tun Tan Siew Sin					

		Tunku Estate					
		Tigowis Estate					
		Sentosa Estate					
		Segaliud Estate					
27	Melalap	Melalap Oil Mill	-	Tenom, Sabah	Certified	21/1/2011	-
		Melalap Estate					
		Sapong Estate					
28	Binuang	Binuang Oil Mill	-	Kunak, Sabah	Certified	16/1/2009	-
		Binuang Estate					
		Sungang Estate					
		Tingkayu Estate					
		Jeleta Bumi Estate					
29	Giram	Giram Oil Mill	-	Kunak, Sabah	Certified	16/1/2009	-
		Giram Estate					
		Mostyn Estate					
30	Merotai	Merotai Oil Mill	-	Tawau, Sabah	Certified	16/1/2009	-
		Merotai Estate					
		Imam Estate					
		Tiger Estate					
		Table Estate					
31	Layang	Layang Oil Mill	-	Bintulu, Sarawak	Certified	30/12/2011	-
		Layang Estate					
		Rasan Estate					
		Belian Estate					

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		Kelida Estate					
		Lavang (Special) Estate					
		Pekaka Estate					
		Ruai Estate					
		Dulang Estate					
		Charquest Estate					
		Paroh Estate					
32	Rajawali	Rajawali Oil Mill	-	Bintulu, Sarawak	Certified	30/12/2011	-
		Rajawali Estate					
		Samudera Estate					
		Semarak Estate					
		Bayu Estate					
33	Derawan	Derawan Oil Mill	-	Bintulu, Sarawak	Certified	30/12/2011	-
		Derawan Estate					
		Sahua Estate					
		Takau Estate					
		Damai Estate					
34	Pekaka	Pekaka Mill	-	Bintulu, Sarawak	Withdrawn	NA	Pekaka Mill is being mothballed and all the supply bases certified to it (Pekaka Estate; Ruai Estate, Dulang Estate, Paroh Estate & Chartquest Estate.) has been transferred to SOU Lavang.
35	Bintang	Bintang Oil Mill	-	Johor	NA	NA	* SDP acquired Bintang Palm Oil Mill in Johor in April 2017. As at Dec 2017, the selling off process of this mill is being initiated hence the RSPO certification process for Bintang Oil Mill is being put on

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							hold. As at 1st Oct 2018, the mill has completed the selling off transaction.
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SDP - RSPO Certification for Time Bound Plan - Indonesia Operations

No	Management Unit	Mill and Supply Base	Time Bound Plan	Latest Internal / External	Location	Status	Certified Date	Remarks (for uncertified unit)
	SOU Name			Audit Date				
1	PT Lahan Tani Sakti	Alur Dumai Mill	-	-	Rokan Hilir District – Riau	Certified	16/01/2012	-
		Alur Dumai Estate						
2	PT Sajang Heulang	Mustika Mill	-	-	Tanah Bumbu District – South Kalimantan	Certified	03/07/2013	KKPA & Plasma is not under the management control of Sime Darby Plantation. The decision of certification is from KKPA / Plasma themselves.
		Mustika Estate						
		KKPA-2 PT.SHE Estate						
		KKPA-3 PT.SHE Estate						
		KKPA-5 PT.SHE Estate						
Pantai Bonati Estate	06/07/2011							
3	PT Ladangrumpun Suburabadi	Angsana Mill	-	-	Tanah Bumbu District – South Kalimantan	Certified	06/07/2021	KKPA & Plasma is not under the management control of Sime Darby Plantation. The decision of certification is from KKPA / Plasma themselves.
		Angsana Estate						
		Pantai Bonati Estate						
		Gunung Sari Estate						
		KKPA-1 PT.SHE Estate						
		KKPA-4 PT.SHE Estate						
Subur Abadi Plasma 1 Estate	TBC	TBC	TBC	TBC				
4	PT Langgeng Muaramakmur	Bebunga Mill	-	-		Certified	16/03/2012	KKPA & Plasma is not under the management control of Sime Darby
		Bebunga Estate						

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		Sungai Cengal Estate			Kotabaru District – South Kalimantan			Plantation. The decision of certification is from KKPA / Plasma themselves.
		Bakau Estate						
		KKPA LMR	TBC	TBC		TBC	TBC	
5	PT Kridatama Lancar	Sukamandang Mill	-	-	Seruyan and East–Kotawaringin District Central Kalimantan	Certified	05/07/2011	-
		Sukamandang Estate						
		Sapiri Estate						
		Barasdanum Estate						
		Kuala Kuayan Estate						
6	PT Bahari Gembira Ria	Ladang Panjang Mill	-		Muaro Jambi District - Jambi	Certified	09/07/2012	Only Division 3 is certified (1,202 Ha). Total Areas of Division 1 and 2 (1,796.19 ha) HGU still in process KKPA & Plasma is not under the management control of Sime Darby Plantation. The decision of certification is from KKPA / Plasma themselves.
		Ladang Panjang Estate						
		Plasma BGR Estate	TBC	TBC		TBC	TBC	
7	PT Tunggal Mitra Plantations	Manggala Mill	-	-	Rokan Hilir District – Riau	Certified	25/11/2010	-
		Manggala 1 Estate						
		Manggala 2 Estate						
		Manggala 3 Estate						
8	PT Paripurna Swakarsa	Pondok Labu Mill	-	-	Kotabaru District – South Kalimantan	Certified	16/03/2012	-
		Pondok Labu Estate	-	-				
		Binturung Estate						
		Rampa Estate						
		Sesulung Estate						
9	PT Bersama Sejahtera Sakti	Gunung Aru Mill	-			Certified	05/07/2011	-
		Gunung Aru Estate						

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		Gunung Kemas Estate			Kotabaru District – South Kalimantan			
		Laut Timur Estate						
		Pantai Timur Estate						
		KKPA MBP	TBC	TBC		TBC	TBC	KKPA & Plasma is not under the management control of Sime Darby Plantation. The decision of certification is from KKPA / Plasma themselves.
10	PT Guthrie Pecconina	Rantau Panjang Mill	-	-	Musu Banyuasin District – South Sumatera	Certified	16/03/2012	Remarks: Land legalisation process for 4152.70 ha is still in process.
		Rantau Panjang Estate						
		Bumi Ayu Estate						
		Karang Ringin Estate						
		Napal Estate						
		Mangun Jaya Estate						
		Sungai Jernih Estate and GPI KKPA Estate	2023	-				
11	PT Laguna Mandiri	Rantau Mill	-	-	Kotabaru District – South Kalimantan	Certified	30/12/2011	
		Rantau Estate						
		Matalok Estate						
		Betung Mill						
		Betung Estate						
		Sekayu Estate						
12		Sekunzir Mill	-	-		Certified	23/11/2010	-

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	PT Indotruba Tengah	Sekunyr Seruyan Estate			Seruyan and West Kotawaringin District – Central Kalimantan			
13	PT Swadaya Andika	Selabak Mill Selabak Estate Randi Estate Sangkoh Estate Lanting Estate	-	-	Kotabaru District – South Kalimantan	Certified	16/03/2012	Mill closed down and all the supply bases was transferred to Rantau Mill – PT Laguna Mandiri. The Selabak Est, Randi Est, Sangkoh Est, Lanting Est is currently under PT Laguna Mandiri – Rantau Factory certification.
14	PT Bina Sains Cemerlang	Sungai Pinang Mill Sungai Pinang Estate Bukit Pinang Estate	-	-	Musi Rawas District – South Sumatera	Certified	11/09/2012	Remarks: Land legalisation process for 308.35 ha is still in process.
15	PT Teguh Sempurna	Pemantang Mill Pemantang Estate Kawan Batu Estate Hatan Tiring Estate Batang Garing Estate	-	-	Seruyan and East Kotawaringin District – Central Kalimantan	Certified	05/07/2011	-
16	PT Bhumireksa Nusa Sejati	Teluk Bakau Mill Teluk Bakau Estate Nusa Lestari Estate Nusa Perkasa Estate Mandah Mill Mandah Estate Rotan Semelur Estate	-	-	Indra Giri Hilir District – Riau	Certified	11/10/2011 01/04/2014	-
17		Teluk Siak Mill	-	-		Certified	11/10/2011	-

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	PT Intipersada Aneka	Teluk Siak Estate			Pekanbaru, Siak District – Riau			
		Pinang Sebatang Estate						
		Aneka Persada Estate						
18	PT Tamaco Graha Krida	Ungkaya Mill	-	-	Morowali District – Sulawesi Tengah	Certified	10/7/2012	-
		Ungkaya Estate						
		Plasma TGK Estate	TBC	TBC		TBC	TBC	KKPA & Plasma is not under the management control of Sime Darby Plantation. The decision of certification is from KKPA / Plasma themselves.
19	PT SIME Indo Agro	Bukit Ajong Mill	-	-	Sanggau District – West Kalimantan	Certified	18/10/2010	Land legalisation process for East Est for 5815.64 ha is still in process.
		West Estate						
		East Estate						
		East* Estate /Sei Mawang Estate	2023	-		-		Land legalisation for Sei Mawang is still in process
		East Plasma Estate	-	-		Certified	18/7/2016	-
		West Plasma Estate						
20	PT Padang Palma Permai /PT Perkasa Subur Sakti	Blang Simpo Mill	-	-	Aceh Tamiang and East Aceh District – Nangroe Aceh Darussalam	Certified	03/05/2013	-
		Tamiang (PT PPP) Estate						
		Batang Ara (PT PSK) Estate						
		Blang Simpo-01 Estate						
		Blang Simpo-02 Estate						
21	PT Natapalma Sandika	Lembiru Mill	-	-	Ketapang District – West Kalimantan	Certified	03/07/2014	PT Sandika Natapalma and PT Budidaya Agro Lestari is sharing one mill i.e. Lembiru Mill.
		Lembiru Estate						
		Awatan Estate						

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		Karya Palma Estate	TBC	TBC		TBC	TBC	KKPA & Plasma is not under the management control of Sime Darby Plantation. The decision of certification is from KKPA / Plasma themselves.
		KKPA SNP Estate	TBC	TBC		TBC	TBC	
22	PT Budidaya Agro Lestari	Pelanjau (PT BAL) Estate	-	-	Ketapang District – West Kalimantan	Certified	03/07/2019	-
		Sungai Putih (PT BAL) Estate	2023	-		-		Land Approval is obtained in 2015 while the other approvals are still in processing HGU obtained as per May 2018 KKPA & Plasma is not under the management control of Sime Darby Plantation. The decision of certification is from KKPA / Plasma themselves.
		Beturus (PT BAL) Estate	2023	-		-		
		KKPA BAL Estate	TBC	TBC		TBC	TBC	
23	PT Mitral Austral Sejahtera	MAS Mill	NA	NA	Sanggau District – West Kalimantan	NA	NA	The properties was sold and currently SDP have no control in the management. Please find latest information on 'Updates on PT MAS' worksheet and updates to RSPO Secretariat.
		MAS 1 Estate						
		MAS 2 Estate						
		MAS 4 Estate						
		Plasma MAS Estate						

SDP - RSPO Certification for Time Bound Plan – New Britain Palm Oil (NBPOL) Operations (as at March 2021)

No	Management Unit	Mill and Supply Base	Time Bound Plan	Location	Status	Certified Date	Remarks (for uncertified unit)
	SOU Name						
1	Guadalcanal Plains Palm Oil Limited (GPPOL)	Tetere Oil Mill	-	Guadalcanal Province, Solomon Islands	Certified	18/03/2011	-
		Tetere Estate					
		Ngalimbiu Estate					
		Mbalisuna Estate					
		Smallholders – West Zone (83)					
		Smallholders – Central Zone (53)					

		Smallholders – MBA East Zone (59)					
		Smallholders – MBE East Zone (37)					
2	Milne Bay Estate (MEB)	Hagita Oil Mill	-	Milne Bay Province, PNG	Certified	15/02/2018	-
		Giligili Estate					
		Hagita Estate					
		Waigani Estate					
		Sagarai Estate					
		Padipadi Estate					
		Mariawatte Estate					
		Smallholders – East Gurney Estate (264)					
		Smallholders – West Gurney Estate (229)					
		Smallholders – East Sagarai Estate (157)					
		Smallholders – West Sagarai Estate (221)					
3	Poliamba (POL)	Poliamba Oil Mill	-	New Ireland Province, PNG	Certified	19/03/2012	-
		Kara Estate					
		Nalik Estate					
		West Coast Estate					
		Noatsi Estate					
		Madak Estate					
		Smallholders -North Division (615)					
		Smallholders- South Division (868)					
		Smallholders -West Division (309)					
4	Ramu Agricultural Industrial Ltd (RAIL)	Gusap Mill	-	Morobe Province, PNG	Certified	05/08/2010	-
		Gusap East (Gusap) Estate					

		Gusap West (Paddox) Estate					
		Surinam Estate					
		Dumpu Estate					
		Ngaru Estate					
		J Estate (Jephcott) Estate					
		Smallholders - Madang VOPs (71)					
		Smallholders - Morobe VOPs (253)					
5	Higaturu Oil Palm (HOP)	Sangara Oil Mill	-	Oro Bay Province, PNG	Certified	01/02/2013	-
		Mamba Oil Mill					
		Embi Estate					
		Ambogo Estate					
		Sangara Estate					
		Sumbiripa Estate					
		Mamba Estate					
		Sambogo Estate					
		Scheme Smallholder Sorovi Division(2019)					
		Scheme Smallholder Saiho Division(842)					
		Scheme Smallholder Aeka Division (911)					
		Scheme Smallholder Igora Division (1367)					
		Scheme Smallholder Ilimo Division (671)					
6	West New Britain (WNB)	Mosa Oil Mill	-	Kimbe, West New Britain, PNG	Certified	10/09/2008	-
		Kumbango Oil Mill					
		Kapiura Mill					

		Numundo Mill				
		Waraston Mill				
		Bebere Estate				
		Kumbango Estate				
		Togulo Estate				
		Dami Estate				
		Waisisi Estate				
		Kautu Estate				
		Karausu Estate				
		Moroa Estate				
		Bilomi Estate				
		Loata Estate				
		Haella Estate				
		Garu Estate				
		Daliavu Estate				
		Sapuri Estate				
		Malilimi Estate				
		Rigula Estate				
		Numundo Estate				
		Navarai / Karato ME /KDC EU Estate				
		Volupai / Lotomgam / Natupi / Goruru Estate				
		Lolokoru Estate				
		Ove Estate				
		Tamare Estate				

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		Smallholders LSS Mosa (1822)					
		Smallholders VOP East (1817)					
		Smallholders VOP Central (1964)					
		Smallholders VOP West (1279)					
		Smallholders LSS Kapiura (551)					
		Smallholders VOP Kapiura (850)					
		Smallholder Kaulong / Akami / Pushiki / Repamira / Sakapei					
7	Markham Farms Company Limited (MFCL) / Markham Agro Pte Ltd	Erap Mill	-	Markham Farms	Certified	27/3/2020	There is total area NPP: 710.30ha which is currently excluded from the certification scope until the NPP is approved

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 3 (Three) Critical; 4 (Four) Minor nonconformities and 2 (Two) Opportunity For Improvement raised. The The Mosa Mill, Kumbango Mill, Waraston Mill, Kapiura Mill and Numundo Mill and Supply Base 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 #	2232929-202207-M1	Issued Date	05/08/2022										
Due Date	01/11/2022	Closure Date	01/11/2022										
Indicator & Category (Critical / Minor)	6.2.4 Critical (Major)												
Statement of Nonconformity:	Housing repair still pending for nearly 1 year after complaint received.												
Requirement Reference:	The Company provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. National laws, or in their absence the ILO Guidance on Workers’ Housing Recommendation No. 115, are used. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5years) is allowed to upgrade the infrastructure. Smallholders may live in houses of traditional materials or other accommodation of their choosing.												
Objective Evidence:	<p>Quarterly housing compound inspection done using PF#29 title “Housing repair and maintenance checklist” and base on inspection done, it has been identified that there several item which has been classified under NR, need for repair (leaking roof, full septic, electrical faults and floor damage) and yet to be done since 2021. Interview respond with the workers and site visit confirm that it is consistent with the document reviewed.</p> <p>2 samples of site have been taken as per below</p> <p>Kapiura POM</p> <p>Line site inspection has been done on quarterly basis, (07/07/2022, 22/05/2022,1703/2022 and 14/12/2021).</p> <table border="1"> <thead> <tr> <th>House number</th> <th>Item need to be repaired</th> <th>Application repair</th> <th>for</th> <th>Pending since</th> </tr> </thead> <tbody> <tr> <td>JG01 and JG02</td> <td>roofing, gutter, toilet, wall, veranda, pipe</td> <td>14/06/2022.</td> <td></td> <td>July 2021</td> </tr> </tbody> </table> <p>Numundo POM</p> <p>Sample has been taken for house DLQ3/A and QLQ 1 and both has been identified as need for repair from the previous inspection which is June 2021 and still pending for repair until the day of audit.</p>			House number	Item need to be repaired	Application repair	for	Pending since	JG01 and JG02	roofing, gutter, toilet, wall, veranda, pipe	14/06/2022.		July 2021
House number	Item need to be repaired	Application repair	for	Pending since									
JG01 and JG02	roofing, gutter, toilet, wall, veranda, pipe	14/06/2022.		July 2021									

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	House number	Date inspection	Remarks
	DLQ1/AB	20/06/2021 08/05/2022	a) Broken gutter
	DLQ3/A	20/06/2021 08/05/2022	b) Roof leaking c) Broken window frame
	QLQ1	12/02/2022	d) Sink outlet discharge leaking e) Toilet system leaking
Corrections:	Quarterly housing inspection and register to be in place, follow up to be done monthly by Manager and appointed representative to reconfirm with physical inspection and update register status of notification raised and progress.		
Root Cause Analysis:	Follow up not done with construction on the notification raised for repairs by appointed personnel at both Mills so that costings and major R&M can be raised and approved by Management for work to be carried out		
Corrective Actions:	Close monitoring of quarterly housing inspection to be done by appointed representative and reconfirmed by Department Manager through the monthly OHS Inspection and findings to be discussed in the OHS Meetings and captured in the minutes. Internal quarterly audits check to ensure issues identified are closed out as per given time frame.		
Assessment Conclusion:	<p>Document received</p> <p>a) Quarterly housing inspection records with reconfirm with physical inspection and update register status of notification raised and progress.</p> <p>b) Appointment letter for PIC for each operating units and issues discuss during monthly OHS Inspection</p> <p>Based on the evidence provided, it was found that the corrections and corrective action plans have been addressed accordingly. Therefore, the Critical Non-Conformity is successfully closed on 01/11/2022</p>		

Non-conformity			
NCR Ref #	2232929-202207-M2	Issued Date	05/08/2022
Due Date	01/11/2022	Closure Date	01/11/2022
Indicator & Category (Critical / Minor)	7.12.4 Critical (Major)		
Statement of Nonconformity:	It was identified that the management of conservation areas (Buffer Zones) were not fully implemented as below:		
Requirement Reference:	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.		

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Objective Evidence:	<p>It was identified that the management of conservation areas (Buffer Zones) were not fully implemented as below:</p> <p><u>Togulo Plantation</u></p> <ul style="list-style-type: none"> • During the site visit along Dagi River and Ru Creek, it was noticed that there were no established buffer zones at certain portions of the river and creek banks. A "No Spray" zone has been established by the management but there were traces of spraying applications being done beyond the designated zone right to the river and creek banks. • Verified the HCV Checklist does not include the monitoring of "loss of riparian vegetation due to agricultural activity" as required under the Habitat Management Plans for buffer zones. <p><u>Numundo Plantation</u></p> <ul style="list-style-type: none"> • During the site visit along Wandora Creek, it was noticed that there were no established buffer zones at certain portions of the riverside due to the riverbanks being eroded over time. There were traces of spraying activities done at the palms that were along the creek banks as well. • As per the Habitat Management Plan, it states that Quarterly Buffer Zones monitoring should be done. Verified the HCV monitoring checklist where buffer zone monitoring was done only annually. <p>Verified the HCV Checklist does not include the monitoring of "loss of riparian vegetation due to agricultural activity" as required under the Habitat Management Plans for buffer zones.</p>
Corrections:	Demarcation to be done in both areas of Numundo and Togulo Plantation. Close monitoring of field activities by Supervisors and Managers.
Root Cause Analysis:	Initial demarcation was there however due to flooding overtime the bank eroded. Lack of supervision in the area to identify the activity as well as demarcation.
Corrective Actions:	Rehabilitation of the buffer areas Review Buffer Inspection checklist to include identifying other agriculture activities within the operational areas.
Assessment Conclusion:	<p>Documents received</p> <ol style="list-style-type: none"> Photo of clear demarcation of buffer zone for Numundo and Togulo Plantation Checklist of monitoring for buffer zone inspection <p>Based on the evidence provided and it was found that the corrections and corrective action plans have been addressed accordingly. Therefore, the Critical Non-Conformity is successfully closed on 01/11/2022</p>

Non-conformity			
NCR Ref #	2232929-202207-M3	Issued Date	05/08/2022
Due Date	01/11/2022	Closure Date	01/11/2022
Indicator & Category (Critical / Minor)	7.3.1 Critical (Major)		

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Statement of Nonconformity:	There were lapses in the implementation of the Waste Management Plan.
Requirement Reference:	A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.
Objective Evidence:	There were lapses in the implementation of the Waste Management Plan. Mosa Oil Mill The SOP NBPOL; Mosa Mill; EFB Disposal From Mill; SOP No: MOM21; Issue Date: 20/06/2022. States: Environment; Spillage from EFB leakages if any, must be diverted to the sludge pit. During the verification done at the EFB Yard at Mosa Oil Mill, it was sighted that there were leachates discharged into the monsoon/storm drain. Due to this being a reoccurrence of non-conformity under the same indicator, a critical non-conformity has been raised.
Corrections:	Engaging contractors to clear out EFB daily to reduce stock piling with ongoing monitoring by Mill Managers / Assistant Managers. Daily / Weekly checks on all triple interceptor with checklist updated.
Root Cause Analysis:	No proper housekeeping supervision to prevent EFB leachate over and next to the drain. Incomplete project which was still work in progress at the time of the audit, due to delay of shipment pump and complete pipe not arriving in time for work to be completed
Corrective Actions:	Leachate from the EFB diverted to mill sludge pit and discharged into the mill effluent pond. Place cover over storm water drain on section next to EFB piling
Assessment Conclusion:	Document received <ol style="list-style-type: none"> 1. Engagement letter for contractor to clear out daily EFB 2. Checklist of monitoring 3. Photo o cover has been place at storm drain. Based on the evidence provided, it was found that the corrections and corrective action plans have been addressed accordingly. Therefore, the Critical Non-Conformity is successfully closed on 01/11/2022

Non-conformity			
NCR Ref #	2232929-202207-N1	Issued Date	05/08/2022
Due Date	Next Audit (Recertification)	Closure Date	Open
Indicator & Category (Critical / Minor)	7.3.2 (Minor)		
Statement of Nonconformity:	Waste has not been disposed according to SOPs and waste management plan.		

<p>Requirement Reference:</p>	<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. Smallholder requirements:</p> <p>The requirements fully applicable to smallholders.</p>
<p>Objective Evidence:</p>	<p>Numundo Oil Mill & Heilla Plantation</p> <ol style="list-style-type: none"> 1. Referred to NBPOL SOP Waste Segregation & Disposal; SOP Number: SusMill 6; Issue No: 01; Issue Date: 16/10/2014; Procedure: NBPOL segregates its rubbish into three main categories – organic, Hydrocarbons & Domestic. During the visit to the landfill it was noticed that the rubbish were not segregated as the organic and domestic rubbish were disposed together in the domestic rubbish pits. Furthermore, it was noticed that there were traces of burning on the rubbish. The rubbish was seen spilling out of the pit with no prompt cleaning up being done. 2. Referred to NBPOL SOP Hydrocarbon Waste and Disposal; SOP No: SusMill 9; Issue: 01; Issue Date: 16/10/2014; Procedure: Dispose of the container and hydrocarbons in the designated hydrocarbon pit. It was noticed in the EFB disposed in the fields that there were hydrocarbons waste also being disposed together such as Ropes and Contaminated Gloves. 3. Referred to NBPOL SOP EFB Disposal; SOP No: SusMill 4; Issue:01; Issue Date: 16/10/2014; Procedure: Plantations should endeavour to remove all EFB from mill sites in a timely manner. It was noticed that there were excess of EFB which have been stored all around the mill complex, contributing to other issues such as: <ul style="list-style-type: none"> • Seen heaps of EFB burning outside the mill complex and in the plantation. • Seen EFB heaps collapsed into the monsoon drain, contributing to leachate in the monsoon drain. • The hydrocarbon rubbish pit (Workshop – Garage Waste) was seen to have scrap metals disposed in them. There were fires seen in the pit as well.
<p>Corrections:</p>	<ul style="list-style-type: none"> • Designated personnel appointed at landfill site to maintain upkeep and monitor. • Awareness carried out with all employees, dependents and surrounding communities on zero burning. • Awareness with workers and dependents on proper waste segregation at each household.
<p>Root Cause Analysis:</p>	<ul style="list-style-type: none"> • Lack of awareness on waste segregation with employees and dependents by specific department Managers and no designated upkeep worker to maintain landfill site. • Waste register not being maintained and updated • Lack of awareness with workers, dependents and surrounding communities on zero burning and process of identifying and reporting. • No proper housekeeping supervision to prevent EFB leachate over and next to the drain.

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Corrective Actions:	<ul style="list-style-type: none"> Engaging contractors to clear out EFB daily to reduce stock piling with ongoing monitoring by Mill Managers / Assistant Managers. Ongoing social awareness with employees, dependents and surrounding communities on zero burning. Place cover over storm water drain on section next to EFB piling
Assessment Conclusion:	<p>The corrective action plan was evaluated. The corrections implemented have addressed the objective evidence while the corrective actions provided are able to eliminate the root cause analysis while the root cause analysis is robust to eliminate the non-conformance.</p> <p>The implementation of corrections and corrective actions will be evaluated during next surveillance audit</p>

Non-conformity			
NCR Ref #	2232929-202207-N2	Issued Date	05/08/2022
Due Date	Next Audit (Recertification)	Closure Date	Open
Indicator & Category (Critical / Minor)	1.2.1 (Minor)		
Statement of Nonconformity:	Policy for ethical conduct has not been fully implemented		
Requirement Reference:	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.		
Objective Evidence:	<p>As per interview with the smallholder it found out that deduction made for fertilizer request is not as per stated in the consent form signed by smallholder and smallholder department (SHA). Details as per below:</p> <ul style="list-style-type: none"> Consent letter dated 15/12/2021, signed by OPIC 17/12/2021, signed by SHA, 17/01/2022 stated fertilizer price PGK111.10/bag, PGK611.05/5 bags Quotation form reference#002-0446, total PGK175.50/bag, PGK965.25/5 bags Deduction made: As per quotation (PGK965.25/5 bags) 		
Corrections:	<ul style="list-style-type: none"> Procurement to updated SHA / Plantation on monthly basis on new pricing for Agrochemical stock items. SHA to communicate new pricing to growers during weekly field day awareness Accounts Department to send out fortnightly list to SHA highlighting balance of debt after growers pay is processed. SHA to keep electronic tracker and update OPIC. OPIC to inform growers so that growers are kept up to date on the progress of repayment 		
Root Cause Analysis:	<ul style="list-style-type: none"> Sudden change of fertilizer pricing. Concept form signed by grower, while waiting for fertilizer stock, the price market rose and the new price change was not communicated by Procurement Department to SHA for SHA (Smallholders Association Department) to carry out awareness to the growers on price change. 		

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Corrective Actions:	<ul style="list-style-type: none"> • SHA HOD to have access to basic agro chemical item price to enable to keep constant track on new pricing to communicate and update the growers. • Procurement and Finance Department to come up with SOP or flowchart to address and capture process of communicating price fluctuation for fertilizer and fertilizer delivery. • Review of growers consent form to include section for advising growers of the sudden price change that can occur for deduction.
Assessment Conclusion:	<p>The corrective action plan was evaluated. The corrections implemented have addressed the objective evidence while the corrective actions provided are able to eliminate the root cause analysis while the root cause analysis is robust to eliminate the non-conformance.</p> <p>The implementation of corrections and corrective actions will be evaluated during next surveillance audit</p>

Non-conformity			
NCR Ref #	2232929-202207-N3	Issued Date	05/08/2022
Due Date	Next Audit (Recertification)	Closure Date	Open
Indicator & Category (Critical / Minor)	3.3.2 (Minor)		
Statement of Nonconformity:	Inconsistent implementation of the SOPs		
Requirement Reference:	<p>A mechanism to check consistent implementation of procedures is in place. Smallholder requirements:</p> <p>Organization that is managing the smallholders maintains production records and field day attendance records as evidence of improved performance.</p>		
Objective Evidence:	<p>1. Standard Operating Procedures- Discrepancy and grievances dated 21/05/2022 stated that "The driver, operator and crew must ensure that the grower is the rightful owner to the block by checking his block E-tag and grower I.D card" and "The driver, operator, crew and the block owner are not allowed to accept E-tags for crop shifting at any other block locations" However, it is found out that crop shifting has been practices for smallholder base on crop production records where some of the smallholder did not have FFB records and some of the smallholder has illogical FFB production (more than 50mt).</p> <p>It has been further confirmed during the interview with smallholder that there is some smallholder that using other smallholder E-tag due to few reasons (still did not register for E-tag, E-tag damage, family issues).</p> <p>2. Internal procedure title " Services management guidelines, compound upkeep practices (NBPOL-EI-MG14) stated in the procedure that line site inspection need to be done quarterly basis using PF#29 document title "Housing repair and maintenance checklist"</p> <p>Kumbango POM</p> <p>The management miss out 1st quarter line site inspection Latest housing inspection done is 14/07/2022 and identified houses which required for some repair. Sample taken house number IB#03, IB#06 and IB#12.</p>		

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	<p>Numundo POM For year 2021 and 2022, line site inspection only been done once which is on 20/06/2021 and 08/05/2022 for DLQ unit Occupational Safety Management Plan (OSMP) Appendix 7: PPE Guidelines form operational Safety Management Plan (May 2019) stated "company must provide gumboot, cap, overall, apron and nitrile glove. However, during site verification with PPE issuance" and site verification with interview with sprayer found no apron been issue and apply for Haella estate, Togulo estate and Daliavu estate. The issuance record sighted as per below sample:</p> <p>Haella Estate Safety glass Apron Coverall Nitrile glove Boot Issuance date: 18/7/22,30/5/22, 30/5/22, 9/6/22</p> <p>Daliavu Estate Safety glass Apron Coverall Nitrile glove Boot Issuance date: 5/5/2022 ,7/1/2022 ,7/1/2022</p> <p>Numundo Estate Safety glass Apron Coverall Nitrile glove Boot Issuance date: 25/7/2022 ,14/6/2022, 14/6/2022, 22/7/2022</p>
<p>Corrections:</p>	<ul style="list-style-type: none"> • SHA to communicate with IT to include in system and issue e-tag to blocks without e-tag. SHA to monitor and carry out awareness during filed days on grievance mechanism for smallholders to raise concerns through this channel so that feedback on issues of e-tags or others can be looked into and dealt with and closer monitoring of daily production report with daily reconfirming and updates from filed supervisors. • Site Manager not checking on the PF29 housing inspection schedule and OHS Meeting agenda not followed through to discuss and minute status of housing inspection when covering this topic. • Issue PPE as per the Operational Safety Management Plan for approved PPE issue
<p>Root Cause Analysis:</p>	<ul style="list-style-type: none"> • E-Tag issue not reported to SHA and no proper awareness to growers on the process of requesting for e-tags and crop shifting. • Housing inspection schedule not done and no thorough inspection of records covered during internal audit to identify the missing gap. • Morning musters PPE check not carried out by Estate Assistant Managers and Supervisors to identify the lack of PPE for orders to be placed with central stores.
<p>Corrective Actions:</p>	<ul style="list-style-type: none"> • Process flow chart for requesting and verification of E-TAG to be in place and include as part of the checks during field and internal inspection. • Daily PPE muster checklist form to be done up. Assistant Managers to use during morning musters.

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	<ul style="list-style-type: none"> PF29 housing inspection schedule to be done up and Manager / Engineer to monitor that inspection are conducted through the OHS Department Meetings and safety inspection.
Assessment Conclusion:	<p>The corrective action plan was evaluated. The corrections implemented have addressed the objective evidence while the corrective actions provided are able to eliminate the root cause analysis while the root cause analysis is robust to eliminate the non-conformance.</p> <p>The implementation of corrections and corrective actions will be evaluated during next surveillance audit</p>

Non-conformity			
NCR Ref #	2232929-202207-N4	Issued Date	05/08/2022
Due Date	Next Audit (Recertification)	Closure Date	Open
Indicator & Category (Critical / Minor)	2.2.2 (Minor)		
Statement of Nonconformity:	Independent Estate who supply to NBPOL-WNB POM did not pay as per minimum wages		
Requirement Reference:	All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party. Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/ accredited) for migrant workers, service providers and labour contractors, is available.		
Objective Evidence:	<p>Sample of 5 workers of has been taken from independent estate, Ngatia Estate and found out that the workers has not been paid as per Papua New Guinea Minimum Wages (PGK3.50/hour)</p> <p>Details as per below</p> <p>Workers A</p> <p>Employment contract: PGK150, 76hours@ PGK1.97/hour, Paid: PGK140, 76hours@ PGK1.84/hour Minimum wages: PGK266, 76 hours@ PGK3.50/hour</p> <p>Worker B</p> <p>Employment contract: PGK150, 76hours@ PGK1.97/hour, Paid: PGK120, 76hours@ PGK1.58/hour Minimum wages: PGK266, 76 hours@ PGK3.50/hour</p>		
Corrections:	<ul style="list-style-type: none"> Workers to be issued contracts and paid as per minimum wage. workers contracts revised and updated with monitoring of this to be done by SHA during internal audits. 		
Root Cause Analysis:	<ul style="list-style-type: none"> No proper supervision No proper employee records 		
Corrective Actions:	<ul style="list-style-type: none"> SHA Audit checklist to be reviewed 		

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Assessment Conclusion:	<p>The corrective action plan was evaluated. The corrections implemented have addressed the objective evidence while the corrective actions provided are able to eliminate the root cause analysis while the root cause analysis is robust to eliminate the non-conformance.</p> <p>The implementation of corrections and corrective actions will be evaluated during next surveillance audit</p>
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Opportunity for Improvements	
OFI #	Description
OFI 1	NBPOL-WNB has established management plan for pending employment contract for workers that has been documented in document title "OUTSTANDING CONTRACT SUMMARY PLAN" which expected to be completed on 31/12/2022. OFI raised to ensure that the management plan implemented for next surveillance audit
OFI 2	The usage of E-SHEQ001 Incident Form, ver. 2, rev. 05/2014 could be further improved to detail out the types of incidents that should be reported under the environmental incidents.

Positive Findings	
PF #	Description
PF 1	Good commitment and corporation from the management.
PF 2	Generally well implementation of Good Agricultural Practices (GAP).

3.3.1 Status of Nonconformities Previously Identified and Observations

Non-conformity			
NCR Ref #	2092717-202107-N1	Issued Date	14/08/2021
Due Date	ASA 2_4	Closure Date	18/07/2022
Indicator & Category (Critical / Minor)	3.3.3 (Minor)		
Statement of Nonconformity:	Records of monitoring and action taken are not consistently maintained and available		
Requirement Reference:	Records of monitoring and any actions taken are maintained and available		
Objective Evidence:	<p>Deviation of latest inspection results (PF29) against actual physical condition of house were observed at the following mills and estates</p> <ul style="list-style-type: none"> • Mosa Oil Mill - DLQ house (24A, 6B & 19A) • Kumbango Oil Mill - DLQ house (17, 13 & 25) • Kapiura Oil Mill - DLQ house (3, 14 & 29) • Lolokuru Estate - QLQ house (6, 17 & 26) • Bilomi Estate - DLQ house (2,12 & 20) <p>Based on site verification at operating unit's housing compound, deviation of inspection results against actual physical condition of house were observed.</p>		

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	<p>Interview with the house occupants have confirmed that most of the problems were reported to their immediate superior/supervisor and the work order issuance process to the management and construction team still in progress. Thus, timely completion on the request for house repair were not made available for verification.</p>
<p>Corrections:</p>	<ul style="list-style-type: none"> • Appointment of Housing Officer under Construction Department to record, monitor and ensure notifications addressed to Construction are acted on and addressed with an update given to requesting Department. • SOP for Housing Urgent Repair drawn up and circulated with training and awareness scheduled to complete by end of September early October 21. • Monthly update on housing population census with reporting process in place with a centralized tracker.
<p>Root Cause Analysis:</p>	<ul style="list-style-type: none"> • No designated personnel to record concerns and consistently monitor to ensure notifications are raised and to follow up on the actions taken at each Department / Plantation level. • No SOP to follow through on Housing Urgent Repairs process and to have in place a centralized housing population census.
<p>Corrective Actions:</p>	<ul style="list-style-type: none"> • Appoint personnel at site / department level to oversee, maintain records and monitor process of ensuring timely inspection are done as per quarterly schedule and concerns raised are captured with monitoring of defects being addressed and feedback given to worker. • Closer monitoring to ensure there is effectiveness in the process through the internal quarterly audits.
<p>Assessment Conclusion:</p>	<p>Records of monitoring and action taken are consistently maintained and available. NBPOL-WNB has established internal procedure for line site management in the document title " services management guidelines, compound upkeep practices (NBPOL-EI-MG14). Stated in the procedure that line site inspection need to be done quarterly basis using PF#29 document title "Housing repair and maintenance checklist"</p> <p>Kumbango POM Latest housing inspection done is 14/07/2022 and identified houses which required for some repair. Sample taken house number IB#03, IB#06 and IB#12</p> <p>Kapiura POM Line site inspection has been done quarterly, on 07/07/2022, 22/05/2022,1703/2022 and 14/12/2021. Sample of house number JG01 and JG02 has been taken and sighted some indicator has been remarks as NR since 2021 such as roofing, gutter, toiler, wall, verandah, pipe. Minor repair has been done for wall painting but the others issues still pending. Application for repair has been submitted to construction department on 14/06/2022 and current practices if there is no progress for the after 1 month, reapplication need to be done.</p> <p>Numundo POM For year 2021 and 2022, line site inspection only been done once which is on 20/06/2021 and 08/05/2022 for DLQ unit.</p>

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Effectiveness Closure (for previous audit closed Critical NC):	Not applicable.
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Non-conformity			
NCR Ref #	2092717-202107-N2	Issued Date	14/08/2021
Due Date	ASA 2_4	Closure Date	18/07/2022
Indicator & Category (Critical / Minor)	7.3.1 (Minor)		
Statement of Nonconformity:	Some wastes were inadequately addressed in the waste management plan.		
Requirement Reference:	A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.		
Objective Evidence:	<p>Based on the Environment Permit [ref.: EP-L2(411), dated 27/04/2017] issued by the PNG Conservation and Environment Protection Authority (CEPA), New Britain Palm Oil Limited is required to comply with the applicable requirements under the Environmental Code of Practice for Papua New Guinea Oil Palm Processing Industry, DEC, 2013. Among the requirements are:</p> <ul style="list-style-type: none"> • Rainfall on piled EFB within the mill area should be collected and diverted into the effluent treatment system (Clause 4.3.7). • Wastes contaminated with hydrocarbons such as oil filters, from which as much oil as possible has been drained, must be disposed in a designated hydrocarbon waste location that is impermeable so that there is no possibility of groundwater contamination. If there are circumstances where the location is permeable or may be susceptible to surface to groundwater transfer, every effort must be made to ensure that there is no liquid exchange by installing and impermeable lining (Clause 4.3.11.2). <p>The above requirements were inadequately addressed in the management plan. In addition to that, based on the site visits, the following lapses were observed:</p> <ul style="list-style-type: none"> • Leachate or potential leachate from EFB pile at MOM, NOM, WOM and KAPOM was not channeled into the effluent treatment system. It was discharged into the environment through storm drain instead. • At the designated hydrocarbon wastes pits located at landfill areas, it was observed that no impermeable lining installed. 		
Corrections:	<ul style="list-style-type: none"> • Engaging contractors to clear out EFB daily to reduce stock piling with ongoing monitoring by Mill Managers and a plan in place to divert leachate into effluent pond. • SOP for digging of new landfill sites drafted up to include installing of lining. 		
Root Cause Analysis:	<ul style="list-style-type: none"> • EFB Pile / Leachate – No proposed plan in place as yet until it was raised, due to the PNG Oil Palm Processing Industry Environmental Code of Practice 1.3 indicate to achieve compliance within 10 years of the publication of the Code of Practice which is by July 2023. • No SOP in place for new landfill . 		

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Corrective Actions:	<ul style="list-style-type: none"> Leachate from the EFB diverted to mill sludge pit and discharged into the mill effluent pond. Pump and pipe details confirmed, with the project scheduled to complete within 6-months' time (Feb 22). Arrangement made by Group Sustainability to engage CEPA (Department of Environment – Government) for a site visit. All NBPOL sites have been visited except WNB. They will schedule to visit in October 2021. EIA in progress on all Landfill within operation and survey is scheduled to be carried out with installation of landfill liner with the use of clay considering its suitability and availability.
Assessment Conclusion:	<p>The corrective action plan was evaluated. The corrections implemented have addressed the objective evidence while the corrective actions provided are able to eliminate the root cause analysis while the root cause analysis is robust to eliminate the non-conformance.</p> <p>There were lapses in the implementation of the Waste Management Plan. Mosa Oil Mill</p> <p>The SOP NBPOL; Mosa Mill; EFB Disposal From Mill; SOP No: MOM21; Issue Date: 20/06/2022. States: Environment; Spillage from EFB leakages if any, must be diverted to the sludge pit. During the verification done at the EFB Yard at Mosa Oil Mill, it was sighted that there were leachates discharged into the monsoon/storm drain.</p> <p>Due to this being a reoccurrence of non-conformity under the same indicator, a critical non-conformity has been raised.</p>
Effectiveness Closure (for previous audit closed Critical NC):	Not applicable

Opportunity for Improvement	
OFI#	Description
OFI 1	<p>OFI Statement:</p> <p>The overall NBPOL's policies implementation is satisfactory. However the changeover of the Parent Company's policies and procedures could be further improved and accelerated.</p> <p>Verification / Follow-up actions:</p> <p>As per interview, the management still in progress to changeover of the Company's policies and procedures and this still pending due to changes of the management recently.</p>
OFI 2	<p>OFI Statement:</p> <p>The grievance registers/mechanism could be further improve to incorporate a centralized / standardized grievances monitoring to ensure all grievances are monitored and addressed effectively.</p> <p>Verification / Follow-up actions:</p> <p>Verification has been done where grievance mechanism still maintain in each operating units base on the Whistle Blowing. It also has been verified that all complaint/grievance has been responded effectively where the PIC for each operating units has been appointed. Any issues that can't be settle by the operating units will be forwarded to other department at main office</p>
OFI 3	<p>OFI Statement:</p>

	<p>The delivering of FFBs by third party contractors could be improved in the aspect of not overloading and drivers carries proper driving documents.</p> <p>Verification / Follow-up actions:</p> <p>Verification has been done through interview and sighted that there no overloading of FFB has been transport by sample FFB lorries. It also has been confirmed that all driver has been trained on safety of driving and carried related document for driving.</p>
OFI 4	<p>OFI Statement:</p> <p>It was noted that some of site-specific issues has yet to be included in the social management plan (SMP) for improvement. Issues such as expensive pricing at trade store and water shortage/rationing issues to be incorporated in the SMP and ensure that planned action, timeline of completion being met and monitored effectively.</p> <p>Verification / Follow-up actions:</p> <p>Updated of social management plan sighted for each operating units which include all issues related to each respected operating units. There is evidence timeline has been set and monitored by each operating units. Issues such as expensive pricing at trade store and water shortage/rationing issues has been incorporated in the SMP</p>
OFI 5	<p>OFI Statement:</p> <p>The grievance registers/mechanism could be further improve to incorporate a centralized / standardized grievances monitoring to ensure all grievances are monitored and addressed effectively.</p> <p>Verification / Follow-up actions:</p> <p>Verification has been done where grievance mechanism still maintain in each operating units base on the Whistle Blowing. It also has been verified that all complaint/grievance has been responded effectively where the PIC for each operating units has been appointed. Any issues that can't be settle by the operating units will be forwarded to other department at main office.</p>

3.3.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Critical / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
<i>No ref from Previous CB</i>	Minor	4.1.2 (P&C 2013)	11/08/2017	Closed 26/07/2018
<i>No ref from Previous CB</i>	Minor	5.1.3 (P&C 2013)	11/08/2017	Closed 26/07/2018
2092717-202107-N1	Minor	3.3.3	14/08/2021	Closed 18/07/2022
2092717-202107-N2	Minor	7.3.1	14/08/2021	Escalated to Major NCs
2232929-202207-M1	Major	6.2.4	04/08/2022	Closed 01/11/2022
2232929-202207-M2	Major	7.12.4	04/08/2022	Closed 01/11/2022
2232929-202207-M3	Major	7.3.1	04/08/2022	Closed 01/11/2022
2232929-202207-N1	Minor	7.3.2	04/08/2022	Open
2232929-202207-N2	Minor	1.2.1	04/08/2022	Open
2232929-202207-N3	Minor	3.3.2	04/08/2022	Open
2232929-202207-N14	Minor	2.2.2	04/08/2022	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 The Mosa Mill, Kumbango Mill, Waraston Mill, Kapiura Mill and Numundo Mill and Supply Base 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 stakeholder	PNG OPRA, Cheah See Siang	Face to Face
Gender committee	NBPOL Women Empowering Women, Ruth Jordan Som	Face to Face
Union	HOPGA – Hoskins Oil Palm Growers Association Augustine Kapi	Face to Face
School	Hoskins Secondary	Face to Face

Stakeholders comment	
SH 1	<p>Feedbacks: PNG OPRA, Cheah See Siang</p> <p>PNG OPRA is part of NBPOL that supplying seedlings to the estates under NBPOL West New Britain and also responsible to conduct leaves sampling and agronomist visit to each estate. There is no issues of communication and consultation. All GAP practices will be monitored and feedback responses will be given by the estates</p> <p>Audit Team verification and response: No further verification required</p>
SH 2	<p>Feedbacks: NBPOL Women Empowering Women, Ruth Jordan Som commented that social incident such as rape do happens within NBPOL. She commented that safety of women in the plantation is still a concern.</p> <p>Audit Team verification and response: No further verification required</p>
SH 3	<p>Feedbacks: Augustine Kapi (Hoskins Oil Palm Grower Association) commented that the company is doing fine and smallholder department is trying their best to address issues.</p> <p>Audit Team verification and response: No further verification required.</p>
SH 4	<p>Feedbacks: Hoskins Secondary</p>

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	There several kids that studies in the Hoskins Secondary school stays in NBPOL compound. There is no issues has been highlighted and they maintain good relationships with the estates.
	Audit Team verification and response: No further verification required.

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
N/A					
It is deemed that there is no previous land user / owner as the company has planted the second generation of oil palms. NBPOL-WNB has been in operations since 1960s.					

Previous land owner / user comment	
N/A	Feedbacks: N/A
	Audit Team verification and response:

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 NBPOL West New Britain – Mosa, Numundo, Kapiura, Kumbango, Waraston Oil Mills and supplhas 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 NBPOL West New Britain – Mosa, Numundo, Kapiura, Kumbango, Waraston Oil Mills and supplis remain certified.

Report prepared by	Acceptance of Assessment Conclusion
Name: Mohd Razaleigh bin Mohamad	Name: Zaralyn Yakopa
Company Name: BSI (Malaysia) Services Sdn Bhd	Company Name: New Britain Palm Oil Limited
Title: Client Manager	Title: Sustainability 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:	Date: 16/11/22



New Britain Palm Oil Limited

Name: Zaralyn Yakopa Signature: 

SUSTAINABILITY DEPARTMENT - WNB

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.</p> <p>- Critical (Major) compliance -</p>	<p>The list of documents that are made publicly available to relevant stakeholders includes Land titles/user rights; Occupational Health & Safety Plans; Details of complaints & grievances; Grievance procedure; pollution prevention & reduction plans; Waste management plan; Natural resource management plan; HCV documentation; negotiation procedures; Continual improvement plans; public summary of certification assessment report; human rights policy; NBPOL WNB Policy Booklet; and Policy on protection of HRD / Whistleblowers.</p> <p>Other than the listed documents, NBPOL has also published the Sustainability Policies and Positions; Sustainability Structure; Sustainability Reports; Certification and Indices; Stakeholder consultations; and NBPOL Foundation in NBPOL website (www.nbpol.com.pg).</p> <p>The list of documents were issued by NBPOL-WNB Sustainability Department and updated in April 2021.</p> <p>Additionally, the Sime Darby Plantation Group policies and whistleblower mechanism are published in the Sime Darby Plantation website.</p> <p>The management has sent an email correspondence on 26/04/2021 related to the 2021 Publicly Available Documents listing for the sites to displayed at the notice boards. Seen the list of Publicly Available</p>	Complied

		<p>Documents issued by Sustainability & Quality Management Department dated April 2021.</p> <p>All the documents listed could be made available at request and at the discretion of the General Manager. As for the smallholders, relevant documents were available at the Smallholders Department for the access of the smallholders.</p>	
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>The Publicly Available Documents list that could be assessed by relevant stakeholder are published in English and Tok Pisin. Both documents are reviewed in April 2021.</p> <p>The list is published in notices boards within the vicinity of the company and at OPIC's notice boards. These documents are also introduced to smallholders during field days.</p>	Complied
1.1.3	<p>(C) Records of requests for information and responses are maintained.</p> <p>- Critical (Major) compliance -</p>	<p>The management for each sample operating units only received request for assistance. There is no information request has been received for all operating units.</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 was established by NBPOL-WNB that has been signed by Mr Mohd Khairi Mahamor, General Manager for WNB dated 10/08/2021. Stated in the policy that NBPOL-WNB is committed to maintain open and transparent communication with all stakeholders including employees, local communities, smallholders and other affected or interested parties. The process of consultation and communication has been outlined in the "Grievances Flow Procedure" dated 22/08/2019 and while for smallholders, outline in "Grievance flowchart for smalholder grower" version #01 April 2019. As stated in the in SOPs all grievances and request need to be responded within 10 days of receiving in an amicable manner with records kept.</p> <p><u>Smallholders</u></p>	Complied

		<p>Plan for SOP and policy communication established for year 2022, during the field day for all smallholders and has been postpone to August 2022 due to election and documented in the document "Hoskin Project, 2022- Field day project". Latest communication has been done in year 2021 and sample 2 field day which are on 03/07/2021 and 13/07/2021 done by Ms Evelyn Tuora and Mr Derrick Tand.</p> <p><u>Communication of the SOPs</u></p> <p>Communication of the SOPs to the stakeholders has been done during the stakeholder engagement workshop in 2022 on 30/06/2022 with 73 participated.</p> <ol style="list-style-type: none"> 1. Mosa POM, communication of the SOPs has been done base on shift and there is evidence base on the training records on 22/07/2022 2. Kapiura POM, communication done on 18/06/2022 to all the workers for shift A 3. Togulo Estate, communication of the SOPs has been done base on shift and there is evidence base on the training records on 04/07/2022 and 05/07/2022 	
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>The current list of stakeholders was updated in June 2021. The stakeholders list includes local government / authorities; NGOs operating in PNG; local communities; business partners; schools and smallholders supplying to NBPOL.</p>	Complied
<p>Criterion 1.2: The unit of certification commits to ethical conduct in all business operations and transactions.</p>			
1.2.1	<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.</p>	<p>The overall commitment of Sime Darby Plantation (SDP) towards ethical conduct is published in the Group Sustainability & Quality Policy Statement undersigned by Mr Mohamad Helmy Othman Basha the Group Managing Director dated 02/12/2019. The statement provided that Sime Darby Group is committed to promote good governance and</p>	Non-compliance

	<p>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>transparency abiding the Groups Policies & Authorities and Code of Business Conduct.</p> <p>The Code of Business Conduct is a guidance for Sime Darby Group to uphold the core values of Integrity, Respect & Responsibility, Enterprise and Excellence to compass in steering towards doing business fairly, honestly and ethically. The COBC is applicable to all mill, estates and the Smallholder Department.</p> <p>The smallholders are made known to the Code of Business Conduct through the continuous Field days conducted for the smallholders.</p> <p>The implementation of the business ethic of the company was further verified during stakeholder consultation and smallholders audits. It is confirmed that the company policies are explained during stakeholder workshops and field days.</p> <p>Workers are being briefed on the company policies and procedures on periodic basis.</p> <p>The company has also extended these policies implementation to contractors and the implementation is documented in Service Management Guidelines – Contractor Engagement Practices (NBPOL-EMP-MG-22 rev 2 dated August 2018.</p> <p>Minor Non conformities</p> <p>As per interview with the smallholder it found out that deduction made for fertilizer request is not as per stated in the consent form signed by smallholder and smallholder department (SHA). Details as per below:</p> <ul style="list-style-type: none"> • Consent letter dated 15/12/2021, signed by OPIC 17/12/2021, signed by SHA, 17/01/2022 stated fertilizer price PGK111.10/bag, PGK611.05/5 bags • Quotation form reference#002-0446, total PGK175.50/bag, PGK965.25/5 bags 	
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		<ul style="list-style-type: none"> • Deduction made: As per quotation (PGK965.25/5 bags) 	
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>The implementation and monitoring of compliance of the ethical business practices includes:</p> <ol style="list-style-type: none"> 1. Internal audits by the sustainability team ensuring the mills and estates maintain the contractors’ contracts and contractor induction records. Internal audit procedure has been established and verified. <p>Internal Audits are conducted quarterly in the operating centres to monitor the compliance to legal requirement. Internal Audit reports were available for verification as below:</p> <ol style="list-style-type: none"> a. Mosa Oil Mill and Laboratory: 08/06/2022 b. Kumbango Oil Mill: 07/07/2022 c. Kapiura Oil Mill: 14/06/2022 d. Numundo Oil Mill: 12/07/2022 e. Dami Waisis Plantation: 08/06/2022 f. Togulo Plantation: 21/06/2022 <ol style="list-style-type: none"> 2. Periodic workers’ training and briefing on policies and procedures. Samples of training records were available during the audit for the auditors to verify. 3. Implementation of training plans demonstrating commitment to provide continuous awareness to workers – sample include Kaipura Oil Mill 2022 training plan, Kumbango Oil Mill 2022 training plan. <p>Establishment of Governance & Audit Committee (under Sime Darby Plantation corporate governance) with primary objective ensuring an effective ethics program is implemented across the Group. The implementation of ethical business conducts are also scrutinized by financial auditors.</p>	Complied

Principle 2: Operate legally and respect rights			
Criterion 2.1: There is compliance with all applicable local, national and ratified international laws and regulations.			
2.1.1	<p>(C) The Unit of Certification complies with legal requirements</p> <p>Smallholder Requirement:</p> <p>Smallholders are to comply with all applicable PNG or Solomon Islands legal requirements. Organization that is managing the smallholders requires to monitor compliance during extension activities. Block inspection reports to provide evidence of compliance.</p> <p>- Critical (Major) compliance -</p>	<p>NBPOL-WNB had maintained the Legal and Subscribed Register updated on 03/06/2021. The evaluation of the legal requirement applicable to the operations were conducted by Teup Goledu who is the company secretary. The Legal and Subscribed Register was prepared against the conditions within the PNG laws and regulation including the PNG Environmental Act 2000, PNG Environment (Water) Regulation 2002, Environmental Health Act, PNG Industrial Safety, Health and Welfare Act, Child Welfare Act 1961, Conservation Area Act 1978, Education Act 1983, Employment Regulation 1980, Forestry Act 1991, Industrial Relations Act 1962, Land Act 1996, Lands Dispute Settlement Act 1996, Land Groups Incorporation Act 2009, Land Registration Act 2009, Oil Palm Industry Corporation Act 1992, Superannuation Act 2000 and Workers’ Compensation Act.</p> <p>The Legal and Subscribed Register has also included the evaluation of the company’s legal compliance against the RSPO P&C – PNG & SI National Interpretation indicators. There were no new updates on PNG legislative and this has been confirmed with the technical expert and the management of NBPOL itself.</p> <p>Other than obtaining appropriate licenses, the company has also submitted the Annual Environment Performance Report dated July 2022 as per the requirement under the Environmental Permits issued by the Conservation and Environment Protection Authority; and submitted the OSH Integrity Inspection Report 2022 to the Department of Labour & Industrial Relations (Occupational Safety & Health).</p> <p>Smallholder</p> <p>The smallholder have implementation of legal and other requirement, verification on implementation on their land title as per below:-</p>	Complied

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ID	Portion allotment	Area	Remark
Marsh Judah Pinas	976	6.08 ha	Agricultural lease under section 56 – period 99 year (start 3/1971)
Junias Tobek namete	26	6.39 ha	Agricultural lease under section 56 – period 99 year (start 5/1971)
Pusiki Estate: Joseph Charles Metta	2137C	153.30 ha	Special Agricultural and Business – 99 years- Lease 04/2009
Francis Togonalit Toikalom	456	7.76 ha	Agricultural lease under section 56 – period 99 year (start 11/1971)
Solistika Vino	762	8.8 ha	Agricultural lease under section 56 – period 99 year (start 02/1984)
Veronica Duke	1042	7.51 ha	Still in progress at Department of Land since march 2020 from Duke James of Sigima Village. Agricultural

					lease under section 56 – period 99 year (start 02/1984) Customary land under Clan land Used agreement Customary land under Clan land Used agreement Customary land under Clan land Used agreement Customary land under Clan land Used agreement	
2.1.2	<p>The milling Company has a documented system for ensuring legal compliance in place. This system has a means to track changes to the law and also includes listing and evidence of legal due diligence of all contracted third parties, recruitment agencies, service providers and labour contractors.</p> <p>Smallholder Requirement: Organization that is managing the smallholders shall disseminate information on legal changes to smallholders. - Minor compliance -</p>	<p>WNB has established a mechanism for implementation of Legal Requirements which will be verified during the internal audit. Internal audit procedure has been established and verified.</p> <p>Internal Audits are conducted quarterly in the operating centres to monitor the compliance to legal requirement. Internal Audit reports were available for verification as below:</p> <ol style="list-style-type: none"> 1. Mosa Oil Mill and Laboratory: 08/06/2022 2. Kumbango Oil Mill: 07/07/2022 3. Kapiura Oil Mill: 14/06/2022 4. Numundo Oil Mill: 12/07/2022 5. Dami Waisis Plantation: 08/06/2022 6. Togulo Plantation: 21/06/2022 				Complied

		<p>7. Haella Plantation: 05/07/2022 8. Daliavu Plantation: 23/03/2022 9. Numundo Estate: 16/06/2022</p> <p>The certificate of Inspection of Boiler Pressure Vessel was available in Mosa POM ;-</p> <p>Under no. 10599 registered PU1789 already been inspect dated May 2021 and valid until 12/10/2022</p> <p>For Boiler, under no 10604 registered under B1770 was valid until 12/10/2022</p> <p>For horizontal air receiver (mobile) under registered no PV3046 was valid until 12/10/2022</p> <p>Boiler attendants license class 1338 was available under name Jackson Sual valid until 22/2/2022</p> <p>Licence to keep a store where inflammable liquids and/or dangerous goods may be kept was available no 21106 valid until 30/9/2022. This regarding to license for Diesel storage 55,000L, chemical storage and LPG industrial Gas.</p> <p>The license for weighbridge was available referred certificate no: ICCC 1935 dated 30/7/2021 and next inspection will done on 30/7/2022.</p> <p>Kumbango POM</p> <p>For vertical steriliser under registered no PV2611 was valid until 12/10/2022 (Certificate no: 14835)</p> <p>For VH BiDrum WTB was valid until 12/10/2022 (Certificate no: 14858)</p> <p>As per Trade Measurement Act, The Kumbango POM have conducted the calibration of the weighbridge dated 20/7/2021 as per certificate ICCC 1933 and valid until 20/7/2022.</p>	
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		<p>Licence to keep a store where inflammable liquids and/or dangerous goods may be kept was available no 21118 valid until 30/9/2022. This regarding to license for Diesel storage 55,000L and 20000L, chemical storage and LPG industrial Gas and also chemical storage.</p> <p>Kapiura POM For Mechmar Bi drum WTB was valid until 12/10/2022 (Certificate no: 10731) For Mechmar Bi Drum WTB was valid until 12/10/2022 (Certificate no: 14906)</p> <p>As per Trade Measurement Act, The Mill have conducted the calibration of the weighbridge dated 30/7/2021 as per certificate ICCC 1936 and valid until 30/7/2022. This calibration done by Independent Consumer Competition Commision.</p> <p>License to keep a store where inflammable liquids and Dangerous goods may be kept (No. 21122) valid until 30/9/2022 for electrical pump and chemical storage.</p> <p>License to keep a store where inflammable liquids and Dangerous goods may be kept (No. 21121) valid until 30/9/2022 for Diesel storage Tank 55,000L and industrial Gas/LPG.</p> <p>Dami/Wasisi Estate License to keep a store where inflammable liquids and Dangerous goods may be kept (No. 10590) valid until 30/9/2022 for Diesel storage Tank 20,000L and Lubricant Bay License to keep a store where inflammable liquids and Dangerous goods may be kept (No. 10589) valid until 30/9/2022 for chemical storage.</p>	
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		<p>Togulo Estate License to keep a store where inflammable liquids and Dangerous goods may be kept (No. 10586) valid until 30/9/2022 for chemical storage and Diesel storage 10,000L.</p> <p>Nomundo Mill As per Trade Measurement Act, The Mill have conducted the calibration of the weighbridge dated 30/7/2021 as per certificate ICCC 1934 and valid until 30/7/2022. This calibration done by Independent Consumer Competition Commission. The letter from Brian Bell Technician and ICCC Inspector inform will be conducted the calibration from 11/8/2022 until 15/8/2022.</p> <p>License to keep a store where inflammable liquids and Dangerous goods may be kept (No. 21115) valid until 30/9/2022 for Diesel storage Tank 55,000L, Chemical shed and LPG industrial Gas.</p> <p>The license for Mill maintenance workshop (NO. 9859) available and valid until 31/12/2022.</p> <p>The license for Numundo Processing Plant (No. 9856) was valid until 31/12/2022.</p> <p>The License for Boiler (No. 10642) , type VH Bi Drum WT Boiler valid until 12/10/2022.</p> <p>Haella Estate License to keep a store where inflammable liquids and Dangerous goods may be kept (No. 10581) valid until 30/9/2022 for Diesel storage Tank 27,000L, Chemical shed and LPG industrial Gas.</p>	
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		<p>Daliavu Estate</p> <p>License to keep a store where inflammable liquids and Dangerous goods may be kept (No. 10576) valid until 30/9/2022 for Diesel storage Tank 20,000L, Chemical shed and Lube Bay.</p> <p>Certificate of roadworthiness under no 0096666 valid from 23/5/2022 until 23/11/2022. This covered for Reg no. KAF 155.</p> <p>Certificate of roadworthiness under no 0096662 valid from 23/5/2022 until 23/11/2022. This covered for Reg no. QAH 192.</p> <p>Waraston Mill</p> <p>License to keep a store where inflammable liquids and Dangerous goods may be kept (No. 21117) valid until 30/9/2022 for Diesel storage Tank 24,000L, Chemical shed.</p> <p>The license for Waraton Processing Plant (No. 9863) was valid until 31/12/2022.</p> <p>As per Trade Measurement Act, The Mill have conducted the calibration of the weighbridge dated 30/7/2021 as per certificate ICCC 1937 and valid until 30/7/2022. This calibration done by Independent Consumer Competition Commission. The letter from Brian Bell Technician and ICCC Inspector inform will be conducted the calibration from 11/8/2022 until 14/8/2022.</p> <p>Smallholder</p> <p>The information on legal compliance and changes on legal requirement are updated to the smallholder on a regular basis during the field days conducted. The compliance towards legal and other requirement was been monitored during filed visit. There are no new regulation updated for past 2 years as per interview verification and document review.</p>	
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<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 agreed by all neighbouring parties that share common boundaries.</p> <p>Guidance: Significant disputes are those disputes currently before the Courts.</p> <p>Smallholders requirement:</p> <p>Smallholders, evidence of the “Right to use the land” will be demonstrated by compliance with the following:</p> <p>a) Land title or lease OR uncontested occupancy where</p> <ul style="list-style-type: none"> • Boundaries have been defined by a registered surveyor and portion numbers allocated by the Surveyor General or boundaries have been defined by traditional means and agreed between neighbours with common boundaries and other interested parties; • There is no significant dispute over tenure; • Smallholder allotments, boundaries may be identified by traditional means provided that boundary locations are agreed by all neighbouring parties that share common boundaries. <p>- Minor compliance -</p>	<p>The land matters of the company is managed by NBPOL-WNB Lands & Mini Estate Departments. The company is operating on state lease lands and sub-lease lands. The lease documents includes – maps; lease agreements (for both with state and customary land owner); FPIC documentation (for sub-lease from customary land owners) and land titles.</p> <p>Sample of lease agreement verified during this audit:</p> <ol style="list-style-type: none"> 1. State Lease agreement for Nomundo estate with total 1372 ha that commencing on 28/9/1938 under agriculture lease. 2. The agreement for Daliavu estate with Kedopoho Land Group Inc. was available in land department with total 2740 ha that commencing on 15/2/2000 until 14/11/2039. The other land title was agreement between NBPOL and Honde Laulimi Land Group Inc. with total 1550 ha and the lease was from 15/2/2000 until 14/11/2039 3. State Lease agreement for Dami with total 0.353 ha that commencing on 5/9/1968 to NBPOL and other one was on 15/2/1972 for 64 ha. 4. State Lease agreement for Haella estate with total 1372 ha that commencing on 16/1/1942 under agriculture lease. 5. State Lease agreement for Togulo estate with total 2050 ha that commencing on 5/11/1981 under agriculture lease. <p>The sub-lease agreements details the rent to be paid to the Incorporated Land Groups (ILGs). This include basic land rent and royalty. The time of payment and manner of payment are details in the agreement.</p> <p>During site visit, the demarcation of the lands are done using traditional method by referencing to a stone or an object. So far there</p>	<p>Complied</p>
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are no major disputes while NBPOL-WNB had maintain copy of land titles that has coordinates on it and maintained GIS maps information.

Smallholders

NBPOL maintained the same procedure which is land title need to be provided by the land owner or next of kin where the owner has passed away. For those smallholders without land title, they need to get approval for Customary Land Use Agreement (CLUA). As per site visit for sample smallholders, clear demarcation has been made by the smallholders itself to identify their such as tree planting, rocks, shelter and others. Based on interview with neighboring smallholders, boundaries has been agreed by all people under the same clan.

There is no disputes has been reported where the only disputes is between the family members itself. It has been confirmed by the head of clan and smallholders itself.

Sample of smallholder that has been audited

Name	Location
Maraia Rere	Kaus
Francis Rere	Kaus
Benson Tolon	Tamba
Varavara Andy	Tamba
Paul Misiel	Mosepa
Urusula Mago	Mamota

Other than the individual smallholders, there any community planting and Independent Estates (or sometimes refer as out-growers). Community plantings are groups of families within a clan who gather

		all the clan land and plant oil palm. Each family owns a plot of land divided under the clan agreement. Hence, the community planting are usually treated as per the individual smallholders. However, land usage agreement has been established between the clan and the project custodian.	
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>On each mill and estate maintained the list for supplier contract. As sampling on the contract Rego No: 20-001 between New Britain Palm Oil Limited and Missi Construction for Labour hire for roofing, gutter and Down pipe replacement. This agreement dated 5/2/2020. And the latest contract was regarding to Truck hire contract agreement (Contract no: 2022-01) between New Britain Palm Oil Limited and Songkeg Transport Services LTD dated 30/12/2021.</p> <p>In the KOM, sampling on contractor NBS Building Construction LTD. The agreement was sign on 9/2/2022 between Kumbango Oil Mill and NBS Building Construction LTD. The induction for contractor conducted on 23/6/2022 for WTP construction.</p> <p>In the KAPOM, there is only 1 contractor for transport the boiler ash and excess Fibre from NBPOL Kapiura Oil Mill to the disposal area. The agreement was between New Britain Palm Oil Limited and Vincent Yawi Mini Estate dated 6/6/2022 valid until 7/6/2023.</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>The contract sample as per indicator 2.2.1 have been reviewed and it was complied with clause under compliance with Laws and guidelines within the contract term and conditions. During the engagement with the smallholder and independent estate growers are contracted using the smallholder declaration form mechanism whereby the smallholders have agreed to follow the rules and requirement stated within the RSPO. The engagement of smallholders and independent estates growers are contracted using the Smallholder Declaration form</p>	Non-compliance

		<p>mechanism whereby the smallholders had agree to follow the rules and requirements stated within the RSPO.</p> <p><i>It has to be noted that, the independent estates growers could be community land planting. Community planting is where a tribe uses the clan land to plant oil palm. Within the community planting land, there are plots of land that are subdivided depending on the number for families within the tribe/clan. As such community planting is considerable individual smallholders because the payment of the FFB goes direct to the person holding the Papa/Mama Card (a card system introduced by NBPOL for making payments).</i></p> <p>The delivering of FFBs by third party contractors could be improved in the aspect of not overloading and drivers carries proper driving documents.</p> <p><u>Minor Non conformities</u></p> <p>Sample of 5 workers of has been taken from independent estate, Ngatia Estate and found out that the workers has not been paid as per Papua New Guinea Minimum Wages (PGK3.50/hour)</p> <p>Details as per below</p> <p>Workers A</p> <p>Employment contract: PGK150, 76hours@ PGK1.97/hour, Paid: PGK140, 76hours@ PGK1.84/hour Minimum wages: PGK266, 76 hours@ PGK3.50/hour</p> <p>Worker B</p> <p>Employment contract: PGK150, 76hours@ PGK1.97/hour, Paid: PGK120, 76hours@ PGK1.58/hour Minimum wages: PGK266, 76 hours@ PGK3.50/hour</p>	
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<p>2.2.3</p>	<p>All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour. Where young workers are employed, the contracts include a clause for their protection.</p> <p>Guidance: Companies may have standard conditions of supply for Smallholders which include this requirement.</p> <p>- Minor compliance -</p>	<p>There are several mechanism NBPOL-WNB has implemented the contractual terms of disallowing child, forced and trafficked labour.</p> <p>As per 2.2.1 the samples of contracts were reviewed. Within the contracts, the terms of either the contractor is required to follow the company policies and procedure or explicitly stated in the contract that "under no circumstances to employ persons below the age of 18, forced or trafficked labour".</p> <p>Additional to the terms within the contract, the contractors were being inducted on the Contractor's Social & Environmental Responsibilities. The induction is part of the contractual required procedure. In the induction format, the contractor shall review and accept the clauses of induction form before commence of any work. Within the form, it is stated that No Child, forced or trafficked labour.</p> <p>During induction the management already highlight their policy to the contractor regarding to disallowing child, forced and trafficked labour. The induction conducted before the work was conduct dated on 23/6/2022. Under the contract, the contractor will be given the induction training as per sampling in KAPOM the contractor already attends the induction on 10/6/2022. They also establish the Standard Operating Procedure (Minimum Age Specification) and Human Right Policy approval from Harry Brock (General manager WNB dated 19/6/2014).</p>	<p>Complied</p>
<p>Criterion 2.3: All FFB supplies from outside the unit of certification are from legal sources.</p>			
<p>2.3.1</p>	<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.</p>	<p>NBPOL only process FFB produced by its own estate mini estates and smallholders that are registered under RSPO certification. Total 21 own estates has been registered and list of smallholder has been maintained by smallholders affairs department. Proof of ownerships for smallholders has been verified base on clan land use Agreement or state lease (Land Settlement Scheme (LSS)). Copies of the document</p>	<p>Complied</p>

	<p>Milling Companies in PNG and the Solomon Islands may only source fruit from their own plantations and directly from Independent Smallholders in geographic proximity that are participants in the Unit of Certification of the applicable smallholder group.</p> <p>- Critical (Major) compliance -</p>	<p>has been maintained by the smallholders department and available for verification.</p> <p>Sample of smallholder that has been audited</p> <table border="1" data-bbox="1104 475 1926 821"> <thead> <tr> <th data-bbox="1104 475 1514 523">Name</th> <th data-bbox="1514 475 1926 523">Location</th> </tr> </thead> <tbody> <tr> <td data-bbox="1104 523 1514 576">Maraia Rere</td> <td data-bbox="1514 523 1926 576">Kaus</td> </tr> <tr> <td data-bbox="1104 576 1514 628">Francis Rere</td> <td data-bbox="1514 576 1926 628">Kaus</td> </tr> <tr> <td data-bbox="1104 628 1514 681">Benson Tolon</td> <td data-bbox="1514 628 1926 681">Tamba</td> </tr> <tr> <td data-bbox="1104 681 1514 734">Varavara Andy</td> <td data-bbox="1514 681 1926 734">Tamba</td> </tr> <tr> <td data-bbox="1104 734 1514 786">Paul Misiel</td> <td data-bbox="1514 734 1926 786">Mosepa</td> </tr> <tr> <td data-bbox="1104 786 1514 821">Urusula Mago</td> <td data-bbox="1514 786 1926 821">Mamota</td> </tr> </tbody> </table>	Name	Location	Maraia Rere	Kaus	Francis Rere	Kaus	Benson Tolon	Tamba	Varavara Andy	Tamba	Paul Misiel	Mosepa	Urusula Mago	Mamota	
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2.3.2	<p>No fruit is to be indirectly sourced through third party traders.</p>	<p>During interview with smallholder and transportation management, it was confirmed that the FFBs are collected by NBPOL-WNB directly. There are no third party trader in here. From documentation record of FFB incoming and others record showed that no FFB that are sourced through third party traders.</p>	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.</p> <p>- Critical (Major) compliance -</p>	<p>NBPOL WNB has established a Business Management Plan from 2022 to 2025 and reviewed periodically on the progress and annually at the budget preparation time. Among the information available in the Business Management Plan are:</p> <ul style="list-style-type: none"> a) Plantation Mature (HA) b) Plantation FFB (MT) c) OCP FFB (MT) 	Complied														

		<p>d) Total FFB (MT) e) CPO Production (MT) f) PK Production (MT) g) OER (%) h) KER (%)</p> <p>The annual budget has the information about the financial expenditure allocated to all the estates and mill operations. The Acting General Manager is in charge for any expansion, new techniques and improvement of practices.</p>																																					
<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>NBPOL WNB has established its replanting program with a projection of 9 years (until 2030) for all its supplying estates. The programme is annually reviewed during annual management review. The details of replanting programme for all the estates were documented in the company's Excel spreadsheet entitled "WNB Long Range Replant Programme (LRRP)". Replanting Programme for the sampled estates were as below:</p> <table border="1" data-bbox="1104 946 1890 1310"> <thead> <tr> <th>Estate</th> <th>2023</th> <th>2024</th> <th>2025</th> <th>2026</th> <th>2027</th> </tr> </thead> <tbody> <tr> <td>Dami Wasisi Estate</td> <td>-</td> <td>242.50</td> <td>82.80</td> <td>82.80</td> <td>-</td> </tr> <tr> <td>Togulo Estate</td> <td>-</td> <td>-</td> <td>-</td> <td>560.20</td> <td>92.90</td> </tr> <tr> <td>Haella Estate</td> <td>434.40</td> <td>-</td> <td>287.00</td> <td>216.20</td> <td>237.80</td> </tr> <tr> <td>Daliavu Estate</td> <td>238.40</td> <td>1225.6</td> <td>-</td> <td>-</td> <td>-</td> </tr> <tr> <td>Numundo Estate</td> <td>115.53</td> <td>201.10</td> <td>223.40</td> <td>205.10</td> <td>218.20</td> </tr> </tbody> </table> <p>Smallholder Requirements</p>	Estate	2023	2024	2025	2026	2027	Dami Wasisi Estate	-	242.50	82.80	82.80	-	Togulo Estate	-	-	-	560.20	92.90	Haella Estate	434.40	-	287.00	216.20	237.80	Daliavu Estate	238.40	1225.6	-	-	-	Numundo Estate	115.53	201.10	223.40	205.10	218.20	<p>Complied</p>
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		<p>The smallholder replanting program are documented in the NBPOL WNB Smallholder 5 Years Replanting Program. The management of replanting programs is by the NBPOL WNB Smallholder Affairs Office. However, the replanting decision falls on the smallholder themselves. Records were available as below:</p> <p><u>Smallholders 5 Years Proposed Replanting Program</u></p> <table border="1" data-bbox="1104 580 1890 678"> <thead> <tr> <th>2023</th> <th>2024</th> <th>2025</th> <th>2026</th> <th>2027</th> </tr> </thead> <tbody> <tr> <td>1,285</td> <td>1,186</td> <td>1,177</td> <td>1,161</td> <td>1,310</td> </tr> </tbody> </table>	2023	2024	2025	2026	2027	1,285	1,186	1,177	1,161	1,310	
2023	2024	2025	2026	2027									
1,285	1,186	1,177	1,161	1,310									
3.1.3	<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>NBPOL WNB has held the Management Review meeting on 14/12/2022 for RSPO P&C and RSPO SCCS. The management representative from Sustainability and Quality Department and Environment Officers were among those present for the meetings. Based on the minutes of meeting, among the agenda discussed are as follows:</p> <ol style="list-style-type: none"> 1. General 2. Results of internal audit 3. Compliance with legal requirements 4. Environmental incidents and communication(s) from external interested parties, including complaints 5. Environmental performance of NBPOL 6. Domestic water quality 7. Mosa central laboratory 8. Follow-up actions from previous management review 9. Changing circumstances, including developments in legal and other requirements related to its environmental aspects 10. Recommendation for improvement/resource needs 11. Decisions and actions related to possible changes to environmental policy, objectives, targets and other elements of the EMS 	Complied										

		12. Resources needs Any other business (AOB)	
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.			
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>There is no new update for continuous improvement plan where the management still maintained and implemented a continuous improvement, documented in the NBPOL WNB Continuous Improvement Plan 2014 – 2025. The latest review for the CIP was done in July 2022 that covers the following topics;</p> <ol style="list-style-type: none"> 1. Pesticides. 2. Environment 3. Waste Reduction 4. Pollution, Emission and Non-renewable energy 5. Social Impacts 6. Occupational Safety & Health 7. General (Forward Planning & Other Issues) <p>Each of the topic includes improvement action, reference to the RSPO P&C indicators, expected outcome, timeframe, responsibility and status of progress.</p> <p>The estates visited has established riparian buffer zone for rivers and creek that flow through the estate and along the estate boundaries. Sighted the river buffer zone as below:</p> <ol style="list-style-type: none"> 1. Riparian buffer zone for HCV Hot Water Creeks flows within the Haella Estate. <p>The vegetation along the buffer zone was let to grow naturally and was well established. The estates have erected signboard prohibited</p>	Complied

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		<p>activity such as cutting down trees, open burning and building shelters in the areas. No evidence of chemical application sighted at the buffer zone area.</p> <p>The estates monitored the usage of fuel on monthly basis. Reviewed the diesel consumption FY 2021 as follows:</p> <table border="1" data-bbox="1115 539 1863 837"> <thead> <tr> <th>Estates</th> <th>Diesel consumption (L)</th> </tr> </thead> <tbody> <tr> <td>WNB - Dami-Wasisi Plantation</td> <td>457,800</td> </tr> <tr> <td>WNB – Togulo Plantation</td> <td>100,487</td> </tr> <tr> <td>WNB – Haella Plantation</td> <td>368,000</td> </tr> <tr> <td>WNB – Daliavu Plantation</td> <td>520,500</td> </tr> <tr> <td>WNB – Numundo Plantation</td> <td>505,800</td> </tr> </tbody> </table> <p>The estates continuously conduct briefing and training to enhance employee awareness to switch of lights, air conditioners when not in use to reduce the use of diesel in compounds and offices.</p>	Estates	Diesel consumption (L)	WNB - Dami-Wasisi Plantation	457,800	WNB – Togulo Plantation	100,487	WNB – Haella Plantation	368,000	WNB – Daliavu Plantation	520,500	WNB – Numundo Plantation	505,800	
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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>RSPO metric template version 2.1 is used for the reporting of NBPOL WNB Certification Unit’s metrics (economic, social and environment). Data reporting period is January to December 2021 for (social and environment metrics) and economic metrics from Jun 2021 – May 2022 (counting back from audit month). Based on verification with input data, no discrepancies of data reported for the said period for all metrics.</p>	Complied												
<p>Criterion 3.3: Operating procedures are Appropriately documented, consistently implemented and monitored.</p>															
3.3.1	<p>(C) Standard Operating Procedures (SOPs) for the unit of certification are in place.</p> <p>Smallholder requirements:</p>	<p>NBPOL WNB has established Standard Operating Procedure as guidance for the palm oil mill daily operations. The SOP was documented in Standard Operating Procedures Listing Summary - 2022. The SOP was categorized as follows:</p>	Complied												

	<p>Organization that is managing the smallholders provides relevant SOP of smallholding operations to smallholders.</p> <p>- Critical (Major) compliance -</p>	<ul style="list-style-type: none"> • Milling – General (covering all the mills) • Engineering – General • Milling – Workshops • Transport • Heavy Equipment Workshop • Clinic • Plantations – General • Agronomy • Tractors • Sustainability • Smallholder Affairs • Management Guidelines • Environment Management Plans • Lands & Mini Estate Department <p>Latest additional to the SOP was for SOP COVID - 19 Prep. Refer SOP no. Sust-06, issue no. 1 dated 08/03/2021.</p> <p>Safety and Health procedure has been established in Operational Safety Management Plan for Planation and Production Department. The SOP was categorized as follows:</p> <ul style="list-style-type: none"> • Section 1: Occupational Health and Safety Policy • Section 2: OH&S Committee Member Procedure • Section 3: OHS Responsibility and Communication • Section 4: Risk Assessments • Section 5: Accident and Emergency Response • Section 6: Lost Time Injury Reporting and Recording • Section 7. Initial Reporting Requirements for Incidents (INR) 	
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		<ul style="list-style-type: none"> • Section 8: Fatality and Permanent Disability Reporting and Recording • Section 9: Major Incident Flow Chart • Section 10: Workers Compensation Claims • Section 11: Health and Safety Procedures - Plantations / Production • Section 12: Health and Safety Procedures- General <p>Among the estate’s SOPs reviewed and verified are:</p> <ul style="list-style-type: none"> • MG 01A – New Development, Issue 6; dated 01/05/2016 • MG 01B – Replant, Issue 6; 01/05/2016 • MG 02 – Nursery, Issue 6; 01/05/2016 • MG 03 – Pesticides, Issue 8; 20/04/2017 • MG 04 – Upkeep, Issue 7; 23/10/2018 • MG 05 – Harvesting, Issue 8; 24/10/2018 • Agro 001 – Leaf Sampling & Processing, Issue 1, 01/01/2008 • Agro 002 – Soil Sampling in NBPOL Plantation, Issue 1, 01/01/2013 • Agro 003 – Leaf Sampling & Processing Flow Chart, Issue 1, 25/08/2011 • Agro 004 – Fertiliser Sampling, Issue 9, 11/07/2015 <p>Nevertheless, the usage of E-SHEQ001 Incident Form, ver. 2, rev. 05/2014 could be further improved to detail out the types of incidents that should be reported under the environmental incidents. Hence an OFI was raised.</p> <p>Smallholders</p> <p>Standard Operating Procedures were available by NBPOL-WNB and OPIC (Oil Palm Industry Corporation). The Smallholder Department</p>	
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		<p>have provided SOPs for better managing of the smallholder’s plots. Among the Smallholders available and verified during the assessment were as below.</p> <p>Standard Operating Procedures – Smallholders List</p> <ul style="list-style-type: none"> – Auditing – Change of Name – Tractor Work – Tall Palm Harvesting near Power Lines – Covid-19 Lockdown – Geographic Information System Management (GIS) – Planting – Fertilizer Delivery – Grievance Procedures – Contract Awards – Chemical Handling – Traffic Control in Mill Area – Discrepancy & Grievance – Transport Operations. – Using Dimehypo <p><u>OFI</u></p> <p>The usage of E-SHEQ001 Incident Form, ver. 2, rev. 05/2014 could be further improved to detail out the types of incidents that should be reported under the environmental incidents.</p>	
3.3.2	<p>A mechanism to check consistent implementation of procedures is in place.</p> <p>Smallholder requirements:</p>	<p>NBPOL WNB has established mechanism to monitor the implementation of their procedure and RSPO requirements by</p>	<p>Non-compliance</p>

	<p>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>Performance Monitoring Procedure, Procedure for Contractor Monitoring, Internal Audits and Workplace Inspections among others. Regular Checklists and Inspection Reports are used on a daily basis to ensure compliance towards the procedures. Among the checklist that was verified are as below.</p> <ol style="list-style-type: none"> 1. Welding Machine Inspection Report. 2. Fire Hydrant Inspection Checklist 3. Fire Extinguisher Inspection Checklist 4. First Aid Box Inspection 5. PIIRO Report Register 6. Ladder Inspection Checklist 7. Safety Shower Inspection Checklist <p>Internal Audits are conducted quarterly in the operating centres to monitor the compliance towards procedures and RSPO requirements. Internal Audit reports were available for verification as below:</p> <ol style="list-style-type: none"> 1. Mosa Oil Mill and Laboratory: 08/06/2022 2. Kumbango Oil Mill: 07/07/2022 3. Kapiura Oil Mill: 14/06/2022 4. Numundo Oil Mill: 12/07/2022 5. Dami Waisis Plantation: 08/06/2022 6. Togulo Plantation: 21/06/2022 7. Haella Plantation: 05/07/2022 8. Daliavu Plantation: 23/03/2022 9. Numundo Estate: 16/06/2022 <p>Smallholders</p>	
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		<p>NBPOL Smallholder Departments maintain all FFB received from the smallholders in their database. The FFB production records were available for verification. Sighted the document Smallholders – FFB Statistics as Per Weighbridge Tonnes (Jan 22 to 22)</p> <p>Field Days are conducted regularly by NBPOL Smallholder Departments together with OPIC personals at the smallholder’s plots. The Field Days are conducted as platform to provide trainings, monitor legal compliance, and inspect field conditions and compliance to the RSPO requirements. Trainings that are provided for the smallholders include BMPs, HCVs management, RTE Species, Chemical and Fertiliser Applications, Buffer Zones, etc. Records of Field Day Inspections were available for dates 14/09/2021 (Akami mini Estate), 13/07/2021 (Galewale VOP), 06/07/2022 (Matavulu VOP), 29/06/2022 (29/06/2021) and 29/06/2022 (Kulungi VOP). The Field Day has been halted due to Covid-19 restrictions and the ongoing elections in the country. Nevertheless, the Field Days are planned to be commenced on 09/08/2022.</p> <p>Minor nonconformities</p> <ol style="list-style-type: none"> 1. Standard Operating Procedures- Discrepancy and grievances dated 21/05/2022 stated that “The driver, operator and crew must ensure that the grower is the rightful owner to the block by checking his block E-tag and grower I.D card” and “The driver, operator, crew and the block owner are not allowed to accept E-tags for crop shifting at any other block locations” However, it is found out that crop shifting has been practices for smallholder base on crop production records where some of the smallholder did not have FFB records and some of the smallholder has illogical FFB production (more than 50mt) It has been further confirmed during the interview with smallholder that there is some smallholder that using other 	
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		<p>smallholder E-tag due to few reasons (still did not register for E-tag, E-tag damage, family issues).</p> <p>2. Internal procedure title "Services management guidelines, compound upkeep practices (NBPOL-EI-MG14) stated in the procedure that line site inspection need to be done quarterly basis using PF#29 document title "Housing repair and maintenance checklist"</p> <p>Kumbango POM The management miss out 1st quarter line site inspection Latest housing inspection done is 14/07/2022 and identified houses which required for some repair. Sample taken house number IB#03, IB#06 and IB#12</p> <p>Numundo POM For year 2021 and 2022, line site inspection only been done once which is on 20/06/2021 and 08/05/2022 for DLQ unit Occupational Safety Management Plan (OSMP) Appendix 7: PPE Guidelines form operational Safety Management Plan (May 2019) stated "company must provide gumboot, cap, overall, apron and nitrile glove. However, during site verification with PPE issuance" and site verification with interview with sprayer found no apron been issue and apply for Haella estate, Togulo estate and Daliavu estate. The issuance record sighted as per below sample:- Haella Estate Safety glass Apron Coverall Nitrile glove Boot Issuance date: 18/7/22,30/5/22, 30/5/22, 9/6/22</p> <p>Daliavu Estate</p>	
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3.3.3	<p>Records of monitoring and any actions taken are maintained and available. - Minor Compliance -</p>	<p>Records of monitoring including any action taken are maintained and available. Among the records verified are:</p> <ul style="list-style-type: none"> • E-SHEQ001 Incident Form, ver. 2, rev. 05/2014 • Buffer Zone Quarterly Inspection Schedule 2022 • Waste Disposal Records • Accident Records 	Complied
<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>			
3.4.1	<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. Guidance: SEIA will be undertaken where:</p> <p>a) It is required by law; or 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>Social and environmental impact assessment (SEIA) Report has been done by David Konge Amos, freelance environment consultant. The methodology of the assessment is including desktop reviews for regulatory and characterization issues, community meeting, stakeholder interviews, household surveys and field inspection visit. 2 communities has been interviewed which Sakapei and Kukuru ILG has been interviewed as part of information collection.</p> <p>There is 3 negative impact identified as the outcome of the assessment as per below</p> <ol style="list-style-type: none"> a. Some POM workers interviewed have been interviewed has been on probation for years without position confirmation or promotion. b. House with roof, walls and window damages encourage the infestation of rats, snakes, insects and vermin 	Complied

	<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>c. Sakapei communities has complaint about their land being illegally trespassed without their consent by NBPOL staff. Recommendation for management plan has also outline in the same document.</p> <p>Estates 2018 Social Dialogue Report NBPOL WNB was conducted between December 2018 and February 2019 for whole group. This considered as review of initial SIA which was carried out in 2008. The study focused on the employees and dependents through interview with questionnaire. Data analysis was completed in February 2019. The indicators that focused are as such:</p> <ol style="list-style-type: none"> 1. General living condition in compounds. 2. Land 3. Working hours 4. Female gender, pregnancy & income, breastfeeding, domestic violence 5. PPE, service provided by Security & Construction Department and Clinics 6. Substance abuse, dangerous driving 7. Water accessibility 8. Toilets and cookhouses 9. Transport for students 10. Awareness 11. Pay issues 12. Other important issues 	
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3.4.2	<p>For the unit of certification, a SEIA is available and social and environmental management and monitoring plans have been developed with participation of affected stakeholders. The SEIA shall be reviewed as a minimum once every two years and updated as necessary, in those cases where the review has concluded that changes shall be made to current practices. In any case, the complete SEIA shall be updated at least every</p>	<p><u>Social</u></p> <p>Social management plan for all operating units documented in the document title, social management project” which the objective of the management plan is to</p> <ol style="list-style-type: none"> a. To established safe and harmonious NBPOL communities 	Complied

	<p>ten years to evaluate the cumulative effect of incremental changes. There shall be evidence that the review includes the participation of affected stakeholders.</p> <p>Smallholder requirements:</p> <p>Improvements suggested at the pre-planting inspection should be noted on the inspection form.</p> <p>- Minor Compliance -</p>	<ul style="list-style-type: none"> b. Promoting healthy lifestyle c. Education and literacy programs d. Promoting sports and reducing social problems e. Food security and nutrition and improvement f. Promote gender equality through support from WEW. <p>Stated in the management plan is the estate to established bakery project, fish project, chicken project, layers project, duck and corn project. Other than that the management plan to maintain to provide basic necessities such as housing, electric, water, waste management and church.</p> <p><u>Environment</u></p> <p>For the Environmental Aspect Registry, the latest review was conducted by the Sustainability Department. The significant impact activities were documented in the Beneficial Impact Register. Since the environmental aspect registry is an assessment on the aspect and impact due to the oil palm operations, it is not necessary to involved stakeholders. The control measures for all the significant aspects were incorporated in the register, whereas the management plans to minimize the impacts were incorporated in the Continuous Improvement Plan.</p> <p>Base on the assessment conducted, a management plan was established and documented in the Continual Improvement Plan 2014 - 2025. The environmental management plan focusing on:</p> <ul style="list-style-type: none"> 1. Minimizing the usage of certain pesticides 2. Reducing negatives and enhancing positives environmental impacts 3. Waste reduction 	
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		<p>4. Pollutions, emission and non-renewable energy</p> <p>Smallholder Requirements.</p> <p>The Smallholder Affairs Office conduct Pre-Planting Inspection at the smallholder plots that have been selected for replanting. A Planting Approval Form – Replant is raised where the Smallholder Affairs officers assess the smallholder’s site on areas such as land Ownership, Topography, Buffer zones, Clearing of the Blocks, Grower and Planting and Production History and Improvements to be done prior to replanting. The Planting Approval Form – Replant was available for verification. Among the improvements that have been noticed are for buffer zone establishments, Re-GPS, Voluntary Palms to be poisoned before replant, areas to be left out from replanting due to steep slopes.</p>	
3.4.3	<p>(C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.</p> <p>Smallholder requirements:</p> <p>Management improvements suggested by organization managing the smallholders during routine block inspections shall be implemented as practicable.</p> <p>- Critical (Major) compliance -</p>	<p>NBPOL WNB has incorporated its Environment Management Plan in NBPOL WNB Continuous Improvement Plan 2014-25. It was last reviewed in July 2021. Where identification of impacts that requires changes in current practices, to mitigate negative effects, a timetable for change is developed and implemented. The management plan is annually reviewed, and the progress of implementation is monitored through internal audit which is carried out on quarterly. Based on on-site verification, the progress was found to be on track.</p> <p>While the Social Management Plan has been developed to improve social conditions for employees and dependents within all mills and estates in the WNB group. Document dated 15th May 2019 is referred to. The management plan entitled, Social Management Plan for Mills in West New Britain Province 2019–2021 has 7 main objectives with measurable indicators for each of the mills to implement as such:</p> <ol style="list-style-type: none"> 1. Working Hours 	Complied

		<ol style="list-style-type: none"> 2. Superannuation benefits 3. Provision of PPE 4. Pregnancy 5. Living Conditions 6. Sustainable livelihoods 7. Service provision <p>Monitoring of the working hours has been done by the management for each operating units using check-roll book for estate and time clocking for POM. Other than that, the management has 5 years plan to improve the housing condition where sighted new workers quarters has been constructed and plan to complete in 2026.</p> <p>PPE has been given for free to all workers and staff where types of PPE has been identified base on the risk assessment that has been conducted.</p> <p>There is evidence that social management plan that has been established has been reviewed and updated participatory ways where input/consultation has been done with consultation of stakeholders. Any issues that has been highlighted during any meeting (union, gender, workers committee) will be updated in the social management plan.</p> <p>Smallholder Requirements.</p> <p>Internal Audits are conducted every 2 years for each smallholder within the certification unit. The internal audits are conducted by the Smallholders Affairs Department. Once the internal audits are done a Quality Improvement Plan (QIP) are issued while onsite with the smallholders. The smallholders are then given 12 days to implement the improvements suggested by the internal auditors. After that they are then revisited to ensure implementation of the recommended improvements. Among the improvements that were noted were</p>	
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		awareness and understanding of RSPO requirements and best practices, waste management, weed management and IPM implementations among others.	
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 -	Employment procedure has been established by NBPOL-WNB issuance number No:01/2019 dated 01/8/2019 title "Recruitment and selection policy". Stated in clause 3.0, steps of recruitment and selection which stated from requisition management, sourcing management, screening and selection, job offer and hire and onboarding. While for termination is has been clearly explained in disciplinary policy and procedure document dated March, 2017. Termination is based on 4 category which are poor behaviour, unacceptable, misconduct and gross misconduct.	Complied
3.5.2	Employment procedures are implemented, and records are maintained. - Minor Compliance -	There are no changes compare to last year where the management still using WNB30 @ non-executive staff recruitment form, employment interview assessment form, pre-employment medical report, employee induction form was sighted for new recruited employees. On top of the said documents, as required by the law of PNG, salary @ wages via form S3 declaration must be submitted to PNG Internal Revenue Commission and application for membership: Palm SUPA was also verified. The latest recruitment records at mills and estates for 2022 available for verification. A personal file with records of interview, application form and assessment records was kept as personal employment records. The method of recruitment of general labour and semi- skilled are from hearing of vacancies through word of mouth and putting up notice on notice board. As per verification, there is evidence that the management for each operating units has followed the recruitment process as stated in the SOPs	Complied

Criterion 3.6: An occupational health and safety (H&S) plan is documented, effectively communicated and implemented.			
3.6.1	<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>In Mosa POM the workplace risk assessment (WRA) was available for all job in POM included the water treatment plan, engine room, boiler operation, forklift truck operation and others. The latest review of WRA was on 19/5/2019. The management already produce the operational safety management plan for production Department as per document referred issue 7 dated May 2019. There was 1 incident happen on 19/8/2021 at the capstan in sterilization area.</p> <p>For the accident happen on 19/8/2021 at capstan in sterilization area, the LTI was 56 days, the investigation on the accident conducted on 20/8/2021 and the injury assessment report (IAR) on 19/8/2021. The MC was form 20/8/2021 until 20/10/2021. Due to accident the management already review the WRA on 24/8/2021 to include the body entanglement as hazard and to produce the SOP for CAPSTAN Operation (dated; 20/6/2022). The training conducted after accident happen dated 7-10/2/2022. In the OSH meeting dated 30/8/2021 they discuss regarding this accident and corrective action was done accordingly.</p> <p>In Kapiura POM, the chemical risk assessment was available dated 13/10/2020 referred KAPOM WRA – 201013. The WRA covered for activity water treatment plan (Demin) and Laboratory.</p> <p>In Wasisi/Dami Estate, the chemical risk assessment already included under spraying activities use of pesticide/chemical/fertiliser. The</p> <p>Smallholder</p> <p>The organization managing the smallholder such as identify the risk and review. The latest review dated 25/11/2018 followed as per Doc no. OHSP-08 Rev No. 1 dated 11/06/2016. This included the all</p>	<p>Complied</p>

		<p>activities. From the risk assessment the management conducted training to ensure the risk was manage accordingly, the latest record was on 22/2/2022 on Refresher Herbicide Training at Galai LSS-Section 14-BIK 005-1532. The trainer was from management team and the training included the safety during herbicide application, PPE and others.</p>	
<p>3.6.2</p>	<p>(C) The effectiveness of the H&S plan to address health and safety risks to people is monitored. - Critical (Major) compliance -</p>	<p>NBPOL WNB has establish Operational Safety Management Plan issue no 7 dated 19/5/2019 for production and Plantation. The effectiveness of the H&S plan is monitored through various method example:</p> <ul style="list-style-type: none"> • Workplace inspection by monthly basis • Internal audit by quarterly basis • And also OSH inspection <p>Reviewed the implementation of the management plan as followed:- The monitoring on confined space implementation, SOP for confined space was establish on 11/9/2021 SOP No. OHS02. Verify on Confine Space Work Permit dated 26/4/2022 for CPO tank cleaning. There conducted the atmosphere test before entry and result as per below:- Oxygen content = 20.9% tested by safety coordinator</p> <p>There were 3 people entered the CPO tank and all already attended the training in July 2022.</p> <p>Sampling in the KOM on shovel tractor driver as per refer on workplace risk assessment (WRA) action plan was to conducted the Daily check per start check that they must have the valid license. On the verification license for shovel tractor under 14646 valid until 24/8/2023.</p> <p>There also P.I.I.R.O (Preventing Incident by Identifying hazard, Reporting Near Miss and Observing & Recognising Positive Safety Behaviour) Report implementation in operation. Sampling the record in Kapiura POM dated 13/6/2022, the issue was regarding to no</p>	<p>Complied</p>

		<p>harness been using during working at height area. as per verification on the corrective action the management already conducted the training as measure to control. The record sighted was on 21/6/2022 attended by 30 casual workers. From verification on Elevated Work Permit dated 19/7/2022.</p>	
<p>Criterion 3.7: All staff, workers, Scheme Smallholders, outgrowers, and contract workers are appropriately trained.</p>			
<p>3.7.1</p>	<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>Organization managing the smallholders to provide advice and ongoing support to Smallholders through field days and visits to Smallholder blocks.</p> <p>- Major Compliance -</p>	<p>NBPOL WNB has established central training plan and documented in Training calendar FY 2022. This training covered all criteria such as human resource, sustainability, best practices, safety and health, environment and others. In each training already been justified as per evaluation for target group need to be give training by the management. From the interview during site verification found the workers and staff was aware regarding to policy, safety and others matter.</p> <p>Smallholder</p> <p>The organization conducted the field day for the smallholder as per verification on document below:-</p> <p>Field visit was on 28/09/2021 at Mamota to attend the Hoskins Oil Palm Project. This field visit was along the OPRA (Oil palm Research Association), Mama Bank and OPIC (Oil palm Industry Corporation). The previous field days was on 17/06/2021 at Mundikina VOP. During this field day they covered the below issue to smallholder. Training topic :-</p> <ol style="list-style-type: none"> 1. Safety 2. Crop and quality 3. Pest and Disease 4. Planting 5. eTag 	<p>Complied</p>

		<p>6. Grievance 7. Certification and 8. Saving(Eda Supa & Nambawan Supa)</p> <p>The management also conducted the Preventing Incident by identifying hazard, Reporting Near miss and Observing & Recognising Positive safety Behaviour (P.I.I.R.O) - NBPOL ESH-01/Version 2/Feb-2019. Latest record the implementation was on 23/06/2022 record number 058753. PIIRO training dated 25/04/2022 attended by 19 staff. From the</p>	
3.7.2	<p>Records of training are maintained, where appropriate on an individual basis. Appropriate records include records of training or evidence of competency for trade qualifications, boiler operation and other safety related activities such as chemical handling</p> <p>Smallholder requirements: Smallholder training records are maintained. - Minor Compliance -</p>	<p>The records of training were maintained by the Sustainability Department and the operating units. Reviewed the sampled records of training as followed:-</p> <p>MOM</p> <ul style="list-style-type: none"> • The training record was available in Mosa POM: • Training on confined space entry by the management was n 25/4/2022 • Female awareness Refresher at lab office dated 22/7/2022 • RSPO principle & Grievances procedure Awareness was conducted on 22/7/2022 by Jonathan Seken. • Boiler SOP training conducted by Jonathan dated 11/7/2022 attended by 14 person. • Waste segregation and Environmental conservation training was conducted on 30/6/2022 • Chemical handling training conducted on 20/6/2022 • Scaffolding training and working at height dated 6/6/2022 	Complied

		<p>KOM</p> <ul style="list-style-type: none"> • Training on General PPE & Work permit dated 21/6/2022 • The training on emergency response dated 21/6/2022 • Safety alert on vehicle & machinery operation dated 20/7/2022 • Sulphric acid spillage emergency training dated 13/7/2022 • Chemical store training dated 6/7/2022 • Compound training on skin disease(STI) dated 19/5/2022 • FFB grading training dated 7/5/2022 • Environmental on reuse, reduce and recycle training dated on 24/3/2022 • Teenage pregnancy and puberty/personal hygiene dated 22/3/2022 • Grievance procedure dated 18/6/2022 <p>Togulo Estate</p> <ul style="list-style-type: none"> • Fertiliser application training was On 16/1/2022 • Chemical mixer training record was on 16/01/2022 • Sprayer training record was on 20/01/2022 • Training on harvesting standard was on 18/3/2022 • Loose fruit collection and Bag removal training was on 02/05/2022 • Waste disposal for chemical mixer training was on 2/6/2022 • Spillage and emergency training was on 1/6/2022 • Smallholder and grower Training record:- 	
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		<ul style="list-style-type: none"> • Field day training for crop quality, communication procedure ,eTag, Grievance, Pest Management, certification dated 13/7/2021 and 6/7/2021. • 22/2/2022 on Refresher Herbicide Training at Galai LSS- Section 14-BIK 005-1532. The trainer was from management team and the training included the safety during herbicide application, PPE and others. <p>Haella Estate</p> <ul style="list-style-type: none"> • Safety and social issue/work standard dated 15/2/2022 • Fertiliser application safety procedure dated 20/4/2022 • WRA and PIIRO procedure training dated 20/4/2022 • First aid and Emergency drill dated 5/6/2022 • OSH policy awareness dated 16/6/2022 • Bumbag content & First aid Kit usage dated 28/7/2022 • Buffer zone and no spray zone dated 13/1/2022 • Spillage management of pesticide dated 18/6/2022 • Child labor and right issue dated 15/2/2022 • Grievance procedure and registry dated 18/7/2022 <p>Daliavu estate</p> <ul style="list-style-type: none"> • Spraying and chemical handling training dated 15/3/2022 • Container disposal training dated 7/6/2022 • Chemical mixing ratio training dated 7/6/2022 • Use of PPE and safety training dated 10/6/2022 • Pay rates awareness training dated 3/1/2022 	
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		<ul style="list-style-type: none"> • Compound hygiene awareness dated 15/2/2022 • Domestic violence policies and regulation training dated 3/2/2022 • TB Malaria awareness training dated 1/3/2022 • OSH awareness training April 2022 <p>Nomundo estate</p> <ul style="list-style-type: none"> • TB/Malaria awareness, malaria policy, Business Ethics Policy dated 11/1/2022 • Communication policy training dated 2/2/2022 • ERP, Fire, flood earthquake training dated 1/3/2022 • Human right policy dated 1/3/2022 • Environmental policy awareness dated 2/6/2022 • Company policy and gender right policy training dated 4/7/2022 • Safety when chemical mixing, MSDS, First aid, Risk Assessment dated 10/2/2022 • Fertiliser application- sop, spillage emergency sop, and environmental dated 12/5/2022 • Refresher training on road safety relating to accident dated 26/7/2022 • Breast feeding, maternity leave, sick leave, annual leave and other dated 25/7/2022. <p>Smallholder</p> <p>For the sampling smallholder the record was available in each smallholder personal file. The training was covered safety and health, new system tag for FFB, environmental training, Malaria Awareness, communication awareness and others. From the record and interview with smallholder sampling such as Momota village, they understand</p>	
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		and implement the best practice such as how to do the correct way of harvesting. The bufferzone in each smallholder area also in good condition, not sighted any chemical activities in buffer zone area.	
3.7.3	Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed. - Minor Compliance -	In Mosa Mill the supply chain training conducted on 21/7/2022 by Mr Chong (Manager Mosa POM) attended by 12 people included Lab analysis, process supervisor, weighbridge operator and others. In KAPOM, the supply chain training conducted on 6/6/2021 attended by weighbridge operator, admin, and engineer. For Namundo POM, the supply chain training already conducted on 30/6/2021, this training was attended by lab operator, weighbridge operator, and other workers that involve in the supply chain matter.	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 and uncertified FFB without physically separating them, then only Mass Balance Module is applicable.</p>	<p>This certification is a multi-mills certification. The FFB received are from certified source either from the owned estates or smallholders that are associated with the mills.</p> <p>The NBPOL Supply Chain Management Guidelines rev 13 dated July 2021 has correctly identify the supply chain module Identity Preserved.</p>	Complied
3.8.2	<p>Mass Balance Module</p> <p>A mill is deemed to be Mass Balance (MB) if the mill process FFB from both RSPO certified and uncertified plantations/estates. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own</p>	Not applicable since all POM operate under Identity Preserved Module which received FFB from own supply bases, certified mini estates and certified smallholder	Not Applicable

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	and 3rd party certified supply base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.		
3.8.3	The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall be recorded by the certification body (CB) in the public summary of the P&C certification report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.	The mills maintain mill daily production reports which monitors the production of CPO and PK. The production reports provide details such as OER, KER, quantity produced and total stock. With such historical data and budget from the estates, trending can be plotted to estimate the future CPO and PK tonnage. As per section 7-11 of the report, it volumes are reported.	Complied
3.8.4	The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.	The estimated tonnage of CPO and PK is available in the public summary report. NBPOL-WNB is a subsidiary of Sime Darby Plantation. Hence the RSPO member ID carried by NBPOL-WNB is 1-0008-04-000-00. This certification is a multi-mill certification. There is total of 5 mills included in the certification. Each mill holds a PalmTrace account. Below are the Mills' PalmTrace member ID: 1. Kapiura Oil Mill with PalmTrace member ID RSPO_PO1000007539 2. Waraston Oil Mill with PalmTrace member ID RSPO_PO1000007522 3. Numundo Oil Mill with PalmTrace member ID RSPO_PO1000007478 4. Mosa Oil Mill with PalmTrace member ID RSPO_PO1000000002 5. Kumbango Oil Mill with PalmTrace member ID RSPO_PO1000007582	Complied
3.8.5	Documented procedures a. The mill shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the	a. Written procedure for supply chain documented in the document title "Supply chain management guideline" by NBPOL-WNB	Complied

	<p>applicable supply chain model specified. This shall include at minimum the following:</p> <ul style="list-style-type: none"> b. Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements. c. Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records). d. 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. e. The mill shall have documented procedures for receiving and processing certified and non-certified FFBS including ensuring no contamination in the IP mill. 	<p>revision#13 dated July 2021. Other than that, there is guidelines established in some document as per below</p> <ul style="list-style-type: none"> i. MG06, Palm Oil Mill Management Guidelines, Palm Oil Mill Practices ii. MG07, Palm Oil Mill Management Guidelines, Palm Kernel Oil Milling Practices iii. MG08, Palm & Kernel Oil Refinery Management Guidelines, the Kumbango Oil Refinery Practices iv. MG09, Bulk terminal management guidelines, the kimbe bulk terminal practices. <ul style="list-style-type: none"> b. The procedure has outline which cover all the process and compliance with SCCS requirement such as purchasing and good in, sales and goods outs and outsourcing activities. c. Identification of roles and responsibilities has been define in the NBPOL Management Guidelines <ul style="list-style-type: none"> i. MG06, Palm Oil Mill Management Guidelines, Palm Oil Mill Practices ii. MG07, Palm Oil Mill Management Guidelines, Palm Kernel Oil Milling Practices iii. MG08, Palm & Kernel Oil Refinery Management Guidelines, the Kumbango Oil Refinery Practices iv. MG09, Bulk terminal management guidelines, the Kimbe bulk terminal practices. d. As stated in procedure, all POM only received FFB from own plantations and certified smallholders. 	
3.8.6	<p>Internal Audit</p> <ul style="list-style-type: none"> i. The mill shall have a written procedure to conduct annual internal audit to determine whether the mill: 	<p>Written procedure for supply chain internal audit documented in the document title "Supply chain management guideline" by NBPOL-WNB revision#13 dated July 2021. Stated in the procedure that internal</p>	Complied

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	<ul style="list-style-type: none"> a. Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. b. Effectively implements and maintains the standard requirements within its organisation. ii. Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non-conformities shall be subject to management review at least annually. The mill shall maintain the internal audit records and reports. 	<p>audit need to be done on annual basis to ensure compliance to RSPO requirement. There is evidence that internal audit has been done for each operating units and corrective action has been established.</p> <p>Internal Audits are conducted quarterly in the operating centres to monitor the compliance towards procedures and RSPO requirements. Internal Audit reports were available for verification as below:</p> <ol style="list-style-type: none"> 1. Mosa Oil Mill and Laboratory: 08/06/2022 2. Kumbango Oil Mill: 07/07/2022 3. Kapiura Oil Mill: 14/06/2022 4. Numundo Oil Mill: 12/07/2022 5. Dami Wasis Plantation: 08/06/2022 6. Togulo Plantation: 21/06/2022 7. Haella Plantation: 05/07/2022 8. Daliavu Plantation: 23/03/2022 9. Numundo Estate: 16/06/2022 	
<p>3.8.7</p>	<p>Purchasing and Goods In</p> <ul style="list-style-type: none"> i. The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBS received. ii. The mill shall inform the CB immediately if there is a projected overproduction of certified tonnage. iii. The mill shall have a mechanism in place for handling non-conforming FFB and/or documents. 	<p>As this is an Identity Preserved certification, the mills only receive and process certified FFBS from its own supply bases and smallholder associated to the mills. However, due to the smallholders that may sometimes be suspended from supplying to the mills, the FFBS will not be allowed into the mill. These FFBS will be isolated until further decision by the management.</p> <p>The MG-26 SCC rev. 13 dated July 2021 had described that the site shall inform the CB immediately if there is a projected over production of certified tonnage.</p>	<p>Complied</p>
<p>3.8.8</p>	<p>Sales and Goods Out</p> <p>The supplying mill shall ensure that the following minimum information for RSPO certified products is made available in document form. The information shall be complete and can be presented either on a single</p>	<p>As per verification done by the auditor, all Crude Palm Oil (CPO) and Palm Kernel) processed by the mills will be transferred to Kumbango Oil Refinery (KOR) and Kumbango Kernel Mill (KKM) which own by</p>	<p>Complied</p>

	<p>document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation):</p> <ul style="list-style-type: none"> a. The name and address of the buyer; 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>NBPOL-WNB and are located at the same vicinity of Kumbango Oil Mill. There is no other customer for both CPO and PK.</p> <p>Other than Kumbango Oil Mill, the CPO and PK from other mills are continued to be transferred by tankers or KCP trucks to the KOR or KKM. The records of transfers are recorded using the weighbridge ticket. Samples of CPO and PK dispatched were reviewed. The ticket includes information such as,</p> <ul style="list-style-type: none"> 1. Name of the mill 2. RSPO certificate number with identification of Identity Preserved 3. Type of product and quantity 4. Date of dispatch 5. Ticket number as the unique identification <p>Since the operation of the KOR and KKM is under the management of Kumbango Oil Mill, the audit team deems that the minimal information stated above are sufficient as there is minimal risk that the information received is incorrect. The implementation remain unchanged since last audit.</p>	
3.8.9	<p>Outsourcing Activities</p> <ul style="list-style-type: none"> 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 ii. The mill shall ensure the following: <ul style="list-style-type: none"> a. The mill has legal ownership of all input material to be included in outsourced processes b. The mill has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable 	<p>There is no outsourcing of mill activities. NBPOL-WNB handles all the mill process.</p> <p>The storage facilities are not related to this certification as it is handled and managed KOR and KKM and both these facilities maintained their own RSPO Supply Chain Certification.</p>	Complied

	<p>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>		
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.	There is no outsourcing of mill activities. NBPOL-WNB handles all the mill process.	Complied
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.	<p>The sites had understood regarding this requirement. Furthermore, as it is not expected to have any outsourced activities, this risk is minimal.</p> <p>Additional to this, NBPOL-WNB was cooperative to provide BSI the pre-audit information as requested before the audit commence.</p>	Complied
3.8.12	<p>Record keeping</p> <p>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.</p> <p>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.</p>	<p>Each mill have Daily and Monthly Production Summary Report. The summary reports the Crops received, Production data (milling hours, ton/hour, oil production, oil extraction, kernel production, kernel extraction rate, CPO stocks and dispatch, PK stocks and dispatch, Oil quality, Kernel quality, process data, oil loses, and kernel loses. The production summary reports demonstrate the balance of received FFBs and deliveries of CPO and PK.</p> <p>The CPO and PK quantities available in the mill are recorded using the Storage Tank Records excel sheets and Kernels Stock & Dispatch record excel sheets.</p>	Choose an item.

	<ul style="list-style-type: none"> 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>During the audit, the auditors has no issue to receive the requested information.</p> <p>As per the MG-26 SCC rev. 13 dated July 2021, the minimum retention time for all documentation is 3 years and generally all documents have been stored for 5 years.</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 yearly oil extraction rate and palm kernel extraction rate estimate are determined through mill throughput capacity, past historical performance of the mill and age profile of the oil palms. The company 3 years Management Business Plan has reported the Key Operational Drivers which include the target OER and KER up to year 2024. The average OER for 2022-2024 is 23.05% while KER is 6.18%. These Extraction rates were derived from actual production output that were measured daily/monthly by the mills and recorded in the daily production report.</p> <p>During this audit samples of monthly mill production reports were reviewed to confirm the estimation and monitoring of the OER and KER through the reporting period 2021 until June 2022</p>	Complied
3.8.14	<p>Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.</p>	<p>Daily Mill Production Report (DMRP) shows that extraction rates are updated daily to get the most close CPO and PK estimation.</p>	Complied

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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>Mosa Mill, Kumbango Mill, Waraston Mill, Kapiura Mill and Numundo Mill does not receive any FFB from uncertified supply base, therefore all CPO and PK produced are 100% certified.</p> <p>However, due to the smallholders that may sometimes be suspended from supplying to the mills, the FFBs will not be allowed into the mill. These FFBs will be isolated until further decision by the management.</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>The monthly stock records of the PK and CPO volumes transfer to the refinery or crusher plant was reviewed. The records shows that the closing stock at the refinery or crusher are well balanced and the products are not kept more than 3 months. The final products will be shipped out by the refinery or crusher latest by 2nd month after receiving from the mills. While the shipping announcement for the mill will then be conducted. The records of the PalmTrace transaction was verified and the announcements are accordingly.</p> <p>The product shipped out by NNPOL-WNB are mainly RSPO certified material. There are no selling under different schemes. NNPOL-WNB understand the removal of RSPO certified volumes and these can be seen in the last license transactions records.</p>	Complied
3.8.17	<p>Claims</p> <p>The mill shall only make claims regarding the production of RSPO certified oil that are in compliance with the RSPO Rules on Market Communications and Claims.</p>	<p>NNPOL has through its website https://www.nbpol.com.pg/?page_id=277 inform stakeholders about their RSPO Certification. There is no trademark logo used in the website. While the description of the certification did not lead consumers to believe that being an RSPO member means eligible to sell RSPO certified oil palm products. There is no communication regarding NNPOL's RSPO membership.</p> <p>The only claims made was the business to business claims where by the RSPO certificate number and the products was correctly stated in the CPO and PK deliveries.</p>	Complied

General corporate communications

4.1	A corporate communication is one made by any RSPO member that highlights its membership of the RSPO and/or its commitment to the principles of the RSPO. Corporate communication is an 'off-product' claim.	NBPOL has through its website https://www.nbpol.com.pg/?page_id=277 inform stakeholders about their RSPO Certification. There is no trademark logo used in the website. While the description of the certification did not lead consumers to believe that being an RSPO member means eligible to sell RSPO certified oil palm products. There is no communication regarding NBPOL's RSPO membership. Document template, assessment reports, production records, policies and site observation were verified and there was no corporate communication made by NBPOL other than in the website.	Complied
4.2	In corporate communications a member is allowed to: a. Display its RSPO membership status b. Display the RSPO web address (www.rspo.org) c. State that the member supports the work of the RSPO d. State the member's history with regard to the RSPO. e. Use the RSPO trademark to promote its membership of the RSPO. 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.	NBPOL has through its website https://www.nbpol.com.pg/?page_id=277 inform stakeholders about their RSPO Certification. There is no trademark logo used in the website. While the description of the certification did not lead consumers to believe that being an RSPO member means eligible to sell RSPO certified oil palm products. There is no communication regarding NBPOL's RSPO membership. Document template, assessment reports, production records, policies and site observation were verified and there was no corporate communication made by NBPOL other than in the website.	Complied
4.3	In corporate communications RSPO members must not make any statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products.	NBPOL has through its website https://www.nbpol.com.pg/?page_id=277 inform stakeholders about their RSPO Certification. There is no trademark logo used in the website. While the description of the certification did not lead consumers to believe that being an RSPO member means eligible to sell RSPO certified oil palm products. There is no communication regarding NBPOL's RSPO membership.	Complied

		Document template, assessment reports, production records, policies and site observation were verified and there was no corporate communication made by NBPOL other than in the website.	
4.4	Members must ensure that all communication is consistent, clear and cannot mislead consumers or other stakeholders as to the certified content of oil palm products in the member's own products.	NBPOL has through its website https://www.nbpol.com.pg/?page_id=277 inform stakeholders about their RSPO Certification. There is no trademark logo used in the website. While the description of the certification did not lead consumers to believe that being an RSPO member means eligible to sell RSPO certified oil palm products. There is no communication regarding NBPOL's RSPO membership. Document template, assessment reports, production records, policies and site observation were verified and there was no corporate communication made by NBPOL other than in the website.	Complied
4.5	Members are not allowed to use the RSPO corporate logo as shown in the RSPO Rules on Market Communications & Claims document. This is for the sole use of the RSPO secretariat.	Business website, document template, assessment reports, production records, policies and site observation were verified to confirm the RSPO Corporate logo was not in used.	Complied
Business to business communications			
5.1	Business to Business communication relates to RSPO members in the supply chain selling to and/or communicating with other organizations in the supply chain about the use of certified sustainable oil palm products.	All certified CPO and PK are transferred to Kumbango Oil Refinery and Kumbango Kernel Mill respectively and these facilities belongs to NBPOL-WNB located at the same vicinity of Kumbango Oil Mill. The transfer documents, mainly the weighbridge ticket demonstrate the product are transfer as RSPO certified material and the communication is through identity of the RSPO certificate number. There is no other communication.	Complied
5.2	When confirming the sale of certified oil palm products, members must adhere to the requirements of the RSPO SCCS. This includes stating the supply chain model and certificate number under which the claim is being made.	All certified CPO and PK are transferred to Kumbango Oil Refinery and Kumbango Kernel Mill respectively and these facilities belongs to NBPOL-WNB located at the same vicinity of Kumbango Oil Mill. The transfer documents, mainly the weighbridge ticket demonstrate the product are transfer as RSPO certified material and the	Complied

		communication is through identity of the RSPO certificate number. There is no other communication.	
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>	This certification is mill certification. Hence the requirement is not applicable.	Not Applicable
MODULE A – IDENTITY PRESERVED & SEGREGATED SPECIFIC RULES			
Certified oil palm content (IP)			
	For IP, 95% or above of the oil palm content must be RSPO IP-certified.	All CPO and PK produced by the mills are sources from its own supply bases. There are no uncertified source that goes into the mills supply chain. Any non-conforming smallholders will not have their FFBS delivered to the mills. Hence the oil palm content transfer to Kumbango Oil Refinery or Kumbango Kernel mill will be 100% IP certified.	Complied
	For SG, 95% or above of the oil palm content must be SG, or a combination of SG and IP.	All CPO and PK produced by the mills are sources from its own supply bases. There are no uncertified source that goes into the mills supply chain. Any non-conforming smallholders will not have their FFBS delivered to the mills. Hence the oil palm content transfer to	Complied

		Kumbango Oil Refinery or Kumbango Kernel mill will be 100% IP certified.	
	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.	All CPO and PK produced by the mills are sources from its own supply bases. There is no uncertified source that goes into the mills supply chain. Any non-conforming smallholders will not have their FFBS delivered to the mills. Hence the oil palm content transfer to Kumbango Oil Refinery or Kumbango Kernel mill will be 100% IP certified.	Complied
Labelling and trademark (IP)			
	Members are allowed to use the RSPO label in one of the following ways: a. RSPO trademark which includes the tag 'CERTIFIED' or b. RSPO trademark which includes the tag 'This product contains certified sustainable palm oil'. Wherever a RSPO trademark is displayed, the applicable trademark license number must be shown immediately under or next to the trademark or the 'statement'. Font must be Calibri, font size must be at least 4pt (1.4 mm or 0.06 inch). In on-pack communications, the RSPO trademark can be printed anywhere on the pack.	No labelling and trademark were used when delivering the CPO and PK.	Not Applicable
Messaging (IP)			
	Messaging ALLOWED in storytelling in product-related communications may include some or all of the following elements: <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 	No messaging was used when delivering the CPO and PK.	Not Applicable

	<ul style="list-style-type: none"> • 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>Principle 4: Respect community and human rights and deliver benefits</p>			
<p>Criterion 4.1: The unit of Certification respects human rights, which includes respecting the rights of Human Rights Defenders.</p>			
<p>4.1.1</p>	<p>(C) A policy to respect human rights, including Prohibiting retaliation against Human Rights Defenders (HRD), is documented and communicated to all levels of the workforce, operations, supply chain and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.</p> <p>- Critical (Major) compliance -</p>	<p>NBPOL has developed Human Rights Policy that signed by the General Manager of WNB. The management uphold their commitment to respect, support and uphold fundamental human rights as expressed in the Universal Declaration for Human Rights and its two covenants. Their commitment extends to any human being affected by the operations including employees, suppliers, smallholders and people in communities surrounding the operations. There are three core areas that they focus on as below:</p> <ol style="list-style-type: none"> 1. Free, Prior and Informed Consent 2. Right to Health 3. Rights for Workers <p>The same Human Rights Policy was also adopted by Repamira Estate to uphold the same commitments.</p> <p>For the group level, Sime Darby Plantation Berhad has developed the Policy on the Protection of Human Rights Defenders (HRDs) effective on 25/03/2020. This policy statement is guided by the commitment spells out in the Human Rights Charter (HRC). They promote the human rights, safeguard democracy and its institutions and not violate</p>	<p>Complied</p>

		<p>the rights of others. They also recognize the important role Human Right Defenders. In accordance with the United Nations Declaration on Human Rights Defenders, they are committed to safeguarding the confidentiality of those involved by establishing clear operational guidelines on the coordination, administration and response to the allegations of threats through our Human Rights Defender Policy and ensuring that their internal policies and mechanisms protect and prevent harm to complainants, as well as respond to complaints on any alleged threats made to them. Refer to Policy on the Protection of Human Rights Defenders (HRDs) dated 25/03/2020 for more information. There is evidence that the policy has been communicated to all the workers during the morning muster call and has been verified base on training records and interview. It has been confirmed that all workers are aware with the procedure and their right to make any complaint.</p> <p>While for POM and Estate, sample of communication of the policy has been done as per below</p> <p>Sample of communication as per below</p> <ul style="list-style-type: none"> a. 18/04/2022 for 17 workers b. 22/07/2022 for 21 workers c. 22/07/2022 for 30 workers d. 23/07/2022 for 9 workers 	
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>There is evidence that each operating units does not instigate violence or use any form of harassment where it has been confirmed through interview with sample workers. Base on the interview, there is no cases of harassment and violence done by the management. There is no evidence use of mercenaries and paramilitaries in their operations. While for POM and Estate, sample of communication of the policy has been done as per below</p>	Complied

		<p>Sample of communication as per below</p> <ul style="list-style-type: none"> a. 18/04/2022 for 17 workers b. 22/07/2022 for 21 workers c. 22/07/2022 for 30 workers d. 23/07/2022 for 9 workers 	
<p>Criterion 4.2: There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties</p>			
<p>4.2.1</p>	<p>(C) The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistle-blowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.</p> <p>- Critical (Major) compliance -</p>	<p>There are no changes from the previous report where NBPOL maintain the system to resolves disputes The main upholding commitment of NBPOL-WNB towards resolving complaints and protecting complainant is through the established Whistleblower Policy. The Policy is made available in Tok Pisin. The strong commitment of NBPOL-WNB defined the whistle-blower is not a complaint but rather as a witness. The main upholding commitment of NBPOL-WNB towards resolving complaints and protecting complainant is through the established Whistleblower Policy. The Policy is made available in Tok Pisin. The strong commitment of NBPOL-WNB defined the whistle-blower is not a complaint but rather as a witness.</p> <p>The policy stated that any relevant stakeholders to the company whom includes workers holds the rights to raise any complaints if found the company or the employees of the company has violated the company policies. This is with especially referring to the Human Rights Policy where NBPOL-WNB uphold the United Nation Universal Declaration of Human Rights and the 2 covenants including protecting of any defendant of human rights.</p> <p>The Management of NBPOL-WNB has ensured that the complainant will be protected and not be at risk of losing job or suffering any form of retribution.</p> <p>The Whistleblower Policy has maintained strict confidentiality. In case a worker feels uncomfortable to raise the matter to the line manager,</p>	<p>Complied</p>

		<p>the worker can directly raise it to the Locally Designated Officer (LDO) who consist of the General manager, Company Secretary and Lands Officer.</p> <p>Further choice is given to the complainant that if they are unsatisfied, they have the rights to bring the matter outside of the company by contacting Transparency International, external auditors, trade union, Local Member of Parliament, citizen advise bureau, professional bodies or regulatory organization, voluntary organization and the police.</p> <p>RSPO principle & Grievances procedure Awareness was conducted on 22/7/2022 by Jonathan Seken for Mosa POM. It also has been conducted during the Social Issues Committee Meeting was last conducted on 13/07/2022. Other than that, it has been briefed during the morning muster call by each operating units.</p>	
4.2.2	<p>Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.</p> <p>- Minor compliance -</p>	<p>New Britain Palm Oil Limited (NBPOL) has developed Communication & Consultation Procedure, version 3 dated 04/07/2020 where the objectives of the procedure are to:</p> <ol style="list-style-type: none"> a. Ensure free and effective communication between all of NBPOL stakeholders (including employees) and external stakeholders. b. Address and take corrective action on grievances raised against NBPOL’s operations in a timely and adequate manner. <p>The procedure has clearly outlined the department to be responsible to respond to each types of communications. For example: Sustainability Department will be responded to any NGO’s & government bodies for discussions on environment, social and new development projects issue. All the communications raised could be either in writing, phone call, emails or verbal discussion. Details of the grievance or communication will be recorded in grievance registers and community request books at respective sites.</p>	Complied

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		<p>The timeline to deal and respond to the grievances and requests as below:</p> <p>Internal grievances – within 10 days of reporting and response. Any grievances pending further investigation to be communicated to the person not exceeding 90 days.</p> <p>External grievances – within 30 days by receiving Department. Any further investigation shall not exceed 90 days.</p> <p>There is evidence that the policy has been communicated to all the workers during the morning muster call and has been verified base on training records and interview. It has been confirmed that all workers are aware with the procedure and their right to make any complaint</p> <p>RSPO principle & Grievances procedure Awareness was conducted on 22/7/2022 by Jonathan Seken for Mosa POM. It also has been conducted during the Social Issues Committee Meeting was last conducted on 13/07/2022. Other than that, it has been briefed during the morning muster call by each operating units.</p>	
4.2.3	<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.</p> <p>- Minor compliance -</p>	<p><u>Mosa POM</u></p> <p>Latest complaint received by one of the workers on 17/07/2022 related to overflow of septic tank at her house and cause health affect to her kids and uncomfortable condition. Sighted that the issues has been responded and memo has been sent to construction department for repair. As per site visit it has been confirmed that the septic tanks has been repaired and no overflow. It has been confirmed through interview with the complainant that her complaint has been respond and resolved.</p> <p><u>Kumbango POM</u></p> <p>Latest of complaint received is on 31/05/2022. The complaint is for one workers that have not received confirmation letter until now after</p>	Complied

		<p>signing temporary contract in 26/06/2018 (4 years of working). Responses by the management sighted in the document title SHEQ001 incident form on 22/06/2022 and meeting minutes sighted with the complainer.</p> <p><u>Kapiura POM</u> Sample of complaint received on 08/05/2022 has been taken on issues of grocery store located at the housing compound is high and unaffordable, the management has established pricing monitoring to will be done on monthly basis and recorded in the document NBPOL trade store monthly pricelist which outline the price that the shop owner need to follow.</p> <p><u>Numundo POM</u> There is only one grievance received for year 2022 on 18/05/2022 which related to transportation for any emergency which raised by the worker if they need to apply for approval by the manager 1st. The grievance has been responded and closed on 25/05/2022 with face to face meeting was held between both parties.</p> <p><u>Tagulo Estate</u> Complaint and grievances has been recorded in 2 different documents which is RSPO, Grievance registry book and document SHEQ#001, incident form which Ms Victoria Mesmin. Sample of complaint taken 2 received on 18/06/2022 and 02/06/2022</p> <p>a. 2 clerk complaint about their salary has been deducted from 88 hours/ fortnight to 78hrs and 84 hrs/fortnight. Meeting has been conducted on 22/06/2022 between the clerks and the management to clarify the issues.</p>	
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		b. 1 complaint received by workers for house that need be repaired (Veranda) and the management has responded to the complaint and inform the handyman on that issues. Repaired has been done on 06/06/2022. It has been verified	
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 stated in the Whistleblower Policy, further choice is given to the complainant that if they are unsatisfied, they have the rights to bring the matter outside of the company by contacting Transparency International, external auditors, trade union, Local Member of Parliament, citizen advise bureau, professional bodies or regulatory organization, voluntary organization and the police.	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 -	The contributions to community development plans are incorporated in the Action Plan for 2022 significant issues raised in External Stakeholder Workshops. Some of the contributions identified includes: 1. To improve livelihood for the local communities by giving training how to improve the production oil palm 2. Improve cash-crop production such as cocoa and coconut. 3. Donating of equipment to government sector and school. 4. Credit facilities to all smallholder to purchase fertilizers Other that the above programs, NBPOL-WNB has previous introduce financial uplift program for smallholders. This program elevates the overall family financial management of the smallholders by introducing "Papa Card" and "Mama Card" system where certain portion of the income from the FFB sales are given to the Mama who is the female of the family who usual take cares about the household needs of the family. This program not only elevates the financial management but also reduces the on-going domestic violent. Smallholders:	Complied

		<p>Field Days are conducted regularly by NBPOL Smallholder Departments together with OPIC personals at the smallholder’s plots. The Field Days are conducted as platform to provide trainings, monitor legal compliance, and inspect field conditions and compliance to the RSPO requirements. Trainings that are provided for the smallholders include but not limited to BMPs, HCVs management, RTE Species, Chemical and Fertiliser Applications, Buffer Zones, company polices and changes of the company operations. Records of Field Day Inspections were available.</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: - Critical (Major) compliance -</p>	<p>There is no new acquisition by the management and the company still operating on state lease lands and sub-lease lands. Sub-lease lands are usually the leasing of land from the clan. The management comply with NBPOL-WNB Management Guidelines MG-21 Lands & Mini Estates Guidelines Land Acquisition Practices rev.3, dated June 2014 includes FPIC process in the flow chart.</p> <p>The lease documents includes – maps; lease agreements (for both with state and customary land owner); FPIC documentation (for sub-lease from customary land owners) and land titles.</p> <p>Please refer to indicator 2.1.3 for samples of land usage audited during this audit.</p> <p>Based on the sub-lease agreements, the intention of the land use is clearly stated to be planted with oil palm. Hence with agreement of the clan leaders on the sub-leasing agreement, consent is given to the company to cultivate the land. The sub-lease agreement includes the royalty and leasing fee to be paid to the clan.</p> <p>Verification has been done by the auditor base on the documentation that has been provided and interview with relevant stakeholders</p>	<p>Complied</p>

	<p>4.4.1(a) For PNG, there are no written laws on customary land, but decisions are guided by customs of the landowning group or clan and documented in a CLUA (Customary Land Use Agreement) which is valid for one planting cycle only. Decisions on land use and distribution are normally done conventionally at the level of the clan and may vary from clan to clan. Individuals only have exclusive rights to use and occupy land based on verbal and mutual agreement, whilst undisputed outright ownership status of customary land is vested in the clan. Traditionally, clans decide on occupancy and user rights. One has to be a member of a land-owning group through custom in order to have access to land.</p>	<p>Land sub-lease agreements on customary land through Incorporated Land Group (ILG) arrangement are available. Please refer to indicator 2.1.3 for details of the sub-leasing agreement.</p> <p>The incorporation of the land groups are usually initiated by the clan groups. The purpose of the incorporation is mainly to charge out the customary land so that a Special Agricultural Business Lease agreement under the Land Act 1996 between the ILGs and the PNG Lands Department can be formalized to enable the ILGs to legalize the leasing of their lands.</p> <p>As per indicator 2.1.3, the agreements that are maintained by NBPOL-WNB that includes the Special Agricultural Business Lease agreement between the ILG and PNG Lands Department.</p> <p>While for the independent estates sampled for this audit, there is no customary sub-leasing. All lands are direct leasing with the PNG Lands Department. Sample of independent estate has been taken as per below</p> <ul style="list-style-type: none"> a) Lilimo Project b) Ponini Agro Tech c) Pusiki Estate <p>Verification has been done by the auditor base on the documentation that has been provided and interview with relevant stakeholders</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</p>	<p>Not applicable as the certification is not in Solomon Islands.</p>	

	land or their authorised representatives and have observed full FPIC requirements in those negotiations with all required details being appropriately documented.		
4.4.2	Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:	<p>Sublease agreement is a government regulated agreement which has been done through FPIC process that has been detail up in the agreement. The agreement has been signed by representative from NBPOL-WNB and ILGs. The process has been innitied with cooperation between OPIC and NBPOL-WNB in identifying the head of clan for each village.</p> <p>It is compliance as per stated in the Land Act 1996, the incorporation of land groups requires consent from the landowners. The management of consent of the clan is through the clan leaders representative and clan leaders are to be executive of the group. If the consent is not available the Secretary of the Department of Provincial Affairs will not process the Certificate of Alienability and without this certification, the Special Agriculture and Business Lease will not be granted. Hence through the incorporation of ILGs, the landowners have given their consent to leaser to develop the land. While this arrangement has always be recognized as a "joint venture" agreement between NBPOL-WNB and the ILGs.</p> <p>Interview with the head of clans for each sample village confirmed that the process until they achieve the agreement as per stated in the agreement.</p>	Complied

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>Consultation and discussion for any plan has been done through the clan leaders for each village where all the villages is able to speak, share and decide for each plan that has been developed. It has been confirmed with family members/spouse of the landowner that they has been included and consulted by the management.</p>	Complied
4.4.2b	<p>Evidence that the unit of certification has respected communities' decisions to give or withhold their consent to the operation at the time that these decisions were taken</p> <p>- Minor compliance -</p>	<p>As per interview with the smallholders, there is evidence decision making has been made by the landowner itself and they has right either to give or withhold their decision. As per day of audit, the is no cases of withholding by the smallholders.</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>As per interview with smallholders/land owner, it has been confirmed that all smallholders are aware with the implications of their decision in regards with economic, environmental. It also has been clearly stated in the sublease agreement that has been signed by both parties.</p>	Complied
4.4.3	<p>(C) Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities).</p> <p>- Critical (Major) compliance -</p>	<p>Maps with scale either 1:15,000 or 1:25,000 or 1:38,000 are available with approval by PNG Department of Land Office for both all sampled land lease and sublease. As per interview with the head of clan, the establishment of the map has included with consultations of representative for each clan.</p>	Complied

		The customary land map or land settlement scheme maps are on files for each smallholder. Interview with the villagers also confirm that maps is appropriate as per actual.	
4.4.4	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. - Minor compliance -	All information (maps, agreement, records, impact assessment, benefit sharing and legal arrangements) is available in English understood and accessible to affected parties which has been maintained by the land department for NBPOL WNB. As per interview with land department, it is their responsible for them to keep/update all the relevant informations The information incorporation of land groups are detailed in the Management Guidelines MG-21 Lands & Mini Estates Guidelines rev.3, dated June 2014.	Complied
4.4.5	(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. - Critical (Major) compliance -	Local communities will be present by the head of clan for each village and appointment has been done either through the legacy or appointment by the villagers itself. Interview with the head of clans on the process of selection of representative has been done. It has been confirmed and agreed by the villagers through interview that their head clan has been selected by them. As per interview with OPIC and smallholders department, records for each head clan has been maintained and any consultation with regards to the smallholders will be through the representative.	Complied
4.4.6	There is evidence that implementation of agreements negotiated through FPIC is reviewed in consultation with affected parties midway through the term of the agreement however regular communication between the parties is encouraged through the duration of the agreement. - Minor compliance -	As per the sub-lease agreement audited (please refer to indicator 2.1.3), the agreed terms especially regarding the economic will be reviewed fifteen (15) years from the date of the sub-lease agreement. Other than such review, the ILGs are identified as external stakeholders of the company where by the ILGs are invited to involve in the annual external stakeholder workshop. Records of the external stakeholder workshop for year 2019-2021 shows the attendance of	Complied

		ILGs. Stakeholder workshop for year 2022 has been planned in October 2022	
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.			
4.5.1	(C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available. - Critical (Major) compliance -	There is no new planting at the sampled estates. Nonetheless, the sampled estates have their own individual map, Soil Map and Slope Map in appropriate scales established by WNB's GIS & Mapping Unit. It has been further verified through interview with local communities, workers and the management and also site visit. However, if there is any new planting development, the guiding principles of the Management Guidelines MG-21 Lands & Mini Estates Guidelines Land Acquisition Practices rev.3, dated June 2014 will be followed. The guiding principle of new land development or new land sub-leasing will be initiated by landowners. The landowners reserve all rights on the subject land. NBPOL does not have any influence on any decision.	Complied
4.5.2	(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. - Critical (Major) compliance -	There is no new planting at the sampled estates. Nonetheless, the sampled estates have their own individual map, Soil Map and Slope Map in appropriate scales established by WNB's GIS & Mapping Unit. It has been further verified through interview with local communities, workers and the management and also site visit. However, if there is any new planting development, the guiding principles of the Management Guidelines MG-21 Lands & Mini Estates Guidelines Land Acquisition Practices rev.3, dated June 2014 will be followed. The guiding principle of new land development or new land sub-leasing will be initiated by landowners. The landowners reserve all rights on the subject land. NBPOL does not have any influence on any decision.	Complied
4.5.3	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	There is no new planting at the sampled estates. Nonetheless, the sampled estates have their own individual map, Soil Map and Slope Map in appropriate scales established by WNB's GIS & Mapping Unit. It has been further verified through interview with local communities,	Complied

	<p>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>workers and the management and also site visit. However, if there is any new planting development, the guiding principles of the Management Guidelines MG-21 Lands & Mini Estates Guidelines Land Acquisition Practices rev.3, dated June 2014 will be followed. The guiding principle of new land development or new land sub-leasing will be initiated by landowners. The landowners reserve all rights on the subject land. NBPOL does not have any influence on any decision.</p>	
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>There is no new planting at the sampled estates. Nonetheless, the sampled estates have their own individual map, Soil Map and Slope Map in appropriate scales established by WNB's GIS & Mapping Unit. It has been further verified through interview with local communities, workers and the management and also site visit. However, if there is any new planting development, the guiding principles of the Management Guidelines MG-21 Lands & Mini Estates Guidelines Land Acquisition Practices rev.3, dated June 2014 will be followed. The guiding principle of new land development or new land sub-leasing will be initiated by landowners. The landowners reserve all rights on the subject land. NBPOL does not have any influence on any decision.</p>	Complied
4.5.5	<p>Evidence is available that the affected communities and rights holders have had the option to access to information and advice that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands.</p> <p>- Minor compliance -</p>	<p>There is no new planting at the sampled estates. Nonetheless, the sampled estates have their own individual map, Soil Map and Slope Map in appropriate scales established by WNB's GIS & Mapping Unit. It has been further verified through interview with local communities, workers and the management and also site visit. However, if there is any new planting development, the guiding principles of the Management Guidelines MG-21 Lands & Mini Estates Guidelines Land Acquisition Practices rev.3, dated June 2014 will be followed. The guiding principle of new land development or new land sub-leasing will be initiated by landowners. The landowners reserve all rights on the subject land. NBPOL does not have any influence on any decision.</p>	Complied

4.5.6	<p>Evidence is available that the communities (or their representatives) gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator</p> <p>- Minor compliance -</p>	<p>There is no new planting at the sampled estates. Nonetheless, the sampled estates have their own individual map, Soil Map and Slope Map in appropriate scales established by WNB's GIS & Mapping Unit. It has been further verified through interview with local communities, workers and the management and also site visit. However, if there is any new planting development, the guiding principles of the Management Guidelines MG-21 Lands & Mini Estates Guidelines Land Acquisition Practices rev.3, dated June 2014 will be followed. The guiding principle of new land development or new land sub-leasing will be initiated by landowners. The landowners reserve all rights on the subject land. NBPOL does not have any influence on any decision.</p>	Complied
4.5.7	<p>New lands will not be acquired for plantations and mills after 15 November 2018 as a result of recent (2005 or later) expropriations in the national interest without consent (eminent domain), except in cases of smallholders benefitting from agrarian reform or anti-drug programmes.</p> <p>- Minor compliance -</p>	<p>There is no new planting at the sampled estates. Nonetheless, the sampled estates have their own individual map, Soil Map and Slope Map in appropriate scales established by WNB's GIS & Mapping Unit. It has been further verified through interview with local communities, workers and the management and also site visit. However, if there is any new planting development, the guiding principles of the Management Guidelines MG-21 Lands & Mini Estates Guidelines Land Acquisition Practices rev.3, dated June 2014 will be followed. The guiding principle of new land development or new land sub-leasing will be initiated by landowners. The landowners reserve all rights on the subject land. NBPOL does not have any influence on any decision.</p>	Complied
4.5.8	<p>(C) New lands are not acquired in areas inhabited by communities in voluntary isolation unless a full FPIC process has been undertaken with recognised community representatives and their right to use the land is verified in accordance with 4.4.1.</p> <p>- Critical (Major) compliance -</p>	<p>There is no new planting at the sampled estates. Nonetheless, the sampled estates have their own individual map, Soil Map and Slope Map in appropriate scales established by WNB's GIS & Mapping Unit. It has been further verified through interview with local communities, workers and the management and also site visit. However, if there is any new planting development, the guiding principles of the Management Guidelines MG-21 Lands & Mini Estates Guidelines Land Acquisition Practices rev.3, dated June 2014 will be followed. The</p>	Complied

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		guiding principle of new land development or new land sub-leasing will be initiated by landowners. The landowners reserve all rights on the subject land. NBPOL does not have any influence on any decision.	
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	<p>(C) A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place.</p> <p>- Critical (Major) compliance -</p>	<p>The management NBPOL maintained the same guideline that that has been documented in Management Guidelines MG-21 Lands & Mini Estates Guidelines Land Acquisition Practices rev.3, dated June 2014</p> <p>The PNG Land Act protects customary land and as such it would be unlawful for big land development to take place on customary land without formalizing the land administration process through the relevant government authorities. Customary land in PNG is heavily regulated through strong tribal customs.</p> <p>In any circumstance that if NBPOL-WNB would like to possess tenure to a land, under the Land Tenure Conversion Act, all people with any customary interests on the subject land must be in agreement. Under the Act prior to successful tenure conversion, the applicant must first adequately compensate all persons with customary interest on the subject land. The compensation can be monetary (money terms) or according to custom, but must be made before the application can be approved. Any application under this Act must be accompanied by an approved and registered plan of survey.</p> <p>Based on the above, NBPOL-WNB is required to follow the Land Act to ensure all compensation are dealt and such PNG regulation is consistent with the RSPO P&C. The above are identified in Management Guidelines MG-21 Lands & Mini Estates Guidelines Land Acquisition Practices rev.3, dated June 2014.</p>	Complied
4.6.2	<p>(C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is established and implemented,</p>	<p>The PNG Land Act protects customary land and as such it would be unlawful for big land development to take place on customary land</p>	Complied

	<p>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>without formalizing the land administration process through the relevant government authorities. Customary land in PNG is heavily regulated through strong tribal customs.</p> <p>In any circumstance that if NBPOL-WNB would like to possess tenure to a land, under the Land Tenure Conversion Act, all people with any customary interests on the subject land must be in agreement. Under the Act prior to successful tenure conversion, the applicant must first adequately compensate all persons with customary interest on the subject land. The compensation can be monetary (money terms) or according to custom, but must be made before the application can be approved. Any application under this Act must be accompanied by an approved and registered plan of survey.</p> <p>Based on the above, NBPOL-WNB is required to follow the Land Act to ensure all compensation are dealt and such PNG regulation is consistent with the RSPO P&C. The above are identified in Management Guidelines MG-21 Lands & Mini Estates Guidelines Land Acquisition Practices rev.3, dated June 2014.</p> <p>Base on interview with smallholders department, compensation will be paid through bank account to the owner of the land base on the documentation provided such as land title, land lease documentation and they have their to determine allotment between the family member.</p> <p>As per verification, there is no issues of compensation has been raised. It has been confirmed through interview.</p>	
4.6.3	<p>Evidence is available that equal opportunities are provided to both men and women to hold land titles for small holdings in accordance with National law.</p> <p>- Minor compliance -</p>	<p>There is land title need to be provided by the land owner or next of kin where the owner has passed away. For those smallholders without land title, they need to get approval for Customary Land Use Agreement (CLUA). As per verification done by the auditor through interview, it has been confirmed that equal opportunities has given to both men and women for land ownership and to operate the land</p>	Complied

4.6.4	<p>The process and outcomes of any negotiated agreements, compensation and payments are documented, with evidence of the participation of affected parties, and made publicly available to them provided that the right to privacy and confidentiality is respected..</p> <p>- Minor compliance -</p>	<p>As per interview with smallholders and head of clan, there is disputes and compensation has been raised. They also can show their understanding how to consult with the management if there is dispute related to land. Base on the records, there is no dispute of land has been recorded.</p> <p>While if there is any land dispute due to the current operations, it is dealt following the Communication & Consultation Procedure ver. 3 dated 04/07/2020. Depending on the dispute, it will be manage either by the NBPOL-WNB Smallholder Affairs Office or Lands & Mini Estates Department.</p>	Complied
<p>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.</p>			
4.7.1	<p>(C) A mutually agreed procedure for identifying people entitled to compensation is in place.</p> <p>- Critical (Major) compliance -</p>	<p>The PNG Land Act protects customary land and as such it would be unlawful for big land development to take place on customary land without formalizing the land administration process through the relevant government authorities. Customary land in PNG is heavily regulated through strong tribal customs.</p> <p>There is no change compare to previous year where in any circumstance that if NBPOL-WNB would like to possess tenure to a land, under the Land Tenure Conversion Act, all people with any customary interests on the subject land must be in agreement. Under the Act prior to successful tenure conversion, the applicant must first adequately compensate all persons with customary interest on the subject land. The compensation can be monetary (money terms) or according to custom, but must be made before the application can be approved. Any application under this Act must be accompanied by an approved and registered plan of survey.</p>	Complied

<p>4.7.2</p>	<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.</p> <p>- Critical (Major) compliance -</p>	<p>The PNG Land Act protects customary land and as such it would be unlawful for big land development to take place on customary land without formalizing the land administration process through the relevant government authorities. Customary land in PNG is heavily regulated through strong tribal customs.</p> <p>There is no change compare to previous year where in in any circumstance that if NBPOL-WNB would like to possess tenure to a land, under the Land Tenure Conversion Act, all people with any customary interests on the subject land must be in agreement. Under the Act prior to successful tenure conversion, the applicant must first adequately compensate all persons with customary interest on the subject land. The compensation can be monetary (money terms) or according to custom, but must be made before the application can be approved. Any application under this Act must be accompanied by an approved and registered plan of survey.</p> <p>Based on the above, NBPOL-WNB is required to follow the Land Act to ensure all compensation are dealt and such PNG regulation is consistent with the RSPO P&C. The above are identified in Management Guidelines MG-21 Lands & Mini Estates Guidelines Land Acquisition Practices rev.3, dated June 2014.</p>	<p>Complied</p>
<p>4.7.3</p>	<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.</p> <p>- Minor compliance -</p>	<p>There is no expansion identified in this audit. It has been confirmed through interview with the smallholders and the management itself. Despite there is not such expansion that may cause loss of access and rights, NBPOL-WNB has set priority to employed local workers. Evidence on not only local workers are hired but equal opportunity of promotion was audited.</p> <p>Local business opportunity such as grass cutting and non-operational upkeep maintenance are awarded to local communities.</p>	<p>Complied</p>

<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>Guidance: In some circumstances where FPIC was conducted many years ago, documented evidence of the process may not be available. In these cases, evidence of continuing agreement of all parties shall be regarded as evidence of resolution.</p> <p>- Minor compliance -</p>	<p>There is no changes compare to last year where NBPOL-WNB does no "acquire" any land. All lands developed by NBPOL-WNB are either State lease lands or Sub-lease Lands with ILGs. As NBPOL-WNB operation has been long developed since 1960s, many of the FPIC are no more available. However it was able to be demonstrated that continual agreement of the surrounding communities and no significant land dispute between NBPOL-WNB and landowners.</p> <p>In case on any land conflict at the present management units, it will be managed following the Communication & Consultation Procedure ver. 3 dated 04/07/2020. Depending on the dispute, it will be manage either by the NBPOL-WNB Smallholder Affairs Office or Lands & Mini Estates Department.</p>	Complied
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>There were no new land conflicts recorded. It has been confirmed through interview with the smallholders and the management itself Records on resolution of previous land conflict are maintained. The resolution includes independent land market evaluation by the Provincial Valuer.</p> <p>Documented records of the clan negotiation, participatory mapping, scratched maps and final accepted of the compensation is available.</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>Please refer to indicator 4.4.2, 4.4.3 and 4.4.4 for details regarding the management of land development within NBPOL-WNB. There is no such land acquisition.</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>Documented records of the clan negotiation, participatory mapping, scratched maps and final accepted of the compensation is available. It has been verified during the audit base on the documentation provided.</p> <p>Since there is no latest dispute, latest sample records on land conflict dispute on Portion 2093 and 2094 of Megigi, Talasea. The conflict was recorded since 10/09/2018. There were several communication in between the conflict was recorded until it is being resolved. This includes survey by independent valuator, While the final agreement of the clan on the amount to be compensated was dated 24/07/2020.</p>	Complied
<p>Principle 5: Support smallholder inclusion</p>			
<p>Criterion 5.1: The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.</p>			
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>The price are made available to smallholder via notices displayed in public areas at smallholder location and the OPIC office. The prices are provided to OPIC by the mills. As per interview and record training that been reviewed, the current and previous prices of FFB was available for the smallholder accordingly. The Smallholder Harvesting Notice was available. Other than that, the management also has appointed PIC for each smallholders for any queries and guidance.</p>	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>The smallholder Department maintain same mechanism to explain the FFB to smallholder with the assistance of OPIC and PIC that has been appointed during the continues Field Days conducted. The FFB Price are also displayed at the OPIC office and is publicly available for all smallholder to view and has been verified by the auditor during the site visit . The Smallholder Harvesting Notice was also available.</p>	Complied
5.1.3	<p>(C) Fair pricing, calculated as a portion of the international CPO price less costs is provided to smallholders in the supply base and documented.</p>	<p>There are no changes compare to last year where the pricing of FFB is determined by The Department of Agriculture & Livestock, Port Moresby, National Capital District. The FFB Price Calculation is provided by the Department to Economic Advisor on a monthly basis. The</p>	Complied

	<p>Premium pricing, when achieved for RSPO certified sustainable palm oil is also shared with Smallholders.</p> <p>- Critical (Major) compliance -</p>	<p>monthly price calculation was available for verification which clearly indicates the formula to calculate the FFB Price payable to the smallholders which takes into account variable such as US\$ Price for CPO CIF Rotterdam, US\$ Price for PKO Rotterdam, CPO Extraction Rate, Exchange rate US\$ to Kina, Freight Cost US\$, FFB Transport Cost (Kina) and Mill Gate Price. Reductions are included for Levy's for OPRA, Sexava and OPIC and the final price is paid for the smallholders. FFB pricing calculation has been verified by the auditor and available to smallholders upon request. As per interview with the smallholders, there is evidence that same FFB price has been paid to smallholders base on the calculation.</p>	
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>NBPOL Smallholder Department have included the OPIC and all smallholders within the certification regardless of gender in decision making in regard to the smallholders. Pricing of FFB are discussed with the presence of OPIC to the smallholders during Field Days. Repayments for Fertiliser, tools and seedlings are done through credit and deducted when the smallholders send their FFB to the mill. This was done by the smallholders providing a written consent that they are purchasing the items on a credit basis and provide the mill with the authority to deduct they FFB payment. Samples of consent forms were available for verification. Interview with female smallholders found out that they has their right in decision making in term of selling FFB, fertilizers credit decision.</p>	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>There are no changes since last year audit where there is no contractual agreement between NBPOL and smallholders. NBPOL is obliged to process all smallholders FFBs in accordance to the International Development Association for agricultural development Act 1970.</p> <p>For other businesses, sample of contract agreement for FFB transportation and engineering works were sighted. The contracts are</p>	Complied

		entered fairly including pricing mechanism of the services. Contracts are entered following the Sime Darby ethical business guidelines.	
5.1.6	<p>(C) Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given.</p> <p>Guidance: Weight of FFB may be determined by weighing at the point of pick-up or by calculation of average bunch weight when weighed at the verified mill weighbridge. The organization managing the smallholders should determine the data used for payment and communicated to all smallholders.</p> <p>- Critical (Major) compliance -</p>	System of payment remained unchanged where payments are made on a timely manner every fortnightly and payment is deposited directly to the bank account or by cheque. Dockets of the smallholders were sighted to confirm the weight of the FFB sold to NBPOL. Despite there is weighing at the receiving mills, the payment will be based on the weigh at the collection. Samples of payment receipts were available for verification during the assessment.	Complied
5.1.7	<p>Weighbridges used for determining payment to smallholders are verified by an independent third party on a regular basis (this can be government). Other weighing equipment used may be calibrated using weights that are verified on the weighbridges. Records are maintained to provide an audit trail.</p> <p>- Minor compliance -</p>	<p>Weighbridges used for weighing the FFBs received from all the smallholders are regularly calibrated to ensure its precision for accurate payments and production monitoring. The records of weighbridge calibration were available and verified as below.</p> <p>Kapiura Oil Mill Date: 03/11/2021; Certificate Number: ICCC 1797; Scale: Avery Weigh – Tronix; Model: E1110; Capacity: 45 tonnes; Serial Number: 141650295; Inspection Body: Independent Consumer Competition Commission.</p> <p>Kumbango Oil Mill 1. Date: 03/11/2021; Certificate Number: ICCC 1798; Scale: Accuweigh; Model: IT3000M-AC; Capacity: 60 tonnes; Serial Number: 1410513; Inspection Body: Independent Consumer & Competition Commission. 2. Date: 03/11/2021; Certificate Number: ICCC 1907; Scale: Accuweigh; Model: IT3000M-AC; Capacity: 60 tonnes; Serial</p>	Complied

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		<p>Number: 1601281; Inspection Body: Independent Consumer & Competition Commission.</p> <p>Mosa Oil Mill Date: 03/11/2021; Certificate Number: ICC 1799; Scale: Avery Weigh – Tronix; Model: E1110; Capacity: 60 tonnes; Serial Number: 83950226; Inspection Body: Independent Consumer & Competition Commission.</p> <p>Numondo Oil Mill Date: 03/11/2021; Certificate Number: ICC 1800; Scale: Accuweigh; Model: IT3000M-AC; Capacity: 60 tonnes; Serial Number: 1601284; Inspection Body: Independent Consumer & Competition Commission.</p> <p>Waraston Oil Mill Date: 03/11/2021; Certificate Number: ICC 1853; Scale: Accuweigh; Model: IT3000M-AC; Capacity: 60 tonnes; Serial Number: 1601283; Inspection Body: Independent Consumer & Competition Commission.</p>	
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>Supports programme to smallholders that has been developed has been maintained and improved and can be verified base on field visit cum inspection report where advice and evaluation especially in good agriculture practices were available. Sample of training that has been provided to smallholders such as fertilizers applications training, safety training and the records of trainings were well maintained for verification. It has been confirmed through interview where shows that all smallholders has basic knowledge in managing their own farms and queries can be directly through PIC for each group smallholder.</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>New Britain Palm Oil Limited (NBPOL) has developed Communication & Consultation Procedure, version 2 dated 30/06/2018 where the objectives of the procedure are to:</p> <ul style="list-style-type: none"> a. Ensure free and effective communication between all of NBPOL stakeholders (including employees) and external stakeholders. b. Address and take corrective action on grievances raised against NBPOL’s operations in a timely and adequate manner. <p>The procedure states that the smallholders are to raise their grievances to OPIC where they are to detail out the grievances on the Incident/Accident/Grievance Form provided by OPIC. OPIC then escalates the form to NBPOL Smallholder’s Department. The Smallholder Department maintain a registry to monitor all grievances raised by the smallholders. Grievance Committee Meetings are conducted every fortnight to discuss on all the grievances raised by the smallholders. The issues are then addressed by NBPOL accordingly. Samples of Incident/Accident/Grievance Form, Grievance Registry (and Grievance Committee Meetings Minutes were available for verification during the assessment. Sample of grievance has been taken by auditor for verification which related to delay of FFB transport. There is evidence that the management responded to the complaint due to shortage of truck due to repair. The respond has been recorded in the grievances form. Interview with the smallholders also confirmed that any grievances has been responded by the management as per mentioned in the SOPs</p>	Complied
<p>Criterion 5.2: The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.</p>			
5.2.1	<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>	<p>NBPOL Smallholder’s Department maintain the same systems in order to consult with interested parties were it has been confirmed through consultation with smallholders. It can be seen through the field visit and inspection report where advice and evaluation especially in good agriculture practices were available. Apart from that various trainings</p>	Complied

	- Minor compliance -	covering the subjects of occupational safety, environment and field upkeep techniques were also given. Records of trainings were well maintained for verification. Trainings related to Boil the water Awareness, implementation of toilet pits and rubbish pits were noticed to improve the livelihoods of the smallholders in terms of safety and hygiene.	
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>	NBPOL Smallholder's Department provides extension services to smallholders to support the development and implementation of livelihood improvement programmes. The services has been provided on consultation, fertilizers loans and vehicle for transporting FFB. Consultation on best management practices will be done by PIC for each smallholder group that has been appointed by the smallholder department. Training records sighted.	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>	PIC for each group smallholder has been appointed by NBPOL Smallholder's Department where they are responsible to communicate and train smallholder understanding on legal requirements. It has been confirmed through consultation with smallholders.	Complied
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>	Pesticides handling training is still under the responsibilities of the Smallholder Department with the assistance of OPIC conduct regular refreshers on Chemical Handling for the smallholders. All smallholders that are to use chemicals or pesticides are required to undergone special designated trainings by OPIC which will in return provide them with a Certificate which allows them to use chemicals in their plots. The certificate also enables them to purchase chemicals from NBPOL.	Complied

		<p>Records of refresher trainings conducted by NBPOL and OPIC were available for verification as below.</p> <ul style="list-style-type: none"> – Chemical – Smallholder Refresher Training (16/01/2022) <p>Interviews conducted on the sampled smallholders indicated that they rarely use chemicals for weed control and resort to manual brushing as advised by the Smallholders Department. A number of smallholders occasionally do use chemical application and it was verified that they have the relevant certificate and trainings provided by OPIC and NBPOL. They are well aware on the hazards that are associated with chemical application, the required PPEs and the restrictions of chemical application along buffer zones.</p>	
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 and performance of smallholders were reported through field inspection reports and the reports are accessible by public. Samples has been taken for sample smallholder on the field inspection report for March and June 2022</p>	Complied
<p>Principle 6: Respect workers’ rights and conditions</p>			
<p>Criterion 6.1: Any form of discrimination is prohibited.</p>			
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>NBPOL maintained same policy for non-discrimination and equal opportunity policy and documented developed in the document Employee Rights & Equal Employment Opportunities Policy dated 25/07/2016 where NBPOL is committed to eliminate any unlawful or unfair discrimination on the grounds of race, colour, gender, religion, disability, age, ethic/national origins, marital status, religious or ethical beliefs, etc. The company will use positive discrimination to encourage an ethnically diverse workforce across the company to protect against social inequality. Other than the policy mentioned, the company also established Human Rights Policy to highlight the equal opportunities and discrimination based on any grounds in recruitment, dismissal or promotion is strictly prohibited.</p>	Complied

		<p>For group level, Sime Darby Plantation has developed Human Rights Charter to ensure decent work for all workers means providing equal opportunity, social protection, respecting rights at work and providing a platform for workers' voice and social dialogue. They respect the rights of workers and provide fair and favourable working conditions by Promoting diversity and inclusion by providing equal opportunities and not tolerating any form of discrimination on the grounds of ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age. They will facilitate opportunities for advancement for our employees, especially women, by removing barriers to progress and respecting reproductive and maternal rights. The policy could be downloaded from</p> <p>https://www.simedarbyplantation.com/sustainability/human-rights-charter.</p>	
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>Base on Interview with the workers shows that the management uphold the policy as per previous year comprises of different gender and nationalities as well as the parolees where confirmed that no discrimination has reported. The management treated all equally such as provided free accommodation and medical to all the workers and offered job based on capability. The worker can request for job transfer if they found they unfit for the job assigned to them.</p>	Complied
6.1.3	<p>The unit of certification demonstrates that recruitment selection, hiring, access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available.</p> <p>- Minor compliance -</p>	<p>NBPOL has developed Employee Rights & Equal Employment Opportunities Policy dated 25/07/2016 where NBPOL is committed to eliminate any unlawful or unfair discrimination on the grounds of race, colour, gender, religion, disability, age, ethic/national origins, marital status, religious or ethical beliefs, etc. The company will use positive discrimination to encourage an ethnically diverse workforce across the company to protect against social inequality. Other than the policy mentioned, the company also established Human Rights Policy to</p>	Complied

		highlight the equal opportunities and discrimination based on any grounds in recruitment, dismissal or promotion is strictly prohibited. Sample of document for recruitment, hiring and promotion has been taken such as interview records, assessment records, KPI assessment has been verified by the auditor There is evidence that the process is in compliance with the policy and selection has been done base on the capabilities of the candidates.	
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 -	No pregnancy test been conducted for job selection. This is confirmed through the interview session with the female workers and reviewed the medical check-up report	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 -	NBPOL maintained same systems compare to previous to create awareness and discuss any issues related to women and has established a guidance on Social Issues Committee – “Strengthening and Implementing Gender Equity and Social Inclusion in the workplace” dated May 2020. NBPOL is committed to create a fair and equitable environment that is free from discrimination ensuring active participation, accessibility and social inclusion of women, people living with disabilities, people living with HIV and AIDS and other marginalized groups in all aspects of NBPOL’s operations. Social Issues Committee is established to develop, implement and monitor the effectiveness of the SOP developed. The function of the committee is to raise awareness, identify and address issues of concern for women, identify opportunities and improvement for women and to ensure that Gender Smart Audits are carried out and recommendations are acted upon. Minutes meeting Social Issues Committee Meeting was last conducted on 13/07/2022 which chaired by SQM Officer attended by the representative from the workers. The main objective is to communicate social policy that has been established, discuss social related issues	Complied

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		and to plan for any social activities. During the meeting, the management also has highlighted some activities that has been done such as new mother assessment, line site inspection, hygiene training and clean water training.																																											
6.1.6	There is evidence of equal pay for the same work scope. - Minor compliance -	Equal pay has been paid to all the workers regardless the gender base on the payslips reviewed the pay slips for both gender, male and female workers. The minimum basic rate, K3.13/ hour (2020) and K3.29/hr (2021) and K3.50/hr (2022). The rate will be adjusted to higher depends on the job scope and the position. There is no discrimination of pay based on gender. It also has been confirmed base on the interview with sample of women workers that work in each operating units.	Complied																																										
Criterion 6.2: Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW)..																																													
6.2.1	(C) Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions are available to the workers in the English language and verbally explained to them in language they understand. - Critical (Major) compliance -	<p>The management of NBPOL has established document which outline workers wages base on the workers' grade in the document title "WNB, HOP, MBE and POL: Nonexecutive pay rates for Jan- Dec 2022. There is 7 different grades and 7 different rates of pay. Sample as per below</p> <table border="1"> <thead> <tr> <th rowspan="2">Grade</th> <th rowspan="2">Level</th> <th colspan="2">Pay rates Jan- Dec 2021</th> <th colspan="2">Pay rates Jan- Dec 2021</th> </tr> <tr> <th>Hour</th> <th>Pay fortnight</th> <th>Hour</th> <th>Pay fortnight</th> </tr> </thead> <tbody> <tr> <td rowspan="3">1</td> <td>1.1</td> <td>3.29</td> <td>289.52</td> <td>3.50</td> <td>308.00</td> </tr> <tr> <td>1.2</td> <td>3.50</td> <td>308.00</td> <td>3.73</td> <td>328.24</td> </tr> <tr> <td>1.3</td> <td>3.80</td> <td>334.40</td> <td>4.00</td> <td>352.00</td> </tr> <tr> <td rowspan="3">2</td> <td>2.1</td> <td>3.98</td> <td>350.24</td> <td>4.18</td> <td>367.84</td> </tr> <tr> <td>2.2</td> <td>4.22</td> <td>371.36</td> <td>4.44</td> <td>390.72</td> </tr> <tr> <td>2.3</td> <td>4.50</td> <td>396.00</td> <td>4.73</td> <td>416.24</td> </tr> </tbody> </table>	Grade	Level	Pay rates Jan- Dec 2021		Pay rates Jan- Dec 2021		Hour	Pay fortnight	Hour	Pay fortnight	1	1.1	3.29	289.52	3.50	308.00	1.2	3.50	308.00	3.73	328.24	1.3	3.80	334.40	4.00	352.00	2	2.1	3.98	350.24	4.18	367.84	2.2	4.22	371.36	4.44	390.72	2.3	4.50	396.00	4.73	416.24	Complied
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		<p>Harvesting rate in the document NBPOL WNB FY2022- Harvesting rate (Figures shown are bunch rates before the addition of 8.4% for Palm Supa).</p> <p>Reviewed the WNB30, Non-Executive Staff Recruitment Form as the employment contract for the workers. The WNB30 is in English and the Grade/ Level of the worker will clearly be stated in the form. Besides, NBPOL has implemented General Policies & Regulations. Handbook released on May 2010 where summary of employment conditions was clearly stated in the handbook.</p>	
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 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>NBPOL has implemented General Policies & Regulations Handbook released on May 2010 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>Latest pay rates effective from Jan to Dec 2021 is publicly available on all notice boards in mills and estates. Piece rated workers for example harvester gang will be based on latest published rate. NBPOL WNB FY2022 - Harvesting Rate has defined specific rates for cutter, wheeler and loose fruit collector and based on years of planting (YOP). WNB, HOP, MBE AND POL: NON-EXECUTIVE PAY RATES FOR JAN - DEC 2022 is being referred for hourly and fortnightly pay based on NBPOL grades and level.</p> <p><u>OFI</u></p> <p>NBPOL-WNB has established management plan for pending employment contract for workers that has been documented in document title "OUTSTANDING CONTRACT SUMMARY PLAN" which expected to be completed on 31/12/2022. OFI raised to ensure that the management plan implemented for next surveillance audit</p>	OFI

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>Sample of 10% of workers has been taken for each operating units for verification. Verification has been done base on employment contract and pay slips. Reviewed on the payslips in 3 different production trends (low, average and peak) which is for August 2021, December 2021 and March 2022 found that regular working hours (11 days work x 8 hours = 88 hours work weeks/fortnightly) was not exceeded. Overtime only been carried out by the workers based on process/production demand and with the approval by the management. No involuntary overtime work observed. Other legal labour requirements such as sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice is clearly mentioned in the General Policies & Regulations Handbook dated May 2010 and evidently in compliance. Sample of employment contract, attendance chit, pay slips for sample months has been taken and verified. It has been further verified through interview with workers and confirmed that the management comply with working hours, leave and holiday entitlement. Interview with the sample workers also confirmed that all workers entitle for annual leave which depending of length or services, other than that, there workers entitled for 17 days of public holidays based on Public Holiday Act 1953.</p>	Complied
6.2.4	<p>(C) The Company provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. National laws, or in their absence the ILO Guidance on Workers' Housing Recommendation No. 115, are used. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5years) is allowed to upgrade the infrastructure. Smallholders may live in houses of traditional materials or other accommodation of their choosing.</p> <p>- Critical (Major) compliance -</p>	<p>NBPOL-WNB has established internal procedure for line site management in the document title " services management guidelines, compound upkeep practices (NBPOL-EI-MG14). Stated in the procedure that line site inspection need to be done quarterly basis using PF#29 document title "Housing repair and maintenance checklist"</p> <p>Dami/Wasisi Estate</p> <p>Line site inspection done on quarterly basis and has been recorded in the document PF29 on 02/02/2022 and 27/06/2022</p> <p><u>Major Non conformities</u></p>	Non-compliance

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		<p>Quarterly housing compound inspection done using PF#29 title "Housing repair and maintenance checklist" and base on inspection done, it has been identified that there several item which has been classified under NR, need for repair (leaking roof, full septic, electrical faults and floor damage) and yet to be done since 2021. Interview respond with the workers and site visit confirm that it is consistent with the document reviewed.</p> <p>2 samples of site have been taken as per below <u>Kapiura POM</u></p> <p>Line site inspection has been done on quarterly basis, (07/07/2022, 22/05/2022,1703/2022 and 14/12/2021).</p> <table border="1" data-bbox="1095 767 1930 933"> <thead> <tr> <th>House number</th> <th>Item need to be repaired</th> <th>Application for repair</th> <th>Pending since</th> </tr> </thead> <tbody> <tr> <td>JG01 and JG02</td> <td>roofing, gutter, toilet, wall, veranda, pipe</td> <td>14/06/2022.</td> <td>July 2021</td> </tr> </tbody> </table> <p><u>Numundo POM</u></p> <p>Sample has been taken for house DLQ3/A and QLQ 1 and both has been identified as need for repair from the previous inspection which is June 2021 and still pending for repair until the day of audit.</p> <table border="1" data-bbox="1095 1129 1921 1359"> <thead> <tr> <th>House number</th> <th>Date inspection</th> <th>Remarks</th> </tr> </thead> <tbody> <tr> <td>DLQ1/AB</td> <td>20/06/2021 08/05/2022</td> <td>a) Broken gutter</td> </tr> <tr> <td>DLQ3/A</td> <td>20/06/2021 08/05/2022</td> <td>a) Roof leaking b) Broken window frame</td> </tr> </tbody> </table>	House number	Item need to be repaired	Application for repair	Pending since	JG01 and JG02	roofing, gutter, toilet, wall, veranda, pipe	14/06/2022.	July 2021	House number	Date inspection	Remarks	DLQ1/AB	20/06/2021 08/05/2022	a) Broken gutter	DLQ3/A	20/06/2021 08/05/2022	a) Roof leaking b) Broken window frame	
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		QLQ1	12/02/2022	a) Sink outlet discharge leaking b) Toilet system leaking	
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>				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 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</p>			<p>Interviewed with the workers confirmed that they are easily access to adequate, sufficient and affordable foods where the mill and estates have been provided with canteen and can easily access if they need to but supplies. Management has also provided transport if the workers intent to buy any food supply. Sighted in the social management plan, there several projects and plan initiated by the management such as chicken poultry project in Lolokoru Estate, allocation of 300m² of suitable garden area per housing unit (as per Regulations Handbook) for compounds in all new replanting areas near compounds as to encourage workers to plant some vegetable for consumption. Site visit has been done by auditor during the audit, chicken price at the poultry project is K20 cheaper than chicken purchase in town</p> <p>Calculation for DLW remain the same where there is no significant change in benefits given to the workers. NBPOL (WNBOP) has established the prevailing wage calculation to include all the in-kind benefits provided to the workers. The in-kind benefits are such as housing (including maintenance costs & tax levies for a house), ambulance cost, water cost, electricity cost, electricity cost – generator and school bus transport. Based on 2020 calculation, considering total population in WNBOP with the minimum wages of K3.13/hour (with exemption given by the authority), benchmark calculation of prevailing wages and in kind benefit, total benefit per employee or equivalent with K284.34 per 88 hours work week/fortnight. The management of NBPOL responded that there is no changes of DLW since 2020 since there is no changes in-kind benefits provided to the workers.</p>	Complied

	<p>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>The management maintained practice to recruit permanent workers for all core works . All the core works are performed by permanent and full-time employees in mills and plantations. At palm oil mill, temporary or short-term contract offered to non-core type of work such as general worker and miscellaneous labour.</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>NBPOL has developed Employee Rights & Equal Employment Opportunities Policy dated 25/07/2016 where they respect the right of all personnel to form and join trade unions of their choice and to bargain collectively. Other than the policy mentioned, the company also outlined the rights of employees to join and form organization of their</p>	Complied

	- Critical (Major) compliance -	own choosing in the Human Rights Policy dated 19/06/2014. Sime Darby Plantation has developed Human Rights Charter where they respect Freedom of Association by respecting the rights of employees to form and join unions and bargain collectively. In jurisdictions where this right is limited, they will provide alternative means of employee engagement and grievance redressal.	
6.3.2	Minutes of meetings between the unit of certification with trade unions or workers representatives, who are freely elected, are documented in national languages and made available upon request. - Minor compliance -	Minutes of meetings between NBPOL with WNBOP union available for verification. The WNBOP union committee are freely elected every 4 years cycle. Verified latest meeting minutes for 2022 dated 28/5/2022, 09/7/2022 and 15/4/2022. Same issues has been highlighted as last year were related to housing and working conditions for workers. On top of that safety and health issues were also being discussed related to PPE at high risk area. Output from the meetings have been reviewed by management as the inputs for the development of company-wide social and continuous management plan for 2021. Status of the management plan being updated under Social Improvement Register (SIR) dated July 2022. Verification has been done by auditor on the issues that has been highlighted. Base on verification from the line site inspection records, it has been found out that there is repair needed for workers housing has been reported by the workers. During the site visit, sighted that the repair is still pending by the management. Non conformities has been raised under indicator 6.2.4	Complied
6.3.3	Management does not interfere with the formation or operation of registered unions/ labour organisations or associations, or other freely elected representatives for all workers including migrant and contract workers. - Minor compliance -	Interviewed with WNBOP union president and spoke person confirmed that the election of the representatives was elected freely by the workers without any interference of management. Union election will be done every 4 years and the latest election was last carried out in February 2021. Next election will be done on 2025.	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>NBPOL has established Human Rights Policy where no children below 16 working paid or unpaid on their premises. They will seek to ensure that schooling opportunities are available to children in the areas where they operate. Sime Darby Plantation has developed Human Rights Charter 2020 to recognize that they protect the wellbeing of children by safeguarding them from any form of maltreatment or exploitation. They will not employ anyone under the age of 18 years.</p> <p>Please refer to indicator 2.2.3 providing audit details on suppliers complying to this policy.</p> <p>Consultation with stakeholders and field observation during the onsite audit has not identified any use of child labour.</p> <p>Sample of communication as per below</p> <ul style="list-style-type: none"> a. 18/04/2022 for 17 workers b. 22/07/2022 for 21 workers c. 22/07/2022 for 30 workers d. 23/07/2022 for 9 workers 	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>There is no new procedure has been updated where the screening process follows the NBPOL-WNB Standard Operating Procedure for Minimum Age Specification. Steps of verification of the age are conducted with 2 criteria verification. Legal documentations such as birth certificate and national identification card must be provided unless not available due to the condition/ culture of the country. Alternatives procedure may be relied upon to provide assurance that minors are not employed such as:</p> <ul style="list-style-type: none"> a. School certificates b. Letter from parents confirming the date of birth c. Letter from village court/ District Court Magistrate, or local church pastor 	Complied

		<p>d. Previous employment records</p> <p>e. Statutory declaration signed by Commissioner of Oaths</p> <p>f. Assurance during interview that the candidate has strong recollection of key events that aligns with their claimed age.</p> <p>The age or date of birth of each workers are registered in the company database and it can be shown in the workers list.</p> <p>During this audit, the sample sites workers master lists were reviewed. Referring to the date of birth, there is no worker with the age on below 18 years old.</p>	
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>There is no new policy has been updated NBPOL-WNB policy and Sime Darby Group Policy no young person should be employed. Please refer to indicator 6.4.1 detailing the content of the policy and 6.4.2 on how the age of the workers are being audited and verified.</p>	Complied
6.4.4	<p>The Company demonstrates communication about its “no child labour” policy and the negative effects of child labour through notices at workers’ housing compounds and Smallholder field days. It promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live.</p> <p>- Minor compliance -</p>	<p>The management maintained mechanism to communicate as previous year where he no child labour policy of NBPOL-WNB are communicate through several channels including but not limited to:</p> <ol style="list-style-type: none"> 1. Through suppliers contract and supplier Induction program. The suppliers are required to understand the NBPOL-WNB policy and subsequently apply the same when conducting business activities in NBPOL-WNB. Please refer to indicator 2.2.1 and 2.2.3 for more details on the contracts audited. 2. Through providing the Policy Booklet to all workers while the booklet is available in Tok Pisin. 3. Continuous awareness program with workers through periodic training and briefing regarding company policies. 	Complied

		<p>4. Continuous awareness during field days with smallholders and independent estates regarding no child labour. The smallholder Grower Booklet (Growa Buklet) provided to the smallholders displays information regarding Child Labour is against international and PNG labour laws.</p> <p>5. External stakeholder workshop conducted annually will reemphasize the company's policies include Human Rights Policy.</p> <p>6. The NBPOL-WNB policies are also published in notice board of OPIC.</p>	
<p>Criterion 6.5: There is no harassment or abuse in the workplace, and reproductive rights are protected.</p>			
<p>6.5.1</p>	<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. Smallholder requirements: Smallholders must be able to verbally explain that they understand and observe this requirement. - Critical (Major) compliance -</p>	<p>Sexual harassment policy established on 10/08/2021 signed by Mr Mohd Khairi Mahamor, general manager for NBPOL- WNB. Stated in the policy that the management is committed to maintain a work environment that demands respect for the dignity of each individual. Sexual harassment is considered unacceptable and will not be tolerated under any circumstances.</p> <p>Plan for SOP and policy communication established for year 2022, during the field day for all smallholders and has been postpone to August 2022 due to election and documented in the document "Hoskin Project, 2022- Field day project" Latest communication has been done in year 2021 and sample 2 field day which are on 03/07/2021 and 13/07/2021 done by Ms Evelyn Tuora and Mr Derrick Tand. During the interview with smallholder, they able to demonstrate their understanding on the policy.</p> <p>While for POM and Estate, communication of the policy has been done as per below</p> <p>Sample of communication as per below</p> <ul style="list-style-type: none"> a. 18/04/2022 for 17 workers b. 22/07/2022 for 21 workers 	<p>Complied</p>

		<p>c. 22/07/2022 for 30 workers d. 23/07/2022 for 9 workers</p> <p>Smallholders Interview with the smallholders confirms that sexual harassment policy has been communicated to them where the smallholders able to explain the content of the policy, types of harassment and procedure how to report any harassment happen. The smallholders responded that there is no issues of harassment happen in the area. Sample of smallholder that has been audited</p> <table border="1" data-bbox="1104 732 1926 1027"> <thead> <tr> <th data-bbox="1104 732 1514 783">Name</th> <th data-bbox="1514 732 1926 783">Location</th> </tr> </thead> <tbody> <tr> <td data-bbox="1104 783 1514 834">Maraia Rere</td> <td data-bbox="1514 783 1926 834">Kaus</td> </tr> <tr> <td data-bbox="1104 834 1514 885">Francis Rere</td> <td data-bbox="1514 834 1926 885">Kaus</td> </tr> <tr> <td data-bbox="1104 885 1514 936">Benson Tolon</td> <td data-bbox="1514 885 1926 936">Tamba</td> </tr> <tr> <td data-bbox="1104 936 1514 987">Varavara Andy</td> <td data-bbox="1514 936 1926 987">Tamba</td> </tr> <tr> <td data-bbox="1104 987 1514 1027">Paul Misiel</td> <td data-bbox="1514 987 1926 1027">Mosepa</td> </tr> </tbody> </table>	Name	Location	Maraia Rere	Kaus	Francis Rere	Kaus	Benson Tolon	Tamba	Varavara Andy	Tamba	Paul Misiel	Mosepa	
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<p>6.5.2</p>	<p>(C) A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce.</p> <p>Smallholder requirements: Smallholders must be able to verbally explain that they understand and observe this requirement. - Critical (Major) compliance -</p>	<p>As stated in the document "Gender Rights Policy" dated 10/08/2021 that NBPOL does not allow pregnant women and breast-feeding mothers to do any tasks dealing with chemical handling and spraying.</p> <p>Plan for SOP and policy communication established for year 2022, during the field day for all smallholders and has been postpone to August 2022 due to election and documented in the document "Hoskin Project, 2022- Field day project" Latest communication has been done in year 2021 and sample 2 field day which are on 03/07/2021 and 13/07/2021 done by Ms Evelyn Tuora and Mr Derrick Tand. During the interview with smallholder, they able to demonstrate their understanding on the policy.</p> <p>While for POM and Estate, communication of the policy has been done as per below</p> <p>Sample of communication as per below</p> <ul style="list-style-type: none"> a. 18/04/2022 for 17 workers b. 22/07/2022 for 21 workers c. 22/07/2022 for 30 workers d. 23/07/2022 for 9 workers <p>Smallholder</p> <p>Records of training was available during the audit to all smallholders where it has been done by PIC for each smallholders group. It has been further verified during the interview where smallholder able to explain the content of the policy. The smallholders also responded that they are understand on their right reproductive. Most of the smallholders interviewed has more than 1 kids.</p> <p>Sample of smallholder that has been audited</p> <table border="1" data-bbox="1104 1299 1926 1393"> <thead> <tr> <th data-bbox="1104 1299 1514 1350">Name</th> <th data-bbox="1514 1299 1926 1350">Location</th> </tr> </thead> <tbody> <tr> <td data-bbox="1104 1350 1514 1393">Maraia Rere</td> <td data-bbox="1514 1350 1926 1393">Kaus</td> </tr> </tbody> </table>	Name	Location	Maraia Rere	Kaus	<p>Complied</p>
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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>New mothers' need assessment report, 2021-2022 is available that has prepared by the sustainability & quality management department NBPOL-NBP. Total 176 new mother interviewed, and assessment has been done at 3 different locations which are Mosa clinic, Haella/Talasea and Kapiura/ Malilim. Base on the assessment only 17 mothers that has been interviewed work with NBPOL and consultation on treatment after delivery has been done. It has been confirmed through interview with new mother, that there is assessment been done the sustainability department and there is no special request has been raised. New mother also has been asked how the assessment has been done and is there any improvement can be made by the management.</p>	Complied									
6.5.4	<p>A grievance mechanism, which respects anonymity and protects complainants where requested, is established, implemented and communicated to all levels of the workforce.</p> <p>- Minor compliance -</p>	<p>NBPOL maintained same mechanism to handle any issues of sexual harassment. The Special Grievance handling that includes grievances related to gender and sexual harassment that goes directly to the Human Resource department.</p> <p>A welfare officer was employed by NBPOL-WNB to specially handles and resolve matters related to sexuality and domestic issues. Records</p>	Complied									

		<p>of complaints are kept confidential and the rights of anonymity are respected. Addition to this mechanism, the Whistleblower Policy is another channel that complainant can directly contact the General Manager and Company Secretary to raise their complaint anonymously. Interview with the Human resources department has been done by auditor and confirmed there is no cases of harassment has been report. Further verification has been done by auditor through interview with workers, where they demonstrate their understanding the process to make any grievance related to harassment.</p>	
<p>Criterion 6.6: No forms of forced or trafficked labour are used.</p>			
<p>6.6.1</p>	<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. - Critical (Major) compliance -</p>	<p>Total 48 workers has been samples for each operating units which from category such as different gender, newly recruited workers, different races has been taken for verification. Employment contract, pay slips, recruitment document has been taken and verified to ensure no forms of forced or trafficked labour are used in each operating units. Description as per below</p> <p><u>Retention of identity documents or passports</u> A copy of identity documents retained for employment purpose and kept under individual files. No foreign or guest workers in NBPOL.</p> <p><u>Payment of recruitment fees</u> No recruitment fees paid for employment. The method of recruitment of general labour and semi- skilled are from hearing of vacancies through word of mouth and putting up notice on notice board.</p> <p><u>Contract substitution</u> No contract substitution observed. Clear job designation and scope of work written in the contract. No foreign or guest workers in NBPOL.</p> <p><u>Involuntary overtime</u> Overtime is voluntary and must be approved in advance by the appropriate Manager. Exceptionally, this rule will be waived in an</p>	<p>Complied</p>

		<p>emergency where it is impracticable to obtain prior managerial approval</p> <p><u>Lack of freedom of workers to resign, penalty for termination of employment and debt bondage</u></p> <p>Based on General Policies and Guidelines handbook 2010, employees are subject to give notice to terminate the contract. Notice periods for all Non-Executive staff are as follow:</p> <p>Grade 1-7: < 3 months service (1 day)</p> <p style="padding-left: 40px;">< than 1 year (1 week)</p> <p style="padding-left: 40px;">< less than 5 years (2 weeks)</p> <p style="padding-left: 40px;">> 5 years of service (1 month)</p> <p>Debt bondage recorded in the payslip for food rations and sighted deduction consent has been confirmed with the workers during interview.</p> <p><u>Withholding of wages</u></p> <p>There are mandated deductions as required by the law of Papua New Guinea. Deductions such income tax and PSF @ Palm Supa Fund (AON), WNBGW (union fees) were paid on timely manner.</p>	
6.6.2	<p>(C) Where temporary or migrant workers are employed for seasonal or activity related periods of high demand, these are regarded as "casual" workers. A specific labour policy and procedures for casual workers are established and implemented.</p> <p>- Critical (Major) compliance -</p>	<p>SDPB has implemented a Sime Darby's Human Rights Charter revised 2020 and can be easily access via www.simedarbyplantation.com where they committed as below:</p> <ol style="list-style-type: none"> 1. Providing equal opportunity 2. Respecting freedom of association 3. Eradicating any form of exploitation 4. Providing decent and fair wages, reasonable working hours with adequate rest, achievable productivity targets, voluntary overtime as well as adequate housing with access to basic needs 	Complied

		<p>5. Eradicating any form of exploitation, forced or bonded labour, slavery, human trafficking and sexual exploitation by eliminating the need to retain identification documents, eliminating risk caused by debt bondage and avoiding contract substitution.</p> <p>As per verification through interview with the workers at each operating units, it has been confirmed that there was no foreign labours or migrant workers employed in NBPOL WNB.</p>	
<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>			
<p>6.7.1</p>	<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>As stated in the Operational Safety Management Plan for plantation and Production department under section 3: OHS Responsibility and communication, the site operational Manager like POM and Group manager were responsible for the safety performance of the operating units and drive improvement and awareness. The management conducted meeting monthly basis and verification as per below;-</p> <p>MOM</p> <p>OSH communities were available in Mosa POM, it can been identified by the latest OSH Chart. The OSH communities was led by the mill manager and assistant mill engineer as their OSH secretary. OSH meeting conducted by monthly basis. The latest OSH meeting conducted was on 7/7/2022 (Minutes file no; 06/2022) and previously was on 29/5/2022 (Minutes file no: 05/2022) and 03/05/2022 (Minutes files no: 04/2022).</p> <p>KOM</p> <p>OSH meeting conducted on 7/7/2022 (OHS-04-2022), and previously was on 30/3/2022(OHS-03-2022) and also OSH-2-2022 (23/2/2022)</p> <p>KAPOM</p>	<p>Complied</p>

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		<p>The workplace inspection conducted by monthly basis, the record was sighted and verified as per dated record 17/6/2022 and previously was on 31/5/2022 and 30/4/2022.</p> <p>OSH meeting conducted on monthly basis, the latest record was on 30/6/2022 and previously was on 27/5/2022 and 27/4/2022</p> <p>Togulo Estate The OSH meeting conducted monthly basis, the latest meeting dated 26/7/2022 (06/2022). The workplace inspection conducted monthly basis. Previously OSH meeting was on 30/6/2022 (05/2022) and 7/6/2022(04/2022).</p> <p>Nomundo POM The ESH monthly inspection checklist was conducted latest on 27/6/2022 an previously was on 9/6/2022. From the inspection some finding been highlight and the implementation of Corrective action p was verified as per document and interview conducted. The OSH meeting also been conducted monthly basis, the record verification was available dated 28/7/2022 (NOMOHS- 07/2022). Previously was on 2/7/2022 (NOMOHS-06/2022).</p> <p>Haella Estate OSH meeting conducted monthly basis and the latest conducted was on 30/6/2022 (06/22) and other sampling was on 14/4/2022 (03/22).</p> <p>Daliavu Estate The monthly inspection checklist conducted latest on 20/7/2022 and previous record was on 23/6/2022. The OSH meeting conducted</p>	
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		<p>monthly basis, as per record CR/rk 07 dated 26/7/2022. Previously was on 29/6/2022 (CR/rk 06)</p> <p>Waraston POM The OSH meeting conducted was 28/7/2022 and previously was on 22/6/2022 and 31/5/2022</p>	
6.7.2	<p>Accident and emergency procedures are in place and instructions are clearly understood by all workers. Accident procedures are available in 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 procedure for emergency was established in Operational Safety Management Plan for Plantation and Production Department under section 5 and also section 9.</p> <p>Under Section 9: Major Incident Flow chart, as per flowchart when the incident happen in the operating unit the management need to establish the Injury Assessment Report (IAR) to indicate the LTI on the accident. If the accident LTI was more than 5 days they need to establish Initial Notification Report (INR) to Sustainability Quality Management (SQM)</p> <p>IAR – for Nolan Sengian was dated 22/6/2022 with MC 8 days INR – prepared by Mr Justine Numalik and sent to SQM on 22/6/2022 Investigation was conducted on 24/6/2022 and the CAPA was in progress.</p> <p>In Nomundo POM, Verification on accident record January 2022. There was 1 record under maintenance mechanical area. The accident due to the centrifuge box hit his right foot during moving the box. He got 3 days of medical certificate. The IAR already been establish on 10/1/2022 site manager already approved the IAR on 18/1/2022 for payment 3 days as injury leave. Verification n the payslips record on January 2022 (employee no; NOM9077).</p> <p>In each operating unit there are First aider that standby and ensure the treatment will be given if any incident happen immediately. The</p>	Complied

		record of First aid was available at each sampling office and up to date accordingly.																																			
6.7.3	<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.</p> <p>- Critical (Major) compliance -</p>	<p>PPE Issuance record for laboratory was verified as per laboratory verification such as latest record was on June 2022.</p> <p>In KAPOM, verification on PPE issuance record for lab operator been verified as per WRA recommendation. As per recommendation was used Face shield, trousers, shirts, labcoat, clear glass/goggles, hand glove and helmet. The record given as per below:-</p> <table border="1" data-bbox="1104 655 1926 754"> <thead> <tr> <th>Face shield</th> <th>Goggles</th> <th>Helmet</th> <th>Lab coat</th> <th>Boot</th> </tr> </thead> <tbody> <tr> <td>12/4/2021</td> <td>18/7/2022</td> <td>18/7/2022</td> <td>8/7/2022</td> <td>6/7/2022</td> </tr> </tbody> </table> <p>For Namundo POM, the issuance of PPE for lab operator was available Sampling in Togulo Estate, the issuance record for spraying was available dated 17/6/2022 for the Orange overall and the gumboot on 16/6/2022. This was followed as per Appendix 7: PPE Guidelines form operational Safety Management Plan (May 2019). During site verification found the sprayer operator was not wearing apron during spraying and this was not followed as per Appendix 7.</p> <p>Haella Estate</p> <table border="1" data-bbox="1104 1086 1901 1219"> <thead> <tr> <th>Safety glass</th> <th>Apron</th> <th>Coverall</th> <th>Nitrile glove</th> <th>Boot</th> <th>Remark</th> </tr> </thead> <tbody> <tr> <td>18/7/22</td> <td>nil</td> <td>30/5/22</td> <td>30/5/22</td> <td>9/6/22</td> <td></td> </tr> </tbody> </table> <p>Daliavu Estate</p> <table border="1" data-bbox="1104 1310 1901 1388"> <thead> <tr> <th>Safety glass</th> <th>Apron</th> <th>Coverall</th> <th>Nitrile glove</th> <th>Boot</th> <th>Remark</th> </tr> </thead> <tbody> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	Face shield	Goggles	Helmet	Lab coat	Boot	12/4/2021	18/7/2022	18/7/2022	8/7/2022	6/7/2022	Safety glass	Apron	Coverall	Nitrile glove	Boot	Remark	18/7/22	nil	30/5/22	30/5/22	9/6/22		Safety glass	Apron	Coverall	Nitrile glove	Boot	Remark							Complied
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6.7.4	<p>All workers are provided with medical care and covered by accident insurance. Costs incurred from work-related incidents leading to injury or sickness are covered in accordance with national law or by the unit of certification where national law does not offer protection.</p> <p>- Minor compliance -</p>	<p>All the workers were protected under Worker’s Compensation Acts 1978. The operating units as employer made contribution to the compensations fund in quarterly basis.</p> <p>The workers were also covered by Life Insurance (Death Benefits) on optional basis which the workers made contributions on monthly basis.</p> <p>The operating units monitor the status of the compensation claim and recorded in the Workers Compensation Claims Status Report Forms. The operating units maintain the records since 2011.</p>	Complied																		

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6.7.5	Occupational injuries are recorded using Lost Time Accident (LTA) metrics. - Minor compliance -	<p>All the operating units reported all accident occur to the Sustainability Quality Management Department for compilation. The Lost Time Accident Records was recorded in the NBPOL WNB LTI Register. reviewed the records FY 2022 and to date June 2022 as follows:</p> <table border="1" data-bbox="1104 507 1821 1082"> <thead> <tr> <th>Operating Unit</th> <th>2021</th> <th>2022 (Todate)</th> </tr> </thead> <tbody> <tr> <td>Togulo estate</td> <td>57</td> <td>32 days</td> </tr> <tr> <td>Haella estate</td> <td>19</td> <td>26</td> </tr> <tr> <td>Daliavu estate</td> <td>0</td> <td>0</td> </tr> <tr> <td>Numundo estate</td> <td>25</td> <td>0</td> </tr> <tr> <td>Dami/wasisi</td> <td>64</td> <td>32</td> </tr> <tr> <td>NOM</td> <td>9</td> <td>8</td> </tr> <tr> <td>KAPOM</td> <td>8</td> <td>9</td> </tr> <tr> <td>WOM</td> <td>5</td> <td>6</td> </tr> <tr> <td>KOM</td> <td>6</td> <td>24</td> </tr> <tr> <td>MOM</td> <td>49</td> <td>0</td> </tr> </tbody> </table>	Operating Unit	2021	2022 (Todate)	Togulo estate	57	32 days	Haella estate	19	26	Daliavu estate	0	0	Numundo estate	25	0	Dami/wasisi	64	32	NOM	9	8	KAPOM	8	9	WOM	5	6	KOM	6	24	MOM	49	0	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>There are no changes for IPM plan where the Integrated Pest Management Plan was implemented as per Papua New Guinea Oil Palm Research Association (PNGOPRA) Inc. IPM plan revised by PNG OPRA Head of Entomology on dated 01/06/2020. The IPM strategies were:</p> <ol style="list-style-type: none"> 1. Understanding of economic threshold 	Complied
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	<p>- Critical (Major) compliance -</p>	<ol style="list-style-type: none"> 2. Understanding of pest and beneficial organism biology 3. Routine monitoring of pest and beneficial 4. Biological control 5. Physical control 6. Cultural control 7. Precise and target application of pesticides <p>The IPM was conducted when there is sign/evidence of pest attack in the plantations.</p> <p>The sampled estates have effectively implemented their IPM programme as outlined in the procedure. Among the evidence of implementation sighted during the site visits are:</p> <ul style="list-style-type: none"> • Planting of beneficial plants such as <i>Antigonon leptopus</i>, <i>Turnera ulmifolia</i>, and <i>Cassia cobanensis</i>. Apart from that, since <i>Euphorbia heterophylla</i> grows naturally in PNG, the estates keep the plants as one of the beneficial plants. • Overspray of herbicides is not a practice in WNB. It was sighted that soft vegetation was maintained in the field and herbicides application is limited to circle and strip only. <p>Smallholders</p> <p>NBPOL WNB is using the Smallholder Guide to Growing Successful and Profitable Oil Palm which was produced by OPIC as IPM plan for its associate smallholders. Among others, the contents include placement of pruned fronds and manually control of Ganoderma.</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</p>	<p>As per Papua New Guinea Oil Palm Research Association (PNGOPRA) Inc. IPM plan, any invasive species listed under the Global Invasive Species Database or CABI. Org lists are prohibited and must not to be imported into the countries under any circumstances.</p>	Complied

	<p>Authority (NAQIA) and in the Solomon Islands by Biosecurity Solomon Islands (BSI).</p> <p>- Minor compliance -</p>	<p>The estates continuously maintained the beneficial plant in the estate such as Tunera subulata, Cassia cobanensis, Antigonon leptopus and Euphorbia heterophylla that become habitat for natural predator for the insects.</p> <p>There are no changes of practices has been sighted during the site visit compare to last verification.</p>	
7.1.3	<p>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.</p> <p>- Minor compliance -</p>	<p>No evidence and records of fire usage for pest control at all estate visited. It has been verified to the pest control team, chemical usage records and interview with workers and the management.</p> <p>Addressed in the Sime Darby Planation Group Responsible Agriculture Charter under clause 3.2.5 stated as follows:</p> <ul style="list-style-type: none"> • Zero use of fire for land preparation and establish effective monitoring and prevention as well as proactive firefighting measures within a reasonable radius beyond our operational boundaries. <p>There was no use of fire for pest control by the sampled estates. Moreover, there has been no pest outbreak at WNB for the past several years, hence the unavailability of pesticides stock at all the sampled estates.</p>	Complied
<p>Criterion 7.2: Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.</p>			
7.2.1	<p>(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.</p> <p>- Critical (Major) compliance -</p>	<p>Justification of all pesticides used is documented in Plantation Management Guidelines: Pesticide Practices. Refer document no. NBPOL – EI - MG 03, revision no. 8 dated 20/04/2017 under section 5; Complete Spray Program and 6: Weed Identification and Treatment.</p>	Complied
7.2.2	<p>(C) Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) are provided.</p>	<p>Records of pesticides used at all the sampled estates are maintained and available for verification. The records are updated monthly and separated based on the type of pesticides used. Among the information</p>	Complied

	<p>Smallholder requirements: Organization managing the smallholders to maintain records of herbicide issue to smallholders. - Critical (Major) compliance -</p>	<p>available in the records is location of application, sprayed Ha, applied volume and application rate. The records are accumulated to be viewed on a to date figure for the year. The records were updated on monthly basis.</p> <p>Reviewed the sampled records of pesticides usage per ha at estate visited as follows:</p> <p>Daliavu Estate</p> <table border="1"> <thead> <tr> <th>Chemical</th> <th>A.I</th> <th>Jan</th> <th>Feb</th> <th>Mac</th> <th>Apr</th> <th>May</th> <th>Jun</th> </tr> </thead> <tbody> <tr> <td>Ally</td> <td>20%</td> <td>0</td> <td>0</td> <td>0</td> <td>0.01</td> <td>0.02</td> <td>0.02</td> </tr> <tr> <td>Supremo</td> <td>40%</td> <td>0</td> <td>0.76</td> <td>0.57</td> <td>0.37</td> <td>0.60</td> <td>0.51</td> </tr> <tr> <td>Canyon</td> <td>20%</td> <td>0</td> <td>0</td> <td>0</td> <td>0</td> <td>0</td> <td>0</td> </tr> </tbody> </table> <p>Haella Estate</p> <table border="1"> <thead> <tr> <th>Chemical</th> <th>A.I</th> <th>Jan</th> <th>Feb</th> <th>Mac</th> <th>Apr</th> <th>May</th> <th>Jun</th> </tr> </thead> <tbody> <tr> <td>Ally</td> <td>20%</td> <td>0.04</td> <td>0.02</td> <td>0.03</td> <td>0.07</td> <td>0.02</td> <td>0.02</td> </tr> <tr> <td>Glyphosate</td> <td>40%</td> <td>0.65</td> <td>0.58</td> <td>0</td> <td>1.58</td> <td>0.74</td> <td>0.93</td> </tr> <tr> <td>Canyon</td> <td>20%</td> <td>0.01</td> <td>0</td> <td>0</td> <td>0</td> <td>0</td> <td>0</td> </tr> </tbody> </table> <p>Togulo Estate</p> <table border="1"> <thead> <tr> <th>Chemical</th> <th>A.I</th> <th>Jan</th> <th>Feb</th> <th>Mac</th> <th>Apr</th> <th>May</th> <th>Jun</th> </tr> </thead> <tbody> <tr> <td>Ally</td> <td>20%</td> <td>0</td> <td>0.11</td> <td>0</td> <td>0</td> <td>0</td> <td>0</td> </tr> <tr> <td>Glyphosate</td> <td>40%</td> <td>0.45</td> <td>0.43</td> <td>0.58</td> <td>0.47</td> <td>0.76</td> <td>0</td> </tr> </tbody> </table>	Chemical	A.I	Jan	Feb	Mac	Apr	May	Jun	Ally	20%	0	0	0	0.01	0.02	0.02	Supremo	40%	0	0.76	0.57	0.37	0.60	0.51	Canyon	20%	0	0	0	0	0	0	Chemical	A.I	Jan	Feb	Mac	Apr	May	Jun	Ally	20%	0.04	0.02	0.03	0.07	0.02	0.02	Glyphosate	40%	0.65	0.58	0	1.58	0.74	0.93	Canyon	20%	0.01	0	0	0	0	0	Chemical	A.I	Jan	Feb	Mac	Apr	May	Jun	Ally	20%	0	0.11	0	0	0	0	Glyphosate	40%	0.45	0.43	0.58	0.47	0.76	0	
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7.2.3	<p>(C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.</p> <p>Smallholder requirements: Organization managing the smallholders to manage IPM for smallholders. - Critical (Major) compliance -</p>	<p>The plan to minimise the use of pesticides is guided by the Pesticide Practices (NBPOL-EI-MG 030). All the sampled estates have been using the glyphosate-based herbicides and Class I herbicides such as paraquat, is no longer in use. The use glyphosate is mixed with wet and stick substance to have more effective weeding results.</p> <p>The pesticides used was based on the New Guinea Oil Palm Research Association (PNGOPRA) Inc. IPM plan. Pest Recommendation (PestRec) need to be submitted to the PNGOPRA.</p> <p>Smallholder</p> <p>The management already establish the general IPM Sessions Calendar for year 2022 where they conduct the meeting by weekly basis. As per letter dated 17/1/2022. Sampling on June 2022 meeting for weeks 3 dated 15/06/20 (Pest and Disease Meeting Minutes; No 707 (22/2022))</p>	Complied																																																																

		and previously was 08/06/2022 (Pest and Disease Meeting Minutes; No 706 (21/2022)).	
7.2.4	There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines. - Minor compliance -	No evidence of prophylactic use of pesticides in the estates visited as per Agro Chemical Classification and SAN Standard Requirements register. It has been confirmed through verification of chemical usage records and interview with smallholders ,workers and the management itself.	Complied
7.2.5	<p>Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, are not used, unless in exceptional circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks.</p> <p>The due diligence refers to:</p> <ul style="list-style-type: none"> 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>	<p>The management still commit to not using class 1A and 1B for this year audit as per addressed in the Sime Darby Planation Group Responsible Agriculture Charter under clause 3.4 Promote responsible consumption and production stated as follows:</p> <p>We strive to ensure that activities within our operations do not harm the ecosystem and minimise pollution, hazards and the production of waste. We commit to:</p> <p>3.4.2 Eradicating the use of pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by Stockholm or Rotterdam Conventions. We also ensure that paraquat is not used, unless in exceptional circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks.</p> <p>As per Agro Chemical Classification and SAN Standard Requirements register, only Class II, III and IV were used in the estates.</p> <p>In NBPOL WNB, there is no use of pesticides that categorized as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat. It has been confirmed through verification of chemical usage records and interview with workers and the management itself.</p> <p>Smallholders</p>	Complied

		Interview with the sampled smallholders indicated that they avoid using chemicals as they prefer to conduct manual brushing to eradicate the weeds in their blocks. Those that do use chemical application obtain the chemicals from NBPOL which provide them with Class 3 and Class 4 chemicals for weeding purposes.	
7.2.6	<p>(C) Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criteria 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they carry out.</p> <p>Smallholder requirements: Smallholders using and/or storing pesticides must demonstrate knowledge of the correct handling, storage, application and disposal requirements.</p> <p>- Critical (Major) compliance -</p>	<p>There are no changes of practices at the sampled estates compare to the last year, the employees who involve in chemical handling were adequately trained regarding the usage safety and health issue and proper way for chemical application. The training can refer on the indicator 3.7.2.</p> <p>Smallholders Smallholders that wish to use chemicals on their plots are to obtain a certificate from OPIC that enables them to purchase chemicals and apply them at their plots. In order to obtain the certificate, they have to undergo certain trainings (A Smallholder Management Training Guideline – Pesticide Practice) and competencies assessment by OPIC personals. During the site visit to the sampled smallholders, the certificate was available for those smallholders that use chemicals in their plots. As per interview with the smallholder, there is evidence that they can demonstrate their understanding on chemical handling, storage and application.</p>	Complied
7.2.7	<p>(C) Storage of all pesticides is in accordance with recognised best practices.</p> <p>Smallholder requirements: The requirements fully applicable to smallholders.</p> <p>- Critical (Major) compliance -</p>	<p>The management applied the same SOP where there is no new update and has been documented in Standard Operating Procedure for pesticides storage were documented in Plantation Management Guidelines: Pesticide Practices. Refer document no. NBPOL – EI - MG 03, revision no. 8 dated 20/04/2017. All pesticides were stored in designated storage area under lock and key. the pesticides were issued base on request.</p> <p>During the visit to the chemical stores at the sampled estates ,there is evidence storage of the chemical is accordance to the best practices</p>	Complied

		<p>where and no changes compare to last year. It was noticed that all pesticides and chemicals were stored in designated stores labelled as Chemical Stores and was under lock and key. No unauthorised persons could enter the vicinity of the chemical store. Only those wearing appropriate PPE's as stated in the chart displayed at the entrance of stores were allowed into the chemical stores. Inside the chemical stores it was sighted that all chemicals were arranged and labelled on the shelves. A bin card was available for each pesticides and chemicals to monitor the incoming and outgoing of the chemicals. Remaining solutions that were brought back after being issued were also stored in the stores in a separate area. The walling of the stores was equipped with wire mesh windows to ensure good ventilation. Apart from that, up-to-date chemical register, trade and generic names, and their Safety data Sheet were available. There is evidence compliance to the SOPs that has been established.</p> <p>Smallholders</p> <p>Interview with the smallholders indicated that majority of them do not use chemicals or pesticides for field operations and resort to manual brushing of the weeds. A number of smallholders occasionally do use chemicals to eradicate weeds. The chemicals are obtained from NBPOL-WNB. The chemicals are temporarily stored at chemicals sheds in the smallholder's plots. The sheds were noticed to be locked with proper ventilation. Chemical container was properly stacked and they original labels were maintained.</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:</p>	<p>Empty pesticides containers were reused for chemical premixing operation.</p> <p>For containers which are broken or not used for chemical premixing were stored in designated storage area before disposed and buried in the hydrocarbon waste landfill.</p>	Complied

	<p>The requirements fully applicable to smallholders. - Minor compliance -</p>	<p>20 litres empty chemicals containers are normally reused to contain pre-mixed herbicides. Smaller size and worn out empty containers were triple rinsed and punctured or shredded before disposing them at the designated landfill. Those containers that are used to contain pre-mixed herbicides were painted with red lines around them as an indication.</p> <p>The empty container was recycle back by the management and the record was available as per to date was on 24/05/2022 for empty container for glyphosate container (35 container).</p> <p>In Daliavu estate, the record of disposal and recycle was available under pesticide container recycle & disposal record sheet 2022. From the record the disposal and recycle as per below:-</p> <table border="1" data-bbox="1104 791 1924 991"> <thead> <tr> <th>Type of chemical container</th> <th>Disposal</th> <th>Recycle</th> </tr> </thead> <tbody> <tr> <td>Glyphosate</td> <td>19</td> <td>89</td> </tr> <tr> <td>Wet & stick</td> <td>5</td> <td>17</td> </tr> <tr> <td>Ally 20DF</td> <td>82</td> <td>-</td> </tr> </tbody> </table> <p>Smallholders There is no prophylactic use of pesticides in among the smallholders.</p>	Type of chemical container	Disposal	Recycle	Glyphosate	19	89	Wet & stick	5	17	Ally 20DF	82	-	
Type of chemical container	Disposal	Recycle													
Glyphosate	19	89													
Wet & stick	5	17													
Ally 20DF	82	-													
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>Smallholder requirements: The requirements fully applicable to smallholders.</p>	<p>There was no aerial spraying conducted at in NBPOL WNB and all smallholders' plots.</p>	Not Applicable												

	- Critical (Major) compliance -										
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.</p> <p>- Critical (Major) compliance -</p>	<p>There no deviation for the sampled estates compare to other estates sample last year where the estate have not used any organophosphate insecticides for a long time since no pest outbreak reported..It has been confirmed through the chemical usage records and interview with the management and workers. Nonetheless, the medical surveillance for sprayers and herbicide operators were conducted once in every six months at the company's clinics. It is one of the prerequisites to determine whether a spraying operator is fit for the job. After passing the medical test, a "Pesticide Fitness Card" (a.k.a Green Card) will be issued to certify that the operator is fit. The Pesticide Fitness has the information about name of the operator, date of medical test and due date of medical test. In such way, the management can easily monitor to ensure the frequency of medical test is not missed. Based on verification of Pesticide Fitness Cards of the sampled estates, it was found that all the cards were still valid at the point of this visit. The test reports were also well maintained by the estates for verification. Among the parameters tested were skin, pulse, blood pressure, vision, hearing, cardiovascular, respiratory system, gastro-intestinal system, nervous system, haemoglobin, and urinalysis.</p> <p>The fit chemical handlers will be issued with Pesticides fitness card. Different sample has been selected where the medical check up is for pesticides handler in year 2022</p> <p>Reviewed the latest medical check-up and Pesticides fitness card as follows:</p> <table border="1" data-bbox="1099 1209 1921 1292"> <thead> <tr> <th data-bbox="1099 1209 1301 1292"></th> <th data-bbox="1301 1209 1451 1292">Date of test</th> <th data-bbox="1451 1209 1637 1292">Next test date</th> <th data-bbox="1637 1209 1921 1292">Remark</th> </tr> </thead> <tbody> <tr> <td data-bbox="1099 1209 1301 1292"></td> <td data-bbox="1301 1209 1451 1292"></td> <td data-bbox="1451 1209 1637 1292"></td> <td data-bbox="1637 1209 1921 1292"></td> </tr> </tbody> </table>		Date of test	Next test date	Remark					Complied
	Date of test	Next test date	Remark								

RSPO P&C Public Summary Report
Revision 13 (Apr 2022)

		Waisisi/Dami Estate 31/5/2022 December 2022	December 2022	There are 9 person was attended the medical surveillance. Fit to work with chemical	
		Haella Estate 10/5/2022	November 2022	8 person attended	
		8/7/2022	January 2023	11 person attended	
		Daliavu Estate 16/7/2022	Dec 2022	18 person attended and al fit to work with chemical.	
7.2.11	<p>(C) No work with pesticides is undertaken by persons under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions and they are offered alternative equivalent work.</p> <p>Smallholder requirements: The requirements fully applicable to smallholders. - Critical (Major) compliance -</p>	<p>Smallholder Medical surveillance conducted on 07/06/2022 verified as per Pesticide Fitness Card and nest test will be conducted on 07/12/2022 by Dr John Lee.</p> <p>As stated in the Plantation Management Guidelines: Pesticide Practices. Refer document no. NBPOL – EI - MG 03, revision no. 8 dated 20/04/2017 under clause 2.2.0: Safe Systems of Work as follows: If pregnancy is confirmed, the manager will be informed and advised to remove the worker from pesticide duties from that time until six months after delivery. Based on verification of employment records and interview of the spraying operators at the sampled estates, there was no persons under the age of 18, pregnant or breastfeeding women or other people that</p>			Complied

		<p>have medical restrictions was assigned to undertake any work with pesticides.</p> <p>Smallholders</p> <p>Interview with the sampled female smallholders indicated that they were aware they are not to work with pesticides if they were pregnant or breast feeding. The smallholders also ensure that children below the age of 18 do not handle chemicals. smallholders that have undergone Medical Surveillance and obtained negative results have been advised not to conduct pesticides related works.</p>	
<p>Criterion 7.3: Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.</p>			
<p>7.3.1</p>	<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:</p> <p>Smallholders must demonstrate planned waste management and disposal by disposing of waste products in a designated waste pit.</p> <p>- Minor compliance -</p>	<p>The management for each operating units maintained the same waste management plan where there is no update has been done since no new generation of waste and new waste identified. The waste management plan is documented in Environmental Instruction Waste Management Plan (EI-02), rev 11, dated 01/07/2021 to provide the methods and strategies of wastes disposal. NBPOL WNB has categorized its types of waste according to their physical state i.e. solid, liquid, and gaseous.</p> <p>NBPOL WNB has identified waste generated from the operation and categorized as follows:</p> <ol style="list-style-type: none"> 1. Gaseous Wastes 2. Solid Wastes <ol style="list-style-type: none"> a. Household Waste b. Industrial Activities c. Agricultural Waste d. Palm Oil Processing e. Cattle Farming f. Workshop/Garage Wastes 	<p>Non-compliance</p>

		<p>g. Medical Wastes h. Others Including: Carpentry/Joinery, Construction, Office Complexes</p> <p>3. Liquid wastes</p> <p>a. Household b. Industrial activities c. Agricultural Activity d. Production and Processing of Palm Oil Product e. Cattle Farming f. Workshop/Garage Wastes</p> <p>Generally, the management of wastes at the sampled estates were implemented according to plan. Among the evidence of implementation are:</p> <ul style="list-style-type: none"> • Scrap iron was sold to recycle waste contractor • Used lubricants were incinerated at the mills' boilers • Empty pesticide containers were reused for containing pre-mixed chemical for herbicides spraying • Household wastes and industrial wastes were disposed at designated landfill areas which are away from residential area and surface water • Fertiliser bags used for loose fruits collection • EFB used for organic fertilizer in the field <p>Nevertheless, there were some lapse in the implementation of the Waste Management Plan.</p> <p><u>Mosa Oil Mill</u></p>	
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		<p>1. The SOP NBPOL; Mosa Mill; EFB Disposal From Mill; SOP No: MOM21; Issue Date: 20/06/2022. States: Environment; Spillage from EFB leakages if any, must be diverted to the sludge pit. During the verification done at the EFB Yard at Mosa Oil Mill, it was sighted that there were leachates discharged into the monsoon/storm drain.</p> <p><u>Numundo Oil Mill & Heilla Plantation</u></p> <p>1. Referred to <i>NBPOL SOP Waste Segregation & Disposal; SOP Number: SusMill 6; Issue No: 01; Issue Date: 16/10/2014; Procedure: NBPOL segregates its rubbish into three main categories – organic, Hydrocarbons & Domestic.</i> During the visit to the landfill it was noticed that the rubbish were not segregated as the organic and domestic rubbish were disposed together in the domestic rubbish pits. Furthermore, it was noticed that there were traces of burning on the rubbish. The rubbish was seen spilling out of the pit with no prompt cleaning up being done.</p> <p>2. Referred to <i>NBPOL SOP Hydrocarbon Waste and Disposal; SOP No: SusMill 9; Issue: 01; Issue Date: 16/10/2014; Procedure: Dispose of the container and hydrocarbons in the designated hydrocarbon pit.</i> It was noticed in the EFB disposed in the fields that there were hydrocarbons waste also being disposed together such as Ropes and Contaminated Gloves.</p> <p>3. Referred to <i>NBPOL SOP EFB Disposal; SOP No: SusMill 4; Issue:01; Issue Date: 16/10/2014; Procedure: Plantations should endeavour to remove all EFB from mill sites in a timely manner.</i> It was noticed that there were excess of EFB which have been stored all around the mill complex, contributing to other issues such as:</p> <ul style="list-style-type: none"> – <i>Seen heaps of EFB burning outside the mill complex and in the plantation.</i> 	
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		<p>– <i>Seen EFB heaps collapsed into the monsoon drain, contributing to leachate in the monsoon drain.</i></p> <p>4. <i>The hydrocarbon rubbish pit (Workshop – Garage Waste) was seen to have scrap metals disposed in them. There were fires seen in the pit as well.</i></p> <p>Smallholder Requirements.</p> <p>Smallholder Department together with OPIC have conducted regular Field Day and trainings for all the smallholders. Among the trainings provided includes Waste management and Rubbish Pit Management. Visit to the smallholder’s sites indicated that they have well maintained rubbish pits that have been well barricaded. Separate Chemical Pit was also available for disposal of used chemical containers.</p> <p>Sample of smallholder that has been audited</p> <table border="1" data-bbox="1104 863 1926 1209"> <thead> <tr> <th>Name</th> <th>Location</th> </tr> </thead> <tbody> <tr> <td>Maraia Rere</td> <td>Kaus</td> </tr> <tr> <td>Francis Rere</td> <td>Kaus</td> </tr> <tr> <td>Benson Tolon</td> <td>Tamba</td> </tr> <tr> <td>Varavara Andy</td> <td>Tamba</td> </tr> <tr> <td>Paul Misiel</td> <td>Mosepa</td> </tr> <tr> <td>Urusula Mago</td> <td>Mamota</td> </tr> </tbody> </table>	Name	Location	Maraia Rere	Kaus	Francis Rere	Kaus	Benson Tolon	Tamba	Varavara Andy	Tamba	Paul Misiel	Mosepa	Urusula Mago	Mamota	
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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</p>	<p>Waste material was disposed in accordance to the Wastes Management Plan mentioned in Indicator 7.3.1. Among the records of disposal maintained by the sampled estates and verified are as follows:</p> <ul style="list-style-type: none"> Hydrocarbon Wastes Disposal Records 	Non-compliance														

	<p>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:</p> <p>The requirements fully applicable to smallholders.</p> <p>- Minor compliance -</p>	<ul style="list-style-type: none"> • Pesticide Wastes Disposal Records • Bio-medical wastes disposal records • Domestic Waste • Garden Waste <p>Domestic wastes were disposed at landfill. Based on site visit, the landfill area was observed to be well maintained by the certification unit. Clinical wastes were disposed through incineration. The incineration facilities used are either the locally installed incinerators located nearby the company’s clinic or boilers at the mills, depending to the types of clinical wastes. The clinic maintains the records of inventory and disposal.</p> <p>Smallholders</p> <p>Smallholder Department together with OPIC have conducted regular Field Day and trainings for all the smallholders. Among the trainings provided includes Waste management and Rubbish Pit Management. Visit to the smallholder’s sites indicated that they have well maintained rubbish pits that have been well barricaded. Separate Chemical Pit was also available for disposal of used chemical containers.</p> <p>Minor Non conformities</p> <ol style="list-style-type: none"> 1. Numundo Oil Mill & Heilla Plantation <ul style="list-style-type: none"> Referred to NBPOL SOP Waste Segregation & Disposal; SOP Number: SusMill 6; Issue No: 01; Issue Date: 16/10/2014; Procedure: NBPOL segregates its rubbish into three main categories – organic, Hydrocarbons & Domestic. During the visit to the landfill it was noticed that the rubbish were not segregated as the organic and domestic rubbish were disposed together in the 	
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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>Estates and Mills</p> <p>There are no changes in current where the management still commit with the strict no burn policy on all NBPOL land at all stages of development and there was no use of open fire in wastes disposal observed at the certification unit.</p>	Complied

		<p>No evidence of use of fire for waste disposal in estates visited. Domestic was were throw into designated dustbin and collected once a week and disposed into designated landfill.</p> <p>No evidence of use of fire for waste disposal in estates visited. Domestic was were throw into designated dustbin and collected once a week and disposed into designated landfill.</p> <p>Smallholders</p> <p>There was no use of open fire in wastes disposal observed at the sampled smallholders’ plots. It has been confirmed base on interview with the smallholder where all waste will be disposed through rubbish pit that has been established at their plot.</p>	
<p>Criterion 7.4: Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.</p>			
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:</p> <p>Smallholders to implement good agriculture practices as communicated through extension services delivered by organization that is managing the smallholders.</p> <p>- Minor compliance -</p>	<p>NBPOL has established its Plantation Management Guidelines to be adhered for good agriculture practices. In managing the soil fertility to optimise yield and minimise environmental impacts, it is covered under various chapters in the guidelines i.e.:</p> <ul style="list-style-type: none"> • Agro 001 Leaf Sampling and Processing, issue 1, dated 01/01/2008 • Agro 002 Soil sampling in NBPOL plantations, issue 1, dated 01/01/2013 • Agro 003 Leaf Sampling and Processing Flow Chart, issue 1, dated 25/08/2011 • Agro 004 Fertiliser Sampling, issue 9, dated 11/07/2015 • MG 04 Upkeep, issue 7, dated 23/10/2018 • MG 16 Composting, issue 4, dated 01/06/2014 <p>The management maintained complying with the SOPs where leaf sampling was conducted on annually basis and the results were used for fertiliser recommendation by agronomist. It also has been verified that the fertilizers has been applied base on the recommendation by the agronomist.</p>	Complied

		<p>Smallholder</p> <p>The Smallholder Department together with OPIC regularly educates the smallholders to implement good agricultural practices in line with the SOPs that have been cascaded to the smallholders. This is a continuous process done via Field Days and Field inspections. During the visit to the smallholder plots, various GAP has been noticed to be implemented by the smallholders such as buffer zone establishments, frond stacking, harvesting standards, etc.</p> <p>Sample of smallholder that has been audited</p> <table border="1" data-bbox="1104 678 1926 1023"> <thead> <tr> <th>Name</th> <th>Location</th> </tr> </thead> <tbody> <tr> <td>Maraia Rere</td> <td>Kaus</td> </tr> <tr> <td>Francis Rere</td> <td>Kaus</td> </tr> <tr> <td>Benson Tolon</td> <td>Tamba</td> </tr> <tr> <td>Varavara Andy</td> <td>Tamba</td> </tr> <tr> <td>Paul Misiel</td> <td>Mosepa</td> </tr> <tr> <td>Urusula Mago</td> <td>Mamota</td> </tr> </tbody> </table>	Name	Location	Maraia Rere	Kaus	Francis Rere	Kaus	Benson Tolon	Tamba	Varavara Andy	Tamba	Paul Misiel	Mosepa	Urusula Mago	Mamota	
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7.4.2	<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:</p> <p>Organization that is managing the smallholders to take tissue samples from representative Smallholders annually.</p> <p>- Minor compliance -</p>	<p>Periodic tissue and soil sampling is carried out annually guided by the following procedures:</p> <ol style="list-style-type: none"> 1. Agro 001 Leaf Sampling and Processing, issue 1, dated 01/01/2008 2. Agro 002 Soil sampling in NBPOL plantations, issue 1, dated 01/01/2013 3. Agro 003 Leaf Sampling and Processing Flow Chart, issue 1, dated 25/08/2011 <p>The last leaf sampling analysis at the sampled estates were carried out in 19/7/2022 by an research and Development from Dami. Based on the report, among the nutrient contents analysed were Nitrogen,</p>	Complied														

		<p>Phosphorus, Potassium, Sulphur, Calcium, Magnesium, Sodium, Iron, Manganese, Zinc, Copper, Boron, and Chloride. The data was then used as a basis for recommendation of fertiliser application in 2021.</p> <p>Soil sampling for all the sampled estates was last conducted in September 2018 by an accredited third-party laboratory. Analysis reports were well maintained for verification. The soil sampling is done once in every five years.</p> <p>Smallholder</p> <p>Leaf sampling is done across all smallholder’s sites under the certification unit. The samples are processed and dispatched to Malaysia and Indonesia for laboratory analysis. The results are then interpreted and made available to NBPOL and OPIC to:</p> <ol style="list-style-type: none"> 1. Keep surveillance on nutrient levels and trends. 2. If necessary, make amendments to current fertilizer recommendation. 3. Corrective application if there is a significant drop in any particular nutrients. 4. RSPO compliance. <p>Leaf sampling results for 2020 and 2021 were available for verification. As for 2022, the leaf sampling has been conducted and the management is in the process of collecting the samples to be sent for analysis.</p>	
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<p>7.4.3</p>	<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>EFB application was been apply by the NBPOL, sampling in Mosa POM the latest EFB application was on 20/7/2022 as per weighbridge ticket 2325 with total 12,700kg at Babara Estate and other record was on 25/7/2022 on weighbridge ticket 2344 at Babara estate also with total 9,580kg.</p> <p>In the Waraston mill the record of EFB was available that supply to the Numundo estate. The record as per below:-</p> <table border="1" data-bbox="1104 614 1890 863"> <thead> <tr> <th>Month</th> <th>EFB weight (kg)</th> </tr> </thead> <tbody> <tr> <td>Oct 2021</td> <td>102,760</td> </tr> <tr> <td>Nov 2021</td> <td>109,340</td> </tr> <tr> <td>Dec 2021</td> <td>148,060</td> </tr> <tr> <td>Jan 2022</td> <td>100,160</td> </tr> </tbody> </table>	Month	EFB weight (kg)	Oct 2021	102,760	Nov 2021	109,340	Dec 2021	148,060	Jan 2022	100,160	<p>Complied</p>
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Dec 2021	148,060												
Jan 2022	100,160												
<p>7.4.4</p>	<p>Records of fertiliser inputs are maintained.</p> <p>Smallholder requirements: Organization that is managing the smallholders to maintain records of fertiliser distribution.</p> <p>- Minor compliance -</p>	<p>The estates maintained the record of the fertiliser application in the fields in order to monitor and ensure the application is carried out as recommended by the PNG OPRA. Among the information available in the records was field number, date of application and type & quantity of fertilisers. Based on the agronomist recommendations, the average dosage of fertiliser for the visited estates. The dosage depends on the type of fertilizer. The types of fertiliser were mostly of straight fertilisers.</p> <p>The fertiliser were applied based on type and dosage recommended by the agronomist. The estate maintain the fertiliser application records as follows:</p> <p>Togulo Estate</p> <table border="1" data-bbox="1104 1310 1890 1396"> <tr> <td>Month application: May 2022 Type: MOP</td> <td>Month application: Oct 2021 Type: Kieserite</td> </tr> </table>	Month application: May 2022 Type: MOP	Month application: Oct 2021 Type: Kieserite	<p>Complied</p>								
Month application: May 2022 Type: MOP	Month application: Oct 2021 Type: Kieserite												

		Field: 2B Bag: 127 bag (22/5/2022)	Field:1A Bag: 50 (10/10/2021)							
Haella Estate										
Month application: April 2022 Type: Urea Field: HM0100 Bag: 72 bag		Month application: June 2021 Type: MOP Field:HL0700 Bag: 69								
Daliavu Estate										
Month application: Feb 2022 Type: Kieserite Field: DL-0200 Bag: 21 bag (50kg per bag)		Month application: Feb 2022 Type: Borate Field: DL-0200 Bag: 93 bag(25kg per bag)								
Smallholders										
<p>As per verification of sample smallholder records, there is evidence that the SH Manager maintained records of fertiliser distribution of all the smallholders and were available for verification. Fertilisers are provided to the smallholders on a credit basis and deducted from the FFB payment. As per interview, it has been confirmed that smallholders received fertilizers upon request and need to sign agreement.</p>										
<p>Sample of smallholder that has been audited</p>										
<table border="1"> <thead> <tr> <th data-bbox="1086 1224 1496 1270">Name</th> <th data-bbox="1496 1224 1890 1270">Location</th> </tr> </thead> <tbody> <tr> <td data-bbox="1086 1275 1496 1321">Maraia Rere</td> <td data-bbox="1496 1275 1890 1321">Kaus</td> </tr> <tr> <td data-bbox="1086 1326 1496 1367">Francis Rere</td> <td data-bbox="1496 1326 1890 1367">Kaus</td> </tr> </tbody> </table>		Name	Location	Maraia Rere	Kaus	Francis Rere	Kaus			
Name	Location									
Maraia Rere	Kaus									
Francis Rere	Kaus									

		Benson Tolon	Tamba	
		Varavara Andy	Tamba	
		Paul Misiel	Mosepa	
		Urusula Mago	Mamota	
Criterion 7.5: Practices minimise and control erosion and degradation of soils.				

<p>7.5.1</p>	<p>(C) Maps identifying marginal and fragile soils, including steep terrain, are available. - Critical (Major) compliance -</p>	<p>Each estate of NBPOL WNB has its individual map, Soil Map and Slope Map in appropriate scales. Based on the maps, there are no marginal or fragile soils identified at the sampled estates. Reviewed the soil maps as follows:</p> <table border="1" data-bbox="1104 517 1924 1137"> <thead> <tr> <th data-bbox="1104 517 1319 564">Estate</th> <th data-bbox="1319 517 1924 564">Soil Series</th> </tr> </thead> <tbody> <tr> <td data-bbox="1104 564 1319 715">Dami Waisisi Plantation</td> <td data-bbox="1319 564 1924 715">Banaule Series, Banaule Sandy River Phase, Banaule Coarse gravel Phase and Ko Series. Waisisi Series, Waisi Sand Gravel Phase, Gavuvu Alluvials, Lavilelo Series.</td> </tr> <tr> <td data-bbox="1104 715 1319 794">Togulo Plantation</td> <td data-bbox="1319 715 1924 794">Hak Alluvials, Togulo Series, Wakuku Series 1, Ru Series, Wakuku Series 2 and Wakuku Series 3.</td> </tr> <tr> <td data-bbox="1104 794 1319 906">Haella Plantation</td> <td data-bbox="1319 794 1924 906">Garu Shallow Ohase, Numundo hill Series, Dalavu Alluvials, Boku Series, Haella Series 2 and Havila Series 1.</td> </tr> <tr> <td data-bbox="1104 906 1319 994">Daliavu Plantation</td> <td data-bbox="1319 906 1924 994">Daliavu Series, Ismin Peat Series, Sapuri Sandy Loams, Ismin Series & Daliavu Alluvials.</td> </tr> <tr> <td data-bbox="1104 994 1319 1137">Numundo Plantation</td> <td data-bbox="1319 994 1924 1137">Numundo Series 1, Numundo Series 2, Numundo Series 3, garbuna Series, Walindi Series, Warastone Series, Wandoro Series and Numundo Hill Series</td> </tr> </tbody> </table>	Estate	Soil Series	Dami Waisisi Plantation	Banaule Series, Banaule Sandy River Phase, Banaule Coarse gravel Phase and Ko Series. Waisisi Series, Waisi Sand Gravel Phase, Gavuvu Alluvials, Lavilelo Series.	Togulo Plantation	Hak Alluvials, Togulo Series, Wakuku Series 1, Ru Series, Wakuku Series 2 and Wakuku Series 3.	Haella Plantation	Garu Shallow Ohase, Numundo hill Series, Dalavu Alluvials, Boku Series, Haella Series 2 and Havila Series 1.	Daliavu Plantation	Daliavu Series, Ismin Peat Series, Sapuri Sandy Loams, Ismin Series & Daliavu Alluvials.	Numundo Plantation	Numundo Series 1, Numundo Series 2, Numundo Series 3, garbuna Series, Walindi Series, Warastone Series, Wandoro Series and Numundo Hill Series	<p>Complied</p>
Estate	Soil Series														
Dami Waisisi Plantation	Banaule Series, Banaule Sandy River Phase, Banaule Coarse gravel Phase and Ko Series. Waisisi Series, Waisi Sand Gravel Phase, Gavuvu Alluvials, Lavilelo Series.														
Togulo Plantation	Hak Alluvials, Togulo Series, Wakuku Series 1, Ru Series, Wakuku Series 2 and Wakuku Series 3.														
Haella Plantation	Garu Shallow Ohase, Numundo hill Series, Dalavu Alluvials, Boku Series, Haella Series 2 and Havila Series 1.														
Daliavu Plantation	Daliavu Series, Ismin Peat Series, Sapuri Sandy Loams, Ismin Series & Daliavu Alluvials.														
Numundo Plantation	Numundo Series 1, Numundo Series 2, Numundo Series 3, garbuna Series, Walindi Series, Warastone Series, Wandoro Series and Numundo Hill Series														
<p>7.5.2</p>	<p>There is no extensive replanting of oil palm on steep terrain. 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>WNB has established its slope map for all the estates. Based on the maps, generally the sampled estates have flat to undulating terrain. Based on map verification and site visit, there was no extensive replanting of oil palm on steep terrain. Visit to Waisisi Estate, it was sighted that approximately 10 Ha of steep terrains was left unplanted.</p>	<p>Complied</p>												

		<p>Smallholder requirements:</p> <p>The Smallholder Affairs Office conduct Pre-Planting Inspection at the smallholder plots that have been selected for replanting. A Planting Approval Form – Replant is raised where the Smallholder Affairs officers assess the smallholder’s site on Topography suitability. The Planting Approval Form – Replant was available for verification. The Office then decides on plantable areas and areas to be left out from replanting due to steep slopes</p>	
7.5.3	<p>There is no new planting of oil palm on steep terrain.</p> <p>- Minor compliance -</p>	<p>There was no new planting at the sampled estates and smallholder plots.</p>	Complied
<p>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.</p>			
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>There is no new planting at the sampled estates. Nonetheless, the sampled estates have their own individual map, Soil Map and Slope Map in appropriate scales established by WNB’s GIS & Mapping Unit. It has been further verified through interview with local communities, workers and the management and also site visit.</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>The sampled estates have their own individual map, Soil Map and Slope Map in appropriate scales established by WNB’s GIS & Mapping Unit.</p> <p>Addressed in the Sime Darby Planation Group Responsible Agriculture Charter under clause 3.2 Commitment towards no deforestation and new development on peat stated as follows:</p> <p>3.2.2 No new development of ‘potential high carbon stock area’ forest as defined by the ‘HCS Approach’.</p> <p>3.2.3 No new development of peat areas, regardless of depth or location. Existing planted areas shall be managed according to best practices and rehabilitated if the area reaches natural gravity drainability limit⁷ measured using recognised method.</p>	Complied

		<p>No fragile soil categorized in the estates visited as per soil map issued by GIS & Mapping Unit.</p> <p>There is no new planting at the sampled estates. It has been further verified through interview with local communities, workers and the management and also site visit.</p>	
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>There is no new planting at the sampled estates. Nonetheless, the sampled estates have their own individual map, Soil Map and Slope Map in appropriate scales established by WNB's GIS & Mapping Unit. It has been further verified through interview with local communities, workers and the management and also site visit.</p> <p>Soil series and topography map available for estate visited as per slope map issued by GIS & Mapping Unit.</p> <p>The soil sampling conducted on April 2005 by Thomas Betitis from Dami Oil Palm Research Station referred Report No TS/AG-04. In Togolo Estate the soil series as per table 2 in the report, there are 6 soil series in Togolo Estate such as Hak alluvials, Togolo Series, Wakuku Series 1, series 2 & Series 3 and also Ru Series.</p> <p>In Deliavu Estate, the soil map was available, there are 5 type of soil series n deliavu estate. Such as Deliavu series was the major soil series, the other was Ismin peat soils, Sapuri sandy loam, ismin series and Deliavu alluvials.</p> <p>In Numundo estate, there are 7 series ,Numundo series 1,2,3 and Garbuna series, Walindi series, Warastone series, and Wandoro series.</p>	Complied
<p>Criterion 7.7: No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.</p>			
7.7.1	<p>(C) There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas.</p> <p>- Critical (Major) compliance -</p>	<p>No new planting on peat in the estates as no peat identified in the sampled estates as per Soil Map established and sample report reviewed for respective estates. Hence this indicator is not applicable.</p>	Complied

7.7.2	<p>Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat.</p> <p>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).</p> <p>- Minor compliance -</p>	<p>No new planting on peat in the estates as no peat identified in the sampled estates as per Soil Map established and sample report reviewed for respective estates. Hence this indicator is not applicable.</p>	Complied
7.7.3	<p>(C) Subsidence of peat is monitored, documented and minimised.</p> <p>- Critical (Major) compliance -</p>	<p>No new planting on peat in the estates as no peat identified in the sampled estates as per Soil Map established and sample report reviewed for respective estates. Hence this indicator is not applicable.</p>	Complied
7.7.4	<p>(C) A documented water and ground cover management programme is in place.</p> <p>- Critical (Major) compliance -</p>	<p>No new planting on peat in the estates as no peat identified in the sampled estates as per Soil Map established and sample report reviewed for respective estates. Hence this indicator is not applicable.</p>	Complied
7.7.5	<p>(C) For plantations planted on peat, drainability assessments are conducted following the RSPO Drainability Assessment Procedure, or other RSPO recognised methods, at least five years prior to replanting. The assessment result is used to set the timeframe for future replanting, as well as for phasing out of oil palm cultivation at least 40 years, or two cycles, whichever is greater, before reaching the natural gravity drainability limit for peat. When oil palm is phased out, it is replaced with crops suitable for a higher water table (paludiculture) or rehabilitated with natural vegetation.</p> <p>PROCEDURAL NOTE: Full details of the RSPO Drainability Assessment Guidelines and related concepts and detailed actions are in the manual currently being fine-tuned/tested by PLWG. A final version should be approved by PLWG in January 2019 and will include additional guidance on the steps to be followed after the decision not to replant as well as implications for other stakeholders, smallholders, local communities and the unit of certification. It is recommended that a further twelve-month methodology trial period is proposed for all related management units (i.e. those with plantations on peat) to utilise the methodology and provide feedback to the PLWG to enable further refinement of procedure as appropriate</p>	<p>No new planting on peat in the estates as no peat identified in the sampled estates as per Soil Map established and sample report reviewed for respective estates. Hence this indicator is not applicable.</p>	Complied

	<p>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:</p> <p>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>	No new planting on peat in the estates as no peat identified in the sampled estates as per Soil Map established and sample report reviewed for respective estates. Hence this indicator is not applicable.	Complied
7.7.7	<p>(C) All areas of unplanted and set-aside peatlands in the managed area (regardless of depth) are protected as "peatland conservation areas"; new drainage, road building and power lines by the unit of certification on peat soils is prohibited; peatlands are managed in accordance with the 'RSPO BMPs for Management and Rehabilitation of Natural Vegetation Associated with Oil Palm Cultivation on Peat', version 2 (2018) and associated audit guidance</p> <p>- Critical (Major) compliance -</p>	No new planting on peat in the estates as no peat identified in the sampled estates as per Soil Map established and sample report reviewed for respective estates. Hence this indicator is not applicable.	Complied
Criterion 7.8: Practices maintain the quality and availability of surface and groundwater.			
7.8.1	<p>A water management plan is in place and implemented to promote more efficient use and continued availability of water sources and to avoid negative impacts on other users in the catchment. The plan addresses the following:</p> <p>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>The water management plan is addressed by WNB through Water and Natural Resource Management Plan (EI-03) rev 8 dated 13/06/2021. The main objective of the plan is to meet the professional standards for developing and managing the availability of water resources available across the company's operations and to assist with the regulatory compliance. Generally, the management plans established to prevent pollution of water sources and to supply clean water to workers are:</p> <ul style="list-style-type: none"> Well management of mills ETP to meet the regulated parameter of 	Complied

		<p>effluent discharge</p> <ul style="list-style-type: none"> • Ensuring runoff from mill operations such as EFB leachate, hydrocarbons and boiler ash are handled correctly • Establishment and restoration of riparian zone according to the Environmental Permit • No clearing at >25°slope and establishment of cover crop at replanting fields • Ensuring the volume extraction of water from the resources is within the permitted limit • Well maintained water treatment plants to ensure safe potable water to labour quarters <p>Part of the water management plan includes monitoring of the drinking water quality provided to the workers on monthly basis. Among the parameter analyses were turbidity, total solids, total coliform and E.Coli.</p> <p>Reviewed sample water quality analysis for the month of June and July 2022 for sampled mill and estate.</p> <p><u>Kumbango Oil Mill</u></p> <p>Reviewed the domestic analysis for Job No. 213/22 dated 15/04/2022. The results indicated that the coliform does not conform to the CEPA Water Criteria. Other parameters were all within the respective limits.</p> <p>The operating units and Sustainability Dept. conducted investigation and issued CPAR form for all analysis results which do not conform to the Drinking Water Quality Standards. Base on the analysis results, it was found that slightly higher contains of total coliform and E.Coli for most estates and mills. The management were able to show evidence via a WHO Report stating that coliform and E.Coli are naturally present in waters at the tropical areas and are safe to be consumed provided it is boiled first. Hence, the management of each operating unit</p>	
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		<p>conducts continuous trainings to all workers and staffs on the importance of ensuring the water used for consumption are boiled prior to it being consumed. Reviewed the briefing records dated 26/05/2022 (Kumbango Oil Mill). Interview with the sampled workers indicated that they are well aware on the importance of ensuring the water used for consumption are boiled first. There was no evidence of health issues reported due to consumption of water in the certification unit.</p>	
7.8.2	<p>(C) Water courses and wetlands are protected, including maintaining and restoring appropriate riparian and other buffer zones in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017) or applicable National legislation or specific environmental permit. Smallholders may replant existing 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>Water courses and wetlands are protected as per documented Water and Natural Resource Management Plan (EI-03).</p> <p>The main objectives of the Natural Resource management Plan are to protect the area that has conservation value and maintaining balances between oil palm development and ecological integrity.</p> <p>During the site visit at the sampled estates, it was verified that the management have a well-established buffer along the rivers and creeks. The management have erected signages prohibiting of operational activities along the buffers.</p> <p>Some of the location sited:</p> <ul style="list-style-type: none"> • The riparian buffer zone for HCV Hot Wara Creek that flows within the Haella Estate was visited. The vegetation along the buffer zone was well established. No evidence of chemical application at the buffer zone area • The riparian buffer zone for Sapuri Creek and Compound Creek that flows within the Daliavu Estate was visited. The vegetation along the buffer zone was let to grow naturally and was well established. No evidence of chemical application at the buffer zone area. <p>Smallholder During the visit to the smallholders and independent estates' rivers and creeks indicated that the rivers and creeks were well established with</p>	Complied

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		<p>appropriate buffers. Interview with the smallholders and independent estate managements indicated that they are well trained and aware on the importance of ensuring proper buffers and the prohibition of operational activities along the buffers especially agrochemicals and fertilizer applications. Signages have been erected stating the prohibition as well which was verified during the visit.</p>	
7.8.3	<p>Mill effluent is treated to be in compliance with national regulations. Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is regularly monitored. - Minor compliance -</p>	<p>The mill effluent discharge was monitored in compliance with the maximum permissible limit for BOD set by Department of Environment and Conservation which is 100mg/l. The mills monitor the effluent final discharge on a weekly basis. Effluent analysis report demonstrated that the overall BOD results are generally meeting the discharge limits. Occasionally, when the results exceeded the limits, the mill takes the initiative to investigate the root cause and appropriate action plans are being carried out. The investigation report and corrective actions taken are documented in E-SHEQ001 Incident Form, ver. 2, rev. May 201 and were available for verification for reports that have exceed the limits.</p> <p>Nevertheless, the mills are continuously improving the methods to ensure compliance to the standards set by Department of Environment and Conservation. Visit to Mosa Mill indicated that the BOD was slightly higher than the permissible limit. An E-SHEQ001 has been raised on the matter and the correction was to deepen the effluent ponds which could be the root cause to the high BOD. Visit to the effluent ponds at Mosa Mill indicated that effluent ponds deepening works were in progress.</p>	Complied

7.8.4	<p>Mill water use per tonne of FFB is monitored and recorded. - Minor compliance -</p>	<p>Water consumption at all mills are monitored by using flowmeter. Based on the records, the sampled consumptions are as follows.</p> <table border="1" data-bbox="1104 440 1890 692"> <thead> <tr> <th rowspan="2">Mill</th> <th colspan="2">m³/mt FFB Processed</th> </tr> <tr> <th>2021</th> <th>2022 (as at June)</th> </tr> </thead> <tbody> <tr> <td>Mosa</td> <td>1.16</td> <td>1.28</td> </tr> <tr> <td>Kumbango</td> <td>1.51</td> <td>1.65</td> </tr> <tr> <td>Kapiura</td> <td>1.47</td> <td>1.76</td> </tr> </tbody> </table>	Mill	m ³ /mt FFB Processed		2021	2022 (as at June)	Mosa	1.16	1.28	Kumbango	1.51	1.65	Kapiura	1.47	1.76	Complied		
Mill	m ³ /mt FFB Processed																		
	2021	2022 (as at June)																	
Mosa	1.16	1.28																	
Kumbango	1.51	1.65																	
Kapiura	1.47	1.76																	
<p>Criterion 7.9: Efficiency of fossil fuel use and the use of renewable energy is optimised</p>																			
7.9.1	<p>A plan for improving efficiency of the use of fossil fuels and to optimise renewable energy is in place, monitored and reported. - Minor compliance -</p>	<p>The biogas plant operated at Kumbango mill continue to provide renewable energy to nearby housing and office areas. Mosa Mill biogas plant was under repair and awaiting spare parts and will commence once the parts arrive. The amount of energy supplied was recorded on monthly basis. Such information was also reported in the RSPO GHG calculator.</p> <p>For any fossil fuel consumed, it is being monitored. The mills continue to utilize their fiber and shell as biofuel for their boilers.</p> <p>Reviewed Diesel and Electricity Consumption for the year 2021 and 2022 (as of June) as below</p> <table border="1" data-bbox="1104 1114 1921 1356"> <thead> <tr> <th rowspan="2">Mill</th> <th rowspan="2"></th> <th colspan="2">Diesel Consumption (L)</th> <th colspan="2">Electricity Consumption (kWh)</th> </tr> <tr> <th>2021</th> <th>2022 (as at June)</th> <th>2021</th> <th>2022 (as at June)</th> </tr> </thead> <tbody> <tr> <td>Mosa Mill</td> <td>Oil</td> <td>167,900</td> <td>149,500</td> <td>2,816,320</td> <td>5,464,352</td> </tr> </tbody> </table>	Mill		Diesel Consumption (L)		Electricity Consumption (kWh)		2021	2022 (as at June)	2021	2022 (as at June)	Mosa Mill	Oil	167,900	149,500	2,816,320	5,464,352	Complied
Mill		Diesel Consumption (L)			Electricity Consumption (kWh)														
		2021	2022 (as at June)	2021	2022 (as at June)														
Mosa Mill	Oil	167,900	149,500	2,816,320	5,464,352														

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Kumbango Oil Mill	777,273	343,987	8,229,280	3,556,760
Kapiura Oil Mill	890,022	469,796	2,768,003	1,756,853

Reviewed Diesel, Electricity and Water Consumption for the year 2021 and 2022 (as of June) as below:

Diesel Usage

Estate	2021	2022 (as at June)
Dami Waisisi Plantation	457,800	229,180
Togulo Plantation	100,487	44,841
Haella Plantation	368,000	174,000
Daliavu Plantation	520,500	444,500
Numundo Plantation	338,200	95,826

Water Usage

Estate	2021	2022 (as at June)
Dami Waisisi Plantation	152,541	38,228
Togulo Plantation	747,257	803,523
Haella Plantation	874,649	1,029,700

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		<table border="1" data-bbox="1104 362 1890 494"> <tr> <td>Daliavu Plantation</td> <td>162,092</td> <td>186,535*</td> </tr> <tr> <td>Numundo Plantation</td> <td>13,623</td> <td>7,460</td> </tr> </table> <p data-bbox="1104 502 1928 571">* Daliavu Plantation data for 2022 is as of April 2022 due to Reading Meter not working. Repair works in progress.</p> <p data-bbox="1104 619 1299 651"><u>Electricity Usage</u></p> <table border="1" data-bbox="1104 655 1890 756"> <tr> <td>Estate</td> <td>2021</td> <td>2022 (as at June)</td> </tr> <tr> <td>Togulo Estate</td> <td>41,866</td> <td>82,357</td> </tr> </table> <p data-bbox="1104 767 1928 836">* Other sampled estate generates their own electricity via generators and do not purchase electricity from the grid.</p> <p data-bbox="1104 884 1928 1007">The estates and mills continuously conduct briefing and training to enhance employee awareness to switch of lights, air conditioners, water pipes, etc. when not in use to reduce the use of diesel and water in compounds and offices.</p>	Daliavu Plantation	162,092	186,535*	Numundo Plantation	13,623	7,460	Estate	2021	2022 (as at June)	Togulo Estate	41,866	82,357	
Daliavu Plantation	162,092	186,535*													
Numundo Plantation	13,623	7,460													
Estate	2021	2022 (as at June)													
Togulo Estate	41,866	82,357													
<p>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.</p>															
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 GHG emissions are identified and the Palm GHG calculator V4 was used to determine the potential emissions. Records obtained from the estate and mill were verified against the data entered into the Palm GHG Calculator V4 and found to be accurate.</p> <p>The biogas plant operated at Kumbango mill continue to capture the methane emission reducing GHG emission while provide renewable energy to nearby housing and office areas to further reduce fossil consumption to generate electricity. Mosa Mill Methane capture was at</p>	Complied												

		the moment not functioning as there were breakdown in the machineries and they were awaiting parts to be supplied to commence operations.							
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>	There is no new development after 2014. Hence the carbon stock requirement is not applicable for this audit.	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>An assessment of identified polluting activities is being conducted and monitored, inclusive of gaseous emissions, particulate / soot emissions and effluent. The Identification of Potential Source of GHG Emission and GHG Reduction Plan is used to identify the waste products and sources of pollution is in place and is being reviewed accordingly. Among the Potential Source of GHG Emission identified such as Palm Oil Mill Effluent (POME), Diesel Usage, Electricity Usage, Chemical Usage and Generator Set.</p> <p>All pollutants are identified through environmental aspect register and plans to reduce or minimize are compiled in the Continuous Improvement Plan 2014-2025. Among the examples of improvement plans are as follows:</p> <table border="1" data-bbox="1120 1098 1908 1353"> <thead> <tr> <th>Improvement actions</th> <th>Expected outcome</th> </tr> </thead> <tbody> <tr> <td>Pond Management to 7.8.3 reduce BOD below < 90ppm at exit of last pond</td> <td>Reduction of BOD, TS and TDS at discharge and EIP to the limit set out in the EP</td> </tr> <tr> <td>BOD of < 90ppm at exit of 2019-2024 last pond</td> <td>All Mills to be provided with De-oiling Tank to trap oil from getting into ETP.</td> </tr> </tbody> </table>	Improvement actions	Expected outcome	Pond Management to 7.8.3 reduce BOD below < 90ppm at exit of last pond	Reduction of BOD, TS and TDS at discharge and EIP to the limit set out in the EP	BOD of < 90ppm at exit of 2019-2024 last pond	All Mills to be provided with De-oiling Tank to trap oil from getting into ETP.	Complied
Improvement actions	Expected outcome								
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BOD of < 90ppm at exit of 2019-2024 last pond	All Mills to be provided with De-oiling Tank to trap oil from getting into ETP.								

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BOD of < 20 at exit of effluent treatment system at Waraston	Dewatering press system															
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High solid level in mill ponds	Sufficient retention time for biochemical reaction															
<p>Criterion 7.11: Fire is not used for preparing land and is prevented in the managed area</p>																
7.11.1	<p>(C) Land for new planting or replanting is not prepared by burning. - Critical (Major) compliance -</p>	<p>The was no new planting at all the sampled estates. For replanting operation, the management is guided by Plantation Management Guidelines, Replant Practices [NBPOL – EI - MG 01B, rev. 7, dated 05/2016]. Based on the procedure, felled palms should be</p>		Complied												

		<p>neatly stacked into straight lines. The procedure is in line with the Sime Darby Plantation Group Responsible Agriculture Charter under clause 3.2.5 stated – “Zero use of fire for land preparation and establish effective monitoring and prevention as well as proactive firefighting measures within a reasonable radius beyond our operational boundaries”.</p> <p>Smallholders</p> <p>Based on site visit at the smallholder’s plots, there were no evidence that land for replanting was prepared by burning. Interview with the sampled smallholders further justified the fact that they are aware that they are prohibited from using fire during the replanting process.</p>	
7.11.2	<p>The unit of certification establishes fire prevention and control measures for the areas directly managed by the unit of certification.</p> <p>- Minor compliance -</p>	<p>Hotspot monitoring managed by HQ (Fire Hotspot Monitoring Team) – if any fire detected, inform estate.</p> <p>Sime Darby Daily Hotspot Monitoring system has been in place since November 2013 using NASA satellite data [ref.: http://www.simedarbyplantation.com/sustainability/hotspot-dashboard/]. The system monitors any possible occurrence of fire within or nearby the concession areas throughout Sime Darby Plantation Upstream operation globally.</p> <p>Regarding fire prevention WNB is driven by NBPOL Environmental Policy 2017, ver. 3. The commitment to zero burning for land preparation is stated in the policy. WNB has also established the Agriculture Fire Fighting Procedure, [SUST-05, issue 1, dated 01/07/2020] as a reference in firefighting.</p> <p>The SOP was displayed at the notice board and communicated to all the workers during training and morning briefing. Noted during interview, the understanding of the workers on fire prevention plan was satisfactory.</p>	Complied

7.11.3	<p>The unit of certification engages with adjacent stakeholders on fire prevention and control measures.</p> <p>- Minor compliance -</p>	<p>The sampled estates have organized meetings with the adjacent stakeholders which were mainly villages and smallholders with regards to fire prevention and control measure as a mean of engagement.</p> <p>Attendance records were made available for verification as below:</p> <ol style="list-style-type: none"> 1. Togulo Plantation: Awareness on No Fire Burning and Bush Clearing in buffer areas carried out on 16/06/2022 and 22/03/2022. Carried out for adjacent stakeholders. 2. Numundo Plantation: Awareness on Fire & Buffer Zone Preservation carried out on 18/07/2022 carried out for adjacent stakeholders. <p>Smallholders</p> <p>Smallholder Department together with OPIC have conducted regular Field Day and trainings for all the smallholders. During these field days the smallholders have been briefed on fire prevention and control measures. Interview with the sampled smallholders indicate that they are aware of the fire prevention and control measures.</p>	Complied
<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>			
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>Previous Land Clearing done in NBPOL WNB has not affected nor damaged any primary forest or areas protected as HCVs. The management has identified areas for new planting are undergoing the process of obtaining approval from RSPO. Nevertheless, there are no new planting identified during this audit.</p> <p>NBPOL has established the NBPOL WNB established Habitat Management Plan, Landscape Overview, Version 2, 17/11/2016 was a guidance for HCV management covering Government Protected areas and Industry protected area.</p>	Complied

<p>7.12.2</p>	<p>(C) HCVs, HCS forests and other conservation areas are identified as follows:</p> <p>7.12.2a For existing plantations with an HCV assessment conducted by an RSPO-approved assessor and no new land clearing after 15 November 2018, the current HCV assessment of those plantations remains valid.</p> <p>7.12.2b Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the HCSA Toolkit and the HCV-HCSA Assessment Manual. This will include stakeholder consultation and take into account wider landscape-level considerations.</p> <p>PROCEDURAL NOTE:</p> <p>For details of transitional measures, refer to Annex 5: RSPO transition from HCV assessments to HCV-HCSA assessments.</p> <p>- Critical (Major) compliance -</p>	<p>HCV assessments have been established in NBPOL WNB, classified by group estates and individual estates which includes:</p> <ol style="list-style-type: none"> Habitat Management Plans Landscape Overview, Version 2, 17/11/2016. <p>Additionally, NBPOL WNB has established guidance documents for HCV & Conservation covering Government Protected Areas and Industry Protected Areas such as follow.</p> <ol style="list-style-type: none"> Habitat Management Plans for Mosa Groups, Issue 2, dated December 2016. Habitat Management Plans Southern Gabuna Landscape, dated March 2017 <p>For the sampled estates, the HCV have been identified as below:</p> <table border="1" data-bbox="1104 807 1924 1206"> <thead> <tr> <th>Plantation</th> <th>Location of HCV</th> <th>Classification</th> </tr> </thead> <tbody> <tr> <td rowspan="3">Haella</td> <td>Numundo/Haella Forest</td> <td>HCV 1 & 4</td> </tr> <tr> <td>Garu Hot Springs</td> <td>HCV 1, 3 & 4</td> </tr> <tr> <td>Riparian Buffer Zones</td> <td>HCV 4</td> </tr> <tr> <td>Daliavu</td> <td>Riparian Buffer Zones – Daliavu River</td> <td>HCV 4</td> </tr> <tr> <td rowspan="3">Numundo</td> <td>Numundo/Haella Forest</td> <td>HCV 1 & 4</td> </tr> <tr> <td>Numundo Mangroves</td> <td>HCV 3 & 4</td> </tr> <tr> <td>Riparian Buffer Zones</td> <td>HCV 4</td> </tr> </tbody> </table>	Plantation	Location of HCV	Classification	Haella	Numundo/Haella Forest	HCV 1 & 4	Garu Hot Springs	HCV 1, 3 & 4	Riparian Buffer Zones	HCV 4	Daliavu	Riparian Buffer Zones – Daliavu River	HCV 4	Numundo	Numundo/Haella Forest	HCV 1 & 4	Numundo Mangroves	HCV 3 & 4	Riparian Buffer Zones	HCV 4	<p>Complied</p>
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	Riparian Buffer Zones	HCV 4																					
<p>7.12.3</p>	<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</p>	<p>No new planting within NBPOL WNB after 15/11/2018. Hence the HFCL within HFCC is not applicable for this audit.</p>	<p>Complied</p>																				

	<p>consideration regional and national multi- stakeholder processes. Until this procedure is developed and endorsed, 7.12.2 applies.</p> <p>PROCEDURAL NOTE:</p> <p>There shall be demonstrable benefits to the local community; clear recognition of legal and customary lands based on participatory land use planning; development shall be proportional to the needs of the local community; with a balance between conservation and development. This procedure will also cover planting on previous or abandoned agricultural land/ plantations. All other P&C requirements apply, including FPIC and HCV requirements.</p> <p>- Critical (Major) compliance -</p>		
7.12.4	<p>(C) Where HCVs, HCS forests after 15 November 2018, peat land and other conservation areas within Company managed land have been identified, they are protected and/or enhanced. An integrated management plan to protect and/or enhance HCVs, HCS forests, peatland and other conservation areas is developed, implemented and adapted where necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan is developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified) that may result from the actions of the Unit of Certification.</p> <p>- Critical (Major) compliance -</p>	<p>The Habitat Management Plan, Landscape Overview, Version 2, 17/11/2016 has been established as a guidance for HCV management covering Government Protected areas and Industry protected area. The specific area HMP is established to further manage the location. The HMP for Mosa Groups, Issue 2, dated December 2016 has established the plan to protect and conserve conservation area within and surrounding the estates including the sampled estates Dami Waisis and Togulo Plantation. The HMP for Southern Gabuna Landscape, dated March 2017 has established the plan to protect and conserve conservation area within and surrounding the estates including the sampled estates including Numundo, Daliavu and Haella Plantation.</p> <p>HCV inspection reports and forest integrity assessments were made available for verification to confirm the proper implementation of the management plan. Sighted the Quarterly Buffer Zones Inspection Program – 2022 for the sampled estates available for verification.</p> <p>Awareness Programs have been conducted by the managements for workers and stakeholders on buffer zones and HCVs and made available on the sampled documents as below:</p> <ol style="list-style-type: none"> 1. Awareness for Buffer Zone – Togulo Plantation: 08/06/2022 	Non-compliance

		<p>Nevertheless, it was identified that the management of conservation areas (Buffer Zones) were not fully implemented as below:</p> <p><u>Togulo Plantation</u></p> <ul style="list-style-type: none"> - During the site visit along Dagi River and Ru Creek, it was noticed that there were no established buffer zones at certain portions of the river and creek banks. A "No Spray" zone has been established by the management but there were traces of spraying applications being done beyond the designated zone right to the river and creek banks. - Verified the HCV Checklist does not include the monitoring of "loss of riparian vegetation due to agricultural activity" as required under the Habitat Management Plans for buffer zones. <p><u>Numundo Plantation</u></p> <ul style="list-style-type: none"> - During the site visit along Wandora Creek, it was noticed that there were no established buffer zones at certain portions of the riverside due to the riverbanks being eroded over time. There were traces of spraying activities done at the palms that were along the creek banks as well. - As per the Habitat Management Plan, it states that Quarterly Buffer Zones monitoring should be done. Verified the HCV monitoring checklist where buffer zone monitoring was done only annually. - Verified the HCV Checklist does not include the monitoring of "loss of riparian vegetation due to agricultural activity" as required under the Habitat Management Plans for buffer zones. 	
7.12.5	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	There is no new planting after 15/11/2018 within the certification unit.	Complied

	<p>agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas.</p> <p>- Minor compliance -</p>		
<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:</p> <p>Organization managing the smallholders to educate and support Smallholders through field days and visits to Smallholder blocks as part of their routine extension activities.</p> <p>- Minor compliance -</p>	<p>The RTE species status is included in the Habitat Management plan of each area (e.g. Southern Gabuna Landscape). The forest integrity assessment and periodic HCV inspection served the purpose to ensure that there is no encroachment and violation on RTE protection.</p> <p>NBPOL has also established the Flora and Fauna Species ver. 2 dated March 2019 to further identified the potentials RTE.</p> <p>The estates management continue to promote awareness on HCV/RTE to the workers during morning briefing and training. Sighted at several strategic places in the estates visited such as office compound, muster ground, housing area and HCV area, signage on prohibition of capture, harm, collect or kill RTE species are erected.</p> <p>The estate continues to enhance the workers awareness on the RTE species through training as sighted in the training records as follows:</p> <ol style="list-style-type: none"> 1. Environment, Buffer Zone, HCV and RTE species and Environmental Policy Training dated 02/06/2022 at Numundo Plantation. 2. Buffer Zone and RTE Species training dated 08/06/2022 at Togulo Plantation. <p>Independent Estate:</p> <p>RTE awareness training was provided by NBPOL-WNB. Other than training, awareness through pictorial is published on the notice board and available during verification at the smallholder’s sites. Interview with the sampled smallholders indicated that they are aware of the prohibition of capturing, harming, collecting or killing RTE species that are within their operation areas.</p>	<p>Complied</p>

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> <p>- Minor compliance -</p>	<p>There no new planting after 15/11/2018 identified that does not have a prior HCV assessment.</p> <p>However, for the current operations, the HCV and RTE species status are included in the Habitat Management plan of each area (e.g. Southern Gabuna Landscape). The forest integrity assessment and periodic HCV inspection served the purpose to ensure that there is no encroachment and violation on RTE protection.</p> <p>NBPOL has also established the Flora and Fauna Species ver. 2 dated March 2019 to further identified the potentials RTE.</p>	Complied
7.12.8	<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>Land Clearing that have been done since November 2005 in NBPOL WNB have all included an HCV-HCSA assessment. As for this audit there were no land clearing or new planting within the sampled plantations.</p>	Complied

Appendix B: GHG Reporting Executive Summary.

The GHG emissions that were produced in **2021** for **NBPOL WNB** was calculated using the PalmGHG Calculator version 4.0. The assessment team had verified the data input in the PalmGHG Calculator against operations records. PalmGHG Calculation Options selected 'Full version' and 'Exclude LUC Emission' calculation option is not applied. The records verified includes:

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

The summary of the Net GHG emitted in **2021** for **Mosa Oil Mill** and supply base are as following:

Emission per product	tCO ₂ e/tProduct
CPO	-1.38
PKO	0.00

Extraction	%
OER	23.28
KER	6.32

Production	t/yr
FFB Process	286,682.88
CPO Produced	66,732.808
PKO Produced	18,125.4

Land Use	Ha
OP Planted Area	58,539.91
OP Planted on peat	950.59
Conservation (forested)	5,618.70
Conservation (non-forested)	0.00
Total	65,109.2

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	27,708.00	0.55	0.00	0.00	22,574.19	0.00	50,282.20	0.55
CO ₂ Emission from fertilizer	1,791.54	0.04	0.00	0.00	0.00	0.00	1,791.54	0.04
NO ₂ Emission	2,012.22	0.04	0.00	0.00	0.00	0.00	2,012.22	0.04
Fuel Consumption	1,292.52	0.03	0.00	0.00	0.00	0.00	1,292.52	0.03
Peat Oxidation	1,086.13	0.02	0.00	0.00	0.00	0.00	1,086.13	0.02
Sink								
Crop Sequestration	-20,168.94	-0.40	0.00	0.00	-160,681.44	0.00	-180,850.39	-0.40
Conservation Sequestration	-2,510.66	-0.05	0.00	0.00	0.00	0.00	-2,510.66	-0.05
Total	11,359.73	0.22	0.00	0.00	-138,107.25	0.00	-126,747.52	0.22

*Note: Includes both estates and smallholders

Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	9,224.79	0.03
Fuel Consumption	531.65	0.00
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	9,756.44	0.03

Summary of Kernel Crusher Emission and Credit (if applicable)

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

*This mill has no kernel crusher operation.

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

POME Diverted to Anaerobic Digestion:	
Divert to anaerobic pond (%)	0
Divert to methane captured (flaring) (%)	25
Divert to methane captured (energy generation) (%)	75

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The summary of the Net GHG emitted in **2021** for **Kumbango Oil Mill** and supply base are as following:

Emission per product	tCO ₂ e/tProduct
CPO	0.57
PKO	1.36

Extraction	%
OER	21.95
KER	6.22

Production	t/yr
FFB Process	268,356.10
CPO Produced	58,892.41
PKO Produced	16,681.21

Land Use	Ha
OP Planted Area	59,778.61
OP Planted on peat	950.59
Conservation (forested)	5,034.86
Conservation (non-forested)	0.00
Total	65,764.06

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	141,311.65	0.67	0.00	0.00	5,457.89	0.00	146,769.54	0.67
CO ₂ Emission from fertilizer	7,699.81	0.04	0.00	0.00	0.00	0.00	7,699.81	0.04
NO ₂ Emission	8,628.53	0.04	0.00	0.00	0.00	0.00	8,628.53	0.04
Fuel Consumption	5,615.15	0.03	0.00	0.00	0.00	0.00	5,615.15	0.03
Peat Oxidation	2,632.36	0.01	0.00	0.00	0.00	0.00	2,632.36	0.01
Sink								
Crop Sequestration	-95,034.83	-0.45	0.00	0.00	-38,848.82	0.00	-133,883.65	-0.45
Conservation Sequestration	-11,961.19	-0.06	0.00	0.00	0.00	0.00	-11,961.19	-0.06
Total	59,252.38	0.28	0.00	0.00	-33,390.94	0.00	2,5861.44	0.28

*Note: Includes both estates and smallholders

Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	14,973.25	0.06
Fuel Consumption	2,425.09	0.01
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	17,398.34	0.06

Summary of Kernel Crusher Emission and Credit (if applicable)

Emissions	tCO ₂ e
PK from own mill	42,196.90
PK from other source	46,216.44
Fuel Consumptions	3,613.45
Total Crusher emissions	92,026.78

*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 (%)	13
Divert to methane captured (flaring) (%)	0
Divert to methane captured (energy generation) (%)	87

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The summary of the Net GHG emitted in **2021** for **Numundo Oil Mill** and supply base are as following:

Emission per product	tCO ₂ e/tProduct
CPO	2.57
PKO	0.00

Extraction	%
OER	21.28
KER	6.17

Production	t/yr
FFB Process	336,807.40
CPO Produced	71,677.407
PKO Produced	20,770.04

Land Use	Ha
OP Planted Area	47,080.81
OP Planted on peat	950.59
Conservation (forested)	4,006.70
Conservation (non-forested)	0.00
Total	52,038.1

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	284,242.78	0.93	0.00	0.00	3,092.38	0.00	287,335.16	0.93
CO ₂ Emission from fertilizer	10,534.27	0.03	0.00	0.00	0.00	0.00	10,534.27	0.03
NO ₂ Emission	12,553.15	0.04	0.00	0.00	0.00	0.00	12,553.15	0.04
Fuel Consumption	6,166.36	0.02	0.00	0.00	0.00	0.00	6,166.36	0.02
Peat Oxidation	46,663.73	0.15	0.00	0.00	0.00	0.00	46,663.73	0.15
Sink								
Crop Sequestration	-154,341.62	-0.51	0.00	0.00	-22,011.35	0.00	-176,352.96	-0.51
Conservation Sequestration	-32,140.55	-0.11	0.00	0.00	0.00	0.00	-32,140.55	-0.11
Total	180,075.81	0.59	0.00	0.00	-18,918.96	0.00	161,156.85	0.59

*Note: Includes both estates and smallholders

Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	74,332.68	0.22
Fuel Consumption	2,305.37	0.01
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	76,638.05	0.23

Summary of Kernel Crusher Emission and Credit (if applicable)

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

*This mill has no kernel crusher operation.

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

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

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The summary of the Net GHG emitted in **2021** for **Kapiura Palm Oil Mill (KAPOM)** and supply base are as following:

Emission per product	tCO ₂ e/tProduct
CPO	0.86
PKO	0.00

Extraction	%
OER	23.63
KER	5.83

Production	t/yr
FFB Process	285,945.42
CPO Produced	67563.43
PKO Produced	16672.65

Land Use	Ha
OP Planted Area	4088.40
OP Planted on peat	0.00
Conservation (forested)	3134.60
Conservation (non-forested)	0.00
Total	7223.00

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	99,313.15	0.45	0.00	0.00	6,011.54	0.00	105,324.69	0.45
CO ₂ Emission from fertilizer	8,173.02	0.04	0.00	0.00	0.00	0.00	8,173.02	0.04
NO ₂ Emission	9,751.14	0.04	0.00	0.00	0.00	0.00	9,751.14	0.04
Fuel Consumption	3,391.59	0.02	0.00	0.00	0.00	0.00	3,391.59	0.02
Peat Oxidation	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Sink								
Crop Sequestration	-82,510.14	-0.37	0.00	0.00	-42,789.71	0.00	-125,299.84	-0.37
Conservation Sequestration	-19,697.58	-0.09	0.00	0.00	0.00	0.00	-19,697.58	-0.09
Total	18,421.18	0.08	0.00	0.00	-36778.16	0.00	-18,356.98	0.08

**Note: Includes both estates and smallholders*

Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	87,974.55	0.31
Fuel Consumption	2,870.28	0.01
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	90,844.83	0.32

Summary of Kernel Crusher Emission and Credit (if applicable)

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

*This mill has no kernel crusher operation.

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

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

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The summary of the Net GHG emitted in **2021** for **Waraston Palm Oil Mill** and supply base are as following:

Emission per product	tCO ₂ e/tProduct
CPO	2.06
PKO	0.00

Extraction	%
OER	22.02
KER	5.78

Production	t/yr
FFB Process	32,729.00
CPO Produced	7206.44
PKO Produced	1891.56

Land Use	Ha
OP Planted Area	47,071.56
OP Planted on peat	1,296.94
Conservation (forested)	4,064.50
Conservation (non-forested)	0
Total	52,433.00

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	25,879.26	0.93	1,528.58	0.61	240.26	0.10	27,648.10	0.93
CO ₂ Emission from fertilizer	883.98	0.03	90.30	0.04	0.00	0.00	974.28	0.03
NO ₂ Emission	1,052.46	0.04	97.67	0.04	0.00	0.00	1,150.13	0.04
Fuel Consumption	629.35	0.02	45.41	0.02	0.00	0.00	674.76	0.02
Peat Oxidation	2,067.63	0.07	0.00	0.00	0.00	0.00	2,067.63	0.07
Sink								
Crop Sequestration	-13,125.70	-0.47	-1,448.89	-0.58	-17,10.14	-0.68	-16,284.73	-0.47
Conservation Sequestration	-2,123.64	-0.08	-242.49	-0.10	0.00	0.00	-2,366.13	-0.08
Total	15,546.83	0.56	70.58	0.03	-1,469.88	-0.58	14,147.52	0.56

**Note: Includes both estates and smallholders*

Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	4,083.91	0.12
Fuel Consumption	476.74	0.01
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	4,560.65	0.14

Summary of Kernel Crusher Emission and Credit (if applicable)

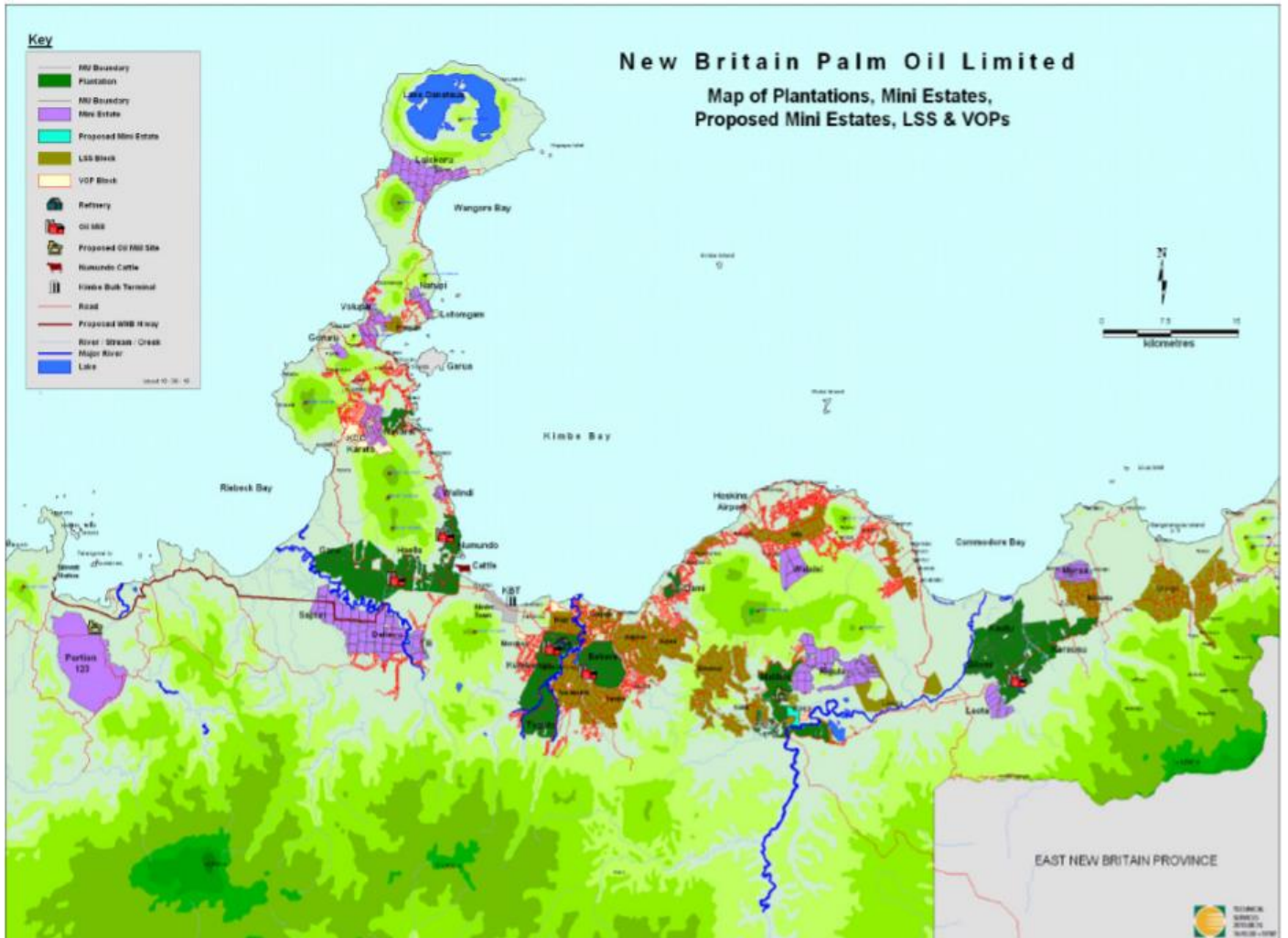
Emissions	tCO ₂ e
PK from own mill	0.00
PK from other source	0.00
Fuel Consumptions	0.00
Total Crusher emissions	0.00

*This mill has no kernel crusher operation.

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

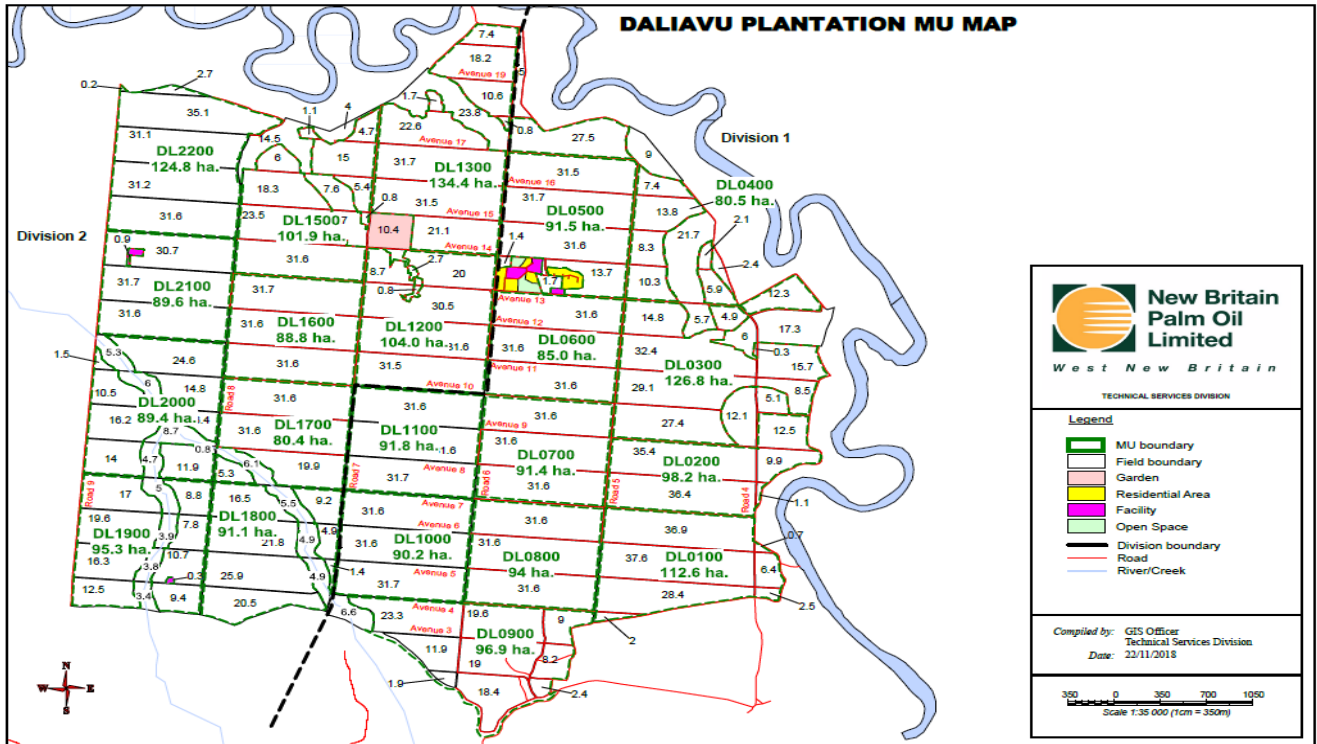
POME Diverted to Anaerobic Digestion:	
Divert to anaerobic pond (%)	100
Divert to methane captured (flaring) (%)	0
Divert to methane captured (energy generation) (%)	0

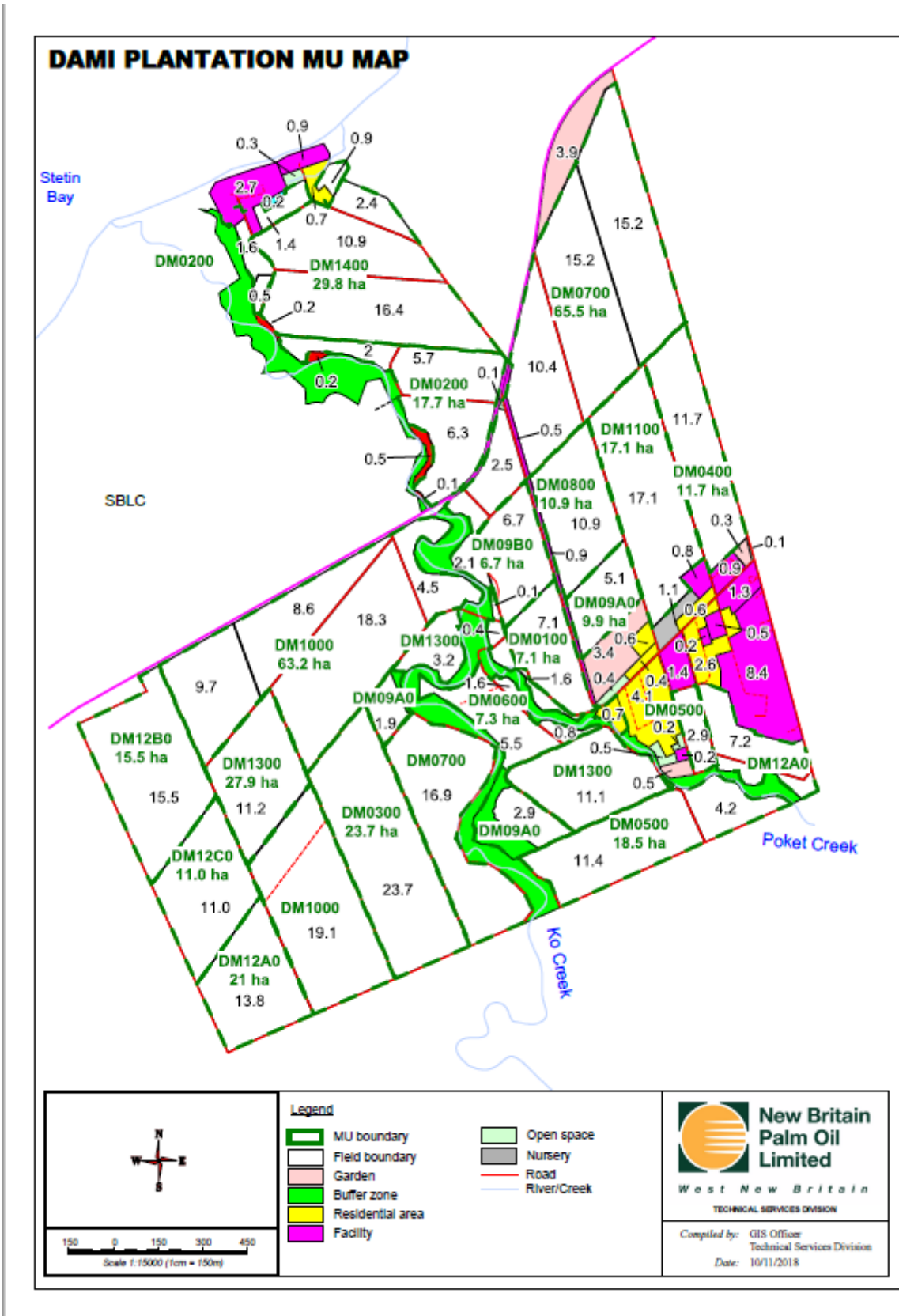
Appendix C: Location Map of Certification Unit and Supply bases



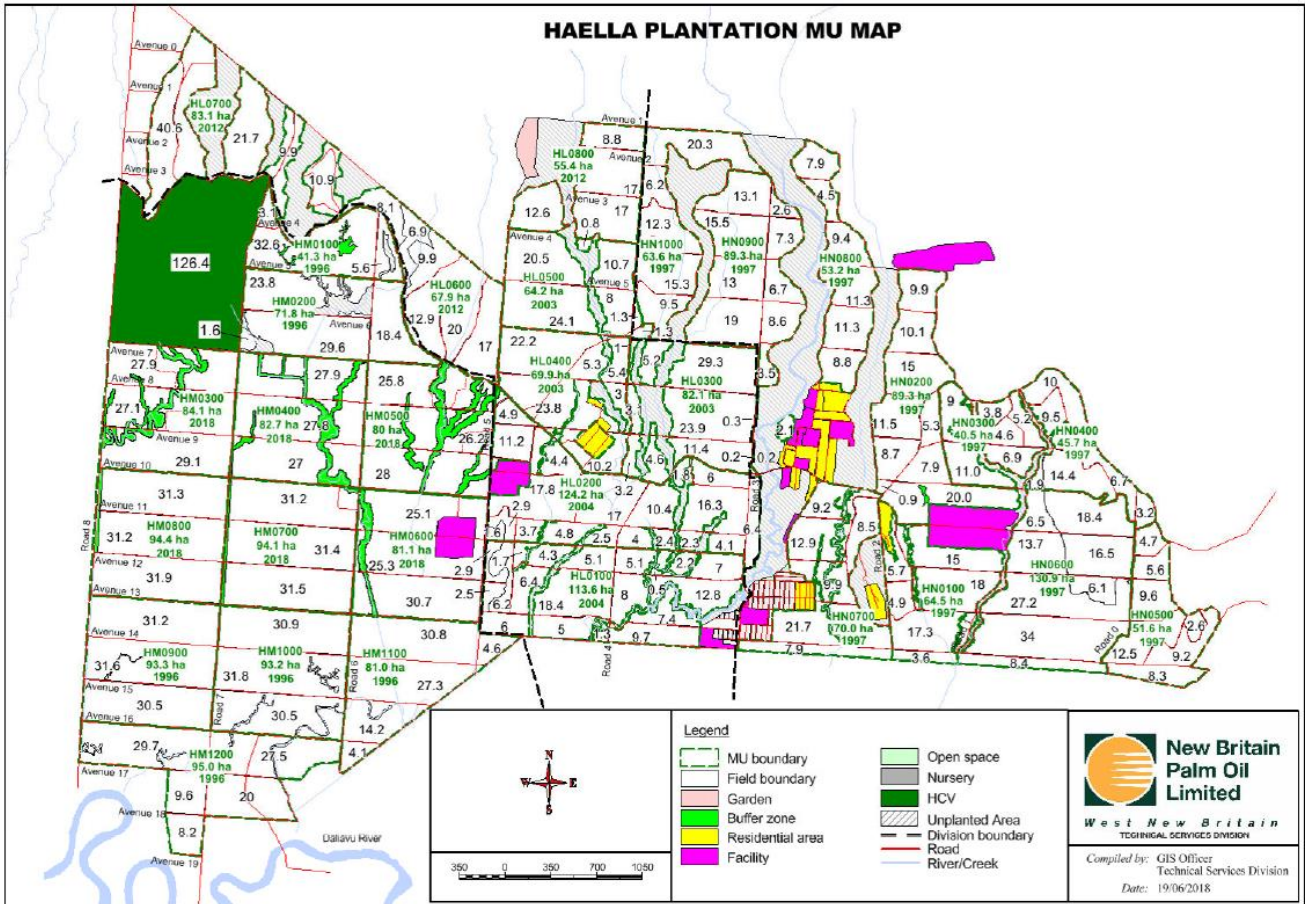
Appendix D: Estate Field Map

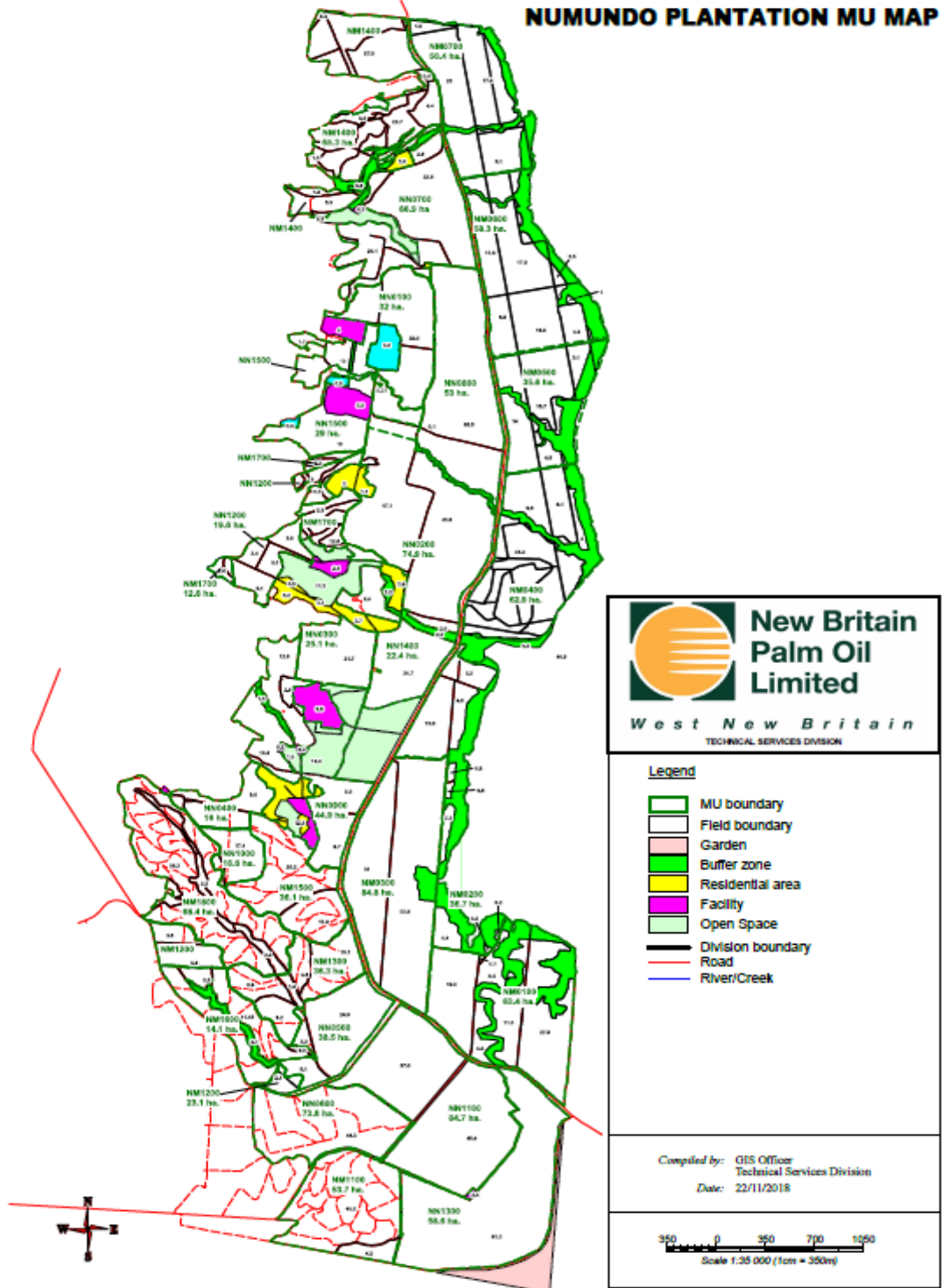
Due to audit site is relatively large, maps within this report are estates that are sampled during this audit.



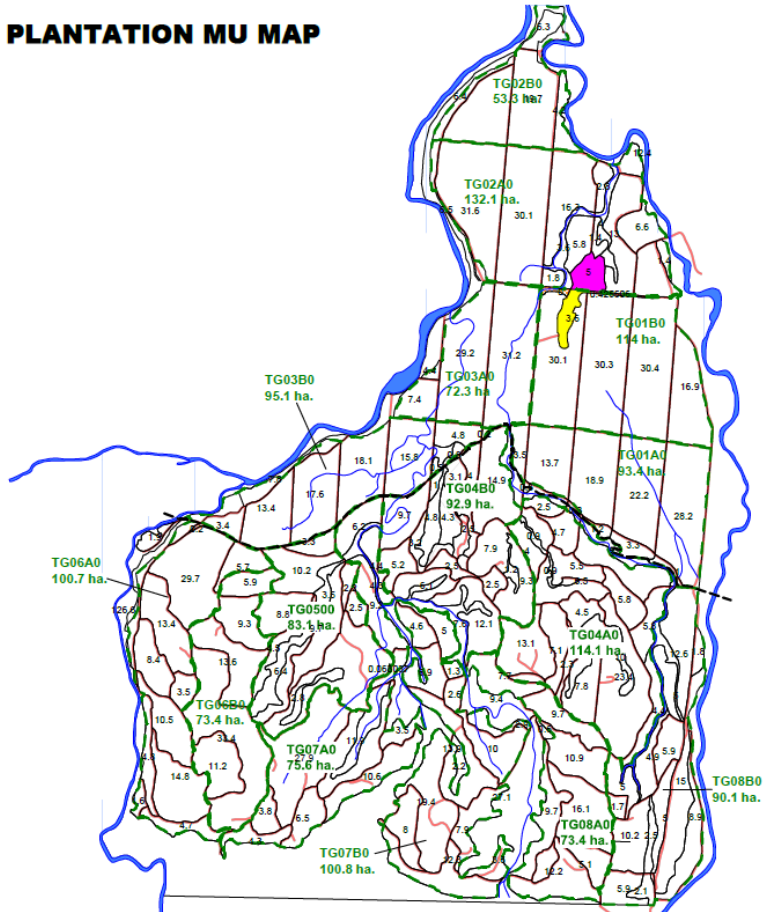



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TOGULO PLANTATION MU MAP





**New Britain
Palm Oil
Limited**
West New Britain

Legend

- MU boundary
- Field boundary
- Facilities
- Compound
- Division boundary
- Road
- River/Creek

Compiled by: Indicate Position
 Technical Services Division
Date: 18/05/2018

3200 0 3200 6400 9600
 Scale 1:3200 (1cm = 3200m)

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Appendix E: List of Smallholder Registered and/or 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	MARAIA RERE	Kaus	-5.49630	150.35046	6.58	5.9	61.386	2014	008-0750
2	FRANCIS RERE	Kaus	-5.49515	150.35179	6.86	5.38	127.217	2014	008-0751
3	JOE HABA	Kaus	-5.49420	150.35334	6.25	5.8	191.310	2014	008-0752
4	JANE FRANCES B LOMAN	Kaus	-5.49311	150.35481	4.27	6.31	69.088	2014	008-0753
5	ELIAS TOIAR	Kaus	-5.49212	150.35666	4.52	6.4	63.259	2014	008-0754
6	RICHARD IPA KAORE	Kaus	-5.49419	150.35986	12.10	7.93	47.554	2014	008-0755
7	RAYMOND SOGI HATE	Kaus	-5.49554	150.35861	7.67	3.67	64.313	2014	008-0756
8	SOLOTIKA VINO	Kaus	-5.50036	150.35256	8.8	4.16	71.310	2014	008-0762
9	MAOBE REU	Kaus	-5.49893	150.35007	7.90	3.63	62.864	2014	008-0763
10	GODFFREY DAVID LING	Kaus	-5.48973	150.35602	3.45	1.96	13.464	2014	008-2124
11	M.TONIAI	Tamba	-5.65027	150.27138	15.22	13.21	195.749	2014	002-0446
12	J.T.TAULE	Tamba	-5.66021	150.26709	10.46	2.8	10.999	2014	002-0451
13	F.T.TOIKALOM	Tamba	-5.65290	150.25963	7.76	5.7	69.228	2014	002-0456
14	JOYCE URASEMBE	Tamba	-5.65804	150.26136	8.07	6.07	82.364	2014	002-0461
15	S.M.TIONI	Tamba	-5.66548	150.25947	6.15	4.5	51.159	2014	002-0466
16	BENSON TOLONG	Tamba	-5.65713	150.25460	7.73	5.64	30.884	2014	002-0471
17	VARAVARA ANDY	Tamba	-5.66322	150.25655	6.92	3.88	131.963	2014	002-0476
18	V.B.ULAWAI	Tamba	-5.66147	150.25137	6.11	5.56	0	2014	002-0481
19	JOYCE NIKUNIKU	Tamba	-5.66360	150.24946	6.36	4.87	51.273	2014	002-0486
20	M. L BAINING	Tamba	-5.67084	150.25092	6.85	4.34	37.726	2014	002-0496
21	EMMANUEL LAIGA	Mosepa	-5.58801	150.78819	2.68	2.68	73.798	2014	249-0006
22	ELUIDA LAIGA	Mosepa	-5.58967	150.78650	2.01	2.01	17.826	2014	249-0007
23	KIKULI JOHN	Mosepa	-5.58955	150.78782	1.98	1.98	76.105	2014	249-0008
24	AISAK LOU	Mosepa	-5.59111	150.78693	1.82	1.82	0	2014	249-0009
25	LAIGA GOTE	Mosepa	-5.59214	150.78462	1.11	1.11	0	2014	249-0011
26	GOLDEN MASEA	Mosepa	-5.59359	150.78477	1.74	1.74	29.747	2014	249-0012
27	ELIZABETH GALO	Mosepa	-5.58582	150.78438	1.49	1.49	1.313	2014	249-0016
28	SESEGA TORE	Mosepa	-5.59372	150.78382	0.91	0.91	0	2014	249-0017
29	PALAU SOGO MASEA	Mosepa	-5.58733	150.78455	1.92	1.92	62.007	2014	249-0018
30	PAUL MISIEL	Mosepa	-5.59153	150.78423	0.91	0.91	103.828	2014	249-0020
31	URUSULA MAGO YAMULI	Mamota	-5.53111	150.73759	6.74	5.41	68.101	2014	240-0868
32	CHARLES MABIA	Mamota	-5.53143	150.74267	6.50	5.33	158.598	2014	240-0872
33	LEO ESKOTI	Mamota	-5.53183	150.74997	6.71	6.53	114.103	2014	240-0876
34	JOHNSON JIMMY	Mamota	-5.53517	150.74118	6.74	6.58	267.412	2014	240-0880
35	GALU KALITOTO	Mamota	-5.53481	150.74858	6.97	5.92	41.673	2014	240-0884

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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			
36	IGNAS META	Mamota	-5.53442	150.75596	7.34	6.74	155.226	2014	240-0888
37	WAKA WAIYANG	Mamota	-5.56353	150.77181	6.56	6.31	101.579	2014	240-1034
38	BLASIUS TINGAL	Mamota	-5.56503	150.77707	2.49	1.34	16.156	2014	240-1038
39	VERONICA DUKE	Mamota	-5.55800	150.77772	6.16	5.88	94.375	2014	240-1042
40	BOTHEN PUSEMBO	Mamota	-5.55082	150.77653	4.77	3.03	36.120	2014	240-1052
41	S.RUKU	Gule	-5.48038	150.52643	1.73	1.73	0	2014	020-0010
42	BUBU RAKULO	Gule	-5.48549	150.52504	0.91	0.91	71.766	2014	020-0020
43	ALBERTH RAVA	Gule	-5.47394	150.52806	2.64	2.54	0	2014	020-0030
44	BENSON BAIMO	Gule	-5.49503	150.52162	2.08	2.08	61.404	2014	020-0040
45	SAM AKAS	Gule	-5.47799	150.52938	1.65	1.65	13.558	2014	020-0050
46	PHILIP BATARI	Gule	-5.47424	150.53465	2.49	2.49	0	2014	020-0060
47	W. GORGE	Gule	-5.49750	150.54025	1.45	1.45	34.145	2014	020-0140
48	WILLY TAUVASA	Gule	-5.47783	150.53657	2.25	2.25	0	2014	020-0080
49	DORCAS MATAHARI	Gule	-5.48087	150.53627	1.18	1.18	0	2014	020-0090
50	ELENAS BATILI	Gule	-5.48915	150.51502	2.78	2.78	3.698	2014	020-0100
51	WILSON KABE	Gule	-5.47473	150.53995	1.63	1.63	0	2014	020-0111
52	DANIEL LILE	Gule	-5.48877	150.53216	1.50	1.50	87.982	2014	020-0122
53	DANIEL CHARE	Pangalu	-5.256231	150.040997	1.87	1.87	52.522	2014	063-0002
54	PETER GALA	Pangalu	-5.252542	150.041484	1.12	1.12	29.658	2014	063-0012
55	FRANCIS WAKORE	Pangalu	-5.252343	150.049746	1.84	1.84	55.298	2014	063-0018
56	FELIX MALALA	Pangalu	-5.244348	150.058558	1.66	1.66	49.433	2014	063-0024
57	MATHIAS DAU	Pangalu	-5.243778	150.057298	1.39	1.39	11.941	2014	063-0032
58	JOACHIM LINGE	Pangalu	-5.248064	150.054121	0.9	0.9	50.913	2014	063-0046
59	JOHN META	Pangalu	-5.25022	150.044123	3.6	3.6	81.630	2014	063-0065
60	JOE VALUKA	Pangalu	-5.259447	150.042012	1.33	1.33	79.319	2014	063-0071
61	JAMES GIRU	Pangalu	-5.25922	150.063132	1.34	1.34	19.546	2014	063-0079
62	ROBERT KIO	Pangalu	-5.24527	150.056334	3.5	3.19	58.310	2014	063-0088
63	WESLEY TUBAWAI	Kilu/Patanga/Garile	-5.45394634	150.0897504	9.12	4.43	112.727	2014	026-0011
64	ERVIN MAUTU	Kilu/Patanga/Garile	-5.555261	150.083642	5.49	5.49	99.322	2014	026-0013
65	ARISI KAIVI	Kilu/Patanga/Garile	-5.44636603	150.0889847	3.16	3.16	137.316	2014	026-0014
66	BEN CHOLE	Kilu/Patanga/Garile	-5.386927	150.065	0.76	0.76	42.235	2014	026-0035
67	BERNARD NULLI	Kilu/Patanga/Garile	-5.37362734	150.0481693	0.88	0.88	104.734	2014	026-0037
68	ALEX NOMU	Kilu/Patanga/Garile	-5.42727251	150.0820043	1.62	1.3	45.672	2014	026-0044
69	CAMILUS KONDI	Kilu/Patanga/Garile	-5.37354573	150.0493516	2.77	2.77	118.039	2014	026-0055
70	EMIL RABUI	Kilu/Patanga/Garile	-5.43309728	150.0756641	1.45	1.36	58.419	2014	026-0058
71	EDWARD BATARI	Kilu/Patanga/Garile	-5.36723436	150.0456742	1.81	1.81	119.780	2014	026-0066
72	MATHEW BUKU	Kilu/Patanga/Garile	-5.37687913	150.0630289	1.6	1.53	23.762	2014	026-0085
73	PETER BANOVO	Kilu/Patanga/Garile	-5.4012795	150.0768728	1.06	1.06	33.180	2014	026-0087
74	FRANCIS TUKA	Kilu/Patanga/Garile	-5.39600699	150.062128	1.02	1.02	29.795	2014	026-0094
75	HENRY TUKA	Kilu/Patanga/Garile	-5.45201714	150.0849272	1.88	1.7	41.044	2014	026-0111

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			Latitude (N)	Longitude (E)	Total Certified Area	Planted Area			
76	GODFREY ROVA	Kilu/Patanga/Garile	-5.4492097	150.0857803	1.03	1.03	62.606	2014	026-0115
77	POININI AGRO TECH	Gaungo	-5.5859390	150.2481588	92.72	20.28	294.900	2014	053-0001
78	UVENI ESTATE	Morokea	-5.58337247	150.18698182	22.96	17.5	406.180	2014	057-0001
79	PONRAVU ESTATE	Kukula	-5.56400	150.24816	45.32	21.29	658.920	2014	296-0001
80	LILIMO PROJECT	Lilimo	-5.67148631	150.48504621	32.3	31.85	693.420	2014	106-0001
81	PUSIKI ESTATE	Kulungi	-5.52878802	150.10347439	111.45	86.56	1,797.120	2014	051-0001
Total							8,491.371	8,491.371	

Note: * are smallholders sampled in this audit.

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
IS - CSPO	Independent Smallholder Certified Sustainable Palm Oil
IS – CSPKO	Independent Smallholder Certified Sustainable Palm Kernel Oil
IS – CSPKE	Independent Smallholder Certified Sustainable Palm Kernel Expeller
ISCC	International Sustainable Carbon Certification
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