

**RSPO PRINCIPLE AND CRITERIA –
1st ANNUAL SURVEILLANCE ASSESSMENT (ASA1)
Public Summary Report**

FGV Holdings Berhad
Client company Address: Sustainability, Compliance and Certification Department (SCCD) Group Sustainability Division (GSD) FGV Holdings Berhad Level W, Wisma FGV Jalan Raja Laut 50350 Kuala Lumpur Malaysia
Certification Unit: FGVPISB Keratong 3 Palm Oil Mill and supply base Location of Certification Unit: Kilang Kelapa Sawit Keratong 3 Off Lebuhraya Tun Razak, 26900 Bandar Tun Razak Pahang, Malaysia

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Section 1: Scope of the Certification Assessment

1. Company Details			
RSPO Membership Number	1-0225-16-000-00	Membership Approval Date	27/12/2016
Parent Company Name	FGV Holdings Berhad		
Address	Sustainability, Compliance and Certification Department (SCCD), Group Sustainability Division (GSD), FGV Holdings Berhad, Level 20 (W), Wisma FGV Jalan Raja Laut, 50350 Kuala Lumpur, Malaysia		
Subsidiary (Certification Unit Name)	FGV Palm Industries Sdn Bhd - Keratong 3 Palm Oil Mill		
Address	Certification unit : Kilang Kelapa Sawit Keratong 3, Off Lebuhraya Tun Razak, 26900 Bandar Tun Razak, Pahang, Malaysia		
Contact Name	En Ameer Izyanif Bin Hamzah		
Website	http://www.fgvholdings.com	E-mail	ameer.h@fgvholdings.com
Telephone	+603 2859 1995	Facsimile	+603 2859 1311

2. Certification Information			
Certificate Number	RSPO 693213	Date of First Certification	25/03/2019
		Certificate Start Date	25/03/2019
		Certificate Expiry Date	24/03/2024
Scope of Certification	Palm Oil and Palm Kernel Production		
Applicable Standards	RSPO Principle & Criteria MYNI-2019 with Mass Balance Supply Chain Module		

3. Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
MSPO 693214	MS 2530-4 Malaysian Sustainable Palm Oil (MSPO) Part 4	BSI Services Malaysia Sdn Bhd	05/12/2023
MSPO 693216	MS 2530-3 Malaysian Sustainable Palm Oil (MSPO) Part 3		25/01/2023

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base)	Location [Map Reference #]	GPS Coordinates	
		Latitude	Longitude
FGVPISB Keratong 3 Palm Oil Mill	Kilang Sawit Keratong 3, Off Lebuhraya Tun Razak, 26900 Bandar Tun Razak, Pahang, Malaysia	2° 55' 44.05" N	102° 56' 04.08" E
FGVPM Keratong 11 Estate	Ladang Felde Keratong 11 26900 Bandar Tun Razak, Pahang, Malaysia	2° 53' 08.00" N	103° 01' 05.00" E

5. Description of Supply Base					
Estate	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
FGVPM Keratong 11	984.24	-	212.16	1,196.40	82

6. Plantings & Cycle							
Estate	Age (Years)					Mature**	Immature
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		
FGVPM Keratong 11	156.29	130.99	129.50	567.46	-	827.95	156.29

7. Certified Tonnage of FFB (Own Certified Scope)				
Estate	Tonnage / year			
	Estimated (March 2019- Feb 2020)	Actual (Dec 2018-Oct 2019)		Forecast (March 2020- Feb 2021)
		<i>Previous license period</i> (Dec 2018-Feb 2019)	<i>Current license period</i> (March 2019-Nov 2019)	
FGVPM Keratong 11	14,666.29	NA – certified in Mar 2019	6,406.05	14,320.00

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8. Certified Tonnage of FFB (from other certified unit(s)) if applicable *				
Estate	Tonnage / year			
	Estimated (March 2019-Feb 2020)	Actual (March 2019-Nov 2019)		Forecast (March 2020-Feb 2021)
		Previous license period (Dec 2018-Feb 2019)	Current license period (March 2019-Nov 2019)	
Nil	N/A	NA – certified in Mar 2019	-	N/A
Total				

9. Non-Certified Tonnage of FFB (outside supplier – excluded from certificate) if applicable				
Independent FFB Supplier	Tonnage / year			
	Estimated (March 2019-Feb 2020)	Actual (March 2019-Nov 2019)		Forecast (March 2020-Feb 2021)
		Previous license period (Dec 2018-Feb 2019)	Current license period (March 2019-Nov 2019)	
FELDA & FTP	197,500.00	NA – certified in Mar 2019	183,576.39	198,000.00
Private suppliers	3,500.00		3,272.43	3,600.00
FGVPM Keratong 11	900.00		879.42	-
FGVPM Merchong	500.00		566.92	500.00
FGVPM Bera Selatan 3	500.00		550.08	500.00
FGVPM Bera Selatan 5	-		6.18	-
FGVPM Keratong Timur	300.00		277.36	300.00
Total	203,200.00			189,128.78

10. Certified Tonnage				
Mill Capacity: 40 MT/hr SCC Model: MB	Estimated (March 2019-Feb 2020)	Actual (March 2019-Nov 2019)		Forecast (March 2020-Feb 2021)
	FFB	FFB		FFB
		Previous license period (Dec 2018-Feb 2019)	Current license period (March 2019-Nov 2019)	
		14,666.00	NA	5,925.00
	CPO (OER: 21.00%)	CPO (OER: 20.68%)		CPO (OER: 21.00%)

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	3,080.00	1,225.11	3,007.20
	PK (KER: 5.15%)	PK (KER: 5.17%)	PK (KER: 5.15%)
	755.30	306.49	737.48

11. Actual Sold Volume (CPO)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSB		
CPO (MT)	700.68			524.43	1,225.11

12. Actual Sold Volume (PK)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSB		
PK (MT)	222.27			84.22	306.49

13. Actual Group certification Claims		
	Credit	Physical Volume (MT)
IS-CSPO		
IS-CSPKO		
IS-CSPKE		

Section 2: Assessment Process

Certification Body:

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

BSI is a leading global provider of management systems assessment and certification, with more than 80,000 certified locations and clients in over 180 countries. BSI Standards is the UK's National Standards Body. BSI provides independent, third-party certification of management systems. BSI is ASI Accredited (ASI-ACC-067) to conduct RSPO assessment since 31/10/2014 with accredited office located at Kuala Lumpur, Malaysia and an office at Jakarta and Australia which involve in RSPO Certification Program.

2.1 Assessment Methodology, Programme, Site Visits

The on-site 1st annual surveillance assessment was conducted from 03-05/12/2019. The audit programme is included as section 2.3. The approach to the audit was to treat the mill and its supply base as an RSPO Certification Unit. Mill was audited together with the sample estates. A range of environmental, Occupational Health & safety, social welfare and best management practices were covered. This includes consideration of topography, palm age, proximity to areas with HCVs, declared conservation areas and local communities.

The Major NC close out on-site assessment was conducted on 28/02/2020. The audit programmes are included in Section 2.3.

The methodology for collection of objective evidence included physical site inspections, observation of tasks and processes, interviews of staff, workers and their families and external stakeholders, review of documentation and monitoring data. RSPO Principles & Criteria 2018 (MYNI 2019) was used to guide the collection of information to assess compliance. The comments made by external stakeholders were also taken into account in the assessment.

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

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

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

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the stakeholder and the company before discussions proceeded. The interviewer recorded comments made by stakeholders and these have been incorporated into the assessment findings.

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

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

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

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

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

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

Assessment Program					
Name (Mill / Supply Base)	Year 1 (Certification)	Year 2 (ASA1)	Year 3 (ASA2)	Year 4 (ASA3)	Year 5 (ASA4)
FGVPISB Keratong 3 Palm Oil Mill	√	√	√	√	√
FGVPM Keratong 11 Estate	√	√	√	√	√

Tentative Date of Next Visit: December 1, 2020 – December 3, 2020

Total No. of Mandays: 7.0 mandays (including 1 day for mill – SC audit)

2.2 BSI Assessment Team:

Team Member Name	Role <i>(Team Leader or Team member)</i>	Qualifications <i>(Short description of the team members)</i>
Valence Shem	Lead auditor	He holds Bachelor Degree in Industrial Technology, graduated from University of Science Malaysia in 1998 and has 9 years working experience in oil palm plantation industry. He has been in the management system auditing line since 2009 for various standards such as ISO 140001, RSPO P&C, RSPO SCCS and SMETA. He completed the ISO 14001 Lead Auditor Course in 2008, ISO 9001 Lead Auditor Course in 2013, Endorsed RSPO P&C Lead Auditor Course in 2011, Endorsed RSPO SCCS Lead Assessor Course in 2012 and MSPO Awareness Training in 2014. He had been involved in RSPO auditing since 2009 in various companies in Malaysia. During this assessment, he assessed on the aspects of legal, environmental & biodiversity, agriculture best practices and the supply chain element. Able to communicate in Bahasa Malaysia and English.
Elzy Ovktafia Chairul	Team Member	She graduated from Universiti Putra Malaysia in Diploma of Agriculture while Licentiate Diploma and Advanced Diploma from the Incorporated Society of Planters. She involve in audits and technical reviews works mainly for Sustainability Programme includes RSPO and MSPO for more than 3 years in more than 11 countries. She is a qualified Lead Auditor/Auditor for MSPO, RSPO P&C, RSPO NEXT, RSPO SCC, ISO 9001:2015, ISO 14001:2015 and Social Compliance Audit by Verite. Prior to this, she was the Agronomist in R&D Department for 5 years in Oil Palm Plantation where her task involved in all Oil Palm Plantation Operations such as conducting experimental trials on Research & Development with technical paper publications, Crop Forecast, Leaf & Soil Sampling Collection, Fertilizer Recommendation, Pest and Diseases Training, Quality Control as well as special project namely Yield Intensification Project and Food for Palm Project for estates. During assessment, she covers the legal issues, land use rights, stakeholder consultation, worker's welfare and social issues.
Vijay Kanna Pakirisamy	Team Member	He holds a bachelor's degree in Agribusiness Science Management with Honours from University Utara Malaysia in 2010. He gained his working exposure in the plantation sector, serving as an Assistant Manager with KL Kepong and IOI Plantations and as a Sr. Assistant Manager with United Plantations Berhad. Throughout his 10 year tenure in the oil palm industry, he has been part of the operations team that implements standards within the estate such as RSPO, MSPO, ISCC and FINWATCH. He has completed ISO IMS 9001, 14001, 45001(OHS 18001) Lead Auditor Course in November 2019, endorsed RSPO P&C Lead Auditor Course in October 2019 and endorsed MSPO Lead Auditor Course in November 2019. During this assessment, he assessed on the aspects of Occupational, Health & Safety and estate best practises. He is fluent in Bahasa Malaysia and English languages.
Muhd Naquiuddin Mazeli	Team Member	He holds Bachelor of Science Horticulture at University Putra Malaysia. He has 11 years working experience in oil palm plantation

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		<p>industry as sustainability team. Joining the sustainability team, he managed, implement and monitors the RSPO, ISCC, MSPO and ISO9001 and ISO 18001 certification requirements for the estates, mills, refineries and Smallholder scheme. He also support in providing training related to RSPO, MSPO and other certifications where applicable to the operations during previous company. He is a trained as Safety and Health Officer, Food Safety System (FSSC and ISO 22000) for Mill and refineries, ISO 9001, ISO 45001 and already attend HCV training with Proforest. For this assessment, he was assigned to conduct the on-site NCR close out..</p>
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Accompanying Persons:

No.	Name	Role
1.	Nor Faizah Azizan	Observer from BSI

2.3 Assessment Plan

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

Date	Time	Subjects	VSH	EOC	VKP	NFA
Tuesday 3/12/2019 Keratong 3 POM	0830-0900	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) 	✓	✓	✓	✓
	0900-1300	Keratong 3 POM Inspection: FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment, staff, workers and contractor interview, housing and facility inspection, clinic, meeting stakeholders, etc.	✓	✓	✓	✓
	1000 - 1300	Stakeholder consultations: Consultation with relevant stakeholders which consists of various categories such as government agencies/enforcers, NGO, contractors, suppliers, surrounding communities (e.g. neighboring estates, smallholders, villages, workers representative, etc.), etc.	-	✓	-	-
	1300-1400	Lunch break				
	1400-1630	Keratong 3 POM Visit to laboratory, weighbridge and palm product storage area. Document Review P1 – P7: SOPs, Supply chain for CPO mill, Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation etc.	✓	✓	✓	-
	1630-1700	<ul style="list-style-type: none"> Interim closing briefing 	✓	✓	✓	✓
Wednesday 4/12/2019 Keratong 11 Estate	0900-1300	Keratong 11 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, Scheduled waste management, worker housing, clinic, Landfill, , etc.	✓	✓	✓	✓
	1300-1400	Lunch break				
	1400-1530	Keratong 11 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.).	✓	✓	✓	✓
	1530-1600	Audit team discussion & preparation for closing meeting	✓	✓	✓	✓
	1600-1700	Closing meeting	✓	✓	✓	✓
Thursday 5/12/2019	0900-1200	Keratong 3 POM RSP0 Supply Chain	✓	✓	-	✓

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Keratong 3 POM		Site visit: Incoming of FFB and outgoing of CSPO & CSPK – weighbridge, ramp, storage area, loading bays, etc. Documentation review: RSPO SCC general requirements, internal audit, management review, sales and purchasing documents, mass balance accounting and other relevant documents and records.				
	1200-1230	Audit team discussion & preparation for closing meeting	✓	✓	-	✓
	1230-1300	Closing meeting	✓	✓	-	✓

Plan for NCR close out

Date	Time	Subjects	MN
Thursday, 27/2/2020		Travel from KL to Segamat and check in VIP Hotel.	✓
Friday, 28/2/2020	0830-0900	Keratong 3 Mill: 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). 	✓
	0900–1230	Keratong 3 POM, and Keratong 11 estate: Verification on previous Major NC. Site observation ,workers interview (individual and group session) if necessary Document review – implemented evidence	✓
	1230–0130	Break	✓
	1.30-4.30	Continues with document and site verification Keratong 3 POM, and Keratong 11 estate: Verification on previous Major NC. Site observation ,workers interview (individual and group session) if necessary Document review – implemented evidence	✓
	4.30-5.00	Closing and travel back	✓

Section 3: Assessment Findings

3.1 Normative requirement applied for this assessment:

- FELDA Global Ventures Holdings Berhad Multiple Management Units / Time Bound Plan
- RSPO P&C 2018 Generic
- RSPO Group Certification Standard 2016
- RSPO Supply Chain Certification Standard 2017
- RSPO P&C National Interpretation MYNI 2019

3.2 Time Bound Plan progress for multiple management units

Time Bound Plan		
Requirement	Remarks	Compliance
Does the plan include all current subsidiaries, estates and mills?	Yes, as per time bound plan 2018.	Yes
Have all the estates and mills certified within five years after obtaining RSPO membership?	9 Complexes have been certified in 2017/2018: POM Kemasul, Maokil, Krau, Keratong 9, Selancar 2b, Aring A, Bukit Sagu, Lepar Utara 6, Selendang	Yes
Have there been any new acquisitions? If yes, the new acquisitions shall be certified within three-year from the date of acquisition. Certification plan for the new acquisition shall be available.	Challenge from the time bound plan is age of plantations and location. No new acquisitions as per 2019.	Yes
Have there been any changes to the time-bound plan since the last audit	The latest ACOP 2018 available in RSPO website reporting no changes.	Yes

<p>(both new acquisition and existing)? If yes, justification is required. Is this consistent with the ACOP reporting?</p>		
<p>Have there been any isolated lapses in implementation of the plan? If yes a Minor non-compliance shall be raised</p>	<p>There is no lapses in implementation of the plan.</p>	<p>Yes</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>There is no fundamental failure. The TBP is in progress and it is expected to achieve 100% RSPO certification of estates and mills in 2021 and RSPO certification of Scheme/Plasma/Associated smallholders and Outgrowers in 2025 as per ACOP 2018. However, as per the RSPO CP decision on 13/01/2020, all new certification under FGV is suspended.</p>	<p>Yes</p>
<p>Un-Certified Units or Holdings</p>		
<p>No replacement after dates defined in NIs Criterion 7.3:</p> <ul style="list-style-type: none"> • Primary forest. • Any area required to maintain or enhance HCVs in accordance with RSPO P&C criterion 7.3. 	<p>No replacement for primary forest or HCV area. There were 7 LUCA submitted to RSPO and all of them have been passed with no concept note or compensation plan required.</p>	<p>Yes</p>

<p>Any new plantings since January 1st 2010 shall comply with the RSPO New Plantings Procedure.</p>	<p>Company Group/ Holding Statement: There is new planting after 1st January 2010. Auditor Verification: NPP audit has been carried out for all FGVPM Estate and is currently under review. Data as per below:</p> <table border="1" data-bbox="618 531 1906 1324"> <thead> <tr> <th data-bbox="618 531 831 647">Estate</th> <th data-bbox="831 531 1037 647">Hectarage Involves In NPP</th> <th data-bbox="1037 531 1906 647">Status</th> </tr> </thead> <tbody> <tr> <td data-bbox="618 647 831 767">Tembangau 05</td> <td data-bbox="831 647 1037 767">45.84</td> <td data-bbox="1037 647 1906 767">March 2016 – May 2016, Cannot undergo development https://hcvnetwork.org/reports/hcv-chegar-perah-02-estate-bukit-sagu-08-estate-tembangau-05-estate-selendang-03-estate-malaysia/</td> </tr> <tr> <td data-bbox="618 767 831 852">Chegar Perah</td> <td data-bbox="831 767 1037 852">259.84</td> <td data-bbox="1037 767 1906 852" rowspan="3">Proceed with new planting. Did not go NPP as this is certified area. Refer to: https://hcvnetwork.org/reports/hcv-chegar-perah-02-estate-bukit-sagu-08-estate-tembangau-05-estate-selendang-03-estate-malaysia/</td> </tr> <tr> <td data-bbox="618 852 831 903">Selendang 03</td> <td data-bbox="831 852 1037 903">97.14</td> </tr> <tr> <td data-bbox="618 903 831 954">Bukit Sagu 08</td> <td data-bbox="831 903 1037 954">61.54</td> </tr> <tr> <td data-bbox="618 954 831 1201">Pt CNP, Kalimantan</td> <td data-bbox="831 954 1037 1201">14,385</td> <td data-bbox="1037 954 1906 1201">Full assessment 22-29 Mac 2018 Public consultations 13-16 July 2018 SEIA: Completed HCV: Completed NPP Completed Nursery and Planting Development www.rspo.org/files/download/c085da6476b00a1</td> </tr> <tr> <td data-bbox="618 1201 831 1324">PT TAA, Kalimantan</td> <td data-bbox="831 1201 1037 1324">8,193</td> <td data-bbox="1037 1201 1906 1324">SEIA: Completed NPP process Development on some area but stop after the CP issue.</td> </tr> </tbody> </table>	Estate	Hectarage Involves In NPP	Status	Tembangau 05	45.84	March 2016 – May 2016, Cannot undergo development https://hcvnetwork.org/reports/hcv-chegar-perah-02-estate-bukit-sagu-08-estate-tembangau-05-estate-selendang-03-estate-malaysia/	Chegar Perah	259.84	Proceed with new planting. Did not go NPP as this is certified area. Refer to: https://hcvnetwork.org/reports/hcv-chegar-perah-02-estate-bukit-sagu-08-estate-tembangau-05-estate-selendang-03-estate-malaysia/	Selendang 03	97.14	Bukit Sagu 08	61.54	Pt CNP, Kalimantan	14,385	Full assessment 22-29 Mac 2018 Public consultations 13-16 July 2018 SEIA: Completed HCV: Completed NPP Completed Nursery and Planting Development www.rspo.org/files/download/c085da6476b00a1	PT TAA, Kalimantan	8,193	SEIA: Completed NPP process Development on some area but stop after the CP issue.	<p>Yes</p>
Estate	Hectarage Involves In NPP	Status																			
Tembangau 05	45.84	March 2016 – May 2016, Cannot undergo development https://hcvnetwork.org/reports/hcv-chegar-perah-02-estate-bukit-sagu-08-estate-tembangau-05-estate-selendang-03-estate-malaysia/																			
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	Tawai 01	2740.11	"January, 24, 2018 - February, 02, 2018"	
	Tawai 02	2745.58	Second resubmission by Aksenta First submission failed on 14 Nov 2018. https://hcvnetwork.org/reports/hcv-ladang-tawai-1-and-ladang-tawai-2-fgvp-malaysia/	
	Asian Plantation Limited	25,325.00	5 - 19 February 2015 HCVRN CLOSED Can proceed with Planting subjected to HCSA report for Grand Performance. https://hcvnetwork.org/reports/felda-global-venture-miri-division-sarawak-state-malaysia/	
<p>Any Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 2.2, 6.4, 7.5 and 7.6.</p> <p>The RSPO RaCP tracker shall be checked to confirm for any land conflicts/Liabilities https://www.rspo.org/certification/mediation-and-compensation/racp-tracker. The progress on the Liabilities shall be verified and reported.</p>	<p>There is No land Conflict reported. From the RSPO RaCP tracker the FGV Management unit already sent 7 Land Use Change Analysis to RSPO and already completed the review for all analysis.</p>			Yes
<p>Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion</p>	<p>On the 26th of July 2015, WSJ ran an article by Syed Zain Al – Mahmood alleging that Felda has breached labour conditions in its plantations. The allegations mainly say that forced labour is being used and the workers</p>			Yes

<p>6.3.</p>	<p>are not paid minimum wages. Further, it is alleged that their health and working conditions is are neglected and also that their employers withheld their passports.</p> <p>Remarks</p> <p>29 July 2015 - 12 NGOs urged the RSPO to conduct a transparent investigation into Wall Street Journal's findings of forced labour, human trafficking, and other human and labour rights violations especially on RSPO member FELDA's plantations.</p> <p>The Complaints Panel in its meeting on August 2015, decided that the member, FELDA, be investigated on the issues raised by the WSJ article. The RSPO Secretariat will conduct an independent assessment to investigate the report on labour condition on all RSPO members. Malaysia would be the first country, where the assessment would be done. RSPO release the following statement on its website: http://www.rspo.org/news-and-events/news/3rd-update_rspo-response-to-the-report-titled-palmoil-migrant-workers_tell-of-abuses-on-malaysian-plantations-published-by-the-wall-street-journal-on-26th-july-2015</p> <p>7 March 2016 - RSPO Complaints Panel reviewed the independent assessment reports and decided to suspend Pasoh palm oil mill owned by FELDA until full clearance is given based on the re-audits.</p> <p>10 March 2016 - FGV had a meeting with RSPO regarding the ASI report and suspension decision by RSPO.</p> <p>18 March 2016 - FGV sent complaint acknowledgment letter to RSPO. FGV will submit 12 month time bound action plan addressing all the issues relating to ASI report.</p> <p>6 May 2016 - FGV withdraws its RSPO Principles and Criteria certificates.</p> <p>4 July 2016 - FGV submits the action plan to RSPO.</p> <p>22 August 2016 - Secretariat has reviewed the action plan and sent the action plan back to the company for further clarification.</p> <p>20 October 2016 - Secretariat to wait for the updated action plan from the company.</p> <p>19 December 2016 - Secretariat to appoint an independent expert to verify action plan and set a time bound plan.</p> <p>22 March 2017 - Secretariat continues searching for an independent expert to review the action plan.</p> <p>31 May 2017 - Secretariat shares the action plan with the Complaints Panel and continues monitoring the case.</p>	
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	<p>25 July 2017 (CP Meeting) -Secretariat to proceed with the review of the Action Plan.</p> <ol style="list-style-type: none"> 1) 24 August 2017 (CP Meeting) 2) CP to wait for the report of the Review of FGV Action Plan; 3) Secretariat to work with the Technical department to develop a formula for identifying the number of units for verification; 4) Secretariat to start identifying a team of experts for the verification exercise. 26 September 2017 (CP Meeting) -Secretariat to follow up with FGV on the 2 reports. 23 October 2017 (CP Meeting) - Secretariat to send CP's response to the Company. 21 November 2017 (CP Meeting) -Verification exercise to be carried out once the schedule is confirmed with the verification team. 21 December 2017 (CP Meeting) - Verification exercise to be carried out in March. 24 January 2018 (CP Meeting) -TOR for the verification exercise to be drafted. Further details, please refer to: https://www.rspo.org/members/complaints/status-ofcomplaints/view/85 <p>26 Sept 2017 – (CP Meeting) Secretariat to follow up with FGV on the 2 reports.</p> <p>23 Oct 2017 – (CP Meeting) Secretariat to send CP's response to the Company.</p> <p>21 Nov 2017 – (CP Meeting) Verification exercise to be carried out once the schedule is confirmed with the verification team.</p> <p>21 Dec 2017 – (CP Meeting) Verification exercise to be carried out in March.</p> <p>24 Jan 2018 – (CP Meeting) TOR for the verification exercise to be drafted.</p> <p>21 Feb 2018 - Verification exercise to be carried out in March.</p> <p>28 Mar 2018 - Secretariat to have a meeting with the experts. Secretariat to share the questions with the CP.</p> <p>25 Apr 2018 - The field verification will commence on 26 – 28 April 2018. The Secretariat is to receive the first draft of the report in two weeks.</p> <p>25 May 2018 - To follow up with the verification team on the report.</p> <p>18 Jun 2018 - Secretariat to share draft verification report with FGV for factual verification.</p> <p>25 Jul 2018 - CP to review all documents before it and proceed to deliberations.</p> <p>23 Aug 2018 - CP to continue deliberations.</p> <p>26 Sep 2018 - Complaints Panel to continue deliberations on the complaint.</p>	
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	<p>24 Oct 2018 – CP to continue deliberations and finalise the decision letter.</p> <p>28 Nov 2018 - Complaints Panel's decision delivered to parties to the Complaint. Refer: https://ap8.salesforce.com/sfc/p/#90000000YoJi/a/90000000PagQ/ZW4jz6LO5zY01E.T_qS04uHRv0ha1iIJt8CgYScuWt4</p> <p>05 Dec 2018 - Complaint transferred to IMU for monitoring / implementation. Refer: https://ap8.salesforce.com/sfc/p/#90000000YoJi/a/0o000000fzal/qaNnRjxq39xHaf4VCwCEcIDk.IGcMh2FOA7r4znXAt8</p> <p>19 Dec 2018 - Decision letter has been sent to the parties. Deadline for submission of appeals is on 28 February 2019.</p> <p>27 Feb 2019 - Timeline for appeal ends 28.2.2019. Action Plan due 28.2.2019. FGV submitted a request for extension of time to submit their Action Plan. FGV's request under consideration by the CP. FGV request for extension of time letter. Refer: https://rspo.my.salesforce.com/sfc/p/#90000000YoJi/a/0o000000Xmil/wua7Mi0mKLzXRXaTxFHF2320ZoCed6LXN.v7QziRCc</p> <p>28 Feb 2019 - The Complaint is officially closed.</p> <p>08 Mar 2019 - CP Directive Letter to FGV. Refer: https://rspo.my.salesforce.com/sfc/p/#90000000YoJi/a/0o000000Xmig/iXfdY2gKbHzqVUZmkRsEnAjGOgDRiElT0ZV71b0kJsQ</p> <p>27 Mar 2019 - 1) Extension of time granted to FGV for submission of their Action Plan and quarterly progress report. 2) FGV is expected to revert by 29 March 2019.</p> <p>24 Apr 2019 - FGV has submitted the action plan and it's being reviewed by IMU.</p> <p>28 Jun 2019 - FGV wrote to the Complaints Panel requesting a lift of the P&C Certificate suspension. Refer: https://rspo.my.salesforce.com/sfc/p/#90000000YoJi/a/0o000000MX6f/CgQnAFQyNw8MydWaOC9Z1JOfu5IOWupruy5R1vlkGQo</p> <p>05 Aug 2019: CP letter - lifting of the suspension on FGV (Serting Complex). Refer: https://rspo.my.salesforce.com/sfc/p/#90000000YoJi/a/0o000000HQyJ/KtzAK4UrK.ZtK0LVQzJsusQJuSJUyJy_2h36BweGo.A</p>	
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	<p>13 Jan 2020 - CP's decision letter on FGV's non-compliance and related sanctions. Refer: https://rspo.my.salesforce.com/sfc/p/#900000000YoJi/a/0o000000Q2Ph/KKtxkdu0okoPB455uo7CklODOAILSxkYX44EsoJEmQc</p> <p>The Complaints Panel hereby finds the Respondent to be in non-compliance of the Complaints Panel Decision. Consequently, the Complaints Panel directs the following –</p> <ul style="list-style-type: none"> i. That the Secretariat instructs the Certification Body to re-suspend FGV's P & C certificate for Kilang Sawit Seriting and its Supply Bases, pursuant to Section 4.12.6 of the RSPO Certifications Systems for Principles & Criteria (June 2017); and ii. That all certification processes of each uncertified management unit within FGV are suspended. <p>The above suspensions are effective from 13 January 2020. This Complaint will continue to be monitored by the IMU. FGV is to continue submitting its quarterly reports and updates related to the completion of this exercise to the Secretariat.</p> <p>Lifting of the above suspensions are conditional upon the satisfactory implementation of the Complaints Panel Decision, verified by audits conducted by Certification Bodies no later than July 2020. Costs for the said audits shall be borne by FGV.</p> <p>The resolution are currently being resolved under complaints panel.</p>	
<p>Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1</p>	<p>Auditor Verification:</p> <p>There is 1 issue happen in FGVPM Palong Timur 04 (Now FGVPM Palong Timur 05) and the details is elaborated below:</p> <p>FGVPM PALONG TIMUR 04 (NOW FGVPM PALONG TIMUR 05): Claims on 19.06.2012 with value of summon RMX1,XXX.60 and summon status is Court Appeal.</p> <p>Auditor Verification:</p> <p>The dispute between FGVPM Palong Timur 04 VS Ahmad Tukiman & 7 other in Mahkamah Rayuan No: J-08-505-11/2017 form Oct 2016 untill May 2018 has been closed and payment to the dependent has been paid through their lawyer, Muhendran Sri (Advocates & Solicitors) for the sum of RMX7,XXX.52.</p>	<p>Yes</p>
<p>Did the company conduct internal audit against the uncertified</p>	<p>Company Group/Holding Statement:</p>	<p>Yes</p>

<p>management units requirement? If yes, a positive assurance statement shall be available.</p>	<p>Yes, at the current status, all 67 complexes already have internal audit in year 2017-2019.</p> <p>Auditor Verification: Yes. The uncertified 33 mills have undergone internal audit conducted by the sustainability department. Internal audit conducted with findings highlighted for site's further improvement. Corrective Action Plans were implemented during the timeframe and the internal audit report recommended for the non-conformity closure as the positive assurance statement.</p>	
<p>Have there been any stakeholder (including NGO) consultation conducted?</p>	<p>Stakeholder comments are recorded in Stakeholder report 2018. No negative comment from stakeholder. Suggestion and recommendation from stakeholders were taking into consideration.</p>	<p>Yes</p>

3.3 Progress of scheme smallholders and/or outgrowers (if applicable to this assessment)

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.	FGVPISB Keratong 3 POM received FFB from smallholder and independent outgrower. No scheme smallholder under FGV Keratong.	Complied

3.4 Details of findings

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

During the 1st Annual Surveillance Assessment there were five (5) Major, one (1) Minor nonconformities and three (3) OFIs raised. The FGVPISB Keratong 3 Palm Oil Mill Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

The implementation of the corrective action plans to address the minor nonconformity will be followed up during the next surveillance assessment. The implementation of the Corrective Actions for the Major 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 #	1860788-201911-M1	Clause & Category (Major / Minor)	Indicator 2.1.1 Major
Date Issued	04/12/2020	Due Date	04/03/2020
Closed (Yes / No)	Yes	Date of nonconformity Closure	28/02/2020
Statement of Nonconformity:	<p>The evidence of compliance with some legal [ref.: Jadual Pematuhan (License No.: 004369, validity 1/7/2019-30/6/2020)] was not adequately demonstrated such as:</p> <p><u>Condition No. 26:</u> Any leachate generated from the EFB collection centre must be channelled to the effluent treatment system</p> <p><u>Condition No. 27:</u> Open burning activity of EFB or any mill wastes is not allowed.</p>		
Requirement Reference:	The unit of certification complies with applicable legal requirements.		
Objective Evidence:	1) The EFB leachate from the stockyard located in Keratong 3 Estate area nearby the mill was not channelled to the effluent treatment plant as required in item 26 of the Jadual Pematuhan (Compliance Schedule)		

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	2) During the site visit, fire breakout was presence at many patches in the EFB stock piles which is not in line with item 27 of the Compliance Schedule
Corrections:	1) Build a reservoir to collect leachate flow and pump the leachate water back into the effluent pool. 2) Prepare an emergency response plan for fire at the EFB collection site
Root Cause Analysis:	<ul style="list-style-type: none"> There is no effective EFB management plan in the palm mill to deal with leachate issues at the EFB collection site. There is no emergency action plan to address the EFB fire issue at the EFB collection site.
Corrective Actions:	1) For long term plan, the by-products (EFB) will be shredded and sold to the fiber shredder contractor in order reduce the quantity of EFB stock in mill. 2) Establish a fire prevention emergency response team at the mill to monitor the level of security at the existing EFB collection site.
Assessment Conclusion:	<p><u>Major NC onsite verification:</u> As per site verification, the EFB dumping area already establish drainage system direct into effluent pond dated 28 Feb 2020. Management also already appoint person for firefighting as per letter (01)4028/Ktg3/840A dated 1 Jan 2020. Training also have been given to ERP team verified as per record 3 Jan 2020. Management also already approach another solution for EFB such as shredded and sold to other party, this evidence verified as per latest buyer record dated 28 Feb 2020 by Classic Palm oil Mill Sdn Bhd, thus Major NCR was close accordingly.</p>

Non-conformity			
NCR Ref #	1860788-201911-M2	Clause & Category (Major / Minor)	Indicator 2.3.1 Major
Date Issued	04/12/2020	Due Date	04/03/2020
Closed (Yes / No)	Yes	Date of nonconformity Closure	28/02/2020
Statement of Nonconformity:	The required information from the mill's direct sourced FFB has yet to be obtained.		
Requirement Reference:	For all directly sourced FFB, the mill requires: <ul style="list-style-type: none"> Information on geo-location of FFB origins Evidence of the ownership status or the right/ claim to the land, or valid use of land by the grower/ smallholder One or more supporting documents for claims Valid MPOB license 		
Objective Evidence:	The required information from smallholders through Felda and Felda Technoplant has yet to be obtained by Keratong POM, i.e.: <ul style="list-style-type: none"> Information on geo-location of FFB origins Evidence of the ownership status or the right/ claim to the land, or valid use of land by the grower/ smallholder One or more supporting documents for claims Valid MPOB license 		

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Corrections:	To complete the information of smallholders submitting FFB directly to mill including: - name of supplier, name / estate owner, management telephone number, MPOB license, estate / farm area, coordinates, grant number (for external suppliers) / shared farm lot map lot list by lot (for FELDA and FTPSB) and MPOB license expiration date
Root Cause Analysis:	The mill is still in progress for completing information on external suppliers including smallholders from the FELDA and FTPSB which sent the FFB to Keratong 3 POM
Corrective Actions:	Weighbridge clerk will first check the details of the new FFB supplier such as; geo-location, grant / land ownership information, MPOB license and other supporting documents to be completed before registering the new supplier in mill weighing system.
Assessment Conclusion:	<u>Major NC onsite verification:</u> Top management (Head of FFB Purchasing Department) has established the plan to ensure all mills must collect data regarding to MPOB license, estate / farm area, coordinates, grant number (for external suppliers) / shared farm lot map lot list by lot (for FELDA and FTPSB) and MPOB license expiration date as per evidence. Latest letter as been issued to all mill (01)FGVTSB/FFBPD/HQ/TRACE dated 8 Jan 2020. Management has taken action and in progress to complete the data, as per sampling the data already available on site. The corrective actions found to be adequate to close the NCR. Nonetheless, the continuous effective implementation shall be carried out in the next assessment.

Non-conformity			
NCR Ref #	1860788-201911-M3	Clause & Category (Major / Minor)	Indicator 4.1.1 Major
Date Issued	04/12/2020	Due Date	04/03/2020
Closed (Yes / No)	Yes	Date of nonconformity Closure	28/02/2020
Statement of Nonconformity:	The stakeholder minute of meeting is not available.		
Requirement Reference:	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.		
Objective Evidence:	Policies were communicated to all Keratong POM & Keratong 11 Estate stakeholder's on 17/10/2019. The stakeholder includes contractors, school representatives, neighbor villagers, etc. However, the minute meeting on stakeholder meeting conducted is not available. Hence, a critical non-conformity is raised.		
Corrections:	Obtain stakeholder consultation minutes of meetings that have been approved and submitted to the project.		

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Root Cause Analysis:	The stakeholder consultation program was conducted but the minutes of the meeting were still in the process of approval from the higher authorities.
Corrective Actions:	The FGVH Department of Sustainability will check the minutes of the stakeholder consultation meeting at the project by including it into internal audit checklist which will be conducted annually
Assessment Conclusion:	<u>Major NC onsite verification:</u> Stakeholder meeting was conducted on 17 Oct 2019. The record was retrieved and available during on site verification. The Internal audit checklist was updated and included the element on minute of stakeholder. Thus Major NC was close accordingly.

Non-conformity			
NCR Ref #	1860788-201911-M4	Clause & Category (Major / Minor)	Indicator 3.6.2 Major
Date Issued	04/12/2020	Due Date	04/03/2020
Closed (Yes / No)	Yes	Date of nonconformity Closure	28/02/2020
Statement of Nonconformity:	The effectiveness of the H&S plan to address health and safety risk was not monitored and implemented.		
Requirement Reference:	The effectiveness of the H&S plan to address health and safety risks to people is monitored.		
Objective Evidence:	<ul style="list-style-type: none"> At Keratong 3 POM the effectiveness of the HIRADC was sampled at the workshop where it was sighted that the Mechanical Apprentice was cutting a metal piece using an oxy without using the appropriate PPE (Shield & Gloves) as stated in the HIRADC. The management has failed to ensure that the provided PPE is used by the employees. The HIRADC also does not state the necessity of training to be provided to the employees that handle the equipment's onsite. The HIRADC only states the need for PPE but does not specify the type of PPE that is required for the particular jobs scope 		
Corrections:	<ul style="list-style-type: none"> Provide a letter of warning / warning to employees who fail to comply with the application of PPE. Appoint the responsible officer to check the compliance of the PPE application at the mill's premises. Update the HIRADC documentation by include the training element and PPE implementation as part of the risk control measures. Provide PPE matrix to the type of Welding work in the mill. 		
Root Cause Analysis:	<ul style="list-style-type: none"> No officer is responsible for regularly reviewing compliance with PPE. The HIRADC documentation provided has not been updated for the current year. The PPE matrix is not included with the HIRADC documentation 		
Corrective Actions:	<ul style="list-style-type: none"> Conduct periodic checks on compliance of PPEs by appointed staffs. 		

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	<ul style="list-style-type: none"> HIRADC document review is carried out at least once a year by management and verified. Regular reviews of the PPE matrix are conducted.
Assessment Conclusion:	<p><u>Major NC onsite verification:</u> The HIRARC was updated on 22 Jan 2020. The PPE matrix is included in the HIRARC document. The HIRARC was review during OSH periodic meeting and the latest evidence record was on 22 Feb 2020. The workplace inspection was done by the mill staff to ensure the PPE at each workplace is adequate and ensure workers followed the recommendation. Thus major NC was close accordingly.</p>

Non-conformity			
NCR Ref #	1860788-201911-M5	Clause & Category (Major / Minor)	Indicator 7.5.1 Major
Date Issued	04/12/2020	Due Date	04/03/2020
Closed (Yes / No)	Yes	Date of nonconformity Closure	28/02/2020
Statement of Nonconformity:	Keratong 11 Estate does not have a suitable terrain map.		
Requirement Reference:	Maps identifying marginal and fragile soils, including steep terrain, are available.		
Objective Evidence:	Keratong 11 Estate has a terrain map. However, the map does not show the steepness of the terrain in the estate.		
Corrections:	To obtain slope map from the headquarters.		
Root Cause Analysis:	The estate did not get the latest slope map from the headquarters and miss place during audit because no person incharge to control the document.		
Corrective Actions:	Slope maps are displayed for public reference. To appoint person to update the document as per RSPO requirement.		
Assessment Conclusion:	<p><u>Major NC onsite verification:</u> The slope map establish by Unit Komputer (GPS/GIS) from FELDA Agricultural Services Sdn Bhd was available and management has appointed person incharge as per letter (20)483/10-01-02. Thus Major NC was close accordingly.</p>		

Non-conformity			
NCR Ref #	1860788-201911-N1	Clause & Category (Major / Minor)	Indicator 2.2.3 Minor
Date Issued	04/12/2020	Due Date	Next annual surveillance assessment
Closed (Yes / No)	Yes	Date of nonconformity Closure	"Open"

Statement of Nonconformity:	Clauses disallowing child, forced and trafficked labour were not included in contract agreement.
Requirement Reference:	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.
Objective Evidence:	Based on the followings sampled contractors, it was found that clauses disallowing child, forced and trafficked labour were not included in contract agreement: Keratong POM: <ul style="list-style-type: none"> • Syarikat Perniagaan Haji Yusof • Mohd Isha bin Hassan • Sebertak Auto Trading Keratong 11 Estate: • Perniagaan Maju Bera • MFM Afdhal Ent
Corrections:	Obtain new contractual agreement terms with statement of prohibition on use of child labor, forced labor and human trafficking from regional procurement of FGVP and FGVPISB.
Root Cause Analysis:	The terms of the contract agreement provided still apply the terms of the old agreement.
Corrective Actions:	The estate and mill management should check the terms of the contract agreement at each renewal and extension of the contract before the contract is signed.
Assessment Conclusion:	Corrective action plan accepted. Evidence of its effectiveness to be verified in next assessment.

Opportunity for Improvements	
OFI #	Description
OFI 1	1860788-201911-I1 <u>Indicator 2.3.2</u> <u>Details:</u> The effort to obtained information from the indirect FFB sources can be further enhanced by establishing an implementation plan.
OFI 2	1860788-201911-I2 <u>Indicator 5.1.2</u> <u>Details:</u> Based on interview, the effectiveness of explanation about FFB pricing to the smallholders can be further improved especially with regards to deduction of OER award and the derivation of kadar perahan digred (kpg) (extraction grade rate) between category "A" and "B".
OFI 3	1860788-201911-I3 <u>Indicator 6.7.1</u>

	<p>Details: The management can further improve the Meetings of Safety & Health by discussing newly raised issues (isu-isu berbangkit) as it is not mentioned in the Minutes of meeting.</p>
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Positive Findings	
PF #	Description
PF 1	Good cooperation from the management team in the assessment activity.
PF 2	Retrieval of relevant documents was efficient.
PF 3	Employees have a good understanding the intention of sustainability standard.

3.4.1 Status of Nonconformities Previously Identified and Observations

Nonconformity			
NCR Ref #	1627502-201804-M1	Clause & Category (Major/Minor)	Indicator 6.1.3 Major
Closed (Yes/No)	Yes	Date of nonconformity closure	19/09/2018
Statement of Nonconformity	Plans for promotion of positive impacts has yet to be developed with the timetabled and responsibilities for implementation.		
Requirement Reference	Keratong 11 Estate: Plans for avoidance or mitigation of negative impacts and promotion of the positive ones, and monitoring of impacts identified, shall be developed in consultation with the affected parties, documented and timetabled, including responsibilities for implementation.		
Objective Evidence	The action to promote the positive impacts have yet to be identified in the management plan.		
Corrections:	Positive impacts plan will be updated		
Root Cause Analysis:	There is no appointed staff to monitoring on positive action plan.		
Corrective Action	1. Appointed person in charge for communication and social Pending – PIC appointment letter		
Assessment Conclusion	ASA1 verification: During ASA1, there is no re-occurrence issue. The social management plan was updated according on both positive and negative impact from the stakeholders consultation. Hence, Major NC is remained closed.		

Nonconformity			
NCR Ref #	1627502-201804-M2	Clause & Category (Major/Minor)	Indicator 2.1.1 Major

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Closed (Yes/No)	Yes	Date of nonconformity closure	19/09/2018
Statement of Nonconformity	No evidence to show that the company has complied with the legal requirements.		
Requirement Reference	Evidence of compliance with relevant legal requirements shall be available		
Objective Evidence	<ul style="list-style-type: none"> i) Keratong 03 POM has deducted wages of employees for mosque fund, Khairat Kematian, corporative loans, welfare society funds, insurance and canteen loan. The mill has obtained approval from the workers to deduct the wages for the following items. However, permission from Labour Department has yet to be obtained as per the Employment Act 955. ii) Linesite inspection was not carried out at Keratong 03 POM and Keratong 11 Estate as per the Workers’ Minimum Standard of Housing and Amenities Act 1990 for once a week. iii) No evidence of approval from Electricity Commission (EC) for the installation of electric fence under regulation 15 of Electricity Regulation 1994 by contractor Yakin Tinggi Enterprise. Refer to work order no. 53000001358 dated 23/6/16 (job scope: to supply and install electric fencing at PN10C for 4200 meter) iv) No evidence to ensure own treated water is suitable and safe for consumption based on National Drinking Water Quality Standard under Ministry of Health [ref.:Workers Minimum Housing Standard and Amenities Act 1990, Section 6 (3) : Water source other than public@ government water supply] 		
Corrections:	<ul style="list-style-type: none"> i) a. Communication between mill management and FPISB human resources department to get the permission from Labour Department. ii) a. Housing monitoring record will be updated on weekly basis b. updated housing monitoring record on weekly basis. iii) To apply from the CEO of FGV Plantations (M) Sdn Bhd to stop the opration of electric fencing at the estate iv) Ensure communication between mill management and Ministry of Health to conduct water sampling test 		
Root Cause Analysis:	<ul style="list-style-type: none"> i) No Appointed staff to Communicate with the FPISB human resources department to obtain a copy of the salary deduction permission. ii) No appointed staff to monitor employee housing on a weekly basis iii) The electric fence installed on the FGVPM Keratong 11 estate is the previous installation and the current FGV management lack of understanding about the Energy Commission guidelines for electric fence installation. iv) No appointed staff to communicate with the Ministry of Health to ensure the quality of water. 		
Corrective Action	<ul style="list-style-type: none"> i) a) Appointed Person in charge in communication and social issue to contact with FPISB Human resources department contact with FPISB Human resources department ii) a) Appointed Person in charge for Housing Monitoring iii) Not applicable as electric fencing is no longer in operation. iv) a) record of Water sampling result conduct by Mill management given to the ministry of health. 		
Assessment Conclusion	<p><u>ASA1 verification:</u> During the assessment, it was confirmed that the Keratong 03 POM & Supply Bases are complying with the relevant legal requirements. Compliance to each applicable law and regulation is monitored by the operating units and sustainability team via</p>		

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	the implementation of a Legal Register. The Internal Audit does regular audits to ensure the legal requirements are met accordingly. The Sampled licenses such as DOE License, MPOB License, Controlled Items Permit & Salary Deduction Approval were sampled and noted to be available and valid at the time of the audit. The social management plan was updated according on both positive and negative impact from the stakeholders consultation. Thus, the NCR remains closed.
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Nonconformity			
NCR Ref #	1627502-201804-M3	Clause & Category (Major/Minor)	Indicator 4.6.11 Major
Closed (Yes/No)	Yes	Date of nonconformity closure	19/09/2018
Statement of Nonconformity	Medical surveillance program was not effectively implemented.		
Requirement Reference	Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, shall be demonstrated.		
Objective Evidence	Keratong 11 Estate has conducted medical surveillance for their sprayers. However, one of them [passport no. BE0634862 (date join: 4/11/17)] was not included in the event.		
Corrections:	Medical surveillance is conducted for sprayer, Passport No. BE0634862.		
Root Cause Analysis:	No Monitoring on new spraying workers to conduct Medical surveillance.		
Corrective Action	i) Record of attendance for medical surveillance ii) Result from medical surveillance		
Assessment Conclusion	<p><u>ASA1 verification:</u> There were no recurrence issue during the ASA 1 audit. Keratong 3 POM Medical surveillance was last done on 11.07.2019 for employees handling 2,5-Hexanedione by OHD DOSH under Klinik Bukit Jelutong. All workers sent for medical surveillance were fit to work with no detrimental of health. Keratong 11 Estate Medical surveillance was done on 17/11/2019 for workers from chemical sprayer, supervisors and store unit operators by OHD DOSH Reg. No. JKKP HQ/08/DOC/00/545 under Klinik Segamat. All workers sent for medical surveillance were fit to work with no detrimental of health. The sampled workers during the audit for both units were found to be included in the medical surveillance. NCR remains closed.</p>		

Nonconformity			
NCR Ref #	1627502-201804-M4	Clause & Category (Major/Minor)	Indicator 4.7.1 Major
Closed (Yes/No)	Yes	Date of nonconformity closure	19/09/2018
Statement of Nonconformity	Health and safety plan was not effectively monitored and implemented.		
Requirement Reference	A health and safety policy shall be in place. A health and safety plan covering all activities shall be documented and implemented, and its effectiveness monitored		

<p>Objective Evidence</p>	<p>FGVPISB Keratong 3 POM: Monthly workplace inspection was carried out by ESH committee. Observed during site visit unsafe act/dangerous occurrence pertaining to:</p> <ul style="list-style-type: none"> i) Eye wash and shower not in order (water treatment plant) ii) Safety device/features malfunction - bobcat used at marshalling/capstan line iii) Manual handling for heavy lifting activity during sludge separator cleaning and maintenance. v) Steam pipe leakages (possible source from steam trapping/drainage system) found at engine room and near to electrical panel. <p>Medical surveillance programme has yet to include new workshop apprentice, workers ID: 1211245, date join: April 2017. The worker has exposed to welding fumes and required to undergo medical surveillance programme as per recommendation by CHRA assessor.</p>
<p>Corrections:</p>	<ul style="list-style-type: none"> i) a. Eye Wash and Shower is properly functioned b. Picture of Eyewash and shower are properly functioned ii) a. Bobcat is properly functioned b. Picture of Safety device/ features are properly functioned iii) a. Chain lock handling for heavy lifting activity during sludge separator cleaning and maintenance. b. Picture of Chain lock used during handling for heavy lifting activity iv) a. The leaking steam pipe is replaced. b. Picture of steam pipe that have been replaced. <p>Medical surveillance is conducted for new workshop apprentice, workers ID: 1211245 Result from medical surveillance</p>
<p>Root Cause Analysis:</p>	<p>No Monitoring from mill management for ESH committee visit report at the FGVPI Keratong 3 POM. No Monitoring on new workshop apprentice workers to conduct Medical surveillance.</p>
<p>Corrective Action</p>	<ul style="list-style-type: none"> i) Safety monitoring record on water treatment plan (Monthly basis) ii) a. Safety monitoring record on bobcat b. Record of Safety device/features repairing on bobcat. iii) Safety monitoring record on heavy lifting activity during sludge separator iv) Repairing record for replacing Leaking Steam pipe <p>Medical Surveillance - monitoring of yearly programme by the appointed person in charge to ensure no lapse of surveillance and baseline monitoring.</p>
<p>Assessment Conclusion</p>	<p><u>ASA1 verification:</u> There were no recurrence of the same issues during the ASA 1 audit. The observations pertaining to the unsafe act/dangerous occurrence were sighted to be rectified as per the correction provided by the management. It was also sighted that the workshop workers were included in the latest medical surveillance programme. NCR remains closed.</p>

Nonconformity

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NCR Ref #	1627502-201804-N1	Clause & Category (Major/Minor)	Indicator 6.2.3 Minor
Closed (Yes/No)	Yes	Date of nonconformity closure	05/12/2019
Statement of Nonconformity	<ul style="list-style-type: none"> i) List of stakeholders was incomplete. ii) KKD meeting was not carry out as per the frequency of at least once a month as stated in the Guideline of KKD 		
Requirement Reference	A list of stakeholders, records of all communication, including confirmation of receipt and that efforts are made to ensure understanding by affected parties, and records of actions taken in response to input from stakeholders, shall be maintained.		
Objective Evidence	Keratong 03 POM and Keratong 11 Estate.: <ul style="list-style-type: none"> i) Government department such as Labour Department and NGO were not included in the stakeholder list of Keratong 03 POM and Keratong 11 Estate. ii) KKD was established and the last meeting conducted in Keratong 03 POM was on 11/5/2018 and 5/10/2017 Estate where the meeting did not carry out as per the frequency stated in Guideline of KKD. 		
Corrections:	<ul style="list-style-type: none"> i) Updated stakeholder list for year 2018 b. Stakeholder list for year 2018 include Labour department and NGO. ii) Monthly KKD Minutes of Meeting are recorded. 		
Root Cause Analysis:	<ul style="list-style-type: none"> i) No Monitoring taken to update stakeholder list ii) No KKD minutes of meeting being recorded (monthly basis) for mill 		
Corrective Action	<ul style="list-style-type: none"> i) Appointed Person in charge in communication and social to Update Yearly Stakeholder List Information ii) Appointed person in charge to record Monthly KKD Minutes of meeting 		
Assessment Conclusion	<p><u>ASA1 verification:</u> During ASA1, there is no re-occurrence issue. For Keratong Mill & Keratong 11 Estate, the stakeholder list was last updated on 1 Oct 2019. It comprises Felda estates, nearby schools, settler heads (ketua peneroka), contractors, traders, government agencies, panel clinics, etc.</p> <p>Gender committee for Keratong POM established and led by Puan Rulbiah Binti Ruslan. Appointment letter dated 12/05/2019 Doc. No: ()RSPO/Krtg3 sighted. Sighted the Gender Committee Meeting Minutes for Keratong Mill conducted on 17/11/2019, 13/10/2019, 19/09/2019, 10/08/2019, 13/07/2019.</p> <p>In Keratong 11 Estate, Puan Nor Azinlina Bt Ihak is appointed as the Gender Committee chairman and the meeting was conducted on 07/03/2019 attended by 10 female workers. Hence, the Minor NC is closed.</p>		

Nonconformity			
NCR Ref #	1627502-201804-N2	Clause & Category (Major/Minor)	Indicator 6.6.2 Minor
Closed (Yes/No)	Yes	Date of nonconformity closure	05/12/2019
Statement of Nonconformity	Meeting minutes of Workers' Committee was not comprehensive where the outcomes during the meeting was not minuted and the meeting was not carried out as per the frequency i.e. at least twice a year as stated in the letter from Penolong		

	Bendahari Agung, Kesatuan Pekerja-pekerja Felda Palm Industries Sdn Bhd, dated 12/11/2011 [ref.: (05)505/IP/102/2010-2013].
Requirement Reference	Minutes of meetings with main trade unions or workers representatives shall be documented.
Objective Evidence	Keratong 03 POM: Meeting minutes of Workers' Committee was not comprehensive where the outcomes during the meeting was not minuted and the meeting was not carried out as per the frequency of the meeting i.e. at least twice a year.
Corrective Action	i) Appointed person in charge to record Workers' Committee Minutes of Meeting
Assessment Conclusion	<u>ASA1 verification:</u> During ASA1, there is no re-occurrence issue. The minutes of meeting between the mill management and the committee members of Felda Palm Industries Workers' Union is available. The meetings were held on 28 June 2019 (Mesyuarat Agong Tiga Tahunan Kali Ke 5 Sesi 2019-2022) for Keratong POM and the minute meeting of Worker's Committee was conducted on 04/05/2019 attended by 8 people (01/2019) for year 2019 and 04/12/2019 attended by 8 people. The person in charge (chairman) for Worker's Committee in Keratong 03 POM is Mr. Mohamad Akhyar (Assistant Engineer) as per appointment letter dated 01/10/2019 (Bil: (01)4028/Krt.3/810). In Keratong 11 Estate, the meeting was conducted on 10/01/2019 (Mesyuarat Exco Bil 01/2019). Hence, the Minor NC is closed.

Nonconformity			
NCR Ref #	1627502-201804-N3	Clause & Category (Major/Minor)	Indicator 6.10.3 Minor
Closed (Yes/No)	Yes	Date of nonconformity closure	05/12/2019
Statement of Nonconformity	Agreement between the contractor and the management was not available.		
Requirement Reference	Evidence shall be available that all parties understand the contractual agreements they enter into, and that contracts are fair, legal and transparent.		
Objective Evidence	Keratong 11 Estate: The contractor, Perniagaan Maju Bera has ran sundry shop business inside the estate. However, no agreement between the company and the contractor was sighted to allow him to run the business.		
Corrections	i) Permission from the estate management to Perniagaan maju bera to run sundry shop ii) Minutes of meeting record with the contractor perniagaan maju bera to explain the agreement. iii) Contract agreement between estate management and perniagaan maju bera to run the sundry shop.		
Assessment Conclusion	<u>ASA1 verification:</u>		

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	The operation of sundry shop by Perniagaan Maju Bera had been discontinued. Thus, this is no longer an issue. NCR is closed.
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Nonconformity			
NCR Ref #	1627502-201804-N4	Clause & Category (Major/Minor)	Indicator 4.5.2 Minor
Closed (Yes/No)	Yes	Date of nonconformity closure	05/12/2019
Statement of Nonconformity	Training of those involved in IPM implementation was not demonstrated.		
Requirement Reference	Training of those involved in IPM implementation shall be demonstrated.		
Objective Evidence	There is no evidence that training of those involved in IPM implementation has been conducted.		
Corrective Action	i) Appointed Person in charge to conduct training to workers		
Assessment Conclusion	<u>ASA1 verification:</u> There were no recurrence of the similar issue sighted during the ASA 1. The management has appointed a PIC to be responsible for IMP implementation and Awareness. The latest IPM Training was conducted on 16.07.2019 by the manager. Thus, the NCR is closed.		

Nonconformity			
NCR Ref #	1627502-201804-N5	Clause & Category (Major/Minor)	Indicator 5.1.2 Minor
Closed (Yes/No)	Yes	Date of nonconformity closure	05/12/2019
Statement of Nonconformity	There was no mitigation nor timetable for change developed by Keratong 11 Estate for the environmental impacts of Perniagaan Maju Bera activities.		
Requirement Reference	Where the identification of impacts requires changes in current practices, in order to mitigate negative effects, a timetable for change shall be developed and implemented within a comprehensive management plan. The management plan shall identify the responsible person/persons.		
Objective Evidence	Keratong 11 Estate has provided Perniagaan Maju Bera (FFB Transport contractor) an area in the estate for them to carry out their activities such as repair & maintenance of machines and storage of diesel & lubricants. Based on the site visit, it was observed that there were some environmental risks have not appropriately mitigated e.g. - diesel skid tank has no secondary containment - scheduled wastes such as used oil and contaminated lubricants containers were not handled in accordance to EQ (SW) Regulations		
Corrective Action	i) Appointed person in charge to Monitoring contractor activity in handling diesel, lubricants and scheduled waste		
Assessment Conclusion	<u>ASA1 verification:</u>		

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	The contractor has move its repair & maintenance activities to somewhere else outside Keratong 11 Estate. Site visit confirmed that the area had been abandoned. Thus, this is no longer an issue. The NCR is closed.
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Nonconformity			
NCR Ref #	1627502-201804-N6	Clause & Category (Major/Minor)	Indicator 5.1.3 Minor
Closed (Yes/No)	Yes	Date of nonconformity closure	05/12/2019
Statement of Nonconformity	At FGVPIB Keratong 3 POM, some of the monitoring requirements stipulated in the DOE's Jadual Pematuhan (compliance schedule) have yet to be carried out.		
Requirement Reference	This plan shall incorporate a monitoring protocol, adaptive to operational changes, which shall be implemented to monitor the effectiveness of the mitigation measures. The plan shall be reviewed as a minimum every two years to reflect the results of monitoring and where there are operational changes that may have positive and negative environmental impacts.		
Objective Evidence	There was no evidence that the following requirements stipulated in DOE's Jadual Pematuhan (compliance schedule) have been carried out - Item 36: Elements of Environmental Mainstreaming Tolls (EMT) to be sent to DOE once in every 6 months - Item 37: Compliance audit of license conditions to be conducted by third party, and the DOE has to be notified 30 days prior to the compliance audit		
Corrective Action	i) Appointed person in charge to monitor Item 36 and Item 37 in Compliance schedule		
Assessment Conclusion	<u>ASA1 verification:</u> The compliance audit of license conditions has been conducted by a third party and report was made available. The report was also submitted to the DOE accordingly. The issue about Environmental Mainstreaming System (EMAINS) was captured and reported in the compliance audit. The current status was that the mill is still in progress to set up the online system. Thus, the NCR is closed.		

Nonconformity			
NCR Ref #	1627502-201804-N7	Clause & Category (Major/Minor)	Indicator 5.3.3 Minor
Closed (Yes/No)	Yes	Date of nonconformity closure	05/12/2019
Statement of Nonconformity	Wastes were not disposed according to the management plan.		
Requirement Reference	A waste management and disposal plan to avoid or reduce pollution shall be documented and implemented.		
Objective Evidence	Based on the site visit at Keratong 11 Estate dumping site (landfill), it was observed that scheduled wastes (such as oil filters & empty lubricants containers) and recyclable wastes (such as plastic bottles) were inside the rubbish pits.		

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	Keratong 11 Estate has also appointed a third party (Bengkel Serting) to carry out repair/servicing of its machinery. The used oil (SW305/306) from the servicing activity is normally taken away by the third party to its premise. However, there is no evidence that the third party has obtained any forms of authority to take away the used oil from the DOE.
Corrective Action	<ul style="list-style-type: none"> a. Provide specific transport to handle waste from estate area b. Circulate information to the specific place (eg : Workers Housing area, Staff Housing area, Contractor Housing area) c. Signboard installation at Landfill, focused on type of waste that cannot be thrown at landfill
Assessment Conclusion	<p><u>ASA1 verification:</u> Approval from DOE [ref.: JAS. 600-3/5/26 Jld 3(32), dated 30/10/2019] for centralised collection for Keratong 11 Estate has been obtained. The locations of the centres is stipulated in the DOE's approval. Therefore, the estate is not keeping its generated scheduled wastes in their premise but send them to the approved collection centres. Thus, the NCR is closed.</p>

Nonconformity			
NCR Ref #	1627502-201804-N8	Clause & Category (Major/Minor)	Indicator 2.1.4 Minor
Closed (Yes/No)	Yes	Date of nonconformity closure	05/12/2019
Statement of Nonconformity	System for tracking any changes in the law was not effectively implemented.		
Requirement Reference	A system for tracking any changes in the law shall be implemented.		
Objective Evidence	FGVPIB Keratong 3 POM FMA (Exemption of Certificate of Fitness for Unfired Pressure Vessel) Order 2017, Employment Insurance System (EIS) 2017 and Minimum Wages Order 2016 was not updated in the register dated 25/12/18. FGVPM Keratong 11 Estate Employment Insurance System (EIS) 2017 and Minimum Wages Order 2016 was not updated in the register dated 30/4/18		
Corrective Action	<ul style="list-style-type: none"> i) Appointed person in charge to update applicable law at mill and estate ii) Record of all applicable law being monitored every year. 		
Assessment Conclusion	<p><u>ASA1 verification:</u> ASA 1 showed no recurrence of the similar issue. The management of both units have appointed a PIC to be responsible for monitoring the LRR. The LRR was available and sighted with the latest updates included during the audit at both sites. Thus, the NCR is closed.</p>		

Nonconformity			
NCR Ref #	1627502-201804-N9	Clause & Category (Major/Minor)	Indicator 4.7.5 Minor
Date Issued	24/05/2018	Due Date	Next surveillance assessment

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Closed (Yes/No)	Yes	Date of nonconformity closure	05/12/2019
Statement of Nonconformity	Emergency preparedness and response was not effectively implemented		
Requirement Reference	Emergency preparedness and response was not effectively implemented		
Objective Evidence	<p>FGVPISB Keratong 3 POM First aid box item was incomplete and not as per 4th Schedule of Safety Health and Welfare Regulation 1970. No item list and inspection record available. Location of first aid box checked: workshop, boiler and supervisor room.</p> <p>FGVPM Keratong 11 Estate First aid box item was incomplete and not as per 4th Schedule of Safety Health and Welfare Regulation 1970. No item list and inspection record available. Location of first aid box checked: spraying gang (PM00A, block 4)</p>		
Corrective Action	Appointed person in charge to monitor items in first aid box		
Assessment Conclusion	<p><u>ASA1 verification:</u></p> <p>There were no similar issues sighted during the ASA 1. Both units have updated their Firsts Aid Box as per requirement under the 4th Schedule of Safety Health and Welfare Regulation 1970. The complete item list were available in the sampled boxes at the workshop, office and boiler room. Thus, the NCR is closed.</p>		

Opportunity for Improvement	
OFI#	Description
OFI 1	Nil

3.4.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Major / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
1627502-201804-M1	Major	6.1.3	24/05/2018	Closed out on 19/09/2018
1627502-201804-M2	Major	2.1.1	24/05/2018	Closed out on 19/09/2018
1627502-201804-M3	Major	4.6.11	24/05/2018	Closed out on 19/09/2018
1627502-201804-M4	Major	4.7.1	24/05/2018	Closed out on 19/09/2018
1627502-201804-N1	Minor	6.2.3	24/05/2018	Closed out on 05/12/2019
1627502-201804-N2	Minor	6.6.2	24/05/2018	Closed out on 05/12/2019
1627502-201804-N3	Minor	6.10.3	24/05/2018	Closed out on 05/12/2019
1627502-201804-N4	Minor	4.5.2	24/05/2018	Closed out on 05/12/2019
1627502-201804-N5	Minor	5.1.2	24/05/2018	Closed out on 05/12/2019
1627502-201804-N6	Minor	5.1.3	24/05/2018	Closed out on 05/12/2019
1627502-201804-N7	Minor	5.3.3	24/05/2018	Closed out on 05/12/2019
1627502-201804-N8	Minor	2.1.4	24/05/2018	Closed out on 05/12/2019

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1627502-201804-N9	Minor	4.7.5	24/05/2018	Closed out on 05/12/2019
RSPO P&C MYNI 2019				
1860788-201911-M1	Major	2.1.1	05/12/2019	Closed out on 28/02/2020
1860788-201911-M2	Major	2.3.1	05/12/2019	Closed out on 28/02/2020
1860788-201911-M3	Major	4.1.1	05/12/2019	Closed out on 28/02/2020
1860788-201911-M4	Major	3.6.2	05/12/2019	Closed out on 28/02/2020
1860788-201911-M5	Major	7.5.1	05/12/2019	Closed out on 28/02/2020
1860788-201911-N1	Minor	2.2.2	05/12/2019	"Open"

3.5 Stakeholders and previous land owner / user consultation

Stakeholder consultation involved internal and external stakeholders. External stakeholders were contacted by telephone to arrange meetings at a location convenient to them to discuss FGVPISB Keratong 3 Palm Oil Mill Certification Unit’s environmental and social performance, legal and any known dispute issues.

Meetings were conducted with stakeholders to seek their views on the performance of the company with respect to the RSPO requirements and aspects where they considered that improvements could be made. At the start of each meeting, the interviewer explained the purpose of the audit followed by an evaluation of the relationship between the stakeholder and the company before discussions proceeded. The interviewer recorded comments made by stakeholders and later was verified with the management team. Any comment which is not complying to the RSPO P&C requirements have been incorporated as an assessment finding. The comments made by external stakeholders were also taken into account in the assessment where the stakeholder notification was made on 06/09/2019, through BSI website as per following link: <https://www.bsigroup.com/en-MY/RSPO-MSPO-Certification/rsपो-clients-and-reports/>

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

List of Stakeholders contacted	
Internal Stakeholders Estate and mill workers Gender committee representatives	Union/Contractors Neighbouring estates FELDA settlers Contractors & suppliers Sundry shop
Government Departments Nil	NGO Nil

Stakeholders comment	
	Feedbacks:

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1	<u>Keratong Industrial Supply (Supplier)</u> Has long business relationship with Felda and now FGV for more than 10 years. The pricing is ok and payment received is within the timeline.
	Management Responses: Noted on the information.
	Audit Team Findings: No further issue.
2	Feedbacks: <u>Far East Holding Berhad (Neighbour: DSK Estate)</u> Has good relationship with FGV whom allowing the road access and tapping of public water line. The boundary from FGV estates are clearly demarcated. No land dispute issue.
	Management Responses: Noted on the information.
	Audit Team Findings: No further issue.
3	Feedbacks: <u>Peneroka Felda Keratong 7</u> As the FELDA settler who sent FFB to Keratong POM, the FFB price was displayed and inform to them. No issue in sending FFB and receiving the weighbridge ticket with complete information.
	Management Responses: Noted on the information.
	Audit Team Findings: No further issue.
4	Feedbacks: <u>SMART Clerk (Petrol Station)</u> SMART is giving petrol and diesel subsidy rate to FELDA settlers. Previously, FGV has bought the petrol & diesel from SMART too before the cash term applied.
	Management Responses: Noted on the information.
	Audit Team Findings: No further issue.
5	Feedbacks: <u>Gender Committee Representatives</u> No sexual harassment cases reported so far and no domestic violence cases too. Meeting and activities were conducted actively year round with participation by all female employees together with wives of male staffs. Has collaboration with Felda's Gabungan Persatuan Wanita (GPW) in most activities.
	Management Responses: Noted on the information.
	Audit Team Findings: No further issue.
6	Feedbacks: <u>Keratong 3 POM Canteen Shopkeeper</u> The canteen operated from morning until evening. The water used for cook and drinks are come from clean water supply from house which they bring themselves.
	Management Responses: Noted on the information.
	Audit Team Findings: No further issue.

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
Not applicable since the land is belonged to FELDA. Based on the land title, the land is belonged to FELDA (government land) and FELDA land is leased to FGV. Based on stakeholder consultation, there is no land encroachment from FGV to other smallholders as a land user in FELDA land as well.					

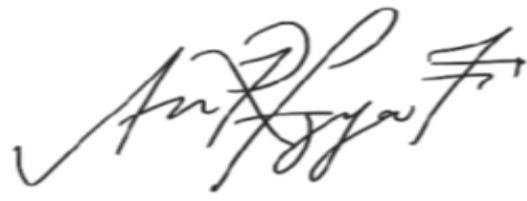
Previous land owner / user comment	
1	Feedbacks: NA
	Management Responses:
	Audit Team Findings:

3.6 Impartiality and conflict of interest

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

Formal Signing-off of Assessment Conclusion and Recommendation

The audit objectives have been achieved and the certificate scope remains appropriate. Based on the results of this audit, it is concluded that FGVPSB Keratong 3 Palm Oil Mill has complied with the the RSPO Principles and Criteria 2018 for Sustainable Palm Oil (Malaysia National Interpretation 2019) and audit criteria identified within the audit report. It is deemed that the management system continues to achieve its intended outcomes. Therefore, it is recommended that the certification of FGVPSB Keratong 3 Palm Oil Mill is continued.

Report prepared by	Acceptance of Assessment Conclusion
Name: Valence Shem	Name: AMGER RYANIF
Company Name: BSI Services Malaysia Sdn Bhd	Company Name: FGVHB
Title: Lead Auditor	Title: HEAD, SUSTAINABILITY COMPLIANCE & CERTIFICATION
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: 29/4/2020	Date: 03.05.2020

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	(C) Documents that are specified in the RSPO P&C are made available to the public. - Major compliance -	In accordance with the procedure known as Komunikasi Penglibatan dan Rundingan, Document No. FGV/ML-1A/L2-Pr12 which became effective on 1 June 2016, the list of documents which are publicly available are as follows: <ul style="list-style-type: none"> • Social Impact Assessment • Human Rights Policy • Negotiation procedures • Details of complaints and grievances • Negotiation procedures • Continuous improvement plans Apart from that other documents such as land titles/user rights, OHS plans, environmental aspect & impact, HCV documentation, pollution prevention & reduction plans and records of contributions to community development.	Complied
1.1.2	Information is provided in appropriate languages and accessible to relevant stakeholders. - Minor compliance -	There is evidence that the estate and mill provide adequate information on social and/or legal issues to relevant stakeholders in appropriate language (Bahasa Melayu and English). Comments or suggestions for improvement by the authorities were followed up by the management such as the mill daily report, OER rate and average FFB received were provided to MPOB	Complied
1.1.3	(C) Records of requests for information and responses are maintained. - Major compliance -	The request/letter from stakeholder internal and external is kept on the file and summarized in the request book. Example of the request sighted are as below: Keratong POM: MSPO course for weighbridge on 07/11/2019.	Complied

		<p>Keratong POM: Regional Controller Meeting with Mill Manager Wilayah 4 on 18/10/2019.</p> <p>Keratong POM: UNIVEST Project Training on 18/09/2019.</p> <p>Keratong 11 Estate: Request for donation to buy the air conditioner in computer laboratory on 18/11/2019.</p> <p>Keratong 11 Estate: Invitation to attend the appreciation & award ceremony by SK (LKTP) Keratong 7 on 15/11/2019.</p> <p>FGVPM Keratong 11 Estate: Request to obtain outpatient in credit term in Pusat Kesehatan Chanis on 01/11/2019.</p>	
1.1.4	<p>(C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by nominated representative.</p> <p>- Major compliance -</p>	<p>Documented procedure in place for consultation and communication as per "Menangani Aduan dan Rungutan" procedure, Doc. No. FGV/ML-1A/L2-Pr13, Issue 1, Rev 2 dated 01.04.2019 and "Komunikasi, Penglibatan dan Rundingan", Doc. No.: FGV/ML-1A/L2-Pr12(0), Issue 1, 01.06.2016. Scope of the procedure covered all the complaints related to Project issues, damage or broken of housing and etc.</p> <p>The person in charge for communication and consultation for Keratong POM is Khairul Anuar (General Clerk) as per appointment letter dated 01/06/2019 signed by Mill Manager.</p> <p>In FGVPM Keratong 11 Estate, Mr Lokman bin Ibrahim (Assistant Manager) is appointed as the person in charge for communication and social as per appointment letter dated 10/01/2019.</p>	Complied
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>For Keratong Mill, the stakeholder list was last updated on 1 Oct 2019. It comprises Felda estates, nearby schools, settler heads (ketua peneroka), contractors, traders, government agencies, panel clinics, etc.</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.</p>	<p>Policy entitled "FGV Code of Business Conduct and Ethics for Employees (CoBCE)" (FGV/GHR/POL/039, rev. 3, w.e.f. 1/11/2017). All employees are required to sign as an acknowledgment that they shall comply with the CoBCE requirements or</p>	Complied

	- Minor compliance -	face disciplinary action. Sampled 5 employees showed that they have signed the code, i.e. xxxxxx-10-6167 xxxxxx-01-5741 xxxxxx-11-5154 xxxxxx-03-6180 xxxxxx-05-6283	
1.2.2	A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice. - Minor compliance -	FGV Holdings has an Anti-Bribery Management System Manual (FGV/GGD/POL/008, rev. 0, effective date 28/8/2019) which objective is to provide guidance for FGV Holdings Bhd and its Group of Companies in establishing, implementing, maintaining, reviewing (FGV/GGD/SOP/014, rev. 0, effective date 1/8/2019) and improving an antri-bribery management system. One of the requirements of the manual is to conduct anti-bribery internal audit in accordance to the established Anti-Bribery Internal Audit (ABIA) SOP. The ABIA is conducted centrally by head office and sample is based on the entire FGV Holdings group. Verified 2 ABIA report (format no.: FGV/GGD/F/027, rev. 0, dated 24/7/2019): ABIA No. NF02, dated 1-2/8/2019 – conducted at Besout and Trolak POM, 4 NCR raised and all have been closed on 14/10/2019 ABIA No. FGV/LFK3/001, dated 7/8/2019 – conducted at Kechau 3 Estate, 2 OFI raised	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	(C) The Unit of Certification complies with legal requirements - Major compliance -	FGVPISB Keratong 3 POM continued to comply with the legal requirements as per indicator. Compliance to each applicable law and regulation is monitored by the operating units and sustainability team.	Major non-conformance

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		<p>FGVPISB Keratong 3 has obtained and renewed license and permits as required by the law. Sample of license checked at FGVPISB Keratong 3 POM and FGVPM Keratong 11 Estate are as below</p> <p>DOE License No. 004369, Compliance Schedule ref# JP/KKS/2019/2020/004369 validity period 1/07/2019 -30/6/2020, method of discharge: Alur Air</p> <p>Perakuan Kelayakan Dandang (Boiler Inspection) under the Factories and Machinery Act License No. PH PMD 699, Compliance Schedule ref# PMD-PH/18 18882, Date of Inspection -14.11.2018, Validity Period 23.11.2018 – 13.02.2020</p> <p>MPOB license no.: 618371015000 valid until 30/06/2020.</p> <p>Permit for Controlled Scheduled Items – Diesel, Serial No. C 026640, Reference No. PHG/RPN/020/96 SK (D), Validity Period from 02.11.2018 to 01.11.2019. This Permit has expired and the management has requested for renewal on 17.10.2019 and awaiting the response from the authority. To be further verified during the next audit.</p> <p>Permit Potongan daripada Gaji Pekerja, Seksyen 24 Akta Kerja 1955, Serial No.: PP3/34/1013 enforced on 16.01.2019.</p> <p>FGVPM Keratong 11</p> <p>MPOB license, 558962002000 valid period from 01/03/19 to 29/02/2020 for selling and transporting/moving of FFB.</p> <p>Permit Barang Kawalan Berjadual – Diesel, Serial No. P (C000017-RPN) Validity Period 28 February 2019 – 27 February 2020</p> <p>JTK Permit (6) BHG PU/9/129 dated 10 April 2012 for salary deduction.</p> <p>JTK Permit (22) dlm BHG.PU/9/129 Jld 23 dated 26 April 2016 for electricity (RM 6) & water bill (RM 4) and excess of medical expenses.</p> <p>The evidence of compliance with some legal requirement [ref.: Jadual Pematuhan (License No.: 004369, validity 1/7/2019-30/6/2020)] was not adequately demonstrated:</p>	
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		<p>The EFB leachate from the stockyard located in Keratong 3 Estate area nearby the mill was not channeled to the effluent treatment plant as required in item 26 of the Jadual Pematuhan (Compliance Schedule)</p> <p>During the site visit, fire breakout was presence at many patches in the EFB stock piles which is not in line with item 27 of the Compliance Schedule</p>	
2.1.2	<p>A documented system for ensuring legal compliance is in place. This system has a means to track changes to the laws and regulations.</p> <p>- Minor compliance -</p>	<p><u>FGVPISB Keratong 3 POM</u></p> <p>List of applicable legal and other requirements was made available during the assessment and compiled in the FPI/L4/QOHSE-2.1 Rev. 0 reviewed on 23rd January 2019 folder. Documented procedure has been established and implemented.</p> <p><u>FGVPM Keratong 11 Estate</u></p> <p>At Keratong 11 Estate a summary of compliance FY2019 incorporating all the legal requirements are sighted during onsite. Latest requirements are registered in the list.</p>	Complied
2.1.3	<p>Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries.</p> <p>- Minor compliance -</p>	<p><u>FGVPISB Keratong 3 POM</u></p> <p>Legal boundaries are clearly fenced and visibly maintained at site</p> <p>At FGVPM Keratong 11, physical boundary demarcation such as as trenches is being practice on site. Red/white boundary pole is visibly maintained and marked. Observed at Block 3, boundary marking (legal and physical boundary) is maintained adjacent with Hutan Simpan Lesung and Block 4, boundary marking (legal and physical boundary) is maintained adjacent with DSK Far East.</p>	Complied
<p>Criterion 2.2: All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements</p>			
2.2.1	<p>A list of contracted parties is maintained.</p> <p>- Minor compliance -</p>	<p><u>FGVPISB Keratong 3 Palm Oil Mill:</u></p> <p>List of contractors is available which consists of various activities such as transportation (EFB, CPO and PK), construction works, mechanical works, spare parts supplier, to name a few. The name of the list is "Nama Syarikat (Pembekal</p>	Complied

		<p>& Pemborong) ada Urusniaga dengan Kilang di Wilayah Muadzam Tahun 2018 & 2019".</p> <p><u>FGVPM Keratong 11 Estate:</u> 2 contractors listed i.e Perniagaan Maju Bera & MFM Afdhal Ent. PMB has "Perjanjian Kontrak" dated 21/9/2016 (exp. on 30/9/2020). MFM has no contract agreement due to small value of the contract. Only SPK is considered to be sufficient. This is guided by FGV Holdings Bhd's Group Procurement Policy dated March 2018.</p>	
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 the third party.</p> <p>Evidence of legal due diligence of all contracted third parties, recruitment agencies (licensed/ accredited) for migrant workers, service providers and labour contractors, is available.</p> <p>- Minor compliance -</p>	<p><u>FGVPISB Keratong 3 Palm Oil Mill:</u> Sampled contracts (Syarikat Perniagaan Hj Yusof, Mohd Isa bin Hassan and Sebertak Auto Trading)</p> <p><u>FGVPM Keratong 11 Estate:</u> Sampled Contract No. 5300002395 between Perniagaan Maju Bera and FGVPM Sdn Bhd .</p> <p>The clauses on meeting applicable legal requirements spelt out in the FGVPM's General Conditions such as SOCSO, EPF, Employment Act to name a few.</p>	Complied
2.2.3	<p>All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour. Where young workers are employed, the contracts include a clause for their protection.</p> <p>- Minor compliance -</p>	<p><u>FGVPISB Keratong 3 Palm Oil Mill:</u> Sampled a contractors: Syarikat Perniagaan Haji Yusof, providing vehicles to transport EFB Mohd Isha bin Hassan, providing vehicles to transport FFB Sebertak Auto Trading, providing labour, insurance, spare part, etc. related to fabricating centre arm of a shovel</p>	Minor non-conformance

		<p>The clauses which include disallowing child, forced and trafficked labour has yet to be established in any contract document. Thus a non-conformity report was assigned due to this lapse.</p> <p><u>FGVPM Keratong 11 Estate:</u> Contract No. 5300002395 with Perniagaan Maju Bera and FGVPM Sdn Bhd Clauses on disallowing child labour was spelt out under General Conditions, item 17. However, clauses on disallowing forced labour and trafficked labour have yet to be included. Thus a non-conformity report was assigned due to this lapse. Verification by estate is by obtaining identification document such as passport, work permits and identity card.</p>	
Criterion 2.3: All FFB supplies from outside the unit of certification are from legal sources.			
2.3.1	<p>(C) For all directly sourced FFB, the mill requires: Information on geo-location of FFB origins Evidence of the ownership status or the right/claim to the land, or valid use of land by the grower/smallholder One or more supporting documents for claims Valid MPOB license - Major compliance -</p>	<p>The required information from smallholders through Felदा and Felदा Technoplant has yet to be obtained by Keratong POM, i.e.: Information on geo-location of FFB origins Evidence of the ownership status or the right/ claim to the land, or valid use of land by the grower/ smallholder One or more supporting documents for claims Valid MPOB license Thus, a non-conformity was assigned due to this lapse.</p>	Major non-conformance
2.3.2	<p>For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in Indicator 2.3.1. - Minor compliance -</p>	<p>There were 4 suppliers identified as dealer by the certification unit. Although the information required in Indicator 2.3.1 for the indirect suppliers has yet to be obtained, on-going plan to complete it is in place.</p>	Complied
Principle 3: Optimise productivity, efficiency, positive impacts and resilience			
Criterion 3.1: There is an implemented management plan that aims to achieve long-term economic and financial viability.			

3.1.1	<p>(C) A business or management plan (minimum three years) is documented that includes, where applicable, a jointly developed business case for Scheme Smallholders.</p> <p>- Major compliance -</p>	<p>FGVPISB Keratong 3 POM has documented an annual business plan in the form of annual budget and the projection for 5 years prepared as guidance for future planning. The business plan contains FFB processed, Estimated CPO Price, Estimated PK Price, Estimated Shell Price, Estimated Sludge Oil Price.</p> <p>FGVPM Keratong 11 Estate has documented an annual business plan in the form of an annual budget and the projection for 3 years prepared as a guidance for future planning. The business plan contains Projected Crop, Penjagaan dan Penyeliaan, Perbelanjaan Am and Kos Kewangan.</p>	Complied
3.1.2	<p>An annual replanting programme projected for a minimum of five years with yearly review, is available.</p> <p>- Minor compliance -</p>	<p>FGVPISB Keratong 3 POM – Not Applicable</p> <p>FGVPM Keratong 11 Estate – An annual replanting programme is available projecting the proposed replanting programme from 2019 to 2023. A total of 225.22Ha and 342.24Ha are projected to be replanted in 2020 and 2023 respectively.</p>	Complied
3.1.3	<p>The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertake.</p> <p>- Minor compliance -</p>	<p>FGVPISB Keratong 3 POM's Management Review is done annually and was last conducted on 15/10/2019. It was chaired by Mill Manager, En Azlie Shaftrie Bin Sharari and attended by 15 mill personnel which includes AMs, Staffs, office clerk, lab analyst, weighbridge clerk, etc.</p> <p>Based on the minutes of meeting, the following agendas were adequately recorded:</p> <ul style="list-style-type: none"> • Internal Audit Report • Customer Feedbacks. • Production • Environment • Social • Management Study • Continuous Improvement 	Complied

<p>Criterion 3.2: The unit of Certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable Continuous improvement in key operations.</p>			
3.2.1	<p>(C) The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification.</p> <p>- Major Compliance -</p>	<p>Action plan for continual improvement has been implemented, based on a consideration of the main social and environmental impacts and opportunities of the mill. Sighted example of continual improvement project at FGV PISB Keratong 3 POM:</p> <ul style="list-style-type: none"> • Ensuring sufficient first aid kits at the site • Continuous training of worker on Environmental HCV 	Complied
3.2.2	<p>As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the [RSPO metrics template].</p> <p>PROCEDURAL NOTE: The RSPO metrics template is awaiting decision/agreement by RSPO and the issue is still being discussed. Until such metrics is agreed and developed, companies will carry on with existing reporting e.g. PalmGHG, Annual Communication of Progress (ACOP) reporting, and information provided to Certification Body and feedback via RSPO Secretariat is required.</p> <p>- Minor Compliance -</p>	<p>The RSPO metrics template has yet to be finalised Nonetheless, other forms of reports are submitted to the RSPO Secretariat last dated 12 July 2019 titled UPDATES ON FGV HOLDINGS BERHAD'S SUSTAINABILITY INITIATIVES addressing the following issues :</p> <ul style="list-style-type: none"> • Revised Group Sustainability Policy • Supplier Code of Conduct • Guidelines and Procedures for the Responsible Recruitment for Foreign Workers. • Second Quarterly Progress Report to RSPO • Petition by Grant & Eisenhofer ESG Institute • Independent Advisory Panel 	Complied
<p>Criterion 3.3: Operating procedures are Appropriately documented, consistently implemented and monitored.</p>			

3.3.1	(C) Standard Operating Procedures (SOPs) for the unit of certification are in place. - Major Compliance -	Standard Operating Procedures (SOPs) for FGVPISB Keratong 3 POM and estate are documented. Interview with staff and workers revealed that all working SOPs being consistently implemented among all employees and monitored by the management through daily muster briefing, training and etc. As sampled from the SOP of FGVPISB Keratong 3 available a masterlist revised 23/10/2017. Approved by Vice President, Planning, Operation, Budgeting & Technical FGVPM. A total of 141 SOPs were available amongst those are Management of Entrance, Control of Products, Loading, Grading of FFB, Conveyor Handling, etc.	Complied
3.3.2	A mechanism to check consistent implementation of procedures is in place.. - Minor Compliance -	Mill Advisory and a Planting Advisory inspect and report on the operations on annual basis. There were other audits by Group internal audit and CDD to ensure compliance against company policy and procedure with regards to operation, finance as well as safety, health and welfare requirements.	Complied
3.3.3	Records of monitoring and any actions taken are maintained and available. - Minor Compliance -	The practices consistently monitored by mill and plantation advisors and recommendations for improvements are given to maintain the sustainable practices. Mill advisor, Operation Technical Officer, Regional General Manager visits the operating units to ensure implementations of procedures are consistent.	Complied
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.			
3.4.1	(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/out-grower scheme, is documented. - Major Compliance -	There is no new planting at Keratong 11 Estate, therefore this clause is not applicable.	Not applicable

<p>3.4.2</p>	<p>For the unit of certification, a SEIA is available and social and environmental management and monitoring plans have been developed with participation of affected stakeholders.</p> <p>- Minor Compliance -</p>	<p>The Social Impact Assessment was conducted on 02/08/2019 (Keratong POM) and on 28/12/2017 (Keratong 11 Estate) by Sustainability Team. SOP for SIA (Doc no: FGV/ML-1A/L2-Pr21 Issue 1 revision 2 Mac 2019 established on SIA process conducted at least 2 years once. The social management plan was updated according on both positive and negative impact from the stakeholders consultation.</p> <p>Based on <i>Polisi Perlindungan dan Penjagaan Alam Sekitar</i>, Dated 1/6/2014. Procedure of EIA covered normal, abnormal and emergency situation with determination significance through Probability/Frequency and Severity matrix. Impacts with score more than 12 are considered significant which related to legal requirement and positive impacts.</p>	<p>Complied</p>
<p>3.4.3</p>	<p>(C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.</p> <p>- Major Compliance -</p>	<p>The social management plan included timeframe, person in charge, short, medium and long term monitoring period as well as review status.</p> <p>The mill and estates were consistently monitoring its effectiveness of mitigation measures through various mechanism such as analysis of ETP final discharge, analysis of monsoon drain discharge, scheduled wastes movements and monitoring of smoke emissions through CEMS and stack sampling, to name a few. Based on its Environmental Aspect and Impact Evaluation procedure [FPI/L2/QOSHE-1.0C], the evaluation will be reviewed should there be any changes of the organization's activity. The review of the effectiveness of the mitigation plan is done from time to time through various mechanism such as management review meeting and as at when the monitoring results are obtained.</p> <p>Example sighted as below:</p> <ol style="list-style-type: none"> 1. Keratong 3 POM: No food price tag in mill canteen causing difficulty for worker and visitor to know the food price. Action: meeting with canteen by mill manager. Records on the minutes of meeting and the regular inspection of the price tag in Jan-Jun 2020 as the long-term action plan. 	<p>Complied</p>

		<ol style="list-style-type: none"> 2. Keratong 3 POM: No source of fund to conducting the Gender Committee monthly activities. The supporting fund is only come from member's contribution. Action: meeting with mill worker's welfare and minute of meeting in Jan-Jun 2020 by Mill Manager as the long-term action plan. 3. Keratong 11 Estate: The contractor's lorry driver has no driving license. Action by HEP: the contractor needs to provide the driver with driving license. Meeting with contractor and checklist for documents required as the long-term action plan. 4. Keratong 11 Estate: Meeting with the JKRR Chanis to discuss any issue, problem arised and continuous improvement involving the Gugusan Chanis community. Action by Estate Manager: Conduct meeting with JKRR and give a briefing to JKRR management in Jan-Jun 2020 as the lon-term action plan. 	
Criterion 3.5: A system for managing human resources is in place.			
3.5.1	<p>Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives where applicable.</p> <p>- Minor Compliance -</p>	<p>As documented in FGV Holdings Berhad Group Sustainability Policy, Doc. No.: FGV/SED/POL/001, Rev 3, effective date: 29.05.2019, Chapter 5.1.2 – Responsible Employment, where hiring and selection of workers during recruitment is based on skill, minimum age, medical fitness and work experience. Performance review is conducted annually and documented in Performance Appraisal Form: PMS2018.</p> <p>There is no any discrimination based on religion, gender, nationality, etc. during their recruitment.</p>	Complied
3.5.2	<p>Employment procedures are implemented, and records are maintained.</p> <p>- Minor Compliance -</p>	<p>There is Recruitment & Selection SOP (SOP no: FGV/GHR/SOP/004 Rev 2.0 dated 13th June 2018) with Flow Chart from request for manpower by HOD until on boarding of new employee.</p>	Complied
Criterion 3.6: An occupational health and safety (H&S) plan is documented, effectively communicated and implemented.			

<p>3.6.1</p>	<p>(C) All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented.</p> <p>- Major Compliance -</p>	<p>FGVPISB Keratong 3 POM had assessed and identified significant hazards and risks and determined appropriate risk control measures. The hazard identification, risk assessment and determining control (HIRADC) records, as well as CHRA reports were verified during the assessment. For example, CHRA for FGVPISB Keratong 3 POM was last revisited 27th March 2015 to 8th April 2015 by registered assessor, JKPP HIE 127/171-2(85). Work units were sampled, assessed, and related recommendation report were evaluated. Example of recommendation as per below:</p> <table border="1" data-bbox="965 639 1910 1145"> <thead> <tr> <th>WORK UNIT</th> <th>RECOMMENDATION</th> </tr> </thead> <tbody> <tr> <td>Chemical Store</td> <td>To paste warning signages at the conspicuous place, "BAHAN KIMIA BERBAHAYA HAZARDOUS CHEMICAL" red font, white background.</td> </tr> <tr> <td>Fume Hood Unit</td> <td>To continue conduct monthly inspection by employer and yearly effectiveness inspection by hygiene technician for FUME hood unit</td> </tr> <tr> <td>Medical Surveillance</td> <td>To continue conduct health surveillance program for employees that has been exposed or likely to be exposed to n-hexane by and occupational health doctor at interval of no longer that twelve month.</td> </tr> <tr> <td>Workshop</td> <td>To use portable air suction unit when welding tasks are performed.</td> </tr> </tbody> </table> <p>For HIRARC, summary of review dated November 2019 reported as per the following table for FGVPISB Keratong 3 POM.</p>	WORK UNIT	RECOMMENDATION	Chemical Store	To paste warning signages at the conspicuous place, "BAHAN KIMIA BERBAHAYA HAZARDOUS CHEMICAL" red font, white background.	Fume Hood Unit	To continue conduct monthly inspection by employer and yearly effectiveness inspection by hygiene technician for FUME hood unit	Medical Surveillance	To continue conduct health surveillance program for employees that has been exposed or likely to be exposed to n-hexane by and occupational health doctor at interval of no longer that twelve month.	Workshop	To use portable air suction unit when welding tasks are performed.	<p>Complied</p>
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Work Unit	Activity	Hazard	Risk Control	Date Review
Weighbridge	Crossing the weighbridge	Slip and Fall/ Hit by moving lorries	PPE (Safety Shoes, Reflective Mirror)	November 2019
Press and Digester	Autofeeder Process	No Cover for Belting, Improper Wiring	Construct Covers, LOTO	November 2019
Kernal Plant	Using Wheel Barrow	Broken Wheel Barrow	Replace with New Wheel Barrow	November 2019
Lab and Despatch	Opening Main Hole Tanker/ Filling MSM into Tanker	Slippery Ladder, Slippery Platform, High Rise Area	Appropriate PPE (Safety Shoes), Railing, Life Line	November 2019
Boiler	Opening steam valve at BPR	Steam Released, Tight Valve, Broken Valve, Hot Surface	Appropriate PPE (Hand Gloves), Replacement Valve.	November 2019

FGVPISB Keratong 3 Estate had assessed and identified significant hazards and risks and determined appropriate risk control measures. The hazard identification, risk assessment and determining control (HIRADC) records, as well as CHRA reports were verified during the assessment. CHRA for FGVP M Keratong 11 Estate

		<p>was last assessed on 13th February 2018 by registered assessor, JKKP IH 127/171-(8). Work units were sampled, assessed, and related recommendation report were evaluated. Example of recommendation as per below:</p> <table border="1"> <thead> <tr> <th>WORK UNIT</th> <th>RECOMMENDATION</th> </tr> </thead> <tbody> <tr> <td>Chemical Handlers</td> <td>Medical Surveillance should be done at least once a year.</td> </tr> <tr> <td>PPE</td> <td>Rekod Pemeriksaan Alat PPE</td> </tr> <tr> <td>Penabur Baja</td> <td>Pengunaan Penapis N95</td> </tr> </tbody> </table>	WORK UNIT	RECOMMENDATION	Chemical Handlers	Medical Surveillance should be done at least once a year.	PPE	Rekod Pemeriksaan Alat PPE	Penabur Baja	Pengunaan Penapis N95	
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PPE	Rekod Pemeriksaan Alat PPE										
Penabur Baja	Pengunaan Penapis N95										
3.6.2	<p>(C) The effectiveness of the H&S plan to address health and safety risks to people is monitored.</p> <p>- Major Compliance -</p>	<p>At FGVPISB Keratong 3 POM the effectiveness of the HIRADC was sampled at the workshop where it was sighted that the Mechanical Apprentice was cutting a metal piece using an oxy without using the appropriate PPE (Shield & Gloves) as stated in the HIRADC.</p> <p>The HIRADC also does not state the necessity of training to be provided to the employees that handle the equipment's onsite. The HIRADC also only states the need for PPE but does not specify the type of PPE that is required for the particular jobs scope. The HIRADC is to be reviewed.</p>	Major non-conformance								
<p>Criterion 3.7: All staff, workers, Scheme Smallholders, out-growers, and contract workers are appropriately trained.</p>											
3.7.1	<p>(C) A documented programme that provides training is in place, which is accessible to all staff, workers, Scheme Smallholders and out-growers, taking into account gender-specific needs, and which covers applicable aspects of the RSPOP&C, in a form they understand, and which includes assessments of training.</p> <p>- Major Compliance -</p>	<p>FGVPISB Keratong 3 POM and Keratong 11 Estate has established an annual training programme for the FY 2019 that covers all aspects including policies, OSH awareness, environmental, machinery, fire drill and contractor awareness on QOHSE.</p>	Complied								

<p>3.7.2</p>	<p>Records of training are maintained. - Minor Compliance -</p>	<p>Training records for employees available and maintained at the office. Records were verified on a sampling basis that covers all aspect of training and RSPO P&C requirement. Samples of training record as follows:</p> <p>Keratong 3 Mill</p> <table border="1" data-bbox="965 523 1890 756"> <thead> <tr> <th>DATE</th> <th>TRAINING</th> <th>TRAINER</th> </tr> </thead> <tbody> <tr> <td>17.08.2019</td> <td>Briefing on STR and BOBCAT Station Safety (Usage of Revolving Light)</td> <td>Mill Manager</td> </tr> <tr> <td>11.07.2019</td> <td>Training on Mechanical LOTO, SOP and General Safety.</td> <td>Mill Manager</td> </tr> <tr> <td>10.05.2019</td> <td>HCV Briefing (Biodiversity Restoration)</td> <td>Mill Manager</td> </tr> <tr> <td>03.04.2019</td> <td>Fire Drill</td> <td>Mill Manager</td> </tr> </tbody> </table> <p>Keratong 11 Estate</p> <table border="1" data-bbox="965 823 1910 991"> <thead> <tr> <th>DATE</th> <th>TRAINING</th> <th>TRAINER</th> </tr> </thead> <tbody> <tr> <td>16.03.2019</td> <td>Manuring SOP</td> <td>Manager</td> </tr> <tr> <td>04.04.2019</td> <td>Policy Training</td> <td>Manager</td> </tr> <tr> <td>18.11.2019</td> <td>Disposal of Schedule Waste</td> <td>Safety & Health Officer</td> </tr> <tr> <td>16.07.2019</td> <td>IPM Training</td> <td>Manager</td> </tr> </tbody> </table>	DATE	TRAINING	TRAINER	17.08.2019	Briefing on STR and BOBCAT Station Safety (Usage of Revolving Light)	Mill Manager	11.07.2019	Training on Mechanical LOTO, SOP and General Safety.	Mill Manager	10.05.2019	HCV Briefing (Biodiversity Restoration)	Mill Manager	03.04.2019	Fire Drill	Mill Manager	DATE	TRAINING	TRAINER	16.03.2019	Manuring SOP	Manager	04.04.2019	Policy Training	Manager	18.11.2019	Disposal of Schedule Waste	Safety & Health Officer	16.07.2019	IPM Training	Manager	<p>Complied</p>
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18.11.2019	Disposal of Schedule Waste	Safety & Health Officer																															
16.07.2019	IPM Training	Manager																															
<p>3.7.3</p>	<p>Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed. - Minor Compliance -</p>	<p>FGVPISB Keratong 3 POM has conducted the RSPO SCCS training to 13 people which comprises from weighbridge clerk, laboratory operator, operation staff, FFB grader and FELSCO. Among the topics discussed are:</p> <ul style="list-style-type: none"> • RSPO SCCS standard. • RSPO SCCS Manual Mass Balance. • Manual Kawalan Keluar Masuk BTS Alihantar. • Kertas Semak Penghantaran Alihhaantar BTS 	<p>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)			
3.8.1	<p>Definition Identity Preserved Mill D.1:</p> <p>A mill is deemed to be Identity Preserved (IP) if the FFB used by the mill are sourced from plantation/estates that are certified against the RSPO Principles and Criteria (RSPO P&C), or against the Group Certification scheme. Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. If a mill processes certified and uncertified FFB without physically separating them, then only Module E is applicable.</p>	Not applicable	Not applicable
3.8.2	<p>Definition Mass Balance Mill E.1</p> <p>Certification for CPO mills is necessary to verify the volumes of certified and uncertified FFB entering the mill and sales volume of RSPO certified products. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 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</p>	Keratong 3 Palm Oil Mill receives and process both FFB supplied from Keratong 11 Estate (own supply base) and other third parties. Since the date of certification it did not receive any certified FFB from any third parties. Roughly, the FFB received from its own supply base is around 6% to 8% from the total FFB received.	Not applicable
3.8.3	<p>Explanation (Volume and product integrity) – D.2, E.2</p> <p>The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall be recorded by the certification body (CB) in the public summary of the P&C certification report. For an independent mill, the estimated tonnage of CPO and PK</p>	The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill is recorded in this public summary report (see Table 10).	Complied

	<p>products shall be recorded in the RSPO IT platform, supply chain certificate and public summary audit report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.</p> <p>The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organisation (RSPO IT platform).</p>		
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<p>3.8.4</p>	<p>Documented procedures – 5.3.1, D.3, E.3</p> <p>The site shall have written procedures and/or work instructions to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:</p> <p>Complete and up-to-date procedures covering the implementation of all the elements of the supply chain model requirements.</p> <p>Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records).</p> <p>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 organisation’s procedures for the implementation of this standard.</p> <p>The site shall have documented procedures for receiving and processing certified and non-certified FFBS.</p>	<p>Procedure namely SOP for Mill RSPO SCC, Doc. No: RSPO SCC, dated: 01/09/2019, version: 3.0 was established which covered general chain of custody, RSPO SCC Committee, Sustainability Compliance & Certification (SCCD), FGVHB, organization chart responsibility, RSPO SCC Supply Chain Verification, claim, RSPO Supply Chain Model, Notis Amaran/Handling Non-conformance material & document, supply chain verification-FFB delivery plantation to mill, etc.</p> <p>Stated in the SOP for Mill RSPO SCC, Doc. No: RSPO SCC, dated: 01/09/2019, version: 3.0, the Mill Manager was the chairman of RSPO SCC Committee whom need to ensure the RSPO SCC system is being implemented. The job descriptions were identified in the procedure accordingly.</p>	<p>Complied</p>
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<p>3.8.5</p>	<p>Internal Audit – 5.3.2 The site shall have a written procedure to conduct annual internal audit to determine whether the organisation; Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</p> <hr/> <p>Effectively implements and maintains the standard requirements within its organisation.</p> <hr/> <p>Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non-conformities shall be subject to management review at least annually. The organisation shall be able to maintain the internal audit records and reports.</p>	<p>Procedure namely SOP for Mill RSPO SCC, Doc. No: RSPO SCC, dated: 01/09/2019, version: 3.0 was established which covered the internal audit under Certification & Due Diligence (CDD), Sustainability & Environmental Department (SED), FGVH responsibility. The internal audit will be plan annually before CB audit. Internal audit procedure was crossed-reference with SOP: FGV/ML-1A-L2-PR11 issue 1 dated 01.06.2016.</p> <p>Internal audit was done on 23/08/2019 by Abdul Rahman bin Awang (CDD department).</p> <p>The procedure was implemented and maintained by the management. The records (for example Internal audit report done on 23/08/2019 by Abdul Rahman bin Awang (CDD department) was available for verification. 2 NCR was raised during the internal audit and closed accordingly.</p> <p>Management review was conducted on 30/08/2019. The issues discussed are: Internal and external audit result (2 NC for internal and external audit is yet to be conducted).</p> <p>Customer satisfaction (no complaint received for period July 2019).</p> <p>Production: Mass Balance is used. All certified FFB suppliers need to be recorded.</p> <p>Recommendation: All data need to be verified from time to time.</p>	<p>Complied</p>
<p>3.8.6</p>	<p>Purchasing Goods In – 5.4, D.4.1/ D.4.2, E.4.1/E.4.2 The site shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.</p> <hr/> <p>The site shall inform the CB immediately if there is a projected overproduction of certified tonnage.</p> <hr/> <p>The site shall have a mechanism in place for handling non- conforming oil palm products and/or documents.</p>	<p>The accompanying documents of incoming FFB from own estate are estate’s weighing bridge tickets which has the info about name of estate, RSPO certificate number, weighbridge ticket number, seal number, date of delivery, field number, number of bunches. Upon arrival at the mill, the mill issues its weighbridge ticket as confirmation of receipt. The estate’s ticket number is recorded in the mill’s ticket number.</p> <p>There has been no projected overproduction. Nonetheless, based on interview with the staff, the facility is aware of this requirements.</p> <p>Addressed under “SOP for Mill RSPO SCC” [RSPO SCC, issue: 3 rev: 5, dated 1/9/2019, section “Notis Amaram/Handling Non-conformance Material &</p>	<p>Complied</p>

		Document" which reads if the FFB supplied found to be not certified after being processed, the CPO or PK shall be downgraded to non-certified.	
3.8.7	<p>Outsourcing Activities – 5.5</p> <p>In cases where an operation seeking or holding certification outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the operation seeking or holding certification shall ensure that the independent third party complies with the requirements of the RSPO Supply Chain Certification Standard. A CPO mill and independent mill cannot outsource processing activities like refining or crushing.</p> <p>This requirement is not applicable to outsourced storage facilities where the management of the oil palm product(s) and instructions for tank movements are controlled by the certified organisation (not the tank farm manager).</p>	Not applicable. No outsourcing activity.	Not applicable
	<p>Sites which include outsourcing within the scope of their RSPO Supply Chain certificate shall ensure the following:</p> <p>The site has legal ownership of all input material to be included in outsourced processes;</p> <p>The site has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the site to ensure that certification bodies (CBs) have access to the outsourcing contractor or operation if an audit is deemed necessary.</p>	Not applicable. No outsourcing activity.	Not applicable

	<p>The site has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</p> <p>The site seeking or holding certification shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and any and all information, when this is announced in advance.</p>		
	<p>The site shall record the names and contact details of all contractors used for the processing or physical handling of RSPO certified oil palm products.</p>	<p>Not applicable. No outsourcing activity.</p>	<p>Not applicable</p>
	<p>The site shall at its next audit inform its CB of the names and contact details of any new contractor used for the processing or physical handling of RSPO certified oil palm products.</p>	<p>Not applicable. No outsourcing activity.</p>	<p>Not applicable</p>
3.8.8	<p>Record keeping – 5.9</p> <p>The organisation shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of these RSPO Supply Chain Certification Standard requirements.</p>	<p>FGVPISB Keratong Palm Oil Mill has maintained the accurate, complete, up-to-date and accessible records and reports covering all aspects of these RSPO Supply Chain Certification requirements.</p>	<p>Complied</p>
	<p>Retention times for all records and reports shall be a minimum of two(2) years and shall comply with legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock.</p>	<p>Procedure namely Mill RSPO SCC (Mass Balance), SOP for Mill RSPO SCC, Doc. No: RSPO SCC, dated: 01/09/2019, version: 3.0 has defined at least 2 years of retention time for all records and report.</p> <p>Sampled the last 2 years weighbridge FFB ticket as below:</p> <ul style="list-style-type: none"> • Nota Hantaran: 0017797 • Lorry no: JLH9729 • Buyer name: FELDA Keratong 4 	<p>Complied</p>

		<ul style="list-style-type: none"> • Seller name: Juhari bin Ali • Quantity: 02.05 MT • Date: 23/03/2017 	
	The organisation shall be able to provide the estimate volume of palm oil / palm kernel oil content (separate categories) in the RSPO certified oil palm product and keep an up to date record of the volume purchased (input) and claimed (output) over a period of twelve (12) months.	Not applicable. The product of the facility is containing 100% palm oil.	Not applicable
	<p>D.5.1 – The site shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.</p> <p>Or</p> <p>E.5.1 –</p> <p>The site shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and/or three-monthly basis.</p> <p>All volumes of palm oil and palm kernel oil that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO.</p> <p>The site can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a site is allowed to sell short. (i.e. product can be sold before it is in stock.)</p>	<p>Mass balance recording is done through utilization of “Lembaran Mass Balance” (Mass Balance Sheet).</p> <p>Computerized system in place with the delivery deducted accordingly.</p> <p>Based on verification of Mass Balance Sheet, it was found that the certified CPO and PK were always delivered from positive stock.</p>	Complied
3.8.9	<p>Conversion Factors – 5.10</p> <p>Where applicable, a conversion rate shall be applied to provide a reliable estimate for the amount of certified</p>	Conversion factor of CPO and PK production is depending on the actual OER and KER.	Complied

	<p>output available from the associated inputs. Organisations may determine and set their own conversion rates which shall be based upon past experience, documented and applied consistently. Guidance on conversion rates is published on the RSPO website (www.rspo.org)</p>		
	<p>Conversion rates shall be periodically updated to ensure accuracy against actual performance or industry average if appropriate.</p>	<p>The facility is using the actual extraction rate and therefore updating of rates is not necessary.</p>	<p>Complied</p>
3.8.10	<p>Processing – D.6 The site 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 product including during transport and storage to strive for 100% separation.</p>	<p>Not applicable</p>	<p>Not applicable</p>
3.8.11	<p>Sales and goods out – 5.6 The supplying site shall ensure that the following minimum information for RSPO certified products is made available in document form: The name and address of the buyer; The name and address of the seller; The loading or shipment / delivery date; The date on which the documents were issued; A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations); The quantity of the products delivered; Any related transport documentation;</p>	<p><u>Crude Palm Oil</u> Sampled Contract: RSPG1219R Buyer: name and address were stated in sales contract (<i>but not disclosed in this report</i>) Seller: FPI-Keratong 3 - stated in sales contract Delivery order: L00000175/2019 Cargo weight: 48.16 mt Commodity: RSPO-certified 100% Certificate number: RSPO 693213 Unique identification number – shipping instruction/confirmation (once certified)</p>	<p>Complied</p>

	<p>Supply chain certificate number of the seller; A unique identification number.</p> <p>Information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation).</p> <p>For sites that are required to announce and confirm trades in the RSPO IT platform, this shall include making Shipping Announcements/Announcements and Confirmations on the RSPO IT platform per shipment or group of shipments.</p>	<p>Shipping announcements were made by FGV marketing department located at Kuala Lumpur headquarters. The list of announcement made can be access in the RSPO PalmTrace.</p>	
<p>3.8.12</p>	<p>Registration of Transactions – 5.7</p> <p>Supply chain actors who: Are mills, traders, crushers and refineries; and Take legal ownership and/or physically handle RSPO Certified Sustainable oil palm products that are available in the yield scheme of the RSPO IT Platform (Figure 2 and 3, refer Annex 1) shall register their transaction in the RSPO IT platform and confirm upon receipt where applicable.</p> <p>The involved supply chain actors mentioned in 5.7.1 shall do the following actions in the RSPO IT Platform: Shipping Announcement/Announcement: When RSPO certified volume is sold as certified, the volumes of products that are in the yield scheme (Figure2 and 3, refer Annex 1) shall be registered as a Shipping Announcement/Announcement in the RSPO IT Platform. time to do Shipping</p>	<p>Based on the announcement summary, all the registrations were found to be in order.</p> <p>Not applicable. Products are not sold beyond refinery.</p> <p>Based on the MB accounting, the removal of volumes was done correctly when the products were sold as conventional.</p> <p>Based on the announcement summary, all the confirmations were found to be in order.</p>	<p>Complied</p>

	<p>Announcement/Announcement is based on members' own standard operating procedures.</p> <p>Trace: When RSPO certified volumes are sold as RSPO certified to actors in the supply chain beyond the refinery, the volume shall be traced at least annually. Tracing triggers the generation of a trace document with a unique traceability number. Tracing can be done in a consolidated way at least annually.</p> <p>Remove: RSPO certified volumes sold under other scheme or as conventional, or in case of underproduction, loss or damage shall be removed.</p> <p>Confirm: Acknowledge the purchase of RSPO certified volume by confirming Shipping Announcements/Announcements.</p>		
3.8.13	<p>Claims – 5.11</p> <p>The site shall only make claims regarding the use of or support of RSPO certified oil palm products that are in compliance with the RSPO Rules on Market Communications and Claims.</p>	There is no claim been made for RSPO logo & trademark in Keratong POM.	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.	No off-product claim made by Keratong 3 POM and verified through document and site review (notice board, business card, shipping documentation, procurement/ purchasing document and promotional material etc.).	Complied
4.2	<p>In corporate communications a member is allowed to:</p> <ul style="list-style-type: none"> a. Display its RSPO membership status b. Display the RSPO web address (www.rspo.org) 	Not applicable as no off-product claim made by Keratong 3 POM as to date.	Complied

	<p>c. State that the member supports the work of the RSPO</p> <p>d. State the member's history with regard to the RSPO.</p> <p>e. Use the RSPO trademark to promote its membership of the RSPO.</p> <p>Additionally, where an RSPO member displays the RSPO trademark in digital format this must be accompanied by the text 'Check our progress at www.rspo.org' where the link must lead to the member's profile page.</p>		
4.3	In corporate communications RSPO members must not make any statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products.	Not applicable as no off-product claim made by Keratong 3 POM as to date.	Complied
4.4	Members must ensure that all communication is consistent, clear and cannot mislead consumers or other stakeholders as to the certified content of oil palm products in the member's own products.	Not applicable as no off-product claim made by Keratong 3 POM as to date.	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.	No evidence of RSPO corporate logo used by Keratong 3 POM and verified through document and site review (notice board, business card, shipping documentation, procurement/ purchasing document and promotional material etc).	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.	Business to business communication is demonstrated via shipping documentation and invoices to the next supply chain actor or buyer.	Complied

5.2	When confirming the sale of certified oil palm products, members must adhere to the requirements of the RSPO SCCS. This includes stating the supply chain model and certificate number under which the claim is being made.	Shipping documentation verified and conformance with the requirements of RSPO SCCS. In the shipping documents (i.e. weighbridge tickets, delivery order), the name of product/commodity with SCC model (CPO MB) and RSPO certificate number; RSPO 693213.	Complied
5.3	<p>Where a distributor or wholesaler takes title to products containing certified sustainable oil palm products, the requirements of the RSPO SCCS can follow either of two options:</p> <ul style="list-style-type: none"> 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. b. If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2. 	Keratong 3 POM is not under distributor or wholesaler category. Thus, this requirement is not applicable.	NA
Business to consumer communication			
6.1	Only RSPO members that have supply chain certification are allowed to make business to consumer claims about the certified sustainable oil palm products contained within product(s), which are known as 'product-specific' claims. Product-specific claims are voluntary.	NA as no business to consumer communication on product specific claim made Keratong 3 POM and only producing crude and unfinished product.	NA
6.2	Only RSPO members who have supply chain certification are authorised to use the RSPO trademark	NA as no business to consumer communication on product specific claim made Keratong 3 POM and only producing crude and unfinished product.	NA

	and/or RSPO label, with the exception of RSPO Credits and of retailers in accordance with 6.8 below.		
6.3	When on-pack claims on RSPO-certified sustainable oil palm products are used, the RSPO trademark and associated identification number must be present.	NA as no business to consumer communication on product specific claim made Keratong 3 POM and only producing crude and unfinished product.	NA
6.4	Business to consumer communication shall not include information about the claimant's RSPO membership status.	NA as no business to consumer communication on product specific claim made Keratong 3 POM and only producing crude and unfinished product.	NA
6.5	Members shall not communicate to consumers' information about their suppliers' RSPO membership status.	NA as no business to consumer communication on product specific claim made Keratong 3 POM and only producing crude and unfinished product.	NA
6.6	Use of the RSPO trademark is restricted to claims about RSPO-certified sustainable palm oil products and it is not authorised for use in relation to any other ingredient.	NA as no business to consumer communication on product specific claim made Keratong 3 POM and only producing crude and unfinished product.	NA
6.7	Use of any other trademark or logo to highlight the presence of RSPO-certified sustainable oil palm products is an unauthorised product-specific claim.	NA as no business to consumer communication on product specific claim made Keratong 3 POM and only producing crude and unfinished product.	NA
6.8	RSPO members who are retailers or food service companies can apply for an RSPO trademark license for use in business to consumer communications, provided they can demonstrate the validity of these claims to an RSPO-accredited certification body (CB). This will be undertaken via a remote audit, prior to the trademark use, during which the retailer or food service company will need to demonstrate that the use of the trademark is in compliance with the rules contained within this document and that the claim itself can be supported	NA as no business to consumer communication on product specific claim made Keratong 3 POM and only producing crude and unfinished product.	NA

	<p>through a certified supply chain. Any other palm oil claims, including those highlighting the absence of palm oil, must be highlighted to the CB during the audit to ensure that all claims comply with the requirements of these rules. The CB will confirm the outcome of these audits, to be conducted annually, to RSPO who may continue to grant a trademark license or withdraw permission based upon the audit findings. This is in keeping with the rules applying to RSPO supply chain certified members. The guidance document for audits is available on www.rspo.org.</p>		
<p>MODULE A – IDENTITY PRESERVED & SEGREGATED SPECIFIC RULES</p>			
<p>Certified oil palm content (IP)</p>			
	<p>For IP, 95% or above of the oil palm content must be RSPO IP-certified.</p>	<p>NA as Keratong 3 POM is producing RSPO MB product.</p>	<p>NA</p>
	<p>For SG, 95% or above of the oil palm content must be SG, or a combination of SG and IP.</p>	<p>NA as Keratong 3 POM is producing RSPO MB product.</p>	<p>NA</p>
	<p>Where there is any percentage of non-certified oil palm within the product, the reason for this must be fully justified and an action plan for moving to fully certified oil palm must be in place, in accordance with the requirements of the RSPO SCCS. In addition, the volume of non-certified oil palm products must be covered by the purchase of RSPO Credits of equivalent volume.</p>	<p>NA as Keratong 3 POM is producing RSPO MB product.</p>	<p>NA</p>
<p>Labelling and trademark (IP)</p>			
	<p>Members are allowed to use the RSPO label in one of the following ways:</p>	<p>NA as Keratong 3 POM is producing RSPO MB product.</p>	<p>NA</p>

	<p>a. RSPO trademark which includes the tag 'CERTIFIED' or</p> <p>b. RSPO trademark which includes the tag 'This product contains certified sustainable palm oil'. Wherever a RSPO trademark is displayed, the applicable trademark license number must be shown immediately under or next to the trademark or the 'statement'. Font must be Calibri, font size must be at least 4pt (1.4 mm or 0.06 inch). In on-pack communications, the RSPO trademark can be printed anywhere on the pack.</p>		
Messaging (IP)			
	<p>Messaging ALLOWED in storytelling in product-related communications may include some or all of the following elements:</p> <ul style="list-style-type: none"> • The oil palm products contained in this product have been certified to come from RSPO sources. www.rspo.org • By choosing this product, you are sure it contains RSPO-certified palm oil. For more information: www.rspo.org • RSPO-certified sustainable oil palm products were kept apart from other oil palm products throughout the supply chain. www.rspo.org • Certified sustainable oil palm products can be traced back to RSPO-certified mills and plantations. www.rspo.org • The entire supply chain is monitored by independent, RSPO-accredited auditors. www.rspo.org 	<p>NA as Keratong 3 POM is producing RSPO MB product.</p>	<p>NA</p>

	<ul style="list-style-type: none"> • 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. 		
MODULE B – MASS BALANCE SPECIFIC RULES			
Minimum Mass Balance content			
	95% or above of the oil palm content must be RSPO MB-certified.	Oil palm claimed for MB certified contain of 100% CPO or PK MB-certified.	NA
	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 non-certified volume must be covered by equivalent volume of RSPO Credits.	Oil palm claimed for MB certified contain of 100% CPO or PK MB-certified.	NA
Labelling and trademark (MB)			
	<p>Members are allowed to use the RSPO label in one of the following ways:</p> <ul style="list-style-type: none"> • Surrounded by the text: 'Certified sustainable palm oil'. • The RSPO label MUST contain the tag 'MIXED'. The tag MIXED designates oil palm products sourced under the Mass Balance (MB) supply chain system, which administratively balances inputs and outputs of certain palm oil volumes. The tag 'MIXED' on a product does not guarantee that the product itself 	As at to date, no RSPO trademark used by Keratong 3 POM.	NA

	<p>contains the certified material; some or all of it may reside in a product that does not carry a claim.</p> <ul style="list-style-type: none"> • The RSPO label can also include the statement: '[The palm oil contained in this product] contributes to the production of certified sustainable palm oil'. • Wherever the 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 4 pt (1.4 mm or 0.06 inch). • In on-pack communications, the RSPO trademark can be printed anywhere on the pack. Further guidance on use of the trademark is provided in the RSPO Trademark License Terms and Conditions and in Annex 1 of the Rules on Market Communications & Claims document. 		
Messaging (MB)			
	<p>Messaging ALLOWED in storytelling in product-related communications includes:</p> <ul style="list-style-type: none"> • [Oil palm products]/[palm oil]/[palm kernel oil] from RSPO-certified mills and plantations were mixed with non-certified oil palm products in the supply chain. • The volume of [oil palm products][palm oil]/[palm kernel oil] in this product reflects an equivalent volume of palm oil or palm kernel oil produced by RSPO certified mills and plantations. • In off-product communications, reference to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown in company records is allowed. 	<p>As at to date, no RSPO trademark used by Keratong 3 POM.</p>	<p>NA</p>

	<p>Messaging NOT ALLOWED in storytelling in product-related communications:</p> <ul style="list-style-type: none"> Anything that can lead consumers to believe that RSPO-certified palm products are (certified to be) part of the product. 		
<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, FFB suppliers and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.</p> <p>- Major compliance -</p>	<p>FGV Holdings has developed Group Sustainability Policy, Doc. No.: FGV/SED/POL/001, Rev 3, Eff date: 29.05.2019. Under clause 5.1.3, Respect for Human Rights, FGV group strives to uphold and respect internationally recognised human rights as enshrined in the Universal Declaration of Human Rights (UDHR), United Nations Convention on the Elimination of All Forms of Discrimination against Women, United Nations Convention on the rights of the child, other applicable United Nations core human rights treaties, the ILO (Declaration on Fundamental Principles and Rights at Work as well as other relevant ILO conventions.</p> <p>Policies communicated to employees during daily muster assembly and meetings as recorded in the muster briefing records on 16/10/2019 to all 28 people (Keratong POM) and on 04/04/2019 to all 126 people (Keratong 11 Estate).</p> <p>Apart from that, FGV also has the FGV Whistleblowing Policy, (policy number FGV/GGD/POL.001 revision 6 dated 28/05/2018) to protect the complainant.</p> <p>Policies were communicated too to all Keratong POM & Keratong 11 Estate stakeholder's on 17/10/2019. The stakeholder includes contractors, school representatives, neighbour villagers, etc. However, the minute meeting on stakeholder meeting conducted is not available. Hence, a critical non-conformity is raised.</p>	<p>Major non-conformance</p>

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4.1.2	The unit of certification does not instigate violence or use any form of harassment in their operations. - Minor compliance -	FGV Holdings has developed Group Sustainability Policy, Doc. No.: FGV/SED/POL/001, Rev 3, Eff date: 29.05.2019. Under the clause 5.16 Gender Equality and Preventing Sexual Harassment violence and abuse.	Complied
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			
4.2.1	(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. - Major compliance -	SOP for Complaint & Grievance (Doc no: FGV/ML-1A/L2-Pr13 issue 01, revision 02 dated 01.04.2019 is available. This procedure is applicable to all employees and stakeholders who wish to lodge a complaint or grievance. The procedure also provides a mechanism for addressing complaints received, and accords protection and confidentiality to complainants. The complaints will be solved on 14 days (first stage), 14 days (second stage) and 14 days (third stage). Apart from that, FGV also has the FGV Whistleblowing Policy, (policy number FGV/GGD/POL.001 revision 6 dated 28/05/2018) to protect the complainant.	Complied
4.2.2	Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties. - Minor compliance -	Policies communicated to employees during daily muster assembly and meetings as recorded in the muster briefing records on 16/10/2019 to all 28 people (Keratong POM) and on 04/04/2019 to all 126 people (Keratong 11 Estate). Policies were communicated too to all Keratong POM stakeholders on 17/10/2019. The stakeholder includes contractors, school representatives, neighbour villagers, etc.	Complied
4.2.3	The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders. - Minor compliance -	The grievances recorded in Complaint Book and Housing Repair Request Form. As per SOP for Complaint & Grievance (Doc no: FGV/ML-1A/L2-Pr13 issue 01, revision 02 dated 01.04.2019, under clause 7.2.2 external stakeholder, the complainant will be kept informed within 2 weeks from the complaint receiving date. The latest record sighted on 20/08/2018 on broken gate by Ikhwan, (FELDA Keratong 03).	Complied
4.2.4	The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups	As per SOP for Complaint & Grievance (Doc no: FGV/ML-1A/L2-Pr13 issue 01, revision 02 dated 01.04.2019, under clause 7.1.4 (4 th stages) 7.1.4.1 if there is no agreement after complaint lodges to the headquarters, the complaint can be	Complied

	to support them and/or act as observers, as well as the option of a third-party mediator. - Minor compliance -	escalated to Jabatan Perhubungan Perusahaan, Kementerian Sumber Manusia or Panel Aduan Persijilan Kelestarian (RSPO or MSPO) as a solution.	
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. - Minor compliance -	The development needs of the local community are being carried out on a unit basis. This is verified via requests made by local communities through the stakeholder consultation, complaint and grievance mechanism as requested as follows: <ol style="list-style-type: none"> 1. Request for school children transportation to Sekolah Agama Rakyat Kafa Keratong 3 on 12/10/2019 based on the stakeholder meeting. 2. Donation RM 100 to Masjid An-Nur Felda Keratong 3 on 04/11/2019 for the upcoming religious activity with the community based on the stakeholder meeting. 3. Road repair plan for Felda Keratong 6 school children as per stakeholder meeting and SIA management plan. 4. Providing child care centre (KEMAS) at Felda Keratong 6 as per stakeholder meeting and SIA management plan. 	Complied
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.			
4.4.1	(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. Documents Related to the history of land tenure and the actual legal or customary use of the land are available. - Major compliance -	There is no customary right in Keratong POM and supply bases as the land is belonged to FELDA and leased to FGV for Oil Palm Plantation activities. It was verified through the land titles and stakeholder consultation with the communities. Therefore, the clause is not applicable. Through an agreement [ref.: letter of permission from FELDA to FASSB, (06)JPLDG1151/02-30, dated 18/1/2018], the certification unit has the right to use the land.	Not applicable

4.4.2	Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:	There is no customary right in Keratong POM and supply bases as the land is belonged to FELDA and leased to FGV for Oil Palm Plantation activities. It was verified through the land titles and stakeholder consultation with the communities. Therefore, the clause is not applicable.	Not applicable
4.4.2a	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. - Minor compliance -		
4.4.2b	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. - Minor compliance -	There is no customary right in Keratong POM and supply bases as the land is belonged to FELDA and leased to FGV for Oil Palm Plantation activities. It was verified through the land titles and stakeholder consultation with the communities. Therefore, the clause is not applicable.	Not applicable
4.4.2c	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. - Minor compliance -	There is no customary right in Keratong POM and supply bases as the land is belonged to FELDA and leased to FGV for Oil Palm Plantation activities. It was verified through the land titles and stakeholder consultation with the communities. Therefore, the clause is not applicable.	Not applicable
4.4.3	(C) Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving	There is no customary right in Keratong POM and supply bases as the land is belonged to FELDA and leased to FGV for Oil Palm Plantation activities. It was verified through the land titles and stakeholder consultation with the communities.	Not applicable

	affected parties (including neighbouring communities where applicable, and relevant authorities). - Major compliance -	Therefore, the clause is not applicable. There is no customary right in Keratong POM and supply bases therefore, the clause is not applicable.	
4.4.4	All relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements. - Minor compliance -	There is no customary right in Keratong POM and supply bases as the land is belonged to FELDA and leased to FGV for Oil Palm Plantation activities. It was verified through the land titles and stakeholder consultation with the communities. Therefore, the clause is not applicable.	Not applicable
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. - Major compliance -	There is no customary right in Keratong POM and supply bases as the land is belonged to FELDA and leased to FGV for Oil Palm Plantation activities. It was verified through the land titles and stakeholder consultation with the communities. Therefore, the clause is not applicable.	Not applicable
4.4.6	There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties. - Minor compliance -	There is no customary right in Keratong POM and supply bases as the land is belonged to FELDA and leased to FGV for Oil Palm Plantation activities. It was verified through the land titles and stakeholder consultation with the communities. Therefore, the clause is not applicable.	Not applicable
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. - Major compliance -	There is no new planting at FGVPM Keratong 11 Estate.	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	There is no new planting at FGVPM Keratong 11 Estate therefore, the requirement is not applicable.	Not applicable

	<p>the relevant information and documents made available, with option of resourced access to independent advice through a documented, long-term and two-way process of consultation and negotiation.</p> <p>- Major compliance -</p>		
4.5.3	<p>Evidence is available that affected local peoples understand they have the right to say 'no' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples. Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations.</p> <p>- Minor compliance -</p>	<p>There is no new planting at FGVPM Keratong 11 Estate therefore, the requirement is not applicable.</p>	<p>Not applicable</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 FGVPM Keratong 11 Estate therefore, the requirement is not applicable.</p>	<p>Not applicable</p>
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 FGVPM Keratong 11 Estate therefore, the requirement is not applicable.</p>	<p>Not applicable</p>

4.5.6	Evidence is available that the communities (or their representatives) gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator. - Minor compliance -	There is no new planting at FGVPM Keratong 11 Estate therefore, the requirement is not applicable.	Not applicable
4.5.7	New lands are not acquired for plantations and mills after 15 November 2018 as a result of recent (2005 or later) expropriations without consent under the right of eminent domain of the federal and state land acquisition legislations. - Minor compliance -	There is no new planting at FGVPM Keratong 11 Estate therefore, the requirement is not applicable.	Not applicable
4.5.8	(C) New lands are not acquired in areas inhabited by communities in voluntary isolation. - Major compliance -	No new land acquisition been made by FGV Keratong 11 Estate as there is there is no changes on the total hectareage and confirmed through stakeholder consultation.	Complied
Criterion 4.6: Any negotiations Concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.			
4.6.1	(C) A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place. - Major compliance -	There is no customary right in FGVPIB Keratong POM and supply bases therefore, the clause is not applicable. The procedure applied by Keratong Complex is Procedure known as Pengenalpastian Dan Penyelesaian Pertikaian Tanah Serta Penentuan Pampasan Document No. FGV/ML-1A/1.2-Pr10 issue 1 revision 2 effective on 1 April 2019. The procedure has clearly states the process of negotiation, involvement of affected and responsible parties (e.g. estate management, FGV Sustainability, Compliance and Certification Department, affected parties) and compensation if any land disputes with Legal Department according to legal requirement and market value.	Complied
4.6.2	(C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise)	The procedure for calculation and distributing fair compensation is contained in procedure applied by Keratong Complex is Procedure known as Pengenalpastian	Complied

	is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. - Major compliance -	Dan Penyelesaian Pertikaian Tanah Serta Penentuan Pampasan Document No. FGV/ML-1A/1.2-Pr10 issue 1 revision 2 effective on 1 April 2019. Paragraph 6.2.5.2 takes into account gender differences, ownership and access to land, different ethnic groups, long-established communities, etc.	
4.6.3	Evidence is available that equal opportunities are provided to both men and women to hold land titles for scheme small holdings. - Minor compliance -	There is no customary right in Keratong POM and supply bases therefore, the clause is not applicable. The procedure applied by Keratong Complex is Procedure known as Pengenalpastian Dan Penyelesaian Pertikaian Tanah Serta Penentuan Pampasan Document No. FGV/ML-1A/1.2-Pr10 issue 1 revision 2 effective on 1 April 2019. The procedure has clearly states the process of negotiation, involvement of affected and responsible parties (e.g. estate management, FGV Sustainability, Compliance and Certification Department, affected parties) and compensation if any land disputes with Legal Department according to legal requirement and market value.	Complied
4.6.4	The process and outcomes of any negotiated agreements, compensation and payments are documented, with evidence of the participation of affected parties, and made publicly available to them. - Minor compliance -	There is no customary right in Keratong POM and supply bases therefore, the clause is not applicable. The procedure applied by Keratong Complex is Procedure known as Pengenalpastian Dan Penyelesaian Pertikaian Tanah Serta Penentuan Pampasan Document No. FGV/ML-1A/1.2-Pr10 issue 1 revision 2 effective on 1 April 2019. The procedure has clearly states the process of negotiation, involvement of affected and responsible parties (e.g. estate management, FGV Sustainability, Compliance and Certification Department, affected parties) and compensation if any land disputes with Legal Department according to legal requirement and market value.	Complied
Criterion 4.7: Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.			
4.7.1	(C) A mutually agreed procedure for identifying people entitled to compensation is in place.	There is no customary right in Keratong POM and supply bases as the land is belonged to FELDA and leased to FGV for Oil Palm Plantation activities. It was	Not applicable

	- Major compliance -	verified through the land titles and stakeholder consultation with the communities. Therefore, the clause is not applicable. Through an agreement [ref.: letter of permission from FELDA to FASSB, (06)JPLDG1151/02-30, dated 18/1/2018], the certification unit has the right to use the land.	
4.7.2	(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. - Major compliance -	There is no customary right in Keratong POM and supply bases as the land is belonged to FELDA and leased to FGV for Oil Palm Plantation activities. It was verified through the land titles and stakeholder consultation with the communities. Therefore, the clause is not applicable.	Not applicable
4.7.3	Communities that have lost access and rights to land for plantation expansion are given opportunities including employment and supply contracts to benefit from plantation development. - Minor compliance -	There is no customary right in Keratong POM and supply bases as the land is belonged to FELDA and leased to FGV for Oil Palm Plantation activities. It was verified through the land titles and stakeholder consultation with the communities. Therefore, the clause is not applicable.	Not applicable
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.			
4.8.1	Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed compensation has been made to all people who held legal, customary, or user rights at the time of acquisition is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC. - Minor compliance -	There is no customary right in Keratong POM and supply bases therefore, the clause is not applicable.	Complied
4.8.2	(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)	The land is belonged to FELDA and leased to FGV for Oil Palm Plantation as sighted in the land title and confirmed with the local communities. There is no land conflict present in the unit of certification.	Complied

	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. - Major compliance -		
4.8.3	Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use rights, these claims will be settled using the relevant requirements (Indicators 4.4.2, 4.4.3 and 4.4.4) - Minor compliance -	The land is belonged to FELDA and leased to FGV for Oil Palm Plantation as sighted in the land title and confirmed with the local communities. There is no land conflict present in the unit of certification.	Complied
4.8.4	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). - Minor compliance -	The land is belonged to FELDA and leased to FGV for Oil Palm Plantation as sighted in the land title and confirmed with the local communities. There is no land conflict present in the unit of certification.	Complied
Principle 5: Support smallholder inclusion			
Criterion 5.1: The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.			
5.1.1	Current and previous period prices paid for FFB are publicly available and accessible by smallholders. - Minor compliance -	Current FFB price was publicly available and displayed at weighbridge office window. Previous FFB price was also available and filed in the office. Public can access the information upon request.	Complied
5.1.2	(C) Evidence is available that the unit of certification explains the FFB pricing to smallholders on request from individual smallholders (at least once a year or upon request). - Major compliance -	Explanation is made normally through meeting e.g. meeting with smallholders and suppliers of KS Keratong 3.	Complied

5.1.3	(C) Fair pricing, calculated as a portion of the international CPO price less costs is provided to smallholders in the supply base and documented. - Major compliance -	Felda provides FFB pricing on a daily basis based on MPOB pricing. Smallholders are then paid based on the OER for their crop. Based on random interview made with FFB suppliers during the assessment, they were able to explain the pricing calculation.	Complied
5.1.4	(C) Evidence is available that all parties, including women and independent representative organisations assisting smallholders where requested, are involved in decision-making processes and understand the contracts. These include those involving finance, loans/credits, and repayments through FFB price reductions for replanting and or other support mechanisms where applicable. - Major compliance -	FFB suppliers other than the management of Felda Technoplant are free whether or not to sell their crop to Keratong 3 POM. Thus no contract agreement necessary. Nonetheless, the suppliers have to be registered in the mill's data base which has the information about names and MPOB license to name a few. The FFB price is displayed at the point of entry of the weighbridge and payment of sales is made no later than 15 th day of any month.	Complied
5.1.5	Contracts are fair, legal and transparent and have an agreed timeframe. - Minor compliance -	FFB suppliers other than the management of Felda Technoplant are free whether or not to sell their crop to Keratong 3 POM. Thus no contract agreement necessary. Nonetheless, the suppliers have to be registered in the mill's data base which has the information about names and MPOB license to name a few. The FFB price is displayed at the point of entry of the weighbridge and payment of sales is made no later than 15 th day of any month.	Complied
5.1.6	(C) Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given. - Major compliance -	The payment is not made directly to the smallholders but through the smallholders' management agencies e.g. Felda Technoplant and Felda. The payments to these agencies were made in timely manner.	Complied
5.1.7	Weighbridges used for determining payment to smallholders are verified by an independent third party on a regular basis (this can be government). - Minor compliance -	Calibration of weighbridge is regularly done by third party (co.'s no.: 465495-W). Certificates which were issued by an authority (Metrology Corporation Malaysia Sdn Bhd) were available for verification. Certificates verified: # B1586075 (dated 2/11/2019) for w/bridge #B844688378 and w/bridge #00865666GK was in	Complied

		progress of calibration at the point of audit, thus no certificate yet – last calibrated was on 14/5/2018 (ref.: cert # B1232689).	
5.1.8	The unit of certification supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material. - Minor compliance -	Keratong 3 certification unit does not deal with the independent smallholders directly but rather with the management agencies such as Felda Technoplant and Felda. FFB suppliers other than the management of Felda Technoplant are free whether or not to sell their crop to Keratong 3 POM. Thus no contract agreement necessary.	Complied
5.1.9	(C) The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner. - Major compliance -	The same grievance mechanism as described in Criteria 4.2 is used. To-date, there has been no grievance received from smallholders.	Complied
Criterion 5.2: The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.			
5.2.1	The Company consults with interested smallholders (irrespective of type) within the Unit of Certification, including women or other partners in their supply base, to assess their needs for support to improve their livelihoods and their interest in RSPO certification. - Minor compliance -	Addressed in the " <i>Pelan Peningkatan Taraf Hidup Smallholder</i> " (Plan to improve the livelihood of smallholders). Among the action plans established were: <ul style="list-style-type: none"> • To provide job opportunity • To continue to purchase the FFB from the smallholders • To contribute in term of supplying EFB and POME as fertiliser • Commitment to sustainable business • To be open in term of discussing and handling issues and grievances 	Complied
5.2.2	The unit of certification develops and implements smallholder support programme to improve smallholder livelihood and build their capacity to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO	Based on the " <i>Pelan Peningkatan Taraf Hidup Smallholder</i> ", one of the plan is commitment to sustainable business which covers the initiative to assist the smallholders in conforming the RSPO & MSPO standard and complying the legal requirements.	Complied

	certification (including the RSPO Independent Smallholder Standard or RISS). - Minor compliance -		
5.2.3	Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production. - Minor compliance -	Based on the " <i>Pelan Peningkatan Taraf Hidup Smallholder</i> ", which was just established in early December 2019, one of the plan is commitment to sustainable business which covers the initiative to assist the smallholders in conforming the RSPO & MSPO standard and complying the legal requirements.	Complied
5.2.4	(C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling. - Major compliance -	The Felda settlers are having an agreement with other Felda's management agencies for example, Felda Technoplant. Therefore, the settlers are considered as scheme smallholders to those agencies but not to FGV. Thus, this indicator is not applicable to this certification unit since the settlers are out of their scope.	Not applicable
5.2.5	The unit of certification regularly reviews and publicly reports on the progress of the Smallholder support programme. - Minor compliance -	Since the program mentioned in Indicator 5.2.3 was just developed, the implementation progress has yet to be seen. Nonetheless, the management of the certification unit shall regularly review the progress.	Complied
Principle 6: Respect workers' rights and conditions			
Criterion 6.1: Any form of discrimination is prohibited.			
6.1.1	(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. - Major compliance -	As documented in FGV Holdings Berhad Group Sustainability Policy, Doc. No.: FGV/SED/POL/001, Rev 3, effective date: 29.05.2019, Chapter 5.1.2 – Responsible Employment. Policy displayed publicly in strategic locations within all operating units and communicated directly to employees as well as through general assembly and relevant meetings.	Complied

6.1.2	<p>(C) Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against including charging of recruitment fees for foreign workers.</p> <p>- Major compliance -</p>	<p>No discrimination practices sighted; workers are hired based on skill and experience and not based on race, caste, origin, religion, disability, gender, sexual orientation, union membership, age, etc. and treated fairly without any signs of discrimination in terms of work assignment, pay, promotion, etc.</p> <p>Manual Lestari 1A, Doc. No.: ML-1A/L2-PR10(1), dated March 2012 – Handling Complaint through Gender Committee Procedure is in place to guide the process of complaints received.</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>As documented in FGV Holdings Berhad Group Sustainability Policy, Doc. No.: FGV/SED/POL/001, Rev 3, effective date: 29.05.2019, Chapter 5.1.2 – Responsible Employment, where hiring and selection of workers during recruitment is based on skill, minimum age, medical fitness and work experience. Performance review is conducted annually and documented in Performance Appraisal Form: PMS2018.</p> <p>Interviewed with the workers consisted of different nationalities and different gender confirmed that they are treated equally without any discrimination. The workers were provided with standard benefits/treatment such as free medical treatment, fair overtime offered to all the workers whoever want to work and free housing to everyone.</p>	Complied
6.1.4	<p>Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women.</p> <p>- Minor compliance -</p>	<p>There is no woman works in mill process and estate operation. Women mainly works in mill and estates offices. No pregnancy test been conducted for job selection. Pregnant worker will still be offered to continue work in office or light work. This is confirmed through the interview session with Gender Committee member.</p>	Complied

6.1.5	(C) A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women. - Major compliance -	As per "Carta Alir Proses Aduan; Talian Nur (Kementerian Pembangunan Wanita, Keluarga & Masyarakat)" and the procedure as following: Manual Lestari 1A; 3.11 "Prosedur Menangani Aduan Melalui Jawatankuasa Wanita"; Doc. No.: FGV/ML-1A/L2-PR14; Date revised: 01/06/2016 and documented procedure for workers to raise their concern, complain and suggestion of improvement, either with their identity or anonymously. Gender committee for Keratong POM established and led by Puan Rulbiah Binti Ruslan. Appointment letter dated 12/05/2019 Doc. No: ()RSPO/Krtg3 sighted. Sighted the Gender Committee Meeting Minutes for Keratong Mill conducted on 17/11/2019, 13/10/2019, 19/09/2019, 10/08/2019, 13/07/2019. In FGVPM Keratong 11 Estate, Puan Nor Azinlina Bt Ihak is appointed as the Gender Committee chairman and the meeting was conducted on 07/03/2019 attended by 10 female workers/ There is no sexual harassment case reported so far in Keratong Complex.	Complied
6.1.6	There is evidence of equal pay for the same work scope. - Minor compliance -	Both man and woman were paid with the same rate under the same job scope. In Mill, the rate or salary is based on experience and grade. Sighted below sampled: <ul style="list-style-type: none">• Keratong POM: Employee ID – 12010XX• Keratong POM: Employee ID – 12040XX	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 national languages (English or Bahasa Malaysia) and explained to them in language they understand. - Major compliance -	For the Keratong Mill, conditions of pay are contained in the Collective Agreement signed between Felda Palm Industries Sdn Bhd and Workers' Union Felda Palm Industries Sdn Bhd Semenanjung valid from 1 January 2019 to 31 December 2021. For non-unionised workers, their conditions of employment are detailed out in their employment contracts. The contracts were prepared in Bahasa Malaysia for the local and Indonesian workers, and in Bengali for the Bangladeshi workers, and they confirmed that the terms were explained to them by a management official.	Complied

		<p>The employment contracts contain contract duration, type of work, annual leave, public holidays, medical leave, termination, location, working hours, wages, (payment of wages based on Kadar Upah Kerja Pekerja Pentadbiran dan Operasi Ladang Bagi Pekerja Ladang FGVMSB (KUK Bil 06 Mulai 01 Januari 2019) and based on the Minimum Wages Order 2019. Payslip, attendance record for month of Jan, Jun & September 2019 were sampled based on the crop summary as listed below.</p> <p>Keratong POM:</p> <ol style="list-style-type: none"> 1. Employee ID: 12010XX 2. Employee ID: 12019XX 3. Employee ID: 12111XX 4. Employee ID: 12072XX 5. Employee ID: 12090XX <p>Keratong 11 Estate:</p> <ol style="list-style-type: none"> 1. Employee ID: FW048304XX 2. Employee ID: LW048300XX 3. Employee ID: FW048304XX 4. Employee ID: FW048303XX 5. Employee ID: FW048304XX 6. Employee ID: FW048304XX 	
6.2.2	(C) Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed. This includes a form of record for work done by family members.	<p>All workers employed under FGV check-roll are hired based on permanent / recognized employment basis that is based on legal regulation and entitlement as per the employment regulation. They were paid with minimum wage based on piece rated, daily rates and monthly rated according to the task they assigned to. Workers are paid once a month, before 7th day of the month and provided with pay-slip, that details their monthly earned wage, deduction, allowance, overtime pay and rate of pay.</p> <p>Payslip, attendance record for month of Jan, Jun & September 2019 were sampled based on the crop summary as listed below.</p>	Complied

	<p>- Major compliance -</p>	<p>Keratong POM:</p> <ol style="list-style-type: none"> 1. Employee ID: 1201042 2. Employee ID: 1201979 3. Employee ID: 1211172 4. Employee ID: 1207229 5. Employee ID: 1209030 <p>Keratong 11 Estate:</p> <ol style="list-style-type: none"> 1. Employee ID: FW04830488 2. Employee ID: LW04830080 3. Employee ID: FW04830410 4. Employee ID: FW04830312 5. Employee ID: FW04830465 6. Employee ID: FW04830486 <p>Interviewed with the workers confirmed that they were understood on the terms and conditions outlined in the employment contract. They were also briefed on the terms and condition during induction training.</p>	
6.2.3	<p>(C) There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements.</p> <p>- Major compliance -</p>	<p>The pay slips sighted in 6.2.2 shows the compliance to Employment Act 1955 and Minimum Wage Order 2018.</p>	Complied
6.2.4	<p>(C) The unit of certification provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. National laws, or in their absence the ILO Guidance on Workers' Housing Recommendation No.</p>	<p>The Keratong Complex provide adequate housing for all its workers. Housing provided to the workers are found to be clean and habitable. Amenities provided include secondary and primary schools, government-run health clinic, children playing ground, mosque, etc. Since the housing is in the FELDA settlement area, accessibility to the basic facilities is not an issue.</p>	Complied

	<p>115, are used. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5years) is allowed to upgrade the infrastructure.</p> <p>- Major compliance -</p>	<p>In Keratong 11 Estate & Keratong Mill, the housing inspection was conducted on weekly basis by HEP staff (Hairul bin Khamisan). The improvement/renovation done in phases according to budget approved.</p> <p>During the housing inspection, it is sighted that the houses has clean water supplies from government, electricity supplies as well as proper toilet and drainage.</p> <p>Also, verified the certificate of fitness for housing occupancy, letter dated 11/11/2019 (Ref no: PLN.PHG.PTK.PKN.06/2019(02) by Jabatan Tenaga Kerja Negeri Pahang for 8 blok x 2 unit (16 unit) for worker's houses in Keratong POM.</p>	
6.2.5	<p>The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.</p> <p>- Minor compliance -</p>	<p>Location of mill and estate were in the FGV Settlers village and access to town is available by public transport to Bandar Tun Razak or Muadzam Shah. Also, sighted that grocery, restaurant and shops are available near the housing area.</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: STATEMENT FROM THE RSPO STANDARDS STANDING COMMITTEE REGARDING INDICATOR 6.2.6 ON DECENT LIVING WAGE (Endorsed by the RSPO BoG on 7th November 2019) With reference to procedural note of indicator 6.2.6, the RSPO has published a guidance on the DLW calculation in June 2019. The RSPO Secretariat will endeavor to carry out DLW country benchmarks for palm oil producing countries in which RSPO members operate and for which no Global Living Wage Coalition (GLWC) benchmarks exist (These benchmarks are developed</p>	<p>FGV has provided the decent living wage for both local and foreign workers based on RSPO GUIDANCE ON CALCULATING PREVAILING WAGES. It includes food, non-food non-house (NFNH), housing, unexpected events, medical, electricity and water utility for a total gross living wage. The payslip sighted in clause 6.2.1 showed that the salary received complied with the minimum wage order 2018 and the decent living wage set up by the group.</p>	Not applicable

<p>based on banana, coffee, floriculture, textile, manufacturing, seafood processing and tea industry. The RSPO is in the process of commissioning benchmarks for Malaysia and Indonesia for the palm oil sector and will develop methods to calculate and/or define DLW applicability for all palm oil producing countries in which RSPO members operate).</p> <p><i>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.</i></p> <p>In the absence of such benchmarks, the RSPO will collaborate with the GLWC and/or local experts on developing oil palm industry benchmarks (Benchmark in this context may include other approaches and/or methods to calculate the applicability of DLW in the country or region in accordance to the RSPO endorsed method for determining a DLW. Local applicability for benchmarks is important and it may differ based on the needs of each locality or country). 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><i>For countries where no living wage standard is established, until such time that an RSPO endorsed</i></p>		
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<p><i>benchmark for the country is in place, national minimum wages shall be paid to all workers. In addition to the payment of minimum wages, the Unit of Certification (UoC) shall conduct an assessment of the prevailing wages and in-kind benefits provided to workers in the Unit of Certification aligned with the RSPO Guidance for Implementing a Decent Living Wage (RSPO Guidance for Implementing a Decent Living Wage. The RSPO will also develop further guidance and tools to calculate DLW in line with the RSPO endorsed methodology which may include independent studies by local experts in their respective region or country).</i></p> <p>Once these 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> <p>Updated assessment on prevailing wages and in-kind benefits</p> <p>There is annual progress on the implementation of living wages</p> <p>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</p> <p>The UoC may choose to implement the living wage payment in a specific section as a pilot project; the pilot</p>		
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	will then be evaluated and adapted before eventual scale up of the living wage implementation. - Minor compliance -		
6.2.7	Permanent, full-time employment is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal. - Minor compliance -	There are no casual workers hired in Keratong POM and supply bases. All employees are permanent employee (for locals) and contracted employee (for foreign workers).	Complied
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.			
6.3.1	(C) A published statement recognising freedom of association and right to collective bargaining in national languages (English and/or Bahasa Malaysia) is available and is explained to all workers, in language that they understand, and is demonstrably implemented. - Major compliance -	At Keratong Complex, the policy recognising freedom of association is available in Bahasa Malaysia entitled Polisi Hak Kebebasan Bersuara & Menganggotai Kesatuan, displayed at the main notice boards at the Mill and Estate offices, near muster ground and near the workers' hostel.	Complied
6.3.2	Minutes of meetings between the unit of certification with trade unions or workers representatives, who are freely elected, are documented in national languages (English and/or Bahasa Malaysia) and made available upon request. - Minor compliance -	The minutes of meeting between the mill management and the committee members of Felda Palm Industries Workers' Union is available. The meetings were held on 28 June 2019 (Mesyuarat Agong Tiga Tahunan Kali Ke 5 Sesi 2019-2022) for Keratong POM and the minute meeting of Worker's Committee was conducted on 04/05/2019 attended by 8 people (01/2019) for year 2019 and 04/12/2019 attended by 8 people. The person in charge (chairman) for Worker's Committee in Keratong 03 POM is Mr. Mohamad Akhyar (Assistant Engineer) as per appointment letter dated 01/10/2019 (Bil: (01)4028/Krt.3/810). In Keratong 11 Estate, the meeting was conducted on 10/01/2019 (Mesyuarat Exco Bil 01/2019).	Complied

6.3.3	<p>Management does not interfere with the formation or operation of registered unions/ labour organisations or associations, or other freely elected representatives for all workers including migrant and contract workers.</p> <p>- Minor compliance -</p>	<p>The workers, without distinction, have the right to join or form trade unions of their own choosing without prior authorization and to bargain collectively. This is also sighted in the minute of meeting a per 6.3.2. on selection of 3 vote checker and 2 branch internal auditor (Keratong POM).</p>	Complied
Criterion 6.4: Children are not employed or exploited.			
6.4.1	<p>A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements.</p> <p>- Minor compliance -</p>	<p>As documented in FGV Holdings Berhad Group Sustainability Policy, Doc. No.: FGV/SED/POL/001, Rev 3, effective date: 29.05.2019, Chapter 5.1.3.1 – Respect for Human Rights. FGV has defined hiring of workers is 18 and above due to the nature of work.</p> <p>Sighted the contractors as below:</p> <ul style="list-style-type: none"> • Keratong 11 Estate = Perniagaan Maju Bera & MFM Afdhal Enterprise. • Keratong POM = Syarikat Perniagaan Hj Yusof Mohd Isha bin Hassan and Sebertak Auto Trading. <p>However, for MFM Afdhal, Syarikat Perniagaan Hj Yusof Mohd Isha bin Hassan and Sebertak Auto Trading didn't have the child labour policy, therefore an NC raised under 2.2.2.</p>	Complied
6.4.2	<p>(C) There is evidence that minimum age requirements are met. Personnel files show that all workers are above the national minimum age or above company policy minimum age, whichever is higher. There is a documented age screening verification procedure.</p> <p>- Major compliance -</p>	<p>Age of workers and candidates are verified against government issue photo ID, passport (for foreign workers) and documented in the personal files. Copy of ID/passport and application form sighted in the personal files evidence of verification is carried out.</p> <p>Sighted the workers list with the details on the worker's age above 18 years old. Personnel file also verified together with the interview conducted.</p>	Complied

6.4.3	(C) Young persons may be employed only for non-hazardous work, with protective restrictions in place for that work. - Major compliance -	This is well mentioned in FGV-SOP on 'Larangan Penggajian Buruh Kanak-Kanak' with Doc. No. FGV/ML-1A/L2-Pr18 issue 1 revision 2 dated 01/04/2019 as in 6.4.2 where the company will not recruit children who less than 15 years old and young worker who less than 18 years (only on certain type of job which is not harmful and dangerous). So far no young worker hired in Keratong POM and Keratong 11 Estate.	Complied
6.4.4	The unit of certification demonstrates communication about its 'no child labour' policy and the negative effects of child labour, and promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live. - Minor compliance -	This is mentioned to all the stakeholders during the stakeholder consultation conducted on 17/10/2019 and its publicly available Group Sustainability in site and website.	Complied
Criterion 6.5: There is no harassment or abuse in the workplace, and reproductive rights are protected.			
6.5.1	(C) A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce. - Major compliance -	FGV Holdings has developed Group Sustainability Policy, Doc. No.: FGV/SED/POL/001, Rev 3, Effective date: 29.05.2019. Under clause 5.16, Gender Equality and Preventing Sexual Harrassment & Violence, FGV group shall not tolerate any form of sexual harassment violence and abuse. Policies communicated to employees during daily muster assembly and meetings as recorded in the muster briefing records on 16/10/2019 to all 28 people (Keratong POM) and on 04/04/2019 to all 126 people (Keratong 11 Estate).	Complied
6.5.2	(C) A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce. - Major compliance -	FGV Holdings has developed Group Sustainability Policy, Doc. No.: FGV/SED/POL/001, Rev 3, Effective date: 29.05.2019. Under clause 5.1.2.1 All employees and workers shall receive equal treatment based on their relevant merits and competency regardless of gender, race, nationality, religion, age, physical condition and marital status, reproductive rights of women, union membership /affiliation /employment status, or political affiliation.	Complied

		Policies communicated to employees during daily muster assembly and meetings as recorded in the muster briefing records on 16/10/2019 to all 28 people (Keratong POM) and on 04/04/2019 to all 126 people (Keratong 11 Estate).	
6.5.3	Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified. - Minor compliance -	<p>FGV has the guideline to assess the needs of new mothers as discussed routinely in the gender committee meeting as below:</p> <ol style="list-style-type: none"> 1. Gender committee for Keratong POM established and led by Puan Rulbiah Binti Ruslan. Appointment letter dated 12/05/2019 Doc. No: ()RSPO/Krtg3 sighted. Sighted the Gender Committee Meeting Minutes for Keratong Mill conducted on 17/11/2019, 13/10/2019, 19/09/2019, 10/08/2019, 13/07/2019. 2. In Keratong 11 Estate, Puan Nor Azinlina Bt Ihak is appointed as the Gender Committee chairman and the meeting was conducted on 07/03/2019 attended by 10 female workers. <p>However, there is no new mother in Keratong POM and Keratong 11 Estate and it is verified during stakeholder consultation and interview session with workers.</p>	Complied
6.5.4	A grievance mechanism, which respects anonymity and protects complainants where requested, is established, implemented and communicated to all levels of the workforce. - Minor compliance -	<p>FGV Whistleblowing Policy (Doc no: FGV/GGD/POL/001 revision 6.0 and effective date 28/05/2018) established the rules and principles for the process of complaint management, investigation and protection for whistleblowing in FGV and its Group of companies.</p> <p>It is mention the protection to whistleblower on:</p> <ul style="list-style-type: none"> • Confidential information and identity of whistleblower • Detrimental action as consequences of whistleblower’s disclosure. <p>Policies communicated to employees during daily muster assembly and meetings as recorded in the muster briefing records on 16/10/2019 to all 28 people (Keratong POM) and on 04/04/2019 to all 126 people (Keratong 11 Estate).</p>	Complied
Criterion 6.6: No forms of forced or trafficked labour are used.			

6.6.1	<p>(C) All workers have entered into employment voluntarily and the following are prohibited:</p> <ul style="list-style-type: none"> • Retention of identity documents or passports (except for administration purposes including legalisation and renewal processes) • Charging the workers for recruitment fees. • Contract substitution • Involuntary overtime • Lack of freedom of workers to resign • Penalty for termination of employment • Debt bondage • Withholding of wages <p>- Major compliance -</p>	<p>Only local workers hired in Keratong POM. The resignation term is for 1-month notice or 1 month pay-in-lieu.</p> <p>Workers' passport are kept by themselves or in the designated locker outside the estate office.</p> <p>As per employment contract seen, the employer will bear the cost of recruitment (fares, operator services, bank guarantee, SPPA insurance, FOMEMA, remuneration family package, endorsement visa, basic needs, temporary accommodation in One Stop Centre Nilai and transportation) as well as levy and work permit.</p> <p>The overtime and working on rest day/public holiday were upon agreed between workers and employer. Sighted the request on working on Sunday letter by Rana Suhel on 22/11/2019 and FFB loading from ramp to lorry on Public Holiday on 09/11/2019 by Mohammad yousuf (Keratong 11 Estate).</p> <p>If workers want to end early before the work contract finished or conduct the undisciplinatory acts, they will need to pay the pro-rated cost of recruitment and work permit fees.</p> <p>Workers are not allowed to work with any individu, institution or organization except FGV during the service duration. If worker is absconded, the employer has the right to terminate the contract and will not responsible with the worker's safety, condition and others.</p>	Complied
6.6.2	<p>(C) Where temporary or migrant workers are employed, a specific labour policy and/or procedures are established and implemented.</p> <p>- Major compliance -</p>	<p>Only local workers hired in Keratong POM. In Keratong 11 Estate, the FGV Group Guidelines and Procedures for Responsible Recruitment of Foreign Workers (Doc No: FGV/FGVPM-JTK/POL/001) is available and implemented. The procedure covers from pre-employment, employment, post-employment.</p>	Complied
Criterion 6.7: The unit of certification ensures that the working environment under its control is safe and without undue risk to health.			
6.7.1	<p>(C) The responsible person(s) for H&S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all</p>	<p>Keratong 3 has appointed En. Azlie Shaftrie Bin Shaari as the Chairman of the Health and Safety at the unit on 15.07.2019.</p> <p>The meetings held are as below:</p>	Complied

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<p>parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded. - Major compliance -</p>	<table border="1"> <thead> <tr> <th>Meeting</th> <th>Date</th> <th>Issues Raised</th> </tr> </thead> <tbody> <tr> <td>OSH Committee Meeting 04/2019</td> <td>Scheduled 9 December 2019</td> <td>Nil</td> </tr> <tr> <td>OSH Committee Meeting 03/2019</td> <td>30 August 2019</td> <td>-Contractors vehicles are prohibited to be parked in the mill area. -Insufficient light at the Press/Kernel plant -Shell Bunker Platform and body have been rusted. -Bomba Water tank is leaking</td> </tr> <tr> <td>OSH Committee Meeting 02/2019</td> <td>30 May 2019</td> <td>-Bee Hive at Digester tank has to be removed. -Workshop Roof is leaking -Sludge Tank at Oil Room is leaking.</td> </tr> </tbody> </table>			Meeting	Date	Issues Raised	OSH Committee Meeting 04/2019	Scheduled 9 December 2019	Nil	OSH Committee Meeting 03/2019	30 August 2019	-Contractors vehicles are prohibited to be parked in the mill area. -Insufficient light at the Press/Kernel plant -Shell Bunker Platform and body have been rusted. -Bomba Water tank is leaking	OSH Committee Meeting 02/2019	30 May 2019	-Bee Hive at Digester tank has to be removed. -Workshop Roof is leaking -Sludge Tank at Oil Room is leaking.
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	<p>Keratong 11 Estate has appointed En. Kadausman bin Tumin as the Chairman of the Health and Safety at the unit on 03.Jan.2019</p> <p>A total of 4 Safety and Health Meeting was conducted for the year 2019. The issues raised are as follows :</p>														
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		Mesyuarat KKP 02/2019	14.05.2019	<ul style="list-style-type: none"> - Usage of Sickle Scabbard - Usage of Safety Shoes - Employees Safety - Compliance to PPE usage. 	
		Mesyuarat KKP 01/2019	26.02.2019	<ul style="list-style-type: none"> - Usage of VEST - Usage of Sickle Scabbard - Employees Safety 	
6.7.2	<p>Accident and emergency procedures are in place and instructions are clearly understood by all workers. Accident procedures are available in national languages (English and/or Bahasa Malaysia) and explained in the language understandable to the workforce. Assigned operatives trained in first aid are present in both field and other operations, and first aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.</p> <p>- Minor compliance -</p>	<p><u>FGVPISB Keratong 11 POM</u></p> <p>Procedure for Emergency Response Plan (ERP) was established and defined in procedure Prosedur Kerja Selamat – Pertolongan Cemas (Doc. Number – FPI-PK-035).</p> <p>The following emergency response plan was available addressing the following incidents :</p> <ul style="list-style-type: none"> • CPO leakage/spillage • Diesel leakage/spillage • Fire breakout at the mill • Collapse of building/roofing • Industrial accident <p>Latest fire evacuation drill was done on 03/04/2019 at Keratong 3 POM. Firefighting system inspection carried on quarterly basis. The inspection includes fire extinguisher inspection, fire hydrant and hose reel. Fire Extinguisher sampled showed expiry date 15.03.2020. Accident and emergency procedures have been communicated to employees. Workers trained in First Aid were present in the mill operation.</p> <p>Records of accidents are kept and reviewed in the OSH Meeting every 3 months as sighted in the meeting minutes.</p>			Complied

		<p><u>FGVPM Keratong 11 Estate</u></p> <p>The Emergency Response Plan for Minor Accidents, Fire, Spillage and Poisoning was established in the FGV Emergency Response Procedure (Menghadapi Kecemasan) – FGV/ML-1A/L2-Pr15. The estate also has a list of personals to contact in case of an emergency.</p>																													
<p>6.7.3</p>	<p>(C) Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.</p> <p>- Major compliance -</p>	<p>Operators for Keratong 3 POM have been provided with proper Personal Protective Equipment. Observed during site visit, the PPE provided to the operators such as safety boots, safety helmets, ear plugs, face shield and leather gloves. Additional, the operators have been given training regarding the usage, safety and health issue by the Mill Manager with knowledge on Safe Operating Procedure. Sanitation facilities are available for those handling chemicals in the form of a shower room.</p> <p>Issuance of PPE for the Sampled personals are as below :-</p> <table border="1" data-bbox="960 831 1912 1259"> <thead> <tr> <th>NO</th> <th>NAME</th> <th>DESIGNATION</th> <th>PPE</th> <th>DATE ISSUED</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>MD. NOR RAZALI</td> <td>BOILER CHARGEMAN</td> <td>HAND GLOVES</td> <td>16.11.2019</td> </tr> <tr> <td>2</td> <td>ABDUL SAMAD BIN YUSOF</td> <td>ELECTRICAL</td> <td>SAFETY BOOTS</td> <td>03.07.2019</td> </tr> <tr> <td>3</td> <td>AZMAN BIN SARBAINI</td> <td>FITTER MECHANIC</td> <td>HAND GLOVES</td> <td>10.10.2019</td> </tr> <tr> <td>4</td> <td>MOHAMMAD TARMIZI BIN SUBRE</td> <td>APPERANTICE MECHANICAL</td> <td>HAND GLOVES</td> <td>16.11.2019</td> </tr> </tbody> </table> <p>Training Records for usage of PPE are as below :-</p> <table border="1" data-bbox="960 1350 1912 1393"> <thead> <tr> <th>NO</th> <th>COURSE</th> <th>DATE</th> </tr> </thead> <tbody> </tbody> </table>	NO	NAME	DESIGNATION	PPE	DATE ISSUED	1	MD. NOR RAZALI	BOILER CHARGEMAN	HAND GLOVES	16.11.2019	2	ABDUL SAMAD BIN YUSOF	ELECTRICAL	SAFETY BOOTS	03.07.2019	3	AZMAN BIN SARBAINI	FITTER MECHANIC	HAND GLOVES	10.10.2019	4	MOHAMMAD TARMIZI BIN SUBRE	APPERANTICE MECHANICAL	HAND GLOVES	16.11.2019	NO	COURSE	DATE	<p>Complied</p>
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1.	FITTER MEKANIK – SAFE OPERATING PROCEDURES	12.07.2019																	
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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 Malaysian law.</p> <p>- Minor compliance -</p>	<p>Operators for Keratong 11 Estate have been provided with proper Personal Protective Equipment. Observed during site visit, the PPE provided to the operators such as safety boots and safety helmets. Additional, the operators have been given training regarding the usage, safety and health issue by the Manager with knowledge on Safe Operating Procedure. Sanitation facilities are available for those handling chemicals in the form of a shower room, PPE room where they store the PPE that are currently being used.</p> <p>Medical care is provided to all the employees. All workers are covered under SOCSO scheme as stated in their contract agreement. Payment of SOCSO is done at HQ level. Sample of social security (SOCSO) were checked via the deduction stated in the payslips:</p> <p>No foreign workers employed at Keratong 3 POM. Checked social security payment on sampled workers as below:</p> <table border="1"> <thead> <tr> <th>NO</th> <th>NAME</th> <th>MONTH</th> <th>CONTRIBUTION</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Azman Bin Mohd Serbani</td> <td>February 2019</td> <td>RM 19.75</td> </tr> <tr> <td>2</td> <td>Mohammad Tarmizi Bin Subre</td> <td>February 2019</td> <td>RM 8.75</td> </tr> <tr> <td>3</td> <td>Mohd Roslan Bin Ahmad</td> <td>February 2019</td> <td>RM 8.75</td> </tr> </tbody> </table> <p><u>FGVPM Keratong 11 Estate</u></p> <p>Checked social security payment, "Jadual Caruman" @ 8A form for September 2019 involving 39 workers amounting to Rm 753.60 (Employer) and RM 83.60 (Employee)</p>	NO	NAME	MONTH	CONTRIBUTION	1	Azman Bin Mohd Serbani	February 2019	RM 19.75	2	Mohammad Tarmizi Bin Subre	February 2019	RM 8.75	3	Mohd Roslan Bin Ahmad	February 2019	RM 8.75	Complied
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3	Mohd Roslan Bin Ahmad	February 2019	RM 8.75																

6.7.5	Occupational injuries are recorded using Lost Time Accident (LTA) metrics. - Minor compliance -	Records on Lost Time Accident (LTA) metrics displayed at the operating units through Safety Statistic Billboard. Sample of accident statistic as shown below <table border="1" data-bbox="965 440 1800 592"> <tr> <td></td> <td>Keratong 3 POM</td> <td>Keratong 11 Estate</td> </tr> <tr> <td>2018</td> <td>1 case (44 days)</td> <td>1 Case (94 days)</td> </tr> <tr> <td>2019 - todate</td> <td>1 case (57 days)</td> <td>0 Case</td> </tr> </table>		Keratong 3 POM	Keratong 11 Estate	2018	1 case (44 days)	1 Case (94 days)	2019 - todate	1 case (57 days)	0 Case	Complied
	Keratong 3 POM	Keratong 11 Estate										
2018	1 case (44 days)	1 Case (94 days)										
2019 - todate	1 case (57 days)	0 Case										
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	(C) IPM plans are implemented and monitored to ensure effective pest control. - Major compliance -	An IPM plan is implemented and available in the "Pelan Pengurusan Kawalan Serangan Makhluk Perosak Tanaman Bersepadu (IPM)" for the year 2019.	Complied									
7.1.2	Species referenced in the Global Invasive Species Database and CABI.org are not to be used in managed areas, unless plans to prevent and monitor their spread are implemented. - Minor compliance -	There are no species under the Global Invasive Database and CABI.org within the estate and mill premises.	Complied									
7.1.3	There is no use of fire for pest control unless in exceptional circumstances such as plantation sanitation, i.e. where no other effective methods exist, and with prior approval of government authorities. - Minor compliance -	There are no use of fire for pest control.	Complied									
Criterion 7.2: Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.												
7.2.1	(C) Justification of all pesticides used is demonstrated. Selective products and application methods that are	Pesticide used are justified and recorded in the Chemical Register 2019.	Complied									

	<p>specific to the target pest, weed or disease are prioritised.</p> <p>- Major compliance -</p>		
7.2.2	<p>(C) Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) are provided.</p> <p>- Major compliance -</p>	<p>The active ingredients are monitored through the "Rekod Racun 5 tahun & Pengiraan a.i/hektar & a.i/tan bts and is monitored on a monthly basis.</p>	Complied
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>- Major compliance -</p>	<p>The management encourage establishing biological control as per IPM plan. No prophylactic type of pesticide used in the estate. The implementation in the field is consistent with the MLSL.</p>	Complied
7.2.4	<p>There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines.</p> <p>- Minor compliance -</p>	<p>The management encourage establishing biological control as per IPM plan. No prophylactic type of pesticide used in the estate. The implementation in the field is consistent with the MLSL.</p>	Complied
7.2.5	<p>Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, are not used, unless in exceptional 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"> • Judgment of the threat and verify why this is a major threat • Why there is no other alternative which can be used 	<p>Paraquat was eliminated. Alternatives such as Glyphosate were used with the elimination of Paraquat. Based on the latest chemical register only class III & IV chemical used at FGVPM Keratong 11 Estate.</p>	Complied

	<ul style="list-style-type: none"> • Which process was applied to verify why there is no other less hazardous alternative • What is the process to limit the negative impacts of the application • Estimation of the timescale of the application and steps taken to limit application to the specific outbreak. <p>- Minor compliance -</p>		
7.2.6	<p>(C) Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criteria 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they carry out.</p> <p>- Major compliance -</p>	<p>Pesticides were handled, used or applied by trained workers applied in accordance with the product label. Appropriate safety and application equipment were provided and used. Sample of chemical safety data sheet (SDS) checked and available during site visit. All precautions attached to the products (SDS, notice board etc) were properly observed, applied, and understood by workers based on the interview with staff and workers at visited estates.</p>	Complied
7.2.7	<p>(C) Storage of all pesticides is in accordance with recognised best practices.</p> <p>- Major compliance -</p>	<p>FGVPISB Keratong 3 POM continued to ensure all new and requiring balance of remaining solution to be kept under lock and key. During visit it was noted that all the remaining chemicals are kept in the store and securely locked and comply with regulation. The used containers are returned back to the supplier.</p> <p>The chemical SDS was sampled. (Soda Ash – 11.01.2018, Industrial Salt – 13.04.2018) which is applicable for 5 years.</p> <p>FGVPM Keratong 11 estate continued to ensure all new and requiring balance of remaining solution to be kept under lock and key. Special designated storage area is provided if there is any class 1A and 1B used in the estate which they do not have at the moment. During visit it was noted that all the remaining pesticides are kept in the store and securely locked and comply with regulation. Most of the</p>	Complied

		empty pesticides containers are used for pre-mixing. Disposal only will be made through DOE licensed contractor.	
7.2.8	All pesticide containers are triple rinsed and punctured before being disposed of and/or handled responsibly if used for other purposes. - Minor compliance -	FGVPISB Keratong 3 POM – The chemical drums used are returned to the suppliers. The Mill maintains an inventory of the used containers in the “Tong Drum Pelincir Terpakai” book. Keratong 11 Estate – Pesticide containers are reused as premix containers and the excess are disposed through DOE licensed contractor.	Complied
7.2.9	(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. - Major compliance -	FGVPISB Keratong 3 POM – Not Applicable FGVPM Keratong 11 Estate – Not Applicable	Complied
7.2.10	(C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated. - Major compliance -	FGVPISB Keratong 3 POM Medical surveillance was last done on 11.07.2019 for employees handling 2,5-Hexanedione by OHD DOSH under Klinik Bukit Jelutong. All workers sent for medical surveillance are fit to work with no detrimental of health. FGVPM Keratong 11 Estate Medical surveillance was last done on 17/11/2019 for workers from chemical sprayer, supervisors and store unit operators by OHD DOSH Reg. No. JKPP HQ/08/DOC/00/545 under Klinik Segamat. All workers sent for medical surveillance are fit to work with no detrimental of health.	Complied
7.2.11	(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. - Major compliance -	No work with pesticides is undertaken by persons under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions in the Mill and Estate.	Complied
Criterion 7.3: Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.			

7.3.1	<p>A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.</p> <p>- Minor compliance -</p>	<p>The types of wastes were generally identified through the evaluation of environmental aspect and impact as mentioned in Indicator 3.4.2. Thereafter, documented in "<i>Pelan Pengurusan Sisa Domestik dan Bahan Buangan</i>" (Management Plan for Domestic Wastes and Waste Products) form. The form has the information about:</p> <ul style="list-style-type: none"> Type of wastes – e.g. fertilizer bags, plastic, glass, iron, paper, used PPE, HDPE containers, organic wastes, POME, EFB, shell, fibre, used oil, used oil filter Method of disposal – generally to reduce, reuse and recycle <p>Apart from that, there is also a procedure entitled "<i>Pelupusan Sisa Domestik</i>" (Domestic Wastes Disposal) [FGV/ML-1A/L2-Pr23, issue 1, rev. 0, 1/6/2016] and "<i>Garis Panduan Pembinaan Lubang Sampah</i>" (Guideline for Landfill Preparation" (ML-1A/L3-GP2(0), rev. 0, 1/6/2016) used as guidance to avoid or reduce pollution. Based on site visit at the landfill at Keratong 3 Estate, it was observed that the rubbish pit is located far from residential area and natural waterway.</p>	Complied
7.3.2	<p>Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.</p> <p>- Minor compliance -</p>	<p>Pesticide empty containers, waste oil, used filters, etc. were seen to be kept in locked designated waste store. Disposal of waste material are in accordance with procedure and legal requirement.</p>	Complied
7.3.3	<p>The unit of certification does not use open fire for waste disposal.</p> <p>- Minor compliance -</p>	<p>There was no use of fire for disposal of wastes observed in the operating unit.</p>	Complied
<p>Criterion 7.4: Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.</p>			
7.4.1	<p>Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts.</p> <p>- Minor compliance -</p>	<p>Management of soil fertility is guided by FGV's "<i>Manual Ladang Sawit Lestari</i>" (Oil Palm Plantation Sustainability Manual), Third Edition (2017), Section V: Manuring. It covers the applications of fertiliser for various stages of palm age and techniques. Recommendation of type of fertilisers and dosage is given by the agronomy unit through analysis of foliar and soil.</p>	Complied

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.</p> <p>- Minor compliance -</p>	<p>Soil and Leaf Sampling was done on 25 and 26 September 2018 to monitor the changes in soil fertility and plant health as well as to generate the Manuring Recommendation.</p> <p>The Tissue and Soil Sampling is to be done on a yearly basis. FGV Plantations (M) Sdn Bhd have issued a circular dated 06.12.2019 undersigned by the Chief Executive Officer, that states there would be no sampling done for the year due to the access fertiliser available and the application of the fertiliser will be in accordance to the recommendation provided in the mentioned circular.</p>	Complied
7.4.3	<p>A nutrient recycling strategy is in place, which includes the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers.</p> <p>- Minor compliance -</p>	<p>Application of EFB was in place as part of the nutrient recycling strategy. Records of mulching was recorded in EFB Records where information such as quantity of EFB and Field number is available. Apart from that, the mill also sell its EFB to neighbouring estates for mulching purposes.</p>	Complied
7.4.4	<p>Records of fertiliser inputs are maintained.</p> <p>- Minor compliance -</p>	<p>Straight, compound and mix fertilizer are used at the estate. Progress of fertiliser application is recorded in "Buku Rekod Kerja Penaburan Baja" (Manuring Records Book). Based on sampled records, the progress of manuring was in line with the programme.</p>	Complied
<p>Criterion 7.5: Practices minimise and control erosion and degradation of soils.</p>			
7.5.1	<p>(C) Maps identifying marginal and fragile soils, including steep terrain, are available.</p> <p>- Major compliance -</p>	<p>A map identifying the types of soil is available within the estate. The estate does not have an established terrain map for the area under their management</p>	Major non-conformance
7.5.2	<p>No replanting on steep slopes (above 25 degrees) unless approved by state governments. In case of replanting is permitted, no replanting in contiguous area of steep terrain (greater than 25 degrees) larger than 25 Ha within the Unit of Certification.</p> <p>- Minor compliance -</p>	<p>There is no replanting done in the estate as of the audit date. However, replanting has been programmed for the year 2020. Finding on the unavailability of a terrain map has been raised in 7.5.1.</p>	Complied

7.5.3	There is no new planting of oil palm on steep terrain. - Minor compliance -	No New planting within the estate since 15 Nov 2019.	Complied
Criterion 7.6: Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.			
7.6.1	(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. - Major compliance -	Soil maps were available at FGVPM Keratong 11 Estate. Based on the maps, 100% of the soil at the estate is of mineral type. There is no soils categorized as fragile or marginal.	Complied
7.6.2	Extensive planting on marginal and fragile soils, is avoided, or, if necessary, done in accordance with the soil management plan for best practices. - Minor compliance -	Not applicable as there are no marginal or fragile soils within the estate as indicated in the soil map.	Not applicable
7.6.3	Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure. - Minor compliance -	Not applicable as there are no marginal or fragile soils within the estate as indicated in the soil map.	Not applicable
Criterion 7.7: No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.			
7.7.1	(C) There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas. - Major compliance -	Not Applicable as there is no peat soil within the estate	Not applicable
7.7.2	Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat.	Not Applicable as there is no peat soil within the estate	Not applicable

	<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>		
7.7.3	<p>(C) Subsidence of peat is monitored, documented and minimised.</p> <p>- Major compliance -</p>	Not Applicable as there is no peat soil within the estate	Not applicable
7.7.4	<p>(C) A documented water and ground cover management programme is in place.</p> <p>- Major compliance -</p>	Not Applicable as there is no peat soil within the estate	Not applicable
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>This is subject to transitional (5 years: 2019 to 2024) arrangement stated in the Drainability Assessment Procedure.</p> <p>Within 12 months initial implementation period, company could submit other alternate methodologies to be considered by RSPO for recognition.</p>	Not Applicable as there is no peat soil within the estate	Not applicable

	- Major compliance -		
7.7.6	(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 (2019) and associated audit guidance. - Major compliance -	Not Applicable as there is no peat soil within the estate	Not applicable
7.7.7	(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 (2019) and associated audit guidance. - Major compliance -	Not Applicable as there is no peat soil within the estate	Not applicable
Criterion 7.8: Practices maintain the quality and availability of surface and groundwater.			
7.8.1	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: a) The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities. b) Workers have adequate access to clean water. - Minor compliance -	Pelan Pengurusan Air Kilang Sawit Keratong was sighted. The plan consists of the management of quality and availability of water which inclusive of identifying source of water used, efficiency of water usage, identifying of renewable water source and impact to water catchment area and stakeholders as well as action plan of water shortage in employee's housing area. Implementation can be seen with availability of records on the monitoring of water usage, monitoring of rainfall and water shortage contingency plan. At Keratong 11 Estate, the plan was documented in " <i>Pelan Tindakan Pengurusan Air Ladang Felda Keratong Sebelas</i> ". The water management plan involved quality and availability established for both plantation field and housing/office area. The contingency plan for availability of water in housing/office area are as following:	Complied

		<ul style="list-style-type: none"> • Reporting water supply shortage to nearest supplier (Water Supply Department-WSD) • Providing sufficient water storage tank • Requesting WSD to deliver water tank for housing/office use <p>Clean water is supplied directly to the workers housing from the local water supply company.</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>- Major compliance -</p>	<p>Protection of water course is guided by its established procedure [Ref.: <i>Pengenalpastian Kawasan Cerun dan Rizab Sungai</i> [ML-1A/L2-Pr8(0), rev.. 0, 1/6/2016)]. Based on the procedure, the width of buffer zones to be established are as follows:</p> <table border="1" data-bbox="958 735 1738 1034"> <thead> <tr> <th>River width (m)</th> <th>Buffer zones (m)</th> </tr> </thead> <tbody> <tr> <td>> 40</td> <td>50</td> </tr> <tr> <td>20 – 40</td> <td>40</td> </tr> <tr> <td>10 – 20</td> <td>20</td> </tr> <tr> <td>5 – 10</td> <td>10</td> </tr> <tr> <td>< 5</td> <td>5</td> </tr> </tbody> </table> <p>Nonetheless, there is no river crossing Keratong 11 Estate. Thus, establishment of buffer zone is not necessary.</p>	River width (m)	Buffer zones (m)	> 40	50	20 – 40	40	10 – 20	20	5 – 10	10	< 5	5	Complied
River width (m)	Buffer zones (m)														
> 40	50														
20 – 40	40														
10 – 20	20														
5 – 10	10														
< 5	5														
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.</p> <p>- Minor compliance -</p>	<p>The mill applies the biological system with anaerobic lagoon and tertiary plant (membrane plant) in series for its treatment of effluent. The quality of discharged effluent was analysed every month and the parameters are T, pH, BOD, COD, TS, SS, O&G, AN and TN. Based on quarterly report to the DOE, generally the mill has complied with the regulated limit.</p>	Complied												

7.8.4	Mill water use per tonne of FFB is monitored and recorded. - Minor compliance -	The mill has been monitoring its consumption of water on daily basis. Based on the daily records, the consumption is as follows: <ul style="list-style-type: none"> • 2018: 1.46 mt/mt FFB • 2019 (as at November): 1.21 mt/mt FFB 	Complied
Criterion 7.9: Efficiency of fossil fuel use and the use of renewable energy is optimised			
7.9.1	A plan for efficiency of the use of fossil fuels and to optimise renewable energy is implemented, monitored and documented. - Minor compliance -	The mill and estates consistently monitored their fossil fuel consumption and kept records in order to get the information about efficient consumption. Among the management plans to improve efficiency were to ensure mill operation is running smoothly without interruption, therefore maximise the usage of turbine and eventually minimise the usage of generator set; to practice maintenance of machinery (such as tractors, vehicles and shovel) on schedule and continuous education to operators who handle the machinery so that the unnecessary running hours can be minimised	Complied
Criterion 7.10: Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.			
7.10.1	(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. - Major compliance -	Identification of significant pollutants and greenhouse gas (GHG) emissions has been done e.g. POME, diesel/fuel and fertilizer. Their usage have been recorded and documented at each of the operating units. The plan to reduce or minimise the GHG emission has been established and implemented. Among the action plans were: <ul style="list-style-type: none"> To optimise the usage of diesel To conduct training to the employees on chemical handling To send only organic wastes to the landfill Monitoring and reporting of the significant pollutants to water, gaseous emissions to air and contamination on land are in place. Tools and systems used include the DOE online CEMS monitoring for air emissions, water quality at discharge points as per DID regulations and SW disposal were adhering to DOE requirements. Water samples were regularly taken every month and tested by mill environment	Complied

		<p>officer in charge and analysed to ensure compliance to DOE requirements at final discharge points.</p> <p>Monitoring of the GHG quantity was done through RSPO PalmGHG Calculator Version 3.0.1 which is submitted to the RSPO Secretariat. Based on verification of various record, the data in the RSPO PalmGHG Calculator was correct.</p>	
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>- Major compliance -</p>	<p>Not applicable since no new development by the certification unit.</p>	Complied
7.10.3	<p>(C) Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored.</p> <p>- Major compliance -</p>	<p>Other significant pollutant identified is the smoke emission from boiler operation. The mill currently is using multi-stage dust cyclone to minimise the pollutant. Monitoring of quality is done through regular stack sampling. Verification of the stack sampling reports shows that the mill complied with the regulated limit.</p>	Complied
Criterion 7.11: Fire is not used for preparing land and is prevented in the managed area			
7.11.1	<p>(C) Land for new planting or replanting is not prepared by burning.</p> <p>- Major compliance -</p>	<p>Based on the visit at the replanting areas, there was no sign of fire being used for preparing the land.</p>	Complied
7.11.2	<p>The unit of certification establishes fire prevention and control measures for the areas directly managed by the unit of certification.</p> <p>- Minor compliance -</p>	<p>Apart from having zero burning policy at corporate level, contractors who are engaged to carry out preparation of land for replanting are also required not to use fire throughout the task through enforceable contract agreement.</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>Adjacent stakeholders were approached through stakeholder consultation meeting and given information about zero burning policy.</p>	Complied

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.			
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>- Major compliance -</p>	Not applicable since there is no land clearing after November 2005.	Not applicable
7.12.2	<p>(C) HCVs, HCS forests and other conservation areas are identified as follows:</p> <p>a) For existing plantations with an HCV assessment conducted by an RSPO-approved assessor and no new land clearing after 15 November 2018, the current HCV assessment of those plantations remains valid.</p> <p>b) Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the HCSA Toolkit and the HCV-HCSA Assessment Manual. This will include stakeholder consultation and take into account wider landscape-level considerations.</p> <p>PROCEDURAL NOTE: Requirement is further clarified under the Interpretation of Indicator 7.12.2 and Annex 5 (approved by BOG on 12 June 2019).</p> <p>- Major compliance -</p>	<p>Assessment on biodiversity value was conducted by CCD Unit, FGVH Bhd on 2/9/2014. It was updated by an internal executive from FGV HQ on 27/12/2017. Based on the report, HCV or RTE were reported to be absence at Keratong 11 Estate. Although no RTE or HCV, management plan is still addressed in "<i>Pelan Pengurusan biodiversiti Ladang FGVPM Keratong 11 (2017-2022)</i>". The estate has identified hotspot such as boundary with forest reserve, estate drainage and uneconomical area. Monitoring of presence of wildlife is carried out by the staff from time to time.</p>	Complied

7.12.3	<i>Indicator is not applicable in Malaysia context</i>	This indicator is not applicable since there is no indigenous people nor local community nearby.	Not applicable
7.12.4	(C) Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An integrated management plan to protect and/or enhance HCVs, HCS forests, peatland and other conservation areas is developed, implemented and 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). - Major compliance -	Based on the report mentioned in Indicator 7.12.2, there is no HCV or RTE presence at Keratong 11 Estate. Nonetheless, since the estate is located next to FR Lesong, there is a potential of encroachment of wildlife. The management plan is still addressed in " <i>Pelan Pengurusan biodiversiti Ladang FGVPM Keratong 11 (2017-2022)</i> ". The estate has identified hotspot such as boundary with forest reserve, estate drainage and uneconomical area. Monitoring of presence of wildlife is carried out by the staff from time to time.	Complied
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 agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas. - Minor compliance -	Based on the report mentioned in Indicator 7.12.2, there is no HCV or RTE presence at Keratong 11 Estate.	Complied
7.12.6	All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and	Based on the report mentioned in Indicator 7.12.2, there is no HCV or RTE presence at Keratong 11 Estate. Nonetheless, employees are educated through morning briefing and signange about the restriction of hunting wildlife.	Complied

	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. - Minor compliance -		
7.12.7	The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan. - Minor compliance -	Based on the report mentioned in Indicator 7.12.2, there is no HCV or RTE presence at Keratong 11 Estate. The management plan is still addressed in " <i>Pelan Pengurusan biodiversiti Ladang FGVPM Keratong 11 (2017-2022)</i> ". The estate has identified hotspot such as boundary with forest reserve, estate drainage and uneconomical area. Monitoring of presence of wildlife is carried out by the staff from time to time. Based on the report, there was no RTE species spotted.	Complied
7.12.8	(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. - Major compliance -	Not applicable since there is no land clearing after November 2005.	Not applicable

Appendix B: Approved Time Bound Plan

Time Bound Plan Forecast For RSPO Certification of All FGV Palm Oil Mills & Supply Bases					
	Palm Oil Mill	Supply bases (estates, plantations, associations)			
		Internal			
		FFB Supplier	Certification Year	Certification standard	Status
1	KS Selancar 2B	FGVPM Selancar 06	2017	MYNI 2019	Certified
		FGVPM Selancar 08	2017	MYNI 2019	
		FGVPM Selancar 09	2017	MYNI 2019	
2	KS Aring A	FGVPM Aring 02	2017	MYNI 2019	Certified
		FGVPM Aring 03	2017	MYNI 2019	
		FGVPM Aring 04	2017	MYNI 2019	
		FGVPM Aring 05	2017	MYNI 2019	
		FGVPM Aring 06	2017	MYNI 2019	
		FGVPM Aring 08	2017	MYNI 2019	
		FGVPM Aring 10	2017	MYNI 2019	
		FGVPM Aring 11	2017	MYNI 2019	
3	KS Selendang	FGVPM Selendang 3	2017	MYNI 2019	Certified
		FGVPM Selendang 4	2017	MYNI 2019	
		FGVPM Selendang 5	2017	MYNI 2019	
		FGVPM Berabong 1	2017	MYNI 2019	
4	KS Bukit Sagu	FGVPM Bukit Sagu 04	2017	MYNI 2019	Certified
		FGVPM Bukit Sagu 06	2017	MYNI 2019	
		FGVPM Bukit Sagu 07	2017	MYNI 2019	
		FGVPM Bukit Sagu 08	2017	MYNI 2019	
5	KS Keratong 9	FGVPM Bera Selatan 05	2017	MYNI 2019	Certified
		FGVPM Bera Selatan 07	2017	MYNI 2019	
		FGVPM Merchong	2017	MYNI 2019	
		FGVPM Keratong Timur	2017	MYNI 2019	
		FASSB Merchong	2017	MYNI 2019	
6	KS Lepar Utara 6	FGVPM Lepar Utara 07	2017	MYNI 2019	Certified
		FGVPM Lepar Utara 08	2017	MYNI 2019	
		FGVPM Lepar Utara 09	2017	MYNI 2019	
		FGVPM Lepar Utara 11	2017	MYNI 2019	
7	KS Maokil	FGVPM Maokil 6	2018	MYNI 2019	Certified

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	Palm Oil Mill	Supply bases (estates, plantations, associations)			
		Internal			
		FFB Supplier	Certification Year	Certification standard	Status
		FGVPM Maokil 7	2018	MYNI 2019	
8	KS Kemasul	FGVPM Mengkarak 1	2018	MYNI 2019	Certified
		FGVPM Mengkarak 2	2018	MYNI 2019	
9	KS Krau	FGVPM Krau 2	2018	MYNI 2019	Certified
		FGVPM Krau 4	2018	MYNI 2019	
10	KS Lepar Hilir	FGVPM Lepar Hilir 5	2017	MYNI 2019	Certified
		FGVPM Lepar Hilir 6	2017	MYNI 2019	
		FGVPM Lepar Hilir 8	2017	MYNI 2019	
11	KS Triang	FGVPM Triang 2	2017	MYNI 2019	Certified
		FGVPM Triang Selatan 1	2017	MYNI 2019	
		FGVPM Triang 4	2017	MYNI 2019	
12	KS Kechau B	FGVPM Kechau 02	2017	MYNI 2019	Certified
		FGVPM Kechau 03	2017	MYNI 2019	
		FGVPM Kechau 06	2017	MYNI 2019	
		FGVPM Kechau 07	2017	MYNI 2019	
		FGVPM Kechau 08	2017	MYNI 2019	
		FGVPM Kechau 09	2017	MYNI 2019	
		FGVPM Kechau 10	2017	MYNI 2019	
		FGVPM Kechau 11	2017	MYNI 2019	
		FGVPM Telang 01	2017	MYNI 2019	
		FGVPM Chegar Perah 02	2017	MYNI 2019	
		FASSB Telang	2017	MYNI 2019	
13	KS Palong Timur	FGVPM Palong Timur 4/5	2018	MYNI 2019	Certified
		FGVPM Palong Timur 6	2018	MYNI 2019	
14	Besout	FGVPM Besout 06	2018	MYNI 2019	Certified
		FGVPM Besout 07	2018	MYNI 2019	
15	KS Neram	FGVPM Cherul 03	2018	MYNI 2019	Certified
16	KS Chini 3	FGVPM Terapai 1	2018	MYNI 2019	Certified
		FGVPM Chini Timur 4	2018	MYNI 2019	
17	KS Chiku	FGVPM Ciku 4	2018	MYNI 2019	Certified
		FGVPM Ciku 8	2018	MYNI 2019	

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	Palm Oil Mill	Supply bases (estates, plantations, associations)			
		Internal			
		FFB Supplier	Certification Year	Certification standard	Status
18	KS Keratong 2	FGVPM Bera Selatan 3	2018	MYNI 2019	Certified
19	KS Serting	FGVPM Palong 17	2018	MYNI 2019	Certified
		FGVPM Palong 18	2018	MYNI 2019	
		FGVPM Palong 21	2018	MYNI 2019	
		FGVPM Serting Hilir 08	2018	MYNI 2019	
20	KS Keratong 3	FGVPM Keratong 11	2018	MYNI 2019	Certified
21	KS Kerteh	FASSB Kerteh	2019	MYNI 2019	Certified
		FGVPM Semaring 01	2019	MYNI 2019	
22	KS Kota Gelanggi	FASSB PPTR	2018	MYNI 2019	Certified
		FASSB Kota Gelanggi 5/6	2018	MYNI 2019	
23	KS Jengka 21	FASSB Jengka 24/25	2021	MYNI 2019	Main Audit
24	KS Penggeli	FGVPM Inas Selatan	2021	MYNI 2019	Main Audit
25	KS Belitong	FASSB Ulu Belitong	2019	MYNI 2019	Certified
		FGVPM Bukit Tongkat B	2019	MYNI 2019	
26	KS Kulai	FASSB Bkt Besar/Taib Andak	2018	MYNI 2019	Certified
27	KS Adela	FGVPM Kledang 2	2018	MYNI 2019	Certified
28	KS Serting Hilir	FGVPM Tembangau 03	2021	MYNI 2019	Main Audit
		FGVPM Tembangau 05	2021	MYNI 2019	
		FGVPM Tembangau 06	2021	MYNI 2019	
		FGVPM Tembangau 07	2021	MYNI 2019	
		FGVPM Tembangau 08	2021	MYNI 2019	
		FGVPM Tembangau 09	2021	MYNI 2019	
		FGVPM Serting Hilir 8	2021	MYNI 2019	
		FGVPM Serting Hilir 9	2021	MYNI 2019	
29	KS Bukit Kepayang	FASSB Serting Hilir	2021	MYNI 2019	Main Audit
		FGVPM Terapai 3	2018	MYNI 2019	
30	KS Jerangau Baru	FGVPM Rantau Abang 1	2018	MYNI 2019	Certified
		FGVPM Rantau Abang 2	2018	MYNI 2019	
		FGVPM Chador 1	2018	MYNI 2019	
31	KS Tenggaroh	FGVPM Tenggaroh 9	2018	MYNI 2019	Certified
		FGVPM Tenggaroh 11	2018	MYNI 2019	

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	Palm Oil Mill	Supply bases (estates, plantations, associations)			
		Internal			
		FFB Supplier	Certification Year	Certification standard	Status
		FGVPM Tenggaroh 13	2018	MYNI 2019	
32	KS Nitar	FGVPM Nitar Timur	2018	MYNI 2019	Certified
33	KS Chalok	FGVPM Setiu 1	2018	MYNI 2019	Certified
34	KS Waha	FGVPM Bukit Aping Selatan	2018	MYNI 2019	Certified
35	KS Sampadi	FGVPM Sampadi 1	2021	MYNI 2019	Internal Audit
		FGVPM Sampadi 3	2021	MYNI 2019	
		FGVPM Sampadi 4	2021	MYNI 2019	
		FGVPM Sampadi 5	2021	MYNI 2019	
		FGVPM Sampadi 6	2021	MYNI 2019	
36	KS Mempaga	n/a	n/a	n/a	Internal Audit
		n/a	n/a	n/a	
37	KS Kalabakan	FGVPM Kalabakan Utara 01	2020	MYNI 2019	Internal Audit
		FGVPM Kalabakan Selatan	2020	MYNI 2019	
38	KS Kembara Sakti	FGVPM Sahabat 30	2020	MYNI 2019	Internal Audit
		FGVPM Sahabat 35	2020	MYNI 2019	
		FGVPM Sahabat 40	2020	MYNI 2019	
		FGVPM Sahabat 41	2020	MYNI 2019	
		FGVPM Sahabat 42	2020	MYNI 2019	
		FGVPM Sahabat 30	2020	MYNI 2019	
39	KS Nilam Permata	FGVPM Sahabat 50	2020	MYNI 2019	Internal Audit
		FGVPM Sahabat 51	2020	MYNI 2019	
		FGVPM Sahabat 52	2020	MYNI 2019	
		FGVPM Sahabat 53	2020	MYNI 2019	
		FGVPM Sahabat 54	2020	MYNI 2019	
40	KS Hamparan Badai	FGVPM Sahabat 23	2020	MYNI 2019	Internal Audit
		FGVPM Sahabat 24	2020	MYNI 2019	
		FGVPM Sahabat 26	2020	MYNI 2019	
		FGVPM Sahabat 28	2020	MYNI 2019	
		FGVPM Sahabat 31	2020	MYNI 2019	
		FGVPM Sahabat 33	2020	MYNI 2019	
		FGVPM Sahabat 34	2020	MYNI 2019	
		FASSB Tambisan Sahabat 59	2020	MYNI 2019	

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	Palm Oil Mill	Supply bases (estates, plantations, associations)			
		Internal			
		FFB Supplier	Certification Year	Certification standard	Status
		FGVPM Sahabat 21	2020	MYNI 2019	
		FGVPM Sahabat 22	2020	MYNI 2019	
41	KS Mercu Puspita	FGVPM Sahabat 07	2020	MYNI 2019	Internal Audit
		FGVPM Sahabat 46	2020	MYNI 2019	
		FGVPM Sahabat 48	2020	MYNI 2019	
		FASSB Sahabat 06	2020	MYNI 2019	
42	KS Lancang Kemudi	FGVPM Sahabat 10	2020	MYNI 2019	Internal Audit
		FGVPM Sahabat 36	2020	MYNI 2019	
		FGVPM Sahabat 38	2020	MYNI 2019	
		FGVPM Sahabat 39	2020	MYNI 2019	
		FGVPM Sahabat 44	2020	MYNI 2019	
		FGVPM Sahabat 45	2020	MYNI 2019	
43	KS Embara Budi	FGVPM Sahabat 11	2020	MYNI 2019	Internal Audit
		FGVPM Sahabat 12	2020	MYNI 2019	
		FGVPM Sahabat 17	2020	MYNI 2019	
		FGVPM Sahabat 56	2020	MYNI 2019	
		FGVPM Sahabat 20	2020	MYNI 2019	
		FGVPM Sahabat 25	2020	MYNI 2019	
		FASSB Sahabat 17	2020	MYNI 2019	
44	KS Baiduri Ayu	FGVPM Sahabat	2020	MYNI 2019	Internal Audit
		FGVPM Sahabat	2020	MYNI 2019	
		FGVPM Sahabat	2020	MYNI 2019	
45	KS Umas	FGVPM Sahabat	2020	MYNI 2019	Internal Audit
		FGVPM Sahabat	2020	MYNI 2019	
46	KS Tenggaroh Timur	FGVPM Tenggaroh 12	2020	MYNI 2019	Internal Audit
		FGVPM Tenggaroh Timur 2	2020	MYNI 2019	
47	KS Selancar 2A	n/a	n/a	n/a	Internal Audit
48	KS Bukit Mendi	n/a	n/a	n/a	Internal Audit
49	KS Jengka 8	n/a	n/a	n/a	Internal Audit
50	KS Jengka 18	n/a	n/a	n/a	Internal Audit
51	KS Jengka 3	n/a	n/a	n/a	Internal Audit
52	KS Padang Piol	n/a	n/a	n/a	Internal Audit

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	Palm Oil Mill	Supply bases (estates, plantations, associations)			
		Internal			
		FFB Supplier	Certification Year	Certification standard	Status
53	KS Tersang	n/a	n/a	n/a	Internal Audit
54	KS Pontian Fico	Pontian Fico	2022	MYNI 2019	Internal Audit
		Pontian Subok	2022	MYNI 2019	
		Pontian Orico	2022	MYNI 2019	
		Pontian Pendirosa	2022	MYNI 2019	
		Pontian Kuril	2022	MYNI 2019	
		Pontian Hilco	2022	MYNI 2019	
		Rawajaya Sdn Bhd	2022	MYNI 2019	
55	KS Tementi	FGVPM Bera Selatan 1	2022	MYNI 2019	Internal Audit
		FGVPM Bera Selatan 4	2022	MYNI 2019	
56	KS Kemahang	n/a	n/a	n/a	Internal Audit
57	KS Chini 2	n/a	n/a	n/a	Internal Audit
58	KS Jerangau Barat	n/a	n/a	n/a	Internal Audit
59	KS Trolak	n/a	n/a	n/a	Internal Audit
60	KS Semenchu	n/a	n/a	n/a	Internal Audit
61	KS Panching	n/a	n/a	n/a	Internal Audit
62	KS Air Tawar	n/a	n/a	n/a	Internal Audit
63	KS Lok Heng	n/a	n/a	n/a	Internal Audit
64	KS Sg Tenggi	n/a	n/a	n/a	Internal Audit
65	KS Pasoh	n/a	n/a	n/a	Internal Audit
66	KS Kahang	n/a	n/a	n/a	Internal Audit
67	Asian Plantation Milling Sdn Bhd	Incosetia Sdn Bhd	2021	Group Cert	Internal Audit
		Kronos Plantations Sdn Bhd	2021	Group Cert	
		Fortune Plantation Sdn Bhd	2021	Group Cert	
		BJ Corporation Sdn Bhd	2021	Group Cert	
68	Tanah Emas Oil Palm Processing	Tanah Emas Corporation Berhad (TECB)	2021	Group Cert	Internal Audit
		Ladang Kluang	2021	Group Cert	
		Yapidmas D	2021	Group Cert	
		Sri Mosta 1	2021	Group Cert	
		Sri Mosta 2	2021	Group Cert	

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	Palm Oil Mill	Supply bases (estates, plantations, associations)			
		Internal			
		FFB Supplier	Certification Year	Certification standard	Status
		Sri Mosta 3	2021	Group Cert	
		Cepat Ringgit A	2021	Group Cert	
		Cepat Ringgit B	2021	Group Cert	
		Cepat Ringgit D	2021	Group Cert	
		Karamuak	2021	Group Cert	
		Sg Milian	2021	Group Cert	
		Sg Imbak	2021	Group Cert	
		Kuamut	2021	Group Cert	
69	PT Citra Niaga Perkasa	TBA	2021	INA-NIWG	Internal Audit
70	PT Temilia Agro Abadi	TBA	2021	INA-NIWG	Internal Audit
71	FGV estate without mill (Paloh)	Paloh	2021	INA-NIWG	Internal Audit

Note: Those with n/a status are the mills without supply base. FGV has an ongoing discussion with RSPO on how to certify mills. At the point of this assessment, there was no decision being finalised yet.

Appendix C: GHG Reporting Executive Summary

The GHG emissions that were produced in 2018 for FGV PISB Keratong 3 Palm Oil Mill and supply base was calculated using the PalmGHG Calculator version 3.0.1. The assessment team had verified the data input in the PalmGHG Calculator against operations records. PalmGHG Calculation Options selected 'Full version' and 'Exclude LUC Emission' calculation option is not applied. The records verified includes:

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

The summary of the Net GHG emitted in 2018 for FGV PISB Keratong 3 Palm Oil Mill and supply base are as following:

Emission per product	tCO ₂ e/tProduct
CPO	1.84
PKO	1.84

Extraction	%
OER	20.80
KER	5.19

Production	t/yr
FFB Process	215,554.70
CPO Produced	46,858.24
PK Produced	11,187.29

Land Use	Ha
OP Planted Area	984.24
OP Planted on peat	-
Conservation (forested)	-
Conservation (non-forested)	-
Total	984.24

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	2,892.96	0.22					2,892.96	0.22
CO ₂ Emission from fertilizer	651.04	0.05					651.04	0.05
NO ₂ Emission	970.19	0.07					970.19	0.07
Fuel Consumption	41.09	-					41.09	-
Peat Oxidation	-	-					-	-
Sink								
Crop Sequestration	-2,742.15	-0.21					-2,742.15	-0.21
Conservation Sequestration	-	-					-	-

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Total	1,813.13	1.84					1,813.13	1.84
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*Note: Includes both estates and smallholders

Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	45939.33	3.42
Fuel Consumption	314.73	0.02
Grid Electricity Utilization	313.64	0.02
Credit		
Export of Grid Electricity	-	-
Sales of PKS	-22434.60	-1.67
Sales of EFB	-	-
Total	24133.10	1.80

Summary of Kernel Crusher Emission and Credit (if applicable)

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

*This mill has no kernel crusher operation.

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

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

Appendix D: Supply Chain Declaration

A. Monthly Records of Certified and Uncertified FFB Received since the last audit (March 2019-Nov 2019)				
No.	Month - Year	Volume of FFB from certified supply bases (mt)	Volume of FFB from uncertified supply bases (mt)	Total FFB/Month (mt)
1	Mar-19	-	16,896.65	16,896.65
2	Apr-19	921.66	17,748.99	18,670.65
3	May-19	758.47	19,480.34	20,238.81
4	Jun-19	839.01	17,576.79	18,415.80
5	Jul-19	997.83	23,329.25	24,327.08
6	Aug-19	839.78	23,389.66	24,229.44
7	Sep-19	792.74	23,343.14	24,135.88
8	Oct-19	745.71	25,234.22	25,979.93
9	Nov-19	510.85	22,129.74	22,640.59
	Total	6,406.05	189,128.78	195,534.83

B. Monthly Records of Certified CPO & PK since the last audit (Dec 2018-Oct 2019)			
No.	Month - Year	Certified CPO (mt)	Certified PK (mt)
1	Mar-19	-	-
2	Apr-19	90.50	23.02
3	May-19	157.26	38.18
4	Jun-19	168.95	38.79
5	Jul-19	209.93	48.02
6	Aug-19	170.16	43.71
7	Sep-19	165.66	48.65
8	Oct-19	154.21	42.83
9	Nov-19	108.44	23.29
	Total	1,225.11	306.49

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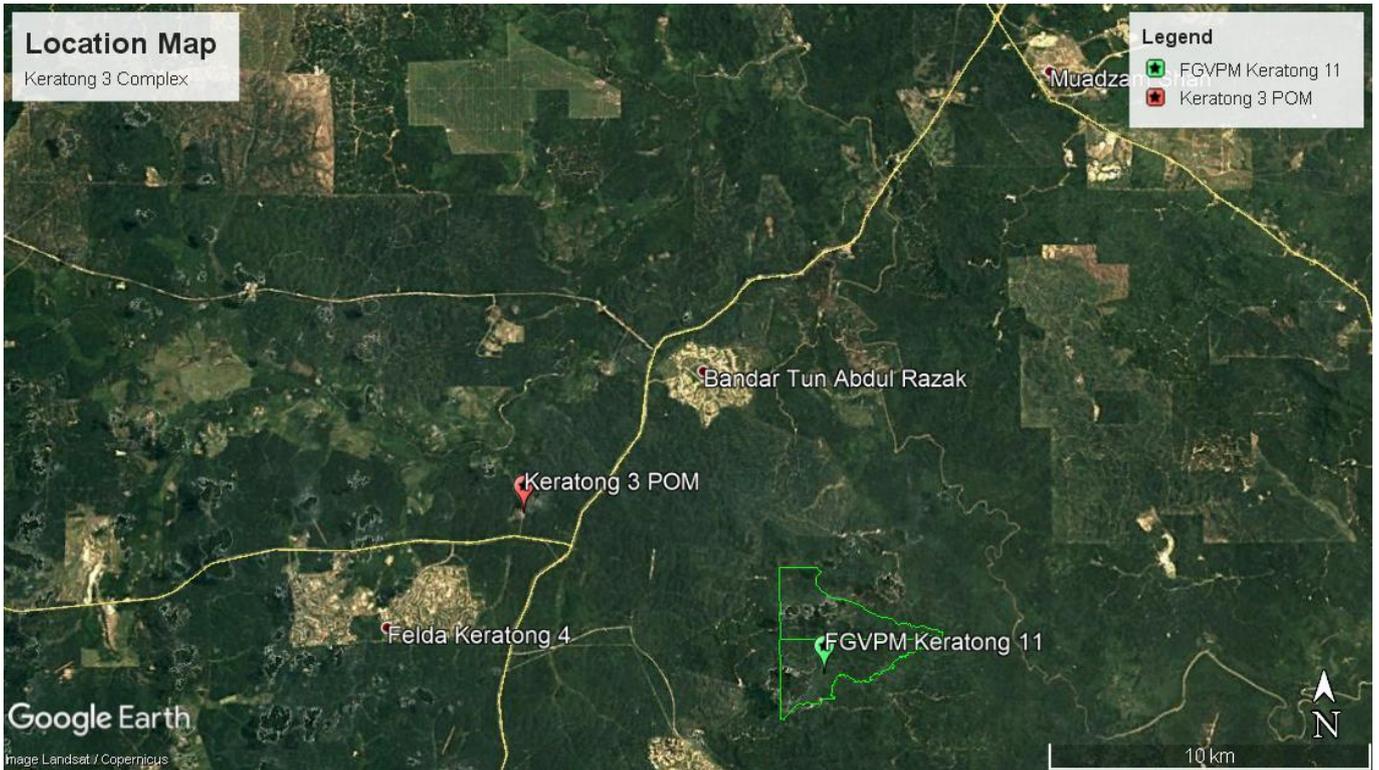
C. Records of Certified CPO & PK Sold under PalmTrace to Buyers since the last audit (if any) (Dec 2018-Oct 2019)				
No.	Buyers Name	Palmtrace Trading License Number	Certified CPO Sold (mt)	Certified PK Sold (mt)
1	Non-disclosure		700.68	
2	Non-disclosure			222.27
	TOTAL		700.68	222.27

D. Records of CPO & PK Sold under other schemes to Buyers since the last audit (if any) (
No.	Buyers Name	Scheme Name	CPO Sold (mt)	PK Sold (mt)
Nil				

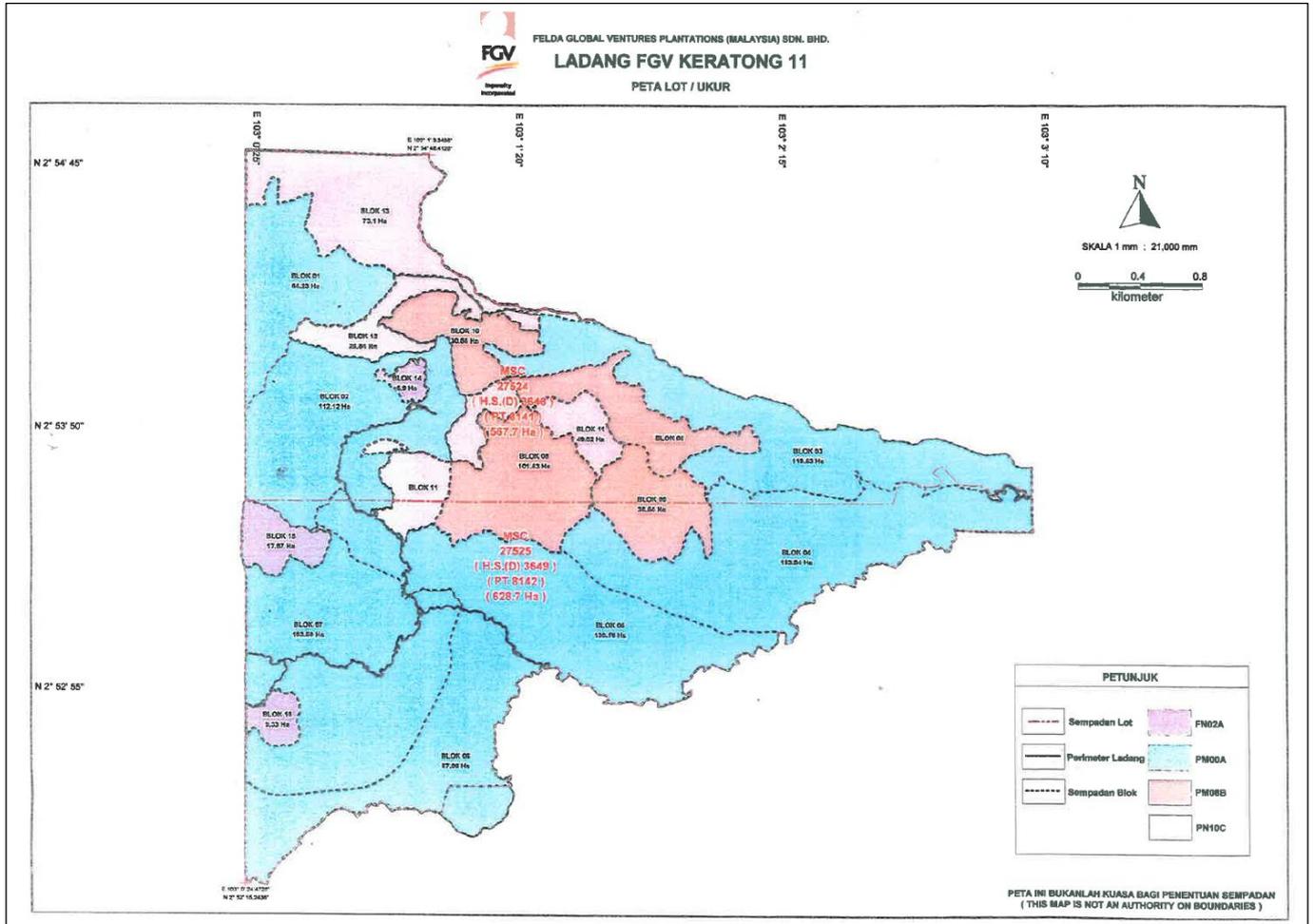
E. Records of CPO & PK Sold as conventional to Buyers since the last audit (if any) (
No.	Buyers Name		CPO Sold (mt)	PK Sold (mt)
1	Non-disclosure			84.22
2	Non-disclosure		524.43	

F. Records of Certified CPO Sold under RSPO Credits to Buyers since the last audit (if any) (Dec 2018-Oct 2019)			
No.	Buyers Name	PalmTrace Trading License Number	RSPO Credits of Certified CPO Sold (mt)
Nil			

Appendix E: Location Map of FGVPISB – Keratong 3 Palm Oil Mill Certification Unit and Supply Bases



Appendix F: FGVP Keratong 11 Estate Field Map



Appendix G: List of Smallholder Sampled *(If applicable – scheme/associated/group certification)*

Not applicable

Appendix H: 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
DLW	Decent Living Wage
EFB	Empty Fruit Bunch
EHS	Environmental, Health and Safety
EIA	Environmental Impact Assessment
EMS	Environmental Management System
FFB	Fresh Fruit Bunch
FGVPISB	Felda Global Ventures Plantation Industries Sdn Bhd
FGVPM	Felda Global Ventures Plantation (M) Sdn Bhd
FPIC	Free, Prior, Informed and Consent
GAP	Good Agricultural Practice
GHG	Greenhouse Gas
GMP	Good Manufacturing Practice
GPS	Global Positioning System
HCV	High Conservation Value
IPM	Integrated Pest Management
IP	Identity Preserved
IS - CSPO	Independent Smallholder Certified Sustainable Palm Oil
IS – CSPKO	Independent Smallholder Certified Sustainable Palm Kernel Oil
IS – CSPKE	Independent Smallholder Certified Sustainable Palm Kernel Expeller
ISCC	International Sustainable Carbon Certification
LD50	Lethal Dose for 50 sample
MB	Mass Balance
MSDS	Material Safety Data Sheet
MT	Metric Tonnes
OER	Oil Extraction Rate
OSH	Occupational Safety and Health
PK	Palm Kernel
PKO	Palm Kernel Oil
POM	Palm Oil Mill
POME	Palm Oil Mill Effluent
PPE	Personal Protective Equipment
RSPO	Roundtable on Sustainable Palm Oil
P&C	Principles & Criteria
RTE	Rare, Threatened or Endangered species
SCCS	Supply Chain Certification Standard
SEIA	Social & Environmental Impact Assessment
SIA	Social Impact Assessment
SOP	Standard Operating Procedure