

**RSPO PRINCIPLE AND CRITERIA  
PUBLIC SUMMARY REPORT**

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

<p><b>Client Company Name / Parent Company:</b>  <b>SIPEF Group</b></p>
<p>Client Company / Parent Company Address:  <b>Kasteel Calesberg – Calesbergdreef 5, B-2900 Schoten – Belgium</b></p>
<p>Certification Unit:  <b>Hargy Oil Palms Limited</b>  <b>Hargy Palm Oil Mill, Barema Palm Oil Mill and Navo Palm Oil Mill</b></p>
<p>Location of Certification Unit:  Portion 15 &amp; 633, Milinch of Ulawun, Fourmil of Talasea, West New Britain Province,  Papua New Guinea</p>
<p>Date of Final Report:  08/10/2022</p>

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## Section 1: Scope of the Assessment

1. Company Details			
<b>Parent Company</b>	SIPEF Group		
<b>RSPO Membership Number</b>	1-0021-05-000-00	<b>Membership Approval Date</b>	07/12/2005
<b>Address</b>	Kasteel Calesber – Calesbergdreef 5, B-2900 Schoten, Belgium		
<b>Palm Oil Mill / Group Manager / Estate (Certification Unit)</b>	Hargy Oil Palms Limited Hargy Palm Oil Mill, Barema Palm Oil Mill and Navo Palm Oil Mill		
<b>Location / Address</b>	Portion 15 & 633, Milinch of Ulawun, Fourmil of Talasea, West New Britain Province, Papua New Guinea		
<b>Website</b>	<a href="http://www.sipef.com">www.sipef.com</a>		
<b>Management Representative</b>	Mrs. Sophie Gett	<b>E-mail</b>	<a href="mailto:sgett@hargy.com.pg">sgett@hargy.com.pg</a>
<b>Telephone</b>	+675 9831005/71001604 Ext.231	<b>Facsimile</b>	+675 9831191

2. Certification Information			
<b>Certificate Number</b>	RSPO 535739	<b>Certificate Start Date</b>	08/10/2019
<b>Date of First Certification</b>	09/04/2009	<b>Certificate Expiry Date</b>	07/10/2023
<b>Scope of Certification</b>	Production of CPO and PK at Hargy Palm Oil Mill, Barema Palm Oil Mill and Navo Palm Oil Mill and 3 Supply Estates, namely Hargy Estate, Navo Estate and Pandi Estate including smallholder growers and marketing activities through SIPEF N.V.		
<b>Visit Objectives</b>	<p>The objective of the assessment is to conduct Annual surveillance Audit (ASA 2_4):</p> <ul style="list-style-type: none"> <li>To confirm that the elements of the proposed scope of registration, the new scope and the management system are conforming the requirements of the assessment standard.</li> <li>To confirm that the organization has effectively implemented and addressed the management system.</li> <li>To confirm the ability of the management system is able to meet applicable statutory and regulatory, contractual requirements, organization policies and wherever are applicable.</li> </ul>		
<b>Assessment Cycle</b>	<input type="checkbox"/> Pre Assessment (Choose an item.) <input type="checkbox"/> Initial Assessment <input checked="" type="checkbox"/> Annual Surveillance Assessment (ASA 2_4) <input type="checkbox"/> Recertification Assessment (Choose an item.) <input type="checkbox"/> Scope Extension		
<b>Applicable Standards / Normative Reference</b>	RSPO Certification System for P&C and RSPO ISH 2020 <input checked="" type="checkbox"/> RSPO P&C 2018 for the Production of Sustainable Palm Oil <input checked="" type="checkbox"/> PNG & SI National Interpretation 2019 for RSPO P&C 2018 for the Production of Sustainable Palm Oil		

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<b>Supply Chain Module</b>	<input checked="" type="checkbox"/> Identity Preserved; <input type="checkbox"/> Mass Balance	<b>Mill Capacity</b>	Refer to Table 10
<b>ISH certification Phase</b>	<input type="checkbox"/> Eligibility <input type="checkbox"/> Milestone A <input type="checkbox"/> Milestone B <input checked="" type="checkbox"/> Not Applicable		

<b>3. Other Certifications</b>			
<b>Certificate Number</b>	<b>Standard(s)</b>	<b>Certificate Issued by</b>	<b>Expiry Date</b>
RSPO 633028	RSPO Supply Chain Certification Standard	BSI Services Malaysia Sdn Bhd	23/07/2025

<b>4. Location(s) of Mill &amp; Supply Bases</b>			
<b>Name (Mill / Supply Base / Smallholders)</b>	<b>Location</b>	<b>GPS Coordinates</b>	
		<b>Latitude</b>	<b>Longitude</b>
Hargy Palm Oil Mill	Bialla, West New Britain Province, PNG	5° 18' 40.05" S	151° 00' 39.46" E
Barema Palm Oil Mill	30 km East of Bialla, West New Britain Province, PNG	5° 12' 40.25" S	151° 07' 51.10" E
Navo Palm Oil Mill	60 km East of Bialla, West New Britain Province, PNG	5° 05' 38.86" S	151° 13' 28.03" E
Hargy Estate	7 km East of Bialla, West New Britain Province, PNG	5° 17' 47.77" S	151° 03' 28.03" E
Navo Estate	33km East of Barema POM, West New Britain Province, PNG	5° 05' 38.41" S	151° 13' 30.01" E
Pandi Estate	44km East of Navo Estate, West New Britain Province, PNG	5° 00' 44.29" S	151° 25' 27.12" E
Smallholders (3,635 members)	Bialla, West New Britain, West New Britain Province, PNG	5° 18' 40.05" S	151° 00' 39.46" E

<b>5. Description of Supply Base</b>					
<b>New Planting Development</b>	<input checked="" type="checkbox"/> No (no change in total planted area)		<input type="checkbox"/> Yes (please refer to Principle 7 for details)		
<b>Estate / Smallholders</b>	<b>Total Planted (Mature + Immature) (ha)</b>	<b>HCV (ha)</b>	<b>Infrastructure &amp; Other (ha)</b>	<b>Total Area (ha)</b>	<b>% of Planted</b>
Hargy Estate	4,413.46	0	2,330.35	6,743.81	65.44
Navo Estate	6,604.55	0	1,252.23	7,856.78	84.06
Pandi Estate	2,584.60	0	3,264.10	5,848.23	44.19
<b>Sub Total</b>	<b>13,602.61</b>	<b>0</b>	<b>6,846.68</b>	<b>20,448.82</b>	<b>66.57</b>
Smallholders	14,806.96	0	18.00	14,824.96	99.88
<b>Total</b>	<b>28,409.57</b>	<b>0</b>	<b>6,864.68</b>	<b>35,273.78</b>	<b>80.54</b>

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**Note:** Hargy Oil Palms Limited is carrying out land measurement on annual basis with regards to NC issued on ASA2\_3. The figure was based on latest land measurement and oil palm planting record.

<b>6. Plantings &amp; Cycle</b>						
Estate / Smallholders	Age (Years) - ha				Mature	Immature
	0 - 3	4 - 14	15 - 25	>25		
Hargy Estate	656.50	2,015.49	1,741.94	0	3,757.43	656.50
Navo Estate	864.76	3,427.44	2,312.35	0	5,739.79	864.76
Pandi Estate	0	2,584.13	0	0	2,584.13	0
Smallholders	916.69	4,079.69	7,958.17	1,852.41	13,890.27	916.69
<b>Total (ha)</b>	<b>2,437.95</b>	<b>12,106.75</b>	<b>12,012.46</b>	<b>1,852.41</b>	<b>25,971.62</b>	<b>2,437.95</b>

**Note:** \*\*Only Mature area is considered as production area

<b>7. Summary of Certified Tonnage of FFB (Own Certified Scope)</b>				
Estate / Smallholders	Tonnage (MT) / year			
	Estimated last year (Oct 2021-Sept 2022)	Actual (Oct 2021-Sept 2022)		Forecast (Oct 2022-Sept 2023)
		Previous license period	Current license period (Oct 2021-Jul 2022)	
Hargy Estate	123,438.00	N/A	113,543.46	125,450.03
Navo Estate	138,202.00	N/A	145,914.88	150,253.70
Pandi Estate	79,876.00	N/A	71,349.46	81,111.04
<b>Subtotal</b>	<b>341,516.00</b>	<b>N/A</b>	<b>330,807.80</b>	<b>356,814.77</b>
Smallholders	221,279.00	N/A	198,797.44	225,000.00
<b>Total</b>	<b>562,795.00</b>		<b>529,605.24</b>	<b>581, 814.77</b>

**Note:**

- The forecast FFB volume in the next calendar year is greater than 25 tons/ha/year because previous FFB production history was already high due to fertile soil from volcano in New Britain Island.
- Reporting period is less than 12 months due to previous reporting period was overs up to September 2021. While the audit was conducted 2 months prior to the current license ends in September 2022.

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<b>8. Summary of Certified Tonnage of FFB (from other certified unit(s))</b>				
<b>Estate / Smallholders</b>	<b>Tonnage (MT) / year</b>			
	<b>Estimated last year (Oct 2021-Sept 2022)</b>	<b>Actual (Oct 2021-Sept 2022)</b>		<b>Forecast (Oct 2022-Sept 2023)</b>
		Previous license period	Current license period (Oct 2021-Jul 2022)	
N/A		N/A	N/A	
<b>Total</b>		<b>N/A</b>		

<b>9. Summary of Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)</b>				
<b>Out growers / smallholders</b>	<b>Tonnage (MT) / year</b>			
	<b>Estimated last year (Oct 2021-Sept 2022)</b>	<b>Actual (Oct 2021-Sept 2022)</b>		<b>Forecast (Oct 2022-Sept 2023)</b>
		Previous license period	Current license period (Oct 2021-Jul 2022)	
N/A	N/A	N/A	N/A	N/A
<b>Total</b>	<b>N/A</b>	<b>N/A</b>		<b>N/A</b>

<b>9A. Monthly Records of Certified and Uncertified FFB Received since the last audit</b>				
<b>No.</b>	<b>Month - Year</b>	<b>Volume of FFB from certified supply base (mt)</b>	<b>Volume of FFB from uncertified supply base (mt)</b>	<b>Total FFB/Month (mt)</b>
1	Oct 2021	47,653.58	0	47,653.58
2	Nov 2021	54,289.94	0	54,289.94
3	Dec 2021	54,362.24	0	54,362.24
4	Jan 2022	53,388.54	0	53,388.54
5	Feb 2022	40,735.52	0	40,735.52
6	Mar 2022	54,154.72	0	54,154.72
7	Apr 2022	51,344.60	0	51,344.60
8	May 2022	59,105.24	0	59,105.24
9	Jun 2022	56,681.22	0	56,681.22
10	Jul 2022	57,889.64	0	57,889.64
	<b>TOTAL</b>	<b>529,605.24</b>	<b>0</b>	<b>529,605.24</b>

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<b>10. Summary of Certified Tonnage (not applicable for ISS)</b>			
<b>Estimated last year (Oct 2021-Sept 2022)</b>	<b>Actual (Oct 2021-Sept 2022)</b>		<b>Forecast (Oct 2022-Sept 2023)</b>
	Previous license period	Current license period (Oct 2021-Jul 2022)	
<b>Hargy POM – Mill Capacity 45 MT/hour</b>			
<b>FFB</b>	<b>FFB</b>		<b>FFB</b>
162,646.10 mt	N/A	142,660.25 mt	161,123.28 mt
<b>CPO (OER: 23.60 %)</b>	<b>CPO (OER: 24.72 %)</b>		<b>CPO (OER: 23.82%)</b>
35,816.22 mt	N/A	35,258.96 mt	38,379.57 mt
<b>PK (KER: 5.15 %)</b>	<b>PK (KER: 5.07 %)</b>		<b>PK (KER: 5.10%)</b>
8,369.10 mt	N/A	7,234.75 mt	8,217.28 mt
<b>Barema POM – Mill Capacity 45 MT/hour</b>			
<b>FFB</b>	<b>FFB</b>		<b>FFB</b>
209,636.70 mt	N/A	174,200.47 mt	199,919.00 mt
<b>CPO (OER: 25.10 %)</b>	<b>CPO (OER: 25.63 %)</b>		<b>CPO (OER: 24.82%)</b>
52,487.09 mt	N/A	44,644.46 mt	49,613.00 mt
<b>PK (KER: 5.15 %)</b>	<b>PK (KER: 5.11 %)</b>		<b>PK (KER: 5.00%)</b>
10,787.28 mt	N/A	8,896.13 mt	9,996.00 mt
<b>Navo POM – Mill Capacity 45 MT/hour</b>			
<b>FFB</b>	<b>FFB</b>		<b>FFB</b>
244,216.40 mt	N/A	212,744.52 mt	220,722.49 mt
<b>CPO (OER: 24.56 %)</b>	<b>CPO (OER: 25.79 %)</b>		<b>CPO (OER: 25.50%)</b>
60,250.34 mt	N/A	54,958.49 mt	56,277.86 mt
<b>PK (KER: 5.15 %)</b>	<b>PK (KER: 5.11 %)</b>		<b>PK (KER: 5.20%)</b>
12,568.61 mt	N/A	10,870.17 mt	11,486.12 mt

<b>10A. Monthly Records of Certified CPO &amp; PK since the last audit</b>			
<b>No.</b>	<b>Month - Year</b>	<b>Certified CPO (MT)</b>	<b>Certified PK (MT)</b>
1	Oct 2021	12,321.52	2,424.09
2	Nov 2021	13,766.73	2,771.42
3	Dec 2021	13,962.40	2,806.96
4	Jan 2022	13,374.95	2,737.39
5	Feb 2022	10,393.47	2,017.79
6	Mar 2022	13,909.34	2,761.48

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7	Apr 2022	13,038.81	2,642.83
8	May 2022	15,281.39	3,070.02
9	Jun 2022	14,205.25	2,899.12
10	Jul 2022	14,608.05	2,869.95
<b>TOTAL</b>		<b>134,861.91</b>	<b>27,001.05</b>

<b>11. Summary of Actual Volume sold</b>					
<b>Current License period (Oct 2021 – Sept 2022)</b>					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
<b>CPO (MT)</b>	115,536.66	-	-	-	115,536.66
<b>PK (MT)</b>	23,203.82	-	-	-	23,203.82
<b>Credits</b>	-	-	-	-	-
<b>Previous License period (N/A)</b>					
<b>CPO (MT)</b>	N/A	N/A	N/A	N/A	N/A
<b>PK (MT)</b>	N/A	N/A	N/A	N/A	N/A
<b>Credits</b>	N/A	N/A	N/A	N/A	N/A
<b>Note:</b> Conventional is RSPO certified material but sold as non-RSPO.					

<b>11A. Records of Certified CPO &amp; PK Sold under PalmTrace since the last audit (if any)</b>				
No.	Buyers Name	PalmTrace Trading License Number	Certified CPO Sold (MT)	Certified PK Sold (MT)
1	Olenex SARL	RSPO_PO1000004914	27,818.12	-
2	Cargill B.V. Refined Oils Europe	RSPO_PO1000000031	83,703.99	-
3	Kuala Lumpur Kepong Sdn Bhd	RSPO_PO1000000907	2,010.28	-
4	Sime Darby Oils	RSPO_PO1000000046	2,004.27	-
5	Hargy Oil Palms Limited KCP	RSPO_PO1000000053	-	23,203.82
<b>TOTAL</b>			<b>115,536.66</b>	<b>23,203.82</b>

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

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11C. Records of CPO & PK Sold as conventional since the last audit (if any)			
No.	Buyers Name	CPO Sold (MT)	PK Sold (MT)
	N/A	N/A	N/A
<b>TOTAL</b>		<b>N/A</b>	<b>N/A</b>

11D. Records of Certified CPO Sold under RSPO Credits since the last audit (if any)			
No.	Buyers Name	PalmTrace Trading License Number	RSPO Credits of Certified CPO Sold
	N/A	N/A	N/A
<b>TOTAL</b>			<b>N/A</b>

12. Independent Smallholders Certified Tonnage (MT) / Volume									
Phase	Estimated last year (Not Applicable)			Actual (Not Applicable)			Forecast (Not Applicable)		
	Eligibility	MS A	MS B	Eligibility	MS A	MS B	Eligibility	MS A	MS B
	40%	70%	100%	40%	70%	100%	40%	70%	100%
FFB			N/A			N/A			N/A
IS-CSPO	N/A	N/A		N/A	N/A		N/A	N/A	
IS-CSPKO	N/A	N/A		N/A	N/A		N/A	N/A	
IS-CSPKE	N/A	N/A		N/A	N/A		N/A	N/A	
CSPK	N/A	N/A		N/A	N/A		N/A	N/A	

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

**Note:** 1 mt = 1 credit

13. Independent Smallholders Actual Sold Tonnage / Volume							
	FFB	FFB Conventional	FFB Other schemes	IS-CSPO	CSPK	IS-CSPKO	IS-CSPKE
<b>Current License period (Not Applicable)</b>							
<b>Credits</b>				N/A	N/A	N/A	N/A

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<b>Physical</b>	N/A	N/A	N/A				
<b>Previous License period (Not Applicable)</b>							
<b>Credits</b>				N/A	N/A	N/A	N/A
<b>Physical</b>	N/A	N/A	N/A				

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

## Section 2: Assessment Process

### Certification Body:

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

BSI is a leading global provider of management systems assessment and certification, with more than 92,000 certified locations and clients in over 193 countries. BSI is the UK's National Standards Body. BSI provides independent, third-party certification of management systems. BSI is ASI Accredited (ASI-ACC-067) to conduct RSPO assessment since 31/10/2014 with accredited office located at Kuala Lumpur, Malaysia.

### 2.1 Assessment Methodology, Programme, Site Visits

The on-site assessment was conducted on 8-20 August 2022. The audit programme is included as Section 2.3.

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

The methodology for collection of objective evidence included physical site inspections, observation of tasks and processes, interviews of staff, workers and their families and external stakeholders, review of documentation and monitoring data. PNG & Solomon Islands National Interpretation 2019 of the RSPO P&C 2018 was used as the normative reference to assess compliance. The comments made by external stakeholders were also taken into account in the assessment.

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

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

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

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

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

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For Initial, Re-certification and Extension of Scope assessment, the report was externally reviewed by approved external peer reviewer prior to certification decision by BSI.

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

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

<b>Assessment Program</b>					
<b>Name (Mill / Supply Base)</b>	<b>Year 1 (RAV)</b>	<b>Year 2 (ASA 2_1)</b>	<b>Year 3 (ASA 2_2)</b>	<b>Year 4 (ASA 2_3)</b>	<b>Year 5 (ASA 2_4)</b>
Hargy Palm Oil Mill	X	X	X	X	X
Barema Palm Oil Mill	X	X	X	X	X
Navo Palm Oil Mill	X	X	X	X	X
Hargy Estate	X	X	X	X	X
Navo Estate	X	X	X	X	X
Pandi Estate	X	X	X	X	X
Smallholders	X	X	X	X	X

**Tentative Date of Next Visit: August 7, 2023 - August 19, 2023**

**Total Number of Mandays: 35.5**

**2.2 BSI Assessment Team**

<b>Name</b>	<b>Role</b>	<b>Competency</b>
Andi Pratama Pasaribu (AP)	Team Leader	<p><b>Education:</b> Holds a Bachelor Degree majoring Social Economy from Jember University</p> <p><b>Work Experience:</b> 5 years working experience as Field Agronomy Assistant. 8 years working experience as RSPO Auditor / Lead Auditor.</p> <p><b>Training attended:</b> Completed Indonesian Sustainable Palm Oil (ISPO) Lead Auditor training, Endorsed RSPO P&amp;C Lead Auditor course, Introductory Course for High Conservation Value and High Carbon Stock (HCS) in Oil Palm Plantation, ISO 9001:2008 Lead Auditor course, ISO 14001:2005 Lead Auditor course, ISO45001:2018 Lead Auditor Course, RSPO endorsed RSPO SCCS Lead Auditor course, SMETA requirements training</p> <p><b>Language proficiency:</b> Fluent in English</p> <p><b>Aspect covered in this audit:</b> During this audit, the auditor assessing the aspect of legal compliance, legal ownership of the land, business ethics, company policy implementation, best management practices for estate and mill, continuous improvement, smallholder assessment.</p>
Arif Faisal Simatupang (AF)	Team Member	<p><b>Education:</b> Holds a Bachelor Degree in Agriculture, Majoring Agronomy, Gadjah Mada University</p> <p><b>Work Experience:</b> Over 3 years of working experience in palm oil estate as Land Acquisition Officer and later as Division Manager with PT PP London</p>

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		<p>Sumatera Indonesia Tbk. 8 years working experience as auditor since 2014 covering RSPO P&amp;C and ISPO.</p> <p><b>Training attended:</b> Completed ISO9001 Lead Auditor Course, ISO 14001 Lead Auditor Course, Endorsed RSPO P&amp;C Lead Auditor Course, Endorsed RSPO SCC Auditor Lead Auditor Course, ISPO Auditor Training, HCV and GIS training and SA8000 Auditor training.</p> <p><b>Language proficiency:</b> Fluent in English</p> <p><b>Aspect covered in this audit:</b> During this audit, the auditor assessing the aspect of environmental impact assessment, environmental management plan, health and safety management system, worker welfare, chemical use, water &amp; energy resources, smallholder assessment.</p>
Pratama Sedayu (PS)	A. Team Member	<p><b>Education:</b> Holds a Degree in Social Economic of Agriculture from University of Jenderal Soedirman.</p> <p><b>Work Experience:</b> He has more than 10 years auditing experience in sustainability and traceability on RSPO, ISPO, FSC, CAFÉ, Organic programs and Timber origins.</p> <p><b>Training attended:</b> Attended and completed the ISO 9001:2008 Lead Auditor Course (2009), Endorsed RSPO P&amp;C Lead Auditor Course (2013), and Endorsed RSPO SCCS Lead Auditor Course (2014), LAC ISO 14001:2004 (2014), LAC OHSAS 18001:2007 (2013), RSPO P&amp;C Lead Auditors Refresher Course (2019), RSPO Supply Chain Certification Refresher Course (2019), LAC ISO 37001:2016 (2020), Introductory Course for High Conservation Value (HCV) and High Carbon Stock (HCS) in Oil Palm Plantation (2021), Pelatihan Refreshment Auditor ISPO sesuai Peraturan Menteri Pertanian No.38 tahun 2020 (2021), SMETA Requirements Training (2021).</p> <p><b>Language proficiency:</b> Fluent in English and understands Tok Pisin</p> <p><b>Aspect covered in this audit:</b> During this assessment, he assessed on the social impact assessment, community development, stakeholder consultation, waste &amp; GHG management, HCV management and monitoring, conservation policies, smallholder assessment.</p>

**Accompanying Persons:**

Name	Role
Melinda Thom (MT)	Translator from Tok Pisin to English
Pamela Avusi (PA)	Translator from Tok Pisin to English

**1.3 Assessment Plan**

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

Date	Time	Subjects	AP	AF	PS	MT	PA
Saturday, 06/08/2022		Flight Port Moresby – Hoskins	√	√	√		
		Travelling Hoskins – Hargy Oil Palms Limited	√	√	√		
Sunday, 07/08/2022		Travelling Hoskins – Hargy Oil Palms				√	√

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Date	Time	Subjects	AP	AF	PS	MT	PA
Monday, 08/08/2022	08.00 – 08.30	Opening meeting <ul style="list-style-type: none"> <li>• Auditee Presentation (Introduction of PIC, Profile of Certified Management Unit)</li> <li>• Auditor Team Presentation (Introduction, Audit Objective, Audit Scope, Audit Plan Discussion, Determine of Audit Sample, Transparency and Confidentiality Clarification)</li> </ul>	√	√	√	√	√
	08.30 – 12.00	Field visit to Hargy POM	√	√	√	√	√
	12.00 – 13.00	Break	√	√	√	√	√
	13.00 – 16.30	Audit to Hargy POM	√	√	√	√	√
	16.30 – 17.00	Wash up meeting/verification/reporting	√	√	√	√	√
Tuesday, 09/08/2022	08.00 – 12.00	Field visit to Hargy Estate – Barema Plantation	√	√	√	√	√
	12.00 – 13.00	Break	√	√	√	√	√
	13.00 – 16.30	Audit to Hargy Estate – Barema Plantation	√	√	√	√	√
	16.30 – 17.00	Wash up meeting/verification/reporting	√	√	√	√	√
Wednesday, 10/08/2022	08.00 – 12.00	Field visit to Smallholder and stakeholder consultation (6 sample smallholders for each auditors)	√	√	√	√	√
	12.00 – 13.00	Break	√	√	√	√	√
	13.00 – 16.30	Audit to Smallholder (continues)	√	√		√	√
	13.00 – 16.30	Audit Supply Chain			√		
	16.30 – 17.00	Wash up meeting/verification/reporting	√	√	√	√	√
Thursday, 11/08/2022	08.00 – 12.00	Field visit to Barema POM	√	√	√	√	√
	12.00 – 13.00	Break	√	√	√	√	√
	13.00 – 16.30	Audit to Barema POM	√	√	√	√	√
	16.30 – 17.00	Wash up meeting/verification/reporting	√	√	√	√	√
Friday, 12/08/2022	08.00 – 12.00	Field visit to Navo Estate – Ibana Plantation	√	√	√	√	√
	12.00 – 13.00	Break	√	√	√	√	√
	13.00 – 16.30	Audit to Navo Estate – Ibana Plantation	√	√	√	√	√
	16.30 – 17.00	Wash up meeting/verification/reporting	√	√	√	√	√
Saturday, 13/08/2022	08.00 – 12.00	Field visit to Smallholder and stakeholder consultation (4 sample smallholders for each auditors)	√	√	√	√	√
	12.00 – 13.00	Break	√	√	√	√	√
	13.00 – 17.00	Audit team document verification/report compiling	√	√	√	√	√

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Date	Time	Subjects	AP	AF	PS	MT	PA
Sunday, 14/08/2022		Day off	✓	✓	✓	✓	✓
Monday, 15/08/2022	08.00 – 12.00	Field visit to Navo POM	✓	✓	✓	✓	✓
	12.00 – 13.00	Break	✓	✓	✓	✓	✓
	13.00 – 16.30	Audit to Navo POM	✓	✓	✓	✓	✓
	16.30 – 17.00	Wash up meeting/verification/reporting	✓	✓	✓	✓	✓
Tuesday, 16/08/2022	08.00 – 12.00	Field visit to Pandi Estate – Bakada Plantation	✓	✓	✓	✓	✓
	12.00 – 13.00	Break	✓	✓	✓	✓	✓
	13.00 – 16.30	Audit to Pandi Estate – Bakada Plantation	✓	✓	✓	✓	✓
	16.30 – 17.00	Wash up meeting/verification/reporting	✓	✓	✓	✓	✓
Wednesday, 17/08/2022	08.00 – 12.00	Field visit to Smallholder and stakeholder consultation (6 sample smallholders for each auditors)	✓	✓	✓	✓	✓
	12.00 – 13.00	Break	✓	✓	✓	✓	✓
	13.00 – 16.30	Audit to Smallholder (continued)	✓	✓	✓	✓	✓
	16.30 – 17.00	Wash up meeting/verification/reporting	✓	✓	✓	✓	✓
Thursday, 18/08/2022	08.00 – 12.00	Field visit to Smallholder (8 sample smallholders for each auditors)	✓	✓	✓	✓	✓
	12.00 – 14.00	Break	✓	✓	✓	✓	✓
	13.00 – 16.30	Audit to Smallholder (continued)	✓	✓	✓	✓	✓
	16.30 – 17.00	Wash up meeting/verification/reporting	✓	✓	✓	✓	✓
Friday, 19/08/2022	08.00 – 12.00	Field visit to Independent Estate	✓	✓	✓	✓	✓
	12.00 – 14.00	Break	✓	✓	✓	✓	✓
	13.00 – 16.30	Audit to Independent Estate (continued)	✓	✓	✓	✓	✓
	16.30 – 17.00	Wash up meeting/verification/reporting	✓	✓	✓	✓	✓
Saturday, 20/08/2022	08.00 – 12.00	Field visit to Smallholder (2 sample smallholders for each auditors)	✓	✓	✓	✓	✓
	12.00 – 13.00	Break	✓	✓	✓	✓	✓
	13.00 – 14.00	Report Preparation	✓	✓	✓	✓	✓
	14.00 – 15.00	Closing Meeting	✓	✓	✓	✓	✓
Sunday, 21/08/2022		Travelling Hargy Oil Palms Limited - Hoskins				✓	✓
Monday 22/08/2022	04.00 – 07.00	Travelling Hargy Oil Palms Limited - Hoskins	✓	✓	✓		
	07.30 – 08.45	Flight Hoskins Port - Moresby	✓	✓	✓		
	15.05 – 19.35	Flight Port Moresby - Singapore	✓	✓	✓		

### Section 3: Assessment Findings

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

Requirement	Assessment	Compliance
Does the time bound plan include all current subsidiaries, estates and mills that is under the control and/or minor shareholding of the holding company?	The time bound plan has included all the subsidiary and group of companies of SIPEF Group. The Timebound Plan was verified against the Group Member information published in the RSPO website under the parent company SIPEF Group.	Complied
Have all the estates and mills certified within five (5) years after obtaining RSPO membership? If no, has RSPO Secretariat approval obtained? Was the submission according to the template as announced by the RSPO Secretariat on 21/12/2021	There are estates and mills that are not certified within 5 years of the RSPO membership. But, since this requirement was published in July 2017, the 5 years starts from 2017 in which the SIPEF have up to 2022 to comply with this requirement.  Despite the above, SIPEF had demonstrated that those units/estates that are not able to be certified are either due to awaiting for the HGU (Hak Guna Usaha <i>Right to Cultivate</i> ) and/or awaiting for full estate development.	Complied
Have there been any new acquisitions? If yes, the new acquisitions shall be certified within three (3) years from the date of acquisition. Certification plan for the new acquisition shall be available. If no, has RSPO Secretariat approval obtained? Was the submission according to the template as announced by the RSPO Secretariat on 21/12/2021.	New acquisition, PT. Asri Rimba Wirabhakti (ARWB) in Bengkulu Province was acquired by SIPEF in end of 2018 and certified as of June 2022.	Complied
Any deviations from the maximum periods requires approval by the RSPO Secretariat.	So far, the deviations periods are acceptable and justifiable. There was no deliberate delay by the company.	Complied
Have there been any changes to the time-bound plan since the last audit (both new acquisition and existing)? If yes, justification is required. Is this consistent with the ACOP reporting?	The commitment timeline has shorten from 2024 to 2023. The changes are acceptable as the control of being certified is not on the hands of the Company due to awaiting for HGU which the approval is beyond the company choice.	Complied
Have there been any isolated lapses in implementation of the plan? If yes a <b>Minor</b> non-compliance shall be raised	All lapses of implanting the original plan are justified base on the awaiting for the HGU (Hak Guna Usaha <i>Right to Cultivate</i> ) and/or awaiting for full estate development. While for the newly acquired estate, SIPEF Group demonstrated commitment to the timebound plan by achieved certified status in June 2022.	Complied
Have there been any fundamental failure (e.g. unable to justify delay in planning the assessments) to proceed with implementation of	There is no fundamental failure as all delays are justified as stated above.	Complied

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the plan? If yes a <b>Major</b> non-compliance shall be raised		
<b>Un-Certified Units or Holdings</b>		
No replacement of primary forest or any area required to maintain or enhance HCVs and HCS in accordance with RSPO P&C criterion 7.12.	Previously prior to certification, PT. Umbul Mas Wisesa and PT. Tonton Usaha Mandiri had liabilities. The compensation plan have been approved by the Compensation Task Force during the staged implementation of the RaCP between May 2014 and November 2015.	Complied
Any new plantings since January 1 <sup>st</sup> 2010 shall comply with the RSPO New Plantings Procedure.	<p>All the new development that are not yet certified has undergone NPP and published in the RSPO website</p> <p>PT. Agro Muara Rupit</p> <ul style="list-style-type: none"> <li>• <a href="https://rspo.org/certification/new-planting-procedure/public-consultations/sipef-group-pt-agro-muara-rupit-iii-and-iv-pt-amr">https://rspo.org/certification/new-planting-procedure/public-consultations/sipef-group-pt-agro-muara-rupit-iii-and-iv-pt-amr</a></li> <li>• <a href="https://rspo.org/certification/new-planting-procedure/public-consultations/sipef-pt-agro-muara-rupit">https://rspo.org/certification/new-planting-procedure/public-consultations/sipef-pt-agro-muara-rupit</a></li> </ul> <p>PT. Agro Kati Lama</p> <ul style="list-style-type: none"> <li>• <a href="https://rspo.org/certification/new-planting-procedure/public-consultations/sipef-pt-agro-kati-lama-phase-ii">https://rspo.org/certification/new-planting-procedure/public-consultations/sipef-pt-agro-kati-lama-phase-ii</a></li> </ul> <p>PT. Agro Rawas Ulu</p> <ul style="list-style-type: none"> <li>• <a href="https://rspo.org/certification/new-planting-procedure/public-consultations/sipef-pt-agro-rawas-ulu-new-planting-assessment-call-for-comments">https://rspo.org/certification/new-planting-procedure/public-consultations/sipef-pt-agro-rawas-ulu-new-planting-assessment-call-for-comments</a></li> <li>• <a href="https://rspo.org/certification/new-planting-procedure/public-consultations/sipef-pt-agro-rawas-ulu-new-planting-assessment-call-for-comments-1">https://rspo.org/certification/new-planting-procedure/public-consultations/sipef-pt-agro-rawas-ulu-new-planting-assessment-call-for-comments-1</a></li> <li>• <a href="https://rspo.org/certification/new-planting-procedure/public-consultations/sipef-pt-agro-rawas-ulu-new-planting-assessment-call-for-comments-1">https://rspo.org/certification/new-planting-procedure/public-consultations/sipef-pt-agro-rawas-ulu-new-planting-assessment-call-for-comments-1</a></li> </ul> <p>PT. Bandar Sumatra Indonesia</p> <p><a href="https://rspo.org/certification/new-planting-procedure/public-consultations/sipef-pt-bandar-sumatra-indonesia-bandar-pinang-estate">https://rspo.org/certification/new-planting-procedure/public-consultations/sipef-pt-bandar-sumatra-indonesia-bandar-pinang-estate</a></p>	Complied
Any Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 4.4, 4.5, 4.6, 4.7 and 4.8.	<p>The assessment team has conducted a search in internet to confirm that there is a lodged land conflict that was recorded as complaint under RSPO Case Tracker; raised by individual on those units that have not been certified.</p> <p>RSPO Case Tracker recorded complaint to PT. Agro Muara Rupit, date complaint submitted 17</p>	Complied

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	<p>May 2017. The complainant brought forward the issue of fraudulent land title to RSPO. The complainant claimed that his land was fraudulently sold by his cousin to PT. Agro Muara Rupit, a subsidiary of SIPEF Group.</p> <p>On 20 December 2018, the complaint is officially closed. The case tracker available on link <a href="https://askrspo.force.com/Complaint/s/case/5090000028Es1JAAS/detail">https://askrspo.force.com/Complaint/s/case/5090000028Es1JAAS/detail</a></p> <p>Based on RaCP tracker in RSPO website there are 4 MU's which have potential liability, 2 of them are PT. Umbul Mas Wisesa and PT. Tonton Usaha Mandiri (SIPEF) have been approved by the Compensation Task Force during the staged implementation of the RaCP between May 2014 and November 2015. Whilst the other 2, PT. Dendymarker Indah Lestari have submitted CN to the RSPO Secretariat and waiting for approval and PT. Bandar Sumatra Indonesia awaiting for RSPO to revert regarding any potential liabilities.</p>	
<p>Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&amp;C criterion 4.2</p>	<p>The assessment team has conducted a search to RSPO Complaint Panel and RSPO Dispute Settlement Facility to confirm that there is a lodged complaint related to casual worker payment and welfare, that was recorded as complaint under RSPO Case Tracker; raised by complainant requesting confidentiality, on those SIPEF Management Unit that have not been certified.</p> <p>RSPO Case Tracker recorded complaint to PT. Agro Kati Lama. The case tracker available on link <a href="https://askrspo.force.com/Complaint/s/case/5000o000039f8kAAA/detail">https://askrspo.force.com/Complaint/s/case/5000o000039f8kAAA/detail</a></p> <p>Date complaints submitted 22 January 2021.  Date complaints accepted 5 March 2021. The complainant brought forward the issue of:</p> <ul style="list-style-type: none"> <li>-The daily casual workers are paid below the minimum wage set out by the Musi Rawas District Government;</li> <li>-The daily casual workers are not protected and no remedy available for work accidents;</li> <li>-The daily casual workers are not equipped with personal protection equipment [PPE] and are not equipped with working tools;</li> <li>-The daily casual workers did not receive festive allowance in accordance with the regulation;</li> <li>-The daily casual workers, who are hired through the third party, do not get a pay slip. The amount written in the payment receipt is without formal</li> </ul>	<p>Complied</p>

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	<p>stamp and without the name of the party who rendered the payment.</p> <p>SIPEF correspond with RSPO Grievance Manager – Indonesia to follow up the complaint on 16 March 2021, 19 March 2021 with highlight that the complainant has decided to resolve the complaint through mediation by RSPO Dispute Settlement Forum/DSF.</p> <p>On 1 April 2021, SIPEF sent formal response to the complaint, addressed to RSPO Grievance Manager. The latest update is on 25 August 2021 where the first pre-mediation was complete and pending finalization of the mediation process agreement.</p> <p>On 16 June 2022, Complaint Panel has reviewed and deliberated on the Mediation Settlement Agreement between parties and reach decision to close the Complaint.</p>	
<p>Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&amp;C criteria 2.1</p>	<p>No legal non-compliance noted. The assessment team has conducted a search in internet to confirm that there is not new comments or dispute raised by the communities on those units that have not been certified.</p>	<p>Complied</p>
<p>Did the company conduct internal audit for those uncertified estates against the uncertified management units requirement and covering the RSPO P&amp;C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12? If yes, a positive assurance statement shall be available and justified.</p>	<p>Internal audit for PT. Agro Muara Rupit has been conducted on 22-23 November 2021. Report of internal audit completed on 30 November 2021 with reference to RSPO Certification System. Reference criteria of internal audit covered Criteria 2.1, 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12. Findings issued on 2.1 related to license for first aider, followed up on December 2021.</p> <p>Internal audit for PT. Agro Rawas Ulu has been conducted on 16-17 November 2021. Report of internal audit completed on 20 November 2021 with reference to RSPO Certification System. Reference criteria of internal audit covered Criteria 2.1, 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12.</p> <p>Internal audit for PT. Agro Kati Lama has been conducted on 16-17 February 2022. Report of internal audit completed on 18 February 2022 with reference to RSPO Certification System. Reference criteria of internal audit covered Criteria 2.1, 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12. Positive assurance statement already justified within the Internal Audit Checklist.</p>	<p>Complied</p>
<p>Are there any Critical (Major) non-compliance raised against any of the RSPO P&amp;C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12 during the last internal audit of the uncertified estates? If</p>	<p>Previously prior to certification, PT. Umbul Mas Wisesa and PT. Toton Usaha Mandiri had liabilities. The compensation plan have been approved by the Compensation Task Force during</p>	<p>Complied</p>

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<p>yes is the NC(s) actively addressed with RSPO?</p>	<p>the staged implementation of the RaCP between May 2014 and November 2015.</p>	
<p>Have there been any stakeholder (including NGO) consultation conducted?</p>	<p>All the new development that are not yet certified has undergone NPP and published in the RSPO website for 30-days stakeholder consultation.</p> <p>PT Agro Muara Rupit</p> <ul style="list-style-type: none"> <li>• <a href="https://rspo.org/certification/new-planting-procedure/public-consultations/sipef-group-pt-agro-muara-rupit-iii-and-iv-pt-amr">https://rspo.org/certification/new-planting-procedure/public-consultations/sipef-group-pt-agro-muara-rupit-iii-and-iv-pt-amr</a></li> <li>• <a href="https://rspo.org/certification/new-planting-procedure/public-consultations/sipef-pt-agro-muara-rupit">https://rspo.org/certification/new-planting-procedure/public-consultations/sipef-pt-agro-muara-rupit</a></li> </ul> <p>PT Agro Kati Lama</p> <ul style="list-style-type: none"> <li>• <a href="https://rspo.org/certification/new-planting-procedure/public-consultations/sipef-pt-agro-kati-lama-phase-ii">https://rspo.org/certification/new-planting-procedure/public-consultations/sipef-pt-agro-kati-lama-phase-ii</a></li> </ul> <p>PT Agro Rawas Ulu</p> <ul style="list-style-type: none"> <li>• <a href="https://rspo.org/certification/new-planting-procedure/public-consultations/sipef-pt-agro-rawas-ulu-new-planting-assessment-call-for-comments">https://rspo.org/certification/new-planting-procedure/public-consultations/sipef-pt-agro-rawas-ulu-new-planting-assessment-call-for-comments</a></li> <li>• <a href="https://rspo.org/certification/new-planting-procedure/public-consultations/sipef-pt-agro-rawas-ulu-new-planting-assessment-call-for-comments-1">https://rspo.org/certification/new-planting-procedure/public-consultations/sipef-pt-agro-rawas-ulu-new-planting-assessment-call-for-comments-1</a></li> <li>• <a href="https://rspo.org/certification/new-planting-procedure/public-consultations/sipef-pt-agro-rawas-ulu-new-planting-assessment-call-for-comments-1">https://rspo.org/certification/new-planting-procedure/public-consultations/sipef-pt-agro-rawas-ulu-new-planting-assessment-call-for-comments-1</a></li> </ul> <p>PT Bandar Sumatra Indonesia</p> <p><a href="https://rspo.org/certification/new-planting-procedure/public-consultations/sipef-pt-bandar-sumatra-indonesia-bandar-pinang-estate">https://rspo.org/certification/new-planting-procedure/public-consultations/sipef-pt-bandar-sumatra-indonesia-bandar-pinang-estate</a></p>	<p>Complied</p>

**3.2 Progress of scheme smallholders and/or outgrowers**

<b>Progress of scheme smallholders or outgrowers towards compliance with relevant standards</b>		
<b>Requirement</b>	<b>Remarks</b>	<b>Compliance</b>
<p>Has 100% of scheme smallholders and/or scheme outgrowers comply with the standard within three years of the mill's initial certification?</p> <p>OFI shall be raised if after one year where 100% of the scheme smallholders and scheme outgrowers are not in compliance, a minor NC after two years, and a major NC if this requirement is not met after three years.</p>	<p>Yes. Hargy Oil Palms Limited included the supplying smallholder into RSPO P&amp;C Certification scope.</p>	<p>Complied</p>

**Approved Time Bound Plan**

Name of company	Name of Mill	Location	Supply Base	TBP	Target Year for RSPO
PT. Agro Muko	Muko Muko POM	Mukomuko Regency, Bengkulu Province, Indonesia	Muko Muko Estate, Sei Betung Estate, Tanah Rekah Estate, Talang Petai Estate, Sei Kiang Estate and KMD	2011	Certified
	Bunga Tanjung POM	Mukomuko Regency, Bengkulu Province, Indonesia	Bunga Tanjung Estate, Air Bikuk Estate, Air Buluh Estate and KMD	2011	Certified
Air Manjunto Estate, Malin Deman Estate			2014	Certified	
PT Asri Rimba Wirabhakti (acquisition in 2018) – Sei Teramang Estate			2022	Certified June 2022	
PT. Mukomuko Agro Sejahtera	Bunga Tanjung POM	Mukomuko Regency, Bengkulu Province, Indonesia	Air Manjunto Estate, Malin Deman Estate	2014	Certified
			PT Asri Rimba Wirabhakti (acquisition in 2018) – Sei Teramang Estate	2022	Certified June 2022
PT. Tolan Tiga	Bukit Maradja POM	Simalungun Regency, North Sumatera, Indonesia	PT Eastern Sumatra Indonesia – Bukit Maradja Estate PT Kerasaan Indonesia – Kerasaan Estate	2010	Certified May 2010
			PT Timbang Deli Indonesia	2018	Certified in 2018 as supply base of Bukit Maradja POM
	Perlabian POM	Labuhan Batu Selatan Regency, North Sumatera, Indonesia	Perlabian Estate and Tolan Estate.	2010	Certified May 2010
PT. Umbul Mas Wisesa	Umbul Mas Wisesa (UMW) POM	Labuhan Batu Selatan Regency, North Sumatera, Indonesia	UMW South Estate, UMW North Estate PT Tonton Usaha Mandiri Estate	2014	Certified in March 2015
PT. Agro Kati Lama	Kati Lama POM	Musirawas Regency, South Sumatera, Indonesia		2023	Certification to take place after obtaining HGU; An NPP submitted in 2019 to cover new areas licenced at the end of 2018.
PT. Agro Rawas Ulu	No mill	Musirawas Regency, South Sumatera, Indonesia		2023	Part of Muara Rupit POM supply base;

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Name of company	Name of Mill	Location	Supply Base	TBP	Target Year for RSPO
					Certification to take place after obtaining HGU.
PT. Agro Muara Rupit	Muara Rupit POM	Musirawas Regency, South Sumatera, Indonesia		2023	Certification to take place after obtaining HGU; An NPP submitted in 2019 to cover new areas licenced at the end of 2018.
Hargy Oil Palm Limited (HOPL)	Hargy POM	East of Bialla, West New Britain Province, PNG	Hargy Estate	2009	Certified in April 2009
	Navo POM	50 Kms East of Bialla, West New Britain Province, PNG	Navo Estate, Bakada Estate and Mengan Estate	2009	Certified in April 2009
	Barema POM	30 km East of Bialla, West New Britain Province, PNG	Barema Estate	2014	Certified in April 2014
PT. Dendymarker Indah Lestari	Dendymarker POM	Musirawas Utara Regency, South Sumatera Province, Indonesia	Sei Mandang Estate, Sei Liam Estate	2015	Acquired on 1 August 2017. Certified in 2015.
PT. Citra Sawit Mandiri	No mill	Labuhanbatu Regency, North Sumatera Province		2022	Certification to take place after HGU, following review by RSPO.
PT. Bandar Sumatra Indonesia	No mill	Kecamatan Bintang Bayu, Kabupaten Serdang Bedagai, North Sumatra Indonesia	Bandar Pinang Estate	2025	Rubber plantation conversion. NPP submitted in July 2021

**3.3 Details of Nonconformities**

The nonconformities are listed below. The findings summary of the assessment by criteria are listed in Appendix A.

During this Assessment there were 0 (zero) Critical; 0 (zero) Minor nonconformities and 1 (one) Opportunity For Improvement raised. The Hargy Oil Palms Limited Palm Oil Mills Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

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

Non-conformity			
<b>NCR Ref #</b>	N/A	<b>Issued Date</b>	
<b>Due Date</b>		<b>Closure Date</b>	
<b>Indicator &amp; Category (Critical / Minor)</b>			
<b>Statement of Nonconformity:</b>			
<b>Requirement Reference:</b>			
<b>Objective Evidence:</b>			
<b>Corrections:</b>			
<b>Root Cause Analysis:</b>			
<b>Corrective Actions:</b>			
<b>Assessment Conclusion:</b>			

Opportunity for Improvements	
OFI #	Description
OFI 1	6.2.4 The company has provided educational facilities such as supporting teacher’s salary in public schools. Moreover, in some plantations, have been provided by school transports. However, the company has an opportunity for improvement to provide more school transport for students, in particular, considering the grievance from parents in Navo region (dated 17 February 2022), requested for student transportation to Bialla Secondary School.

Positive Findings	
PF #	Description
PF 1	

**3.3.1 Status of Nonconformities Previously Identified and Observations**

Non-conformity			
<b>NCR Ref #</b>	2104903-202108-M1	<b>Issued Date</b>	15 September 2021
<b>Due Date</b>	14 December 2021	<b>Closure Date</b>	7 December 2021
<b>Indicator &amp; Category (Critical / Minor)</b>	3.1.1 / Critical		
<b>Statement of Nonconformity:</b>	The data and document for smallholder planted area are not consistent, for projection contribution of FFB supplied by smallholders within the unit of certification.		
<b>Requirement Reference:</b>	(C) A business or management plan (minimum three years) is documented by the Milling Company that includes the projected contribution of fruit supplied by Smallholders that are within the Unit of Certification.		
<b>Objective Evidence:</b>	<ul style="list-style-type: none"> <li>• The submitted RSPO Pre Audit information submitted 30 August 2021, stated smallholder total area is 13,892.73 Ha;</li> <li>• The smallholder block listing 2021 dated 9 August 2021, total planted area from 3,647 smallholders is 14,876.72 Ha</li> </ul> <p>Based on field visit and document review, audit team found "ghost block" or block not existing and not planted (nil production) on smallholder No. 380150 (Augustine Kautu) and 350030 (Michael Waula) block was not planted with oil palm, however the smallholder block listing 2021 dated 9 August 2021, stated it was planted.</p>		
<b>Corrections:</b>	<ul style="list-style-type: none"> <li>i. Review all data sets that are currently in use and determine the data set to use with justification for use. After review of different sets of data; it was agreed that OMP data (14,741 Ha) is the most reliable data as it is the most updated.</li> <li>ii. Update Smallholder Management with data from OMP for Smallholder area and align with other relevant data including the pre-audit data.</li> <li>iii. Conduct analysis of updated smallholder block listing to identify ghost blocks (block not existing and not planted (nil production)) with verification on the ground and update to correspond to OMP information.</li> </ul>		
<b>Root Cause Analysis:</b>	<ul style="list-style-type: none"> <li>i. Different databases within HOPL have different data sets that have not been aligned to one figure; pending completion of smallholder block mapping and consequently updates. Currently in place are;               <ul style="list-style-type: none"> <li>a. 13,892.73 Ha: Based on past audit reports and not updated pending smallholder block mapping which is still in progress.</li> <li>b. 14,876.72 Ha: From SHM in Lintramax, has not been updated; pending smallholder block mapping completion.</li> <li>c. 14,741 Ha: From OMP database, initially based on Lintramax SHM (2016) and continuously updated in line with replanting program as it happens. The data in OMP thus is evolving data and will change year on year as the updates continue.</li> <li>d. 10,222.29ha: From GIS, Work in Progress as the smallholder mapping &amp; data analysis is still in progress.</li> </ul> </li> </ul> <p>Smallholder List in Lintramax SHM has not been updated for ghost blocks/ Block not existing and not planted (nil production), but in actual not planted to be removed.</p>		

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<b>Corrective Actions:</b>	<p>i. Conduct 6 monthly review of data on relevant databases containing smallholder hectare data and address any discrepancies in the data. This will be done by Sustainability.</p> <p>ii. Conduct monthly review of the Smallholder listing to verify continuing compliance with regards to the number of blocks on relevant databases containing smallholder data. This will be done by Smallholder Affairs department.</p> <p>Audit team verification:</p> <ul style="list-style-type: none"> <li>- Audit team reviewed the monthly smallholder data review. Month October smallholder data review stated total 3,647 smallholders with area of 14,876.72 Ha.</li> <li>- Audit team reviewed the month October smallholder data review stated total 3,635 smallholders with area of 14,768.15 Ha.</li> <li>- Audit team reviewed the "Smallholder Ghost Blocks Report Investigation", dated 1 December 2021, reviewing all not planted – no production smallholder blocks in all three divisions. Sampled investigation result: Division 2: smallholder No. 060643 Atharnasius Kolove, comment: Ghost block – Block not existing and not planted (nil production), corrective action: to be deleted from the system. Smallholder No. 380150 (Augustine Kautu), comment: Ghost block – Block not existing and not planted (nil production), corrective action: to be deleted from the system.</li> <li>- Audit team reviewed the 6 monthly smallholder data review, dated 4 December 2021.</li> <li>- The smallholder number verified at 3,635 smallholders with total hectareage of 14,768.15 Ha. The smallholders comprise of 1,797 LSS smallholder with area 8,587.32 Ha; 1,812 VOP smallholders with area 3,956.18 Ha; 26 Independent Estate smallholders with area 2,224.65 Ha.</li> </ul>
<b>Assessment Conclusion:</b>	Correction and corrective action have been implemented. Internal audit and inspections carried out as mechanism to prevent reoccurrence. The action plan by company is effective. NC Major closed out.
<b>Effectiveness Closure (for previous audit closed Critical NC):</b>	<p>Audit team checked on Smallholder Data period January - June 2022. The data on June 2022 shows smallholder number verified at total planted of 14,806.96 Ha, comprise of 14,215.58 Ha mature palm and 591.38 Ha immature palm.</p> <p>The update in smallholder hectareage was due to palm poisoning, replanting and other factors. The HOPL Smallholder Affairs Department demonstrate update after field verification. NC Major remains closed.</p>

Non-conformity			
<b>NCR Ref #</b>	2104903-202108-M2	<b>Issued Date</b>	15 September 2021
<b>Due Date</b>	14 December 2021	<b>Closure Date</b>	7 December 2021
<b>Indicator &amp; Category (Critical / Minor)</b>	3.6.1 / Critical		
<b>Statement of Nonconformity:</b>	The Health and Safety risk assessment, training and implementation was not consistently implemented.		

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

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	<p>ii. Continue trainings on safety to Smallholders as part of the Smallholder Agricultural Advisory Services programs. This is an established program that is already in place.</p> <p>iii. Continued training for plantation spray teams as per Plantation training plan.</p> <p>Audit team verification with audit facilitator:</p> <ul style="list-style-type: none"> <li>- Hargy Oil Palms Limited performed review and updated "Plantation Operation Risk Assessment REG-SUS-OHS-002-12" in 23 November 2021, loose fruit collection has been reviewed with Low Risk.</li> <li>- Review HIRADC/risk register for smallholder (reviewed and updated in parallel) in form of "Smallholders (SHAAS) Operation Risk Assessment REG-SUS-OHS-002-12" have been reviewed and updated 23 November 2021, loose fruit collection has been reviewed with Low Risk.</li> <li>- Personal Protective Equipment (PPE) Matrix as part of Personal Protective Equipment (PPE) SOP No. PRO-SUS-OHS-003-06 reviewed and updated; Fertiliser Handling (Application) requires gloves and apron. In accordance with "Plantation Operation Risk Assessment REG-SUS-OHS-002-12" dated 23 November 2021, the risk related to skin burns.</li> <li>- Procedure of Chemical Weeding has been reviewed.</li> <li>- Sustainability Department and Smallholder Department prepared OHS Training Plan for all sprayers, mixers, driver, including smallholders (including suspended smallholders) into Training Plan.</li> <li>- Sprayers, mixers, drivers, and smallholder blocks have been provided with training on identification and control of risks and health and safety training.</li> <li>- Field visit to Navo Estate – Kiba Plantation, audit team made interview with sprayers confirm that no inner clothing wore inside the sprayer's coverall. Field visit and verification to Navo Estate chemical shed, there are locker to keep clean clothing and shower for worker to cleanse after work.</li> <li>- Internal audit and inspection have been carried out to check consistent implementation.</li> </ul>
<b>Assessment Conclusion:</b>	<p>Correction and corrective action have been implemented. Internal audit and inspections carried out as mechanism to prevent reoccurrence. The action plan by company is effective. NC Major closed out.</p>
<b>Effectiveness Closure (for previous audit closed Critical NC):</b>	<p>In this ASA 2.4 audit, the company has shown the risk assessment of 2022 (Doc. REG-SUS-OHS-002-12_HOPL Plantation Risk Register 2022), and there is no change of SOP of Personal Protective Equipment (SOP No. PRO-SUS-OHS-003-06) and SOP of Chemical Weeding (PRO-PLT-UPK-006-03).</p> <p>Based on document review, filed observation and interview with workers, it can be concluded that the correction and corrective actions are still effective until ASA 2.4, in terms of:</p> <ul style="list-style-type: none"> <li>- Risk assessment of 2022 and SOP of Personal Protective Equipment are still relevant compared to previous verification.</li> <li>- Loose fruits collecting activities has been identified and stated as low risk.</li> <li>- Fertilizer applicator requires gloves and apron, and the implementation has been verified in the field. The workers are do not required mask, because the risk still can be prevent by application (spreading) technique.</li> </ul>

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	<ul style="list-style-type: none"> <li>- Training program for smallholders ex-suspended blocks are available and implemented.</li> <li>- It has been verified that all spraying workers in all plantations did not wear inner clothing inside the coverall. All plantations have provided locker to keep clean clothing and shower for worker to cleanse after work.</li> </ul> <p>Audit team made verification to smallholder sampled 2022:</p> <ul style="list-style-type: none"> <li>- Parfrey Peni No.350061 and Waimal Kepo No.031472 have received training on Best Management Practices &amp; Pests and Disease by PNG OPRA; Training on Smallholder Profile; Training on RSPO Principle and Criteria (code of ethical conduct, prohibit child labour, prudent use of agrochemical, waste management, RTE species protection, HCV area and Buffer zone, new planting and replanting cannot use fire). Training date 28 September 2021.</li> <li>- Parfrey Peni No.350061 received OHS Risk Assessment training on 4 December 2021.</li> <li>- Parfrey Peni No.350061 was represented by the sister Freda Rebon has received training on Best Management Practices &amp; Pests and Disease by PNG OPRA; Training on Smallholder Profile; Training on RSPO Principle and Criteria (code of ethical conduct, prohibit child labour, prudent use of agrochemical, waste management, RTE species protection, HCV area and Buffer zone, new planting and replanting cannot use fire). Training date 22 July 2022.</li> <li>- Parfrey Peni No.350061 was represented by the sister Freda Rebon in attending Pesticide Training on 22 March 2022.</li> </ul> <p>NC Major remains closed.</p>
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Non-conformity			
<b>NCR Ref #</b>	2104903-202108-M3	<b>Issued Date</b>	15 September 2021
<b>Due Date</b>	14 December 2021	<b>Closure Date</b>	7 December 2021
<b>Indicator &amp; Category (Critical / Minor)</b>	7.1.1 / Critical		
<b>Statement of Nonconformity:</b>	Organization cannot demonstrate implementation of IPM in smallholder area.		
<b>Requirement Reference:</b>	(C) IPM plans are implemented and monitored to ensure effective pest control.  Smallholder requirements: Organization managing the smallholders to manage IPM program for smallholders.		
<b>Objective Evidence:</b>	Based on field visit to Block 031470 (John Wapa), 031471 (Rodney Bui Yuku), 031472 (Waimal Kepo), 380150 (Augustine Kautu), there was no evident of IPM plans being implemented.		
<b>Corrections:</b>	i. Training & awareness to relevant staff on requirements for suspended blocks. ii. Conduct Training & Awareness on IPM for all suspended blocks.		
<b>Root Cause Analysis:</b>	Lack of understanding of the requirements for suspended smallholders in the scope extension of the audit.		

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<b>Corrective Actions:</b>	<p>i. Include suspended blocks in the IPM program in place for Smallholders. This is an established system already in place that consists of awareness/training, reporting of pest incidences to HOPL and further to OPRA and pest treatment &amp; management by HOPL based on OPRA advice.</p> <p>ii. Quarterly internal audits by Sustainability to include check on effectiveness of IPM system in place.</p> <p>Audit team verification:</p> <ul style="list-style-type: none"> <li>- Hargy Oil Palms Limited performed review and updated "Smallholders Integrated Pest Management Flowchart PRO-SAD-SHA-010-01" in 23 November 2021. The flowchart triggered with "pest is suspected in smallholder block by grower".</li> <li>- Sustainability Department and Smallholder Department provided training to field officer related to requirement for suspended blocks. Record sighted: 14 October 2021 to 20 sustainability officers, smallholder assistant, GIS assistant, Lands Office assistant, etc.</li> <li>- Sustainability Department and Smallholder Department prepared smallholder Training Plan, including best management practice and integrated pest management for smallholders (including suspended smallholders) into Training Plan.</li> <li>- Sustainability Department and Smallholder Department provided training and field days to suspended smallholders. Record sighted: 4 October 2021 to Ambusah Independent Estate; 8 October 2021 to 9 suspended smallholders in Ewasse village; 17 November 2021 to 38 suspended smallholders;</li> <li>- Field visit to sampled smallholders, audit team made interview and found the smallholder now understands the Integrated Pest Management, company policy with pesticide handling and pesticide container disposal.</li> </ul>
<b>Assessment Conclusion:</b>	Correction and corrective action have been implemented. Internal audit and inspections carried out as mechanism to prevent reoccurrence. The action plan by company is effective. NC Major closed out.
<b>Effectiveness Closure (for previous audit closed Critical NC):</b>	<p>Audit team made verification to smallholder sampled 2022:</p> <p>Audit team verified with previously suspended blocks No.031470 John Wapa, No.031471 Rodney Bui Yuku, No.031472 Waimal Kepo, No.380150 Augustine Kautu, the smallholder blocks have been inspected in 4 November 2021.</p> <p>Subsequently, HOPL provides training on Pest &amp; disease, FFB price formula, Grievance SOP to the smallholder dated 17 November 2021.</p> <p>NC Major remains closed.</p>

Non-conformity			
<b>NCR Ref #</b>	2104903-202108-M4	<b>Issued Date</b>	15 September 2021
<b>Due Date</b>	14 December 2021	<b>Closure Date</b>	7 December 2021
<b>Indicator &amp; Category (Critical / Minor)</b>	7.2.8 / Critical		
<b>Statement of Nonconformity:</b>	In Smallholders area, Organization cannot demonstrated that pesticide containers are punctured before being disposed.		

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	Escalated from previous Minor NC: 1992828-202012-N1
<b>Requirement Reference:</b>	<p>All pesticide containers are triple rinsed and punctured before being disposed of and/or handled responsibly if used for other purposes. Empty pesticide containers may be used for pre-mixing spray solution before transport to the plantation for use by sprayers. In this case they must have visual identification such as painted lines around them.</p> <p>Smallholder requirements: The requirements fully applicable to smallholders.</p>
<b>Objective Evidence:</b>	Audit team found: Based on field Visit to Smallholder 010398 (Barnabas Kua), 010380 (L. Imaran Mogosa A. – Mathias Arombi), 010292 (Kotbundi Masip), observed that pesticide containers disposed in landfill were not cut or punctured.
<b>Corrections:</b>	Empty containers punctured and disposed into the pit as per SOP. Photos provided to audit facilitators onsite.
<b>Root Cause Analysis:</b>	Concerned smallholders have been trained & made aware of the requirements of chemical handling, usage & storage; the latest in 2020, however understanding of the specific requirements not fully understood by growers.
<b>Corrective Actions:</b>	<ol style="list-style-type: none"> <li>i. Review Waste disposal SOP to simplify and clarify on the waste disposal practices in smallholder blocks.</li> <li>ii. Continue trainings on Chemical Usage and Storage to Smallholders as part of the Smallholder Agricultural Advisory Services (SHAAS) programs. This is an established program that is already in place.</li> <li>iii. Continue Block inspections and internal audits on smallholder blocks and take appropriate actions on inspections and audits outcomes.</li> <li>iv. Quarterly internal audits by Sustainability to verify effectiveness of established program in place.</li> </ol> <p>Audit team verification:</p> <ul style="list-style-type: none"> <li>- Hargy Oil Palms Limited performed review and updated "Waste Management Pan PLN-SUS-EMS-001-13" in 30 October 2021. Revision: "All empty chemical containers after use are collected triple rinsed and re-used for chemical mixing, punctured or cut and disposed into the chemical waste pit located within the smallholder block".</li> <li>- Audit team verified the record of training for smallholders; Block Inspection Reports and Internal Audit Reports.</li> <li>- Audit team made visit to smallholder block previously identified with nonconformity: Barnabas Kua No.010398, Imaran Mogosa No.010380, Kotbundi Masip No.010292; and expanded the visit to new smallholder not sampled before: Susan Takun No.010364, Tabitha Kamule No.111175, Raymond Sana No.010306. Interview with the smallholder, they now understood empty chemical container to be cut/destroyed before disposed of to the chemical pit. The smallholders attended training on 27 September 2021. Verified handling of used chemical container: cut in and disposed of into chemical pit.</li> </ul>
<b>Assessment Conclusion:</b>	Correction and corrective action have been implemented. Internal audit and inspections carried out as mechanism to prevent reoccurrence. The action plan by company is effective. NC Major closed out.

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<b>Effectiveness Closure (for previous audit closed Critical NC):</b>	<p>Audit team made verification to smallholder sampled 2022:</p> <p>Audit team verified Block Inspection Report for Parfrey Peni No.350061. So far no chemical spraying, thus no empty pesticide found on domestic waste landfill.</p> <p>Additional verification made to smallholder No.171738 Paul Seria, No.101082 Michael Palia, No.101088 Kangi Waguo implementing destroying empty chemical container when disposing to chemical pit.</p> <p>NC Major remains closed.</p>
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Non-conformity			
<b>NCR Ref #</b>	2104903-202108-M5	<b>Issued Date</b>	15 September 2021
<b>Due Date</b>	14 December 2021	<b>Closure Date</b>	7 December 2021
<b>Indicator &amp; Category (Critical / Minor)</b>	7.3.2 / Critical		
<b>Statement of Nonconformity:</b>	Segregation of waste is not implemented properly by Plantation Escalated into Major NC from previously Minor NC 1992828-202012-N2.		
<b>Requirement Reference:</b>	<p>Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated. Medical waste must be disposed of in purpose- built incinerators.</p> <p>Guidance: With minimal opportunity for recycling in PNG and Solomon Islands, waste disposal is by landfill. Segregation of waste shall be into Hydrocarbon contaminated waste, putrescible waste and hard waste and compostable waste. Company procedures must state how these waste streams are managed.</p> <p>Smallholder requirements: The requirements fully applicable to smallholders.</p>		
<b>Objective Evidence:</b>	In year 2021, during ASA2_3 - based on field visit to Navo Estate - Kiba Plantation, contaminated rags and contaminated gloves disposed of into domestic waste pit. The corrective action is not effective - escalated into Major NC.		
<b>Corrections:</b>	Contaminated rags removed from domestic pit and placed correctly in the hydrocarbon pit. Evidence of corrections done, sent to audit facilitators.		
<b>Root Cause Analysis:</b>	<p>All processes and procedures are in place for waste management, however lack of training, awareness and understanding of these process and procedures including:</p> <ul style="list-style-type: none"> <li>i. Waste segregation</li> <li>ii. Absence of land fill attendant at landfill site</li> </ul> <p>Rubbish being dumped outside of landfill operating times.</p>		
<b>Corrective Actions:</b>	<ul style="list-style-type: none"> <li>i. Review Waste Management plan to simplify and clarify on the waste disposal practices at landfill.</li> <li>ii. Conduct Training/awareness to all relevant staff of sites that use Atata landfill.</li> <li>iii. Enforce the landfill operating hours from 8am to 3pm with a permanent landfill attendant manning the landfill during these operating hours.</li> <li>iv. Monitoring of landfill practices shall be conducted on a monthly basis as part of the monthly Workplace inspection (WPI) by the Plantation Manager. Results of</li> </ul>		

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	<p>this inspection shall be communicated to Division managers responsible for the landfill area to address issues raised.</p> <p>v. Quarterly internal audits by Sustainability shall verify the effectiveness of the implementation of Waste management plan.</p> <p>Audit team verification:</p> <ul style="list-style-type: none"> <li>- Hargy Oil Palms Limited performed review and updated "Waste Management Plan PLN-SUS-EMS-001-13" in 30 October 2021.</li> <li>- Audit team verified the record of training for landfill requirement – waste segregation; Work Place Inspection Reports and Internal Audit Reports, including the corrective action reports.</li> <li>- Audit team made visit Navo Estate’s Waste Pits; found No contaminated rags or contaminated glove in the domestic waste pit; No domestic waste in hydrocarbon waste pit. Interview with the Waste Pit Attendant, stating He have received training on waste type, waste handling, waste segregation, PPE use and no burning policy.</li> </ul>
<p><b>Assessment Conclusion:</b></p>	<p>Correction and corrective action have been implemented. Internal audit and inspections carried out as mechanism to prevent reoccurrence. The action plan by company is effective. NC Major closed out.</p>
<p><b>Effectiveness Closure (for previous audit closed Critical NC):</b></p>	<p>Audit team assessed Estate landfill management during 2022 audit:  Based on visit to Hargy Estate-Barema Plantation landfill area, audit team found that the segregation of waste implemented consistently: hydrocarbon waste, domestic waste, plastic waste, and septic waste.  Based on visit to Navo Estate-Ibana Plantation landfill area, audit team found that the waste segregation implemented consistently: domestic waste pit for tin, plastic, bottles, food wrap, cans, boxes; plastic pit for rinsed plastic chemical, mill boiler chemical container, rinsed fertilizer bag, polybags; septic pit for septic tank sludge. Training provided for Ibana landfill attendant, Bonney Yambe: types of rubbish, rubbish segregation, landfill record, landfill upkeep work, no scavenger policy – on 8 August 2022.  Plantation EHS Monthly Inspection Checklist for Ibana Plantation dated 16 May 2022 by John Peter. The checklist covers all aspect such as genset condition, fuel storage and issue, office area, car park, first aid kit, PPE provision, pesticide use, spraying, fertilizer store, landfill condition (including segregation) and housing condition. Result no finding.  Plantation EHS Monthly Inspection Checklist for Pandi Estate-Bakada Plantation dated 29 July 2022 by Michael Silpaga. The checklist covers all aspect including landfill condition (including segregation). Result no finding.</p> <p>Mill EHS Monthly Inspection Checklist for Navo POM dated 3 August 2022 by David Tautele. The checklist covers all aspect such as general plant condition, first aid, walkways, contractor safety, mill housekeeping, boiler emission, diesel fuel storage, CPO tank, genset condition, water treatment plant and laboratory, workshop, carpark, working at height, effluent ponds, documentation, compound. Result no finding/deviation in landfill operation.</p> <p>Training provided for Navo Estate-Atata landfill attendant, Martin Ai: types of rubbish, rubbish segregation, landfill record – on 7 July 2022.</p>

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	<p>Training provided for Pandi Estate-Gamupa landfill attendant, Jonah Pansop: types of rubbish, rubbish segregation, disposal timing, landfill record – on 23 March 2022.</p> <p>NC Major remains closed.</p>
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Non-conformity			
<b>NCR Ref #</b>	2104903-202108-N1	<b>Issued Date</b>	15 September 2021
<b>Due Date</b>	Next ASA	<b>Closure Date</b>	20 August 2022
<b>Indicator &amp; Category (Critical / Minor)</b>	1.1.5 / Minor		
<b>Statement of Nonconformity:</b>	Current list of contact and details of stakeholders are not up-to-date.		
<b>Requirement Reference:</b>	There is a current list of contact and details of stakeholders and their nominated representatives.		
<b>Objective Evidence:</b>	Unit of Certification has a List of Interested Parties (REG-SUS-GEN-001-10, issue No.10, issue date 18 March 2021) consisting details and contact of stakeholders. However, when audit team selecting one of stakeholder namely Live and Learn Environmental Education Inc. to be contacted, it was informed that organization is inactive or no longer operated in West New Britain Province. While, it still available in stakeholders list.		
<b>Corrections:</b>	List of Interested parties have been update with the specific stakeholder (Live & Learn Environmental Education Inc. removed.		
<b>Root Cause Analysis:</b>	List of Interested Parties is updated once annually. Should there be any changes after the list is updated, the register would not capture that.		
<b>Corrective Actions:</b>	<ul style="list-style-type: none"> <li>i. List of interested parties to be updated on an annual basis or as and when advised by exiting stakeholder, so that only active stakeholders are on the list</li> <li>ii. Revise the Communication Procedure to reflect the frequency of update.</li> <li>iii. Quarterly review of annual workplans (planned vs done) by Assistant Sustainability Manager. Annual workplans shall capture the updating of the List of Interested Parties. Results of review shall be discussed with the relevant staff and actions taken by the relevant staff, if required.</li> </ul>		
<b>Assessment Conclusion:</b>	<p>Audit team verified the HOPL stakeholder list year 2022. The stakeholder list consist of organization name, contact person name, email and/or telephone number and address.</p> <p>Based on the document, audit team contacted several stakeholders for consultation process during onsite audit process 8-20 August 2022: Conservation Environment and Protection Authority/CEPA and Department of Labour and Industrial Relations (National Government), Central Nakanai LLG (Local Level Government), Bialla Oil Palm Grower Association (Oil Palm Growers), Baikakea and Urumaili communities (Local communities and Wards), Ela Lumkere (Incorporated Land Groups), Mahonia Na Dari (Non Government Organization), Worker Union, Social Issue Committee, Earthworks Mowing (Contractor). All of the contacted stakeholders are available for communication/consultation with audit team and up-to-date/current.</p>		

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	Based on verification of correction, root cause analysis, and corrective actions, this non-conformity has been complied and closed.
<b>Effectiveness Closure (for previous audit closed Critical NC):</b>	N/A

Non-conformity			
<b>NCR Ref #</b>	2104903-202108-N2	<b>Issued Date</b>	15 September 2021
<b>Due Date</b>	Next ASA	<b>Closure Date</b>	20 August 2022
<b>Indicator &amp; Category (Critical / Minor)</b>	3.2.2 / Minor		
<b>Statement of Nonconformity:</b>	Untimely submission of the RSPO metrics template.		
<b>Requirement Reference:</b>	As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the RSPO metrics template.		
<b>Objective Evidence:</b>	The RSPO metrics template was submitted three days after audit commencement date on 3 September 2021. According to RSPO Metrix standard, version 2.1, Hargy Oil Palms Limited is allowed to provide data up to two months before audit month. This has taken into consideration that it will need to submit the metrics template to CB prior to an Audit, of which it might not be able to provide data up to one month before audit.		
<b>Corrections:</b>	<ul style="list-style-type: none"> <li>i. Sites not fully aware of the requirements and specific data to be submitted to be included into the RSPO Metrics. RSPO Metrics requirements was communicated but was not clearly explained for them to be fully aware.</li> <li>ii. Current data collection points does not have the information in the format required by RSPO Metrics, thus more time required to convert into appropriate format for input.</li> <li>iii. The RSPO Matrix is a totally new requirement and was not fully aware on some of the information's/data to be collected and put in thus slowing progress.</li> <li>iv. Untimely submission of data from the sites.</li> </ul>		
<b>Root Cause Analysis:</b>	<ul style="list-style-type: none"> <li>1. Sites not fully aware of the requirements and specific data to be submitted to be included into the RSPO Metrics. RSPO Metrics requirements was communicated but was not clearly explained for them to be fully aware.</li> <li>2. Current data collection points does not have the information in the format required by RSPO Metrics, thus more time required to convert into appropriate format for input.</li> <li>3. The RSPO Matrix is a totally new requirement and was not fully aware on some of the information's/data to be collected and put in thus slowing progress.</li> <li>4. Untimely submission of data from the sites.</li> </ul>		
<b>Corrective Actions:</b>	<ul style="list-style-type: none"> <li>i. Training to site managers/clerks on data required for the compilation of RSPO Metrics.</li> <li>ii. Develop RSPO Metrics SOP that provides a guide on RSPO metrics compilation and reporting.</li> </ul>		

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	<p>iii. Schedule data collection for RSPO Metrics on a monthly basis for submission 2 months prior to external audit.</p> <p>iv. Quarterly review of annual workplans (planned vs done) by Assistant Sustainability Manager. Annual workplans shall capture the data collection for RSPO metrics compilation. Results of review shall be discussed with the relevant staff and actions taken by the relevant staff, if required.</p>
<b>Assessment Conclusion:</b>	<p>Unit of certification has been submitted the RSPO Metric Template on 22 July 2022 before the audit date on 8 August 2022.</p> <p>Based on verification of correction, root cause analysis, and corrective actions, this non-conformity has been complied and closed.</p>
<b>Effectiveness Closure (for previous audit closed Critical NC):</b>	N/A

Non-conformity			
<b>NCR Ref #</b>	2104903-202108-N3	<b>Issued Date</b>	15 September 2021
<b>Due Date</b>	Next ASA	<b>Closure Date</b>	20 August 2022
<b>Indicator &amp; Category (Critical / Minor)</b>	3.3.2 / Minor		
<b>Statement of Nonconformity:</b>	<p>Organization has not check consistent implementation of Pollution Control Device/PCD at Mill;</p> <p>and Organization has not demonstrate field day records of suspended smallholders.</p>		
<b>Requirement Reference:</b>	<p>A mechanism to check consistent implementation of procedures is in place.</p> <p>Smallholder requirements:</p> <p>Organization that is managing the smallholders maintains production records and field day attendance records as evidence of improved performance.</p>		
<b>Objective Evidence:</b>	<ul style="list-style-type: none"> <li>- Monitoring of Pollution Control Device was not performed regularly. Based on field visit to Navo POM, in the Pollution Control Device, rubbish skimmed from the trap have been dumped outside of the fence. Inconsistent with SOP Waste Management Plan No.PLN-SUS-EMS-001-011 Section 7.0 Hargy Palm Oil Mills stating "Storm water from the mill, drains to a main trap to capture any traces of oil and grease from the milling processes before being discharged. The traps are cleaned regularly and checked by the Mill Upkeep Supervisor. The grease traps in particular are inspected each day and cleaned when necessary".</li> <li>- Based on review to suspended smallholder documents Block 031470 (John Wapa), 031471 (Rodney Bui Yuku), 031472 (Waimal Kepo), there are no records of field day attendance.</li> </ul>		
<b>Corrections:</b>	<ul style="list-style-type: none"> <li>i. Clean up action conducted on the spot and silt/debris removed from PCD and dumped outside the fence have been cleaned up. Evidence of correction provided to audit facilitators.</li> <li>ii. In order to prevent unnecessary disposal of rubbish skimmed off from oil &amp; grease trap to the environment, L-structure steel plate was fabricated and welded along the fence.</li> </ul>		

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	<ul style="list-style-type: none"> <li>iii. Discussed with Ponds Effluent &amp; Upkeep supervisors to contain rubbish removed from Grease/Oil trap and load them into plastic drums ready for transport to Landfill site and disposed properly.</li> <li>iv. Training &amp; awareness to relevant staff on requirements for suspended blocks.</li> </ul>
<b>Root Cause Analysis:</b>	<ul style="list-style-type: none"> <li>i. Navo Mill Upkeep Team not fully aware of the PCD cleaning requirements including frequency of cleaning.</li> <li>ii. Lack of awareness from workers on proper disposal of rubbish skimmed off from the triple interceptor.</li> <li>iii. Incorrect procedures used to disposed rubbish captured from oil &amp; grease.</li> <li>iv. Lack of understanding of the requirements for suspended smallholders in the scope extension of the audit. No clear requirements on auditing of smallholder suspended blocks.</li> </ul>
<b>Corrective Actions:</b>	<ul style="list-style-type: none"> <li>i. Update Waste Management Plan and related procedures to clearly outline the process for disposal of waste from Mill PCD's.</li> <li>ii. Conduct training to Mill's Upkeep workers on proper wastes disposal.</li> <li>iii. Regular PCD inspections and keep records on Mill PCD Verification checklist: FOR-SUS-EMS-004 -06</li> <li>iv. Regular PCD cleanup based on inspections and file all cleaning records using the record form: FOR- SUS-EMS -001 –06</li> <li>v. Monthly update shall be given on PCD cleaning schedule (planned vs done) by relevant mill supervisors at RSPO monthly meeting. This shall be documented in the RSPO Monthly meeting minutes.</li> <li>vi. Going forward, all suspended blocks to be fully maintained and kept up to standard including awareness/trainings on RSPO requirements prior to audits.</li> </ul>
<b>Assessment Conclusion:</b>	<p>Audit team verified the training provided by Hargy Oil Palms Limited to the employees:</p> <ul style="list-style-type: none"> <li>- Pollution Control Device cleaning and waste segregation training for Engineering in Hargy POM, dated 3 August 2022 – attended by 13 personnel: upkeep attendant, mill pond upkeep, including contractors.</li> <li>- Pollution Control Device cleaning and waste segregation training for Engineering in Navo POM, dated 27 July 2022 – attended by 12 personnel: upkeep attendant, mill pond upkeep, pond operators.</li> </ul> <p>Audit team verified the Pollution Control Devices Inspection Checklist</p> <ul style="list-style-type: none"> <li>- PCD Inspection Checklist Barema VWS Period July 2022, checking oil trap near workshop – not clean/pump out truck postponed, drain near washbay – clean, drain in front of old workshop – clean, bund at lube bay – not clean/scheduled clean up, bund for fuel tank – not clean/scheduled for clean up, drain near new workshop – clean. All cleaned out as of 1 August 2022.</li> <li>- Mill PCD Inspection Checklist Verification Checklist period 12 July 2022; checking drain upfront mill office, next to ramp, near KCP plant, at clarification station, at boiler station, at RO plant – clean and cleaning record filled. Grease trap next to kernel plant, next to ETP, at EFB yard – clean.</li> <li>- PCD Inspection Checklist Fuel Tank Navo POM period August 2022, checking tank bund – newly constructed, oil trap – new constructed PCD, clean. All cleaned out as of 15 August 2022.</li> </ul>

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	<p>Audit team verified the training/field day attendance for smallholder No.031470 (John Wapa) – represented by the wife Cristina Buku, No.031471 (Rodney Bui Yuku) – represented by Yuku Bali, No.031472 (Waimal Kepo): Best Management Practice Training on 11 July 2022, with the other 30 smallholders in Barema area.</p> <p>Audit team verified the Block Inspection Report for smallholder No.31470 John Wapa inspected on 4 November 2021; No.31471 inspected on 4 November 2021; No.31472 Waimal Kepo inspected on 4 November 2021.</p> <p>Based on verification of correction, root cause analysis, and corrective actions, this non-conformity has been complied and closed.</p>
<b>Effectiveness Closure (for previous audit closed Critical NC):</b>	N/A

Non-conformity			
<b>NCR Ref #</b>	2104903-202108-N4	<b>Issued Date</b>	15 September 2021
<b>Due Date</b>	Next ASA	<b>Closure Date</b>	20 August 2022
<b>Indicator &amp; Category (Critical / Minor)</b>	3.7.2 / Minor		
<b>Statement of Nonconformity:</b>	Hargy Oil Palms Limited has not provided evidence training records for suspended smallholders.		
<b>Requirement Reference:</b>	<p>Records of training are maintained, where appropriate on an individual basis. Appropriate records include records of training or evidence of competency for trade qualifications, boiler operation and other safety related activities such as chemical handling</p> <p>Smallholder requirements: Smallholder training records are maintained.</p>		
<b>Objective Evidence:</b>	Hargy Oil Palms Limited has not provided evidence training records for suspended smallholders.		
<b>Corrections:</b>	<ul style="list-style-type: none"> <li>i. Conduct training for all suspended blocks on RSPO requirements.</li> <li>ii. Complete training records for the suspended small holder blocks as evidence that they have attended trainings.</li> </ul>		
<b>Root Cause Analysis:</b>	Lack of understanding of the requirements for suspended smallholders in the scope extension of the audit. No clear requirements on auditing of smallholder suspended blocks.		
<b>Corrective Actions:</b>	<ul style="list-style-type: none"> <li>i. Conduct field day trainings to the small holder suspended blocks.</li> <li>ii. Complete training records for the suspended small holder blocks as evidence that they have attended trainings.</li> <li>iii. Quarterly internal audits by Sustainability to verify effectiveness of established smallholder training program in place.</li> </ul>		
<b>Assessment Conclusion:</b>	<p>Audit team made verification to sampled smallholders 2022:</p> <ul style="list-style-type: none"> <li>- Training Program of 2022, that has included smallholders training (including ex-suspended smallholders).</li> </ul>		

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	<ul style="list-style-type: none"> <li>- Training records for suspended smallholders related RSPO certification (best practices/safety, spraying, weeding, manuring, pruning, FFB pricing/payment, grievance, companys policy) on 28 September 2021, 4 October 2021, 17 November 2021, 11 July 2022 and 22 July 2022.</li> <li>- Quarterly internal audits by Sustainability to verify effectiveness of established smallholder training program in place.</li> <li>- Based on field observation and interview with suspended smallholder (Waimal Kepo, No. 031472), he has been given trainings related RSPO requirements. He has understood the oil palm best practices, pricing mechanism and payment, how to submit a grievance, and prohibition of child labor and forced labour. He can show evidence of land title, and records of harvesting (docks and payment slips). Moreover, the block is well maintained, the ground is slashed and the fronds are pruned.</li> <li>- For quarterly internal audit, it will be conducted in the future considering full training and preparation have just been finished before the RSPO external audit (the last training on 22 July 2022).</li> <li>- Parfrey Peni No.350061 and Waimal Kepo No.031472 have received training on Best Management Practices &amp; Pests and Disease by PNG OPRA; Training on Smallholder Profile; Training on RSPO Principle and Criteria (code of ethical conduct, prohibit child labour, prudent use of agrochemical, waste management, RTE species protection, HCV area and Buffer zone, new planting and replanting cannot use fire). Training date 28 September 2021.</li> <li>- Parfrey Peni No.350061 received OHS Risk Assessment training on 4 December 2021.</li> <li>- Parfrey Peni No.350061 was represented by the sister Freda Rebon has received training on Best Management Practices &amp; Pests and Disease by PNG OPRA; Training on Smallholder Profile; Training on RSPO Principle and Criteria (code of ethical conduct, prohibit child labour, prudent use of agrochemical, waste management, RTE species protection, HCV area and Buffer zone, new planting and replanting cannot use fire). Training date 22 July 2022.</li> <li>- Parfrey Peni No.350061 was represented by the sister Freda Rebon in attending Pesticide Training on 22 March 2022.</li> </ul> <p>Audit team verified the training/field day attendance for smallholder No.031470 (John Wapa) – represented by the wife Cristina Buku, No.031471 (Rodney Bui Yuku) – represented by Yuku Bali, No.031472 (Waimal Kepo): Best Management Practice Training on 11 July 2022, with the other 30 smallholder in Barema area.</p> <p>Based on verification of correction, root cause analysis, and corrective actions, this non-conformity has been complied and closed.</p>
<b>Effectiveness Closure (for previous audit closed Critical NC):</b>	N/A

Non-conformity			
<b>NCR Ref #</b>	2104903-202108-N5	<b>Issued Date</b>	15 September 2021
<b>Due Date</b>	Next ASA	<b>Closure Date</b>	20 August 2022
<b>Indicator &amp; Category (Critical / Minor)</b>	4.3.1 / Minor		

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<b>Statement of Nonconformity:</b>	Hargy Oil Palms Limited made community development projects, however it has not demonstrated evidence the contribution made based on the results of consultation with local communities.  In addition, Hargy Oil Palms Limited has not demonstrated field days and other extension activities was conducted by organization to suspended smallholders.
<b>Requirement Reference:</b>	Contributions to community development that are based on the results of consultation with local communities are demonstrated.
<b>Objective Evidence:</b>	<ul style="list-style-type: none"> <li>- Hargy Oil Palms Limited made community development projects, however it has not demonstrate evidence the contribution made based on the results of consultation with local communities.</li> <li>- Hargy Oil Palms Limited has not demonstrated field days and other extension activities was conducted by organization to suspended smallholders.</li> </ul>
<b>Corrections:</b>	<ul style="list-style-type: none"> <li>i. Provide the evidence for latest community development projects.</li> <li>ii. Conduct field day/training sessions for suspended blocks.</li> </ul>
<b>Root Cause Analysis:</b>	<ul style="list-style-type: none"> <li>i. Evidence available for community development projects based on results of consultation with local communities, however not provided as request was interpreted as seeking evidence for Community Assistance only which is one component of HOPLs CSR.</li> <li>ii. Lack of understanding of the requirements for suspended smallholders in the scope extension of the audit.</li> </ul>
<b>Corrective Actions:</b>	<ul style="list-style-type: none"> <li>i. Annual stakeholder meetings with key stakeholders.</li> <li>ii. Collate the information received from Request for Assistance as one of the sources of data for informing decision making on HOPL CSR.</li> </ul>
<b>Assessment Conclusion:</b>	<p>Audit team made verification during audit in 2022:</p> <p>Hargy Oil Palms Limited demonstrate the community development program was prepared in response to result of consultation with local communities. Audit team verified samples of meeting records/minutes of meeting:</p> <ul style="list-style-type: none"> <li>- Briefing of meeting with West New Britain Provincial Health Authority dated 11 April 2022. The meeting explaining the proposal fo Lalopo Medium Term Development Plan III.</li> <li>- Meeting with canteen operators 13 July 2022, with 11 trading/canteen business owners in all HOPL operation.</li> </ul> <p>Based on verification of correction, root cause analysis, and corrective actions, this non-conformity has been complied and closed.</p>
<b>Effectiveness Closure (for previous audit closed Critical NC):</b>	N/A

Non-conformity			
<b>NCR Ref #</b>	2104903-202108-N6	<b>Issued Date</b>	15 September 2021
<b>Due Date</b>	Next ASA	<b>Closure Date</b>	20 August 2022

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<b>Indicator &amp; Category (Critical / Minor)</b>	6.5.3 / Minor
<b>Statement of Nonconformity:</b>	Assessment and consultation of new mother needs has not demonstrated.
<b>Requirement Reference:</b>	Management has assessed the needs of new mothers, in consultation with the new mothers, and a procedure has been determined that identifies actions are taken to address the needs of them and their babies.
<b>Objective Evidence:</b>	Hargy Oil Palms Limited has not demonstrate record of assessment and consultation of new mother.
<b>Corrections:</b>	Maintain records for the following processes; <ul style="list-style-type: none"> <li>i. Pre and antenatal clinics conducted at all clinics on scheduled days of the week.</li> <li>ii. Clinics continued support on the progress for both new mothers and expecting mothers; through pregnancy and into the early stages of the child’s development.</li> </ul>
<b>Root Cause Analysis:</b>	Initial assessment & consultation of new mothers done as evidenced by process and Maternity Leave and Breastfeeding policies currently in place, however no proper records kept. The current process in place includes; <ul style="list-style-type: none"> <li>a) All Clinics have specific days in the week for both pre and antenatal clinics. This includes conducting reviews, pregnancy progression, health and wellbeing of the mother and baby and referral to the Company Doctor should next level care be required. This is further supported by 2 x Ultra Sound units specifically purchased to support expectant mothers throughout their pregnancy.</li> <li>b) All clinics continue to support the progress for both new mothers and expecting mothers throughout their pregnancy and into the early stages of the child’s development. The latter is however acted upon the mothers request with the exception of immunization.</li> <li>c) HOPL also have a Maternity Leave and Breastfeeding Policy in place to support new mothers at the latter stage of their pregnancy and after the birth with Breastfeeding needs. Both policies are in line with the PNG Employment Act 1975.</li> </ul>
<b>Corrective Actions:</b>	<ul style="list-style-type: none"> <li>i. All clinics to follow their weekly schedules for both pre and antenatal clinics and keep records.</li> <li>ii. Family Planning are conducted to assist families with safe motherhood and number of children they wish to have.</li> </ul>
<b>Assessment Conclusion:</b>	Audit team made verification during audit 2022: Audit team verified through interview with female worker, housewives and company’s medical team, and confirmed Hargy Oil Palms Limited has identified the need from the new mothers. Information gathered through mother/patient visit to prenatal and antenatal clinic. Up to August 2022, the need identified related to pregnancy test, pregnancy check, delivery/labor ward, baby check and immunization. HOPL prepared Maternity and Child Health Management Process comprise of: <ul style="list-style-type: none"> <li>- Treatment for pregnant mother at nearest plantation clinic by plantation clinic nurse, including pregnancy test for confirmation of pregnancy.</li> </ul>

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	<ul style="list-style-type: none"> <li>- Registering the pregnant mother to Antenatal Register. Following that regular checks are continued until delivery. All checks are conducted based on PNG Standard for Antenatal Checks.</li> <li>- During the antenatal checks and if issues are encountered, the clinic nurse then refers the mother to HEO or doctors in Navo/Hargy for further review and management.</li> <li>- After delivery, mothers are expected to bring their babies or children &lt;5 years old to clinic during Maternity and Child Health Clinics for routine baby checks, baby immunizations, discussion on breastfeeding and child nutrition, and Family Planning for the mothers.</li> </ul> <p>Record and implementation sighted:</p> <ul style="list-style-type: none"> <li>- Hargy Oil Palms Limited and SIPEF supports the maternity ward, operating since 2020 for women.</li> <li>- Weekly Child Health Program – 2022: Tuesday – Family planning, Wednesday – well baby clinic, Thursday – Antenatal clinic;</li> <li>- Company medical team has a Antenatal Register Book, sampled from Hargy Estate-Barema Plantation, reported 9 mothers being checked in 2022.</li> <li>- Company medical team has a Antenatal Register Book, sampled from Barema POM clinic, reported 9 mothers being checked in 2022.</li> </ul> <p>Company medical team has a program for family planning. Medical team shows register book "Family planning attendance register book". Up to August 2022, medical team recorded a presence of 28 mother attended for family planning session.</p> <p>Based on verification of correction, root cause analysis, and corrective actions, this non-conformity has been complied and closed.</p>
<b>Effectiveness Closure (for previous audit closed Critical NC):</b>	N/A

Non-conformity			
<b>NCR Ref #</b>	2104903-202108-N7	<b>Issued Date</b>	15 September 2021
<b>Due Date</b>	Next ASA	<b>Closure Date</b>	20 August 2022
<b>Indicator &amp; Category (Critical / Minor)</b>	7.12.7 / Minor		
<b>Statement of Nonconformity:</b>	Hargy Oil Palms Limited has not provided evidence to demonstrate monitoring upon natural ecosystems, peatland conservation areas and RTE species in the suspended smallholder blocks.		
<b>Requirement Reference:</b>	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.		
<b>Objective Evidence:</b>	Hargy Oil Palms Limited has not provided evidence to demonstrate monitoring upon natural ecosystems, peatland conservation areas and RTE species in the suspended smallholder blocks.		

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<b>Corrections:</b>	<ul style="list-style-type: none"> <li>i. Training &amp; awareness to relevant staff on requirements for suspended blocks.</li> <li>ii. Conduct monitoring of all suspended blocks on presence of RTE species, peatlands, natural ecosystems and keep records of such monitoring.</li> </ul>
<b>Root Cause Analysis:</b>	Lack of understanding of the requirements for suspended smallholders in the scope extension of the audit. No clear requirements on auditing of smallholder suspended blocks.
<b>Corrective Actions:</b>	Continue block inspection on Smallholders blocks as part of the Smallholder Agricultural Advisory Services programs. This is an established program that is already in place.
<b>Assessment Conclusion:</b>	<p>Audit team verified the sampled smallholder year 2022:</p> <ul style="list-style-type: none"> <li>- Parfrey Peni No.350061 and Waimal Kepo No.031472 have received training on Best Management Practices &amp; Pests and Disease by PNG OPRA; Training on Smallholder Profile; Training on RSPO Principle and Criteria (code of ethical conduct, prohibit child labour, prudent use of agrochemical, waste management, RTE species protection, HCV area and Buffer zone, new planting and replanting cannot use fire). Training date 28 September 2021.</li> <li>- Parfrey Peni No.350061 was represented by the sister Freda Rebon has received training on Best Management Practices &amp; Pests and Disease by PNG OPRA; Training on Smallholder Profile; Training on RSPO Principle and Criteria (code of ethical conduct, prohibit child labour, prudent use of agrochemical, waste management, RTE species protection, HCV area and Buffer zone, new planting and replanting cannot use fire). Training date 22 July 2022.</li> </ul> <p>Continued inspection to monitor smallholder understanding and RTE protection:</p> <ul style="list-style-type: none"> <li>- Block inspection report for Michael Palia No.101082, understand HCV and RTE species protection.</li> <li>- Block inspection report for Mataururu United Church No.101017, understand HCV and RTE species protection.</li> <li>- Block inspection report for Michael Rakua No.101080, understand HCV and RTE species protection.</li> </ul> <p>Based on verification of correction, root cause analysis, and corrective actions, this non-conformity has been complied and closed.</p>
<b>Effectiveness Closure (for previous audit closed Critical NC):</b>	N/A

Opportunity for Improvement	
OFI#	Description
<b>OFI 1</b>	<p><b>OFI Statement:</b></p> <p>Indicator 3.3.3</p> <p>Hargy Oil Palms Limited monitored the smallholder performance. Organization provides evidence of monitoring upon smallholder blocks in implementing best agricultural practices where oil palm upkeep not consistent; bushes and weed overgrown; and palm pruning was not performed.</p> <p><b>Verification / Follow-up actions:</b></p>

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	<p>Based on audit year 2022, the smallholder best management practices have been improved. Sampled smallholder No.101080 Michael Rakua, No.101082 Michael Palia, No.350061 Parfrey Peni, No.350044 Jack Amos, No.111132 Robert Teia demonstrated best management practices; weed controlled through manual grass cutting using grass knife, palm pruning performed according standard 1 frond subtending the FFB. Interview with worker namely Mona Unu in smallholder block No.350061, he only perform grass cutting in oil palm block although block owner’s son has safety spraying certificate.</p>
<b>OFI 2</b>	<p><b>OFI Statement:</b>  Indicator 4.4.1  Smallholder 440055 (Teddy Male), 041188 (Jerry Mera), 050230 (Graham AINU), 321100 (Wesly Aliai), 321158 (Joe Gaelo) with Application or Tender Form to Department of Lands and Physical Planning completed the lease application process.  <b>Verification / Follow-up actions:</b>  Smallholder 440055 (Teddy Male), 041188 (Jerry Mera), 050230 (Graham AINU), 321100 (Wesly Aliai), 321158 (Joe Gaelo) has demonstrate progress in land lease application process in form of response to Department of Lands and Physical Planning.</p>
<b>OFI 3</b>	<p><b>OFI Statement:</b>  Indicator 7.12.4  Hargy Oil Palms Limited prepared document “HCV/HCS, Peatlands and Conservation Area Management Plan”, dated 30 March 2021. The generic recommendations for conservation areas within all the plantations and smallholders are: Demarcate boundaries of HCV/HCS, other conservation areas and peatlands; Collaborate with local communities to establish and maintain appropriate riparian buffers; Maintain or improve water quality in all rivers in the area of operations.  Abulmosi Reserve Buffer Zone in Pandi Estate consistently equipped with conservation signage.  <b>Verification / Follow-up actions:</b>  Based on audit year 2022, management of Pandi Estate took action. The Abulmosi Reserve Buffer zone in Pandi Estate, near block 13E10 have equipped with signboard “protection of buffer zone, no cutting tree, no gardening, no open fire, no hunting of protected species such as parrot, hornbill, etc.”</p>
<b>OFI 4</b>	<p><b>OFI Statement:</b>  Indicator 7.12.8  Based on document review, visit and interview with smallholder 380150 (Augustine Kautu) and 350050 (Michael Waula), there was no oil palm planted. New development or land clearing requires HCV assessment since November 2005, or prior HCV-HCSA assessment since 15 November 2018. Smallholder block not yet planted, Planning consistently with HCV/HCS assessment carried out.  <b>Verification / Follow-up actions:</b>  Based on audit year 2022, the block No.380150 Augustine Kautu as of 15 August 2022 confirming still no planting on the area. The block is recorded with 0 Ha planted in Lintramax and smallholder OMP.</p>

**3.3.2 Summary of the Nonconformities and Status**

CAR Ref.	Category (Critical / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
1037572M17 – RSPO SCCS	Major	D.3.2	28/03/2014	08/04/2014 (closed)
1037572M18 – RSPO SCCS	Major	D.3.3	28/03/2014	08/04/2014 (closed)
1037572N4	Minor	4.7.2	28/03/2014	06/03/2015 (closed)

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10375752N5	Minor	4.7.3	28/03/2014	06/03/2015 (closed)
10375752N10	Minor	4.7.5	28/03/2014	Escalated to Major NC
10375752N9	Minor	5.3.2	28/03/2014	06/03/2015 (closed)
10375752N13	Minor	5.6.2	28/03/2014	06/03/2015 (closed)
10375752N15	Minor	6.5.3	28/03/2014	06/03/2015 (closed)
1161437M1	Major	4.7.5	06/03/2015	04/05/2015 (closed)
1161437M2	Major	5.6.1	06/03/2015	04/05/2015 (closed)
1161437N1	Minor	4.8.2	06/03/2015	20/02/2016 (closed)
1161437N2	Minor	5.2.4	06/03/2015	20/02/2016 (closed)
1295340M1	Major	2.2.1	20/02/2016	20/04/2016 (closed)
1295340M2	Major	4.7.3	20/02/2016	20/04/2016 (closed)
1295340M3	Major	6.3.2	20/02/2016	20/04/2016 (closed)
1295340M4 – RSPO SCCS	Major	D.4.1	20/02/2016	20/04/2016 (closed)
1295340N1	Minor	4.1.2	20/02/2016	01/08/2017 (closed)
1295340N2	Minor	4.7.5	20/02/2016	01/08/2017 (closed)
1664926-201807-M1	Major	6.5.2	10/08/2018	01/10/2018 (closed)
1664926-201807-M2	Major	4.7.3	10/08/2018	01/10/2018 (closed)
1664926-201807-M3- RSPO SCCS	Major	5.5	10/08/2018	01/10/2018 (closed)
1664926-201807-M4- RSPO SCCS	Major	5.11	10/08/2018	01/10/2018 (closed)
1992828-202012-M1	Critical	6.7.3	15/12/2020	23/02/2021 (closed)
1992828-202012-M2	Critical	7.2.6	15/12/2020	23/02/2021 (closed)
1992828-202012-M3	Critical	7.2.7	15/12/2020	23/02/2021 (closed)
1992828-202012-M4	Critical	7.10.1	15/12/2020	23/02/2021 (closed)
1992828-202012-N1	Minor	7.2.8	15/12/2020	Escalated to NC Major 2104903-202108-M4
1992828-202012-N2	Minor	7.3.2	15/12/2020	Escalated to NC Major 2104903-202108-M45
1992828-202012-N3	Minor	7.3.3	15/12/2020	07/12/2021 (closed)
2104903-202108-M1	Major	3.1.1	15/09/2021	07/12/2021 (closed)
2104903-202108-M2	Major	3.6.1	15/09/2021	07/12/2021 (closed)
2104903-202108-M3	Major	7.1.1	15/09/2021	07/12/2021 (closed)
2104903-202108-M4	Major	7.2.8	15/09/2021	07/12/2021 (closed)
2104903-202108-M5	Major	7.3.2	15/09/2021	07/12/2021 (closed)

2104903-202108-N1	Minor	1.1.5	15/09/2021	20/08/2022 (closed)
2104903-202108-N2	Minor	3.2.2	15/09/2021	20/08/2022 (closed)
2104903-202108-N3	Minor	3.3.2	15/09/2021	20/08/2022 (closed)
2104903-202108-N4	Minor	3.7.2	15/09/2021	20/08/2022 (closed)
2104903-202108-N5	Minor	4.3.1	15/09/2021	20/08/2022 (closed)
2104903-202108-N6	Minor	6.5.3	15/09/2021	20/08/2022 (closed)
2104903-202108-N7	Minor	7.12.7	15/09/2021	20/08/2022 (closed)

### 3.4 Stakeholders and previous land owner / user consultation

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

Meetings were conducted with stakeholders to seek their views on the performance of the company with respect to the RSPO requirements and aspects where they considered that improvements could be made. At the start of each meeting, the interviewer explained the purpose of the audit followed by an evaluation of the relationship between the stakeholder and the company before discussions proceeded. The interviewer recorded comments made by stakeholders and later was verified with the management team. Any comment which is not complying to the RSPO P&C requirements have been incorporated as an assessment finding.

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

Stakeholders contacted		
Type of Stakeholder (e.g. Internal, Union, Contractor, Governmental Department, NGO, External, Communities)	Stakeholder name / organization	Means of communication (e.g. face to face interview, email, phone interview, comment from public notice)
Internal Stakeholders	- Social Issues Committee	Onsite meeting
Government Departments	- Conservation Environment and Protection Agency (CEPA) - Department of Department of Labour and Industrial Relation - Central Nakanai Local Level Government	Phone interview
Union/Contractors/Local Communities	- Hargy Oil Palm Worker Union - Earthworks Mowing Services (local contractor) - Baikakea Community - Gomu Women Representative - Urumaili Community	Onsite meeting

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	- Bialla Oil Palm Growers Associations	
NGO	Mahoni Na Dari	Email and phone interview

Stakeholders comment	
<b>1</b>	<p><b>Feedbacks: Social Issues Committee - Mrs. Marqueritte Masing</b></p> <ul style="list-style-type: none"> <li>- The SIC is cooperating with PNG National Identification to assist on employee and dependent civil registration.</li> <li>- The SIC is assisting in communicating with internal and external stakeholders and identify the voice from communities. Social issue committee and grievance committee is different procedure. Social issues committee also have boundary, whatever issues that come, it goes to the security. If there's a grievance, then following the grievance procedure and it goes to our grievance officer or register it. And then it's handled separately. But for social issue, SIC do not actually end all cases.</li> <li>- Latest inquiry was on request from worker in Navo and Pandi area whose kids going to school in Bialla Secondary School. The current condition no transport provided by company, school bus only for executive kids, kids attend class late, school is not safe because of holdup on the road, parent pays for the PMV and meals.</li> </ul> <p><b>Audit Team verification and response:</b> Audit team reported the stakeholder comment on transport for children to school as OFI into criterion 6.2.4.</p>
<b>2</b>	<p><b>Feedbacks: John Jeffery - Hargy Oil Palm Workers Union</b></p> <ul style="list-style-type: none"> <li>- Express dissatisfaction regarding the investigation of the accident that caused injury to him in 2020. He stated that Mill's Management is responsible regarding the incident and no sanction/punishment.</li> <li>- Advised that the company should financing the transport/ticket of workers remains to his/her hometown (if there is any fatality incident).</li> <li>- There was no significant salary increment for him or other worker.</li> <li>- Advise to give more annual leave, instead of 14 days. Because for whom that their hometown is far away and unable to by airline ticket (go home by sea), it would be time consuming.</li> <li>- Advice to provide house/room for union secretariat.</li> <li>- Last meeting between HOPL management and Workers Union was on 27 July 2021, no other meeting conducted thereafter.</li> </ul> <p><b>Audit Team verification and response:</b></p> <ul style="list-style-type: none"> <li>- Regarding workers facilities/amenities such as transport of dead body to hometown, increasing of annual leave, it has been regulated by government regulation and Employee Handbook.</li> <li>- Salary increment has been made annually in accordance with annual minimum wage. For significant increment, the workers should be promoted to a higher grade. It will be based on the workers assessment and available position.</li> <li>- There is no requirement for a company to provide Union's secretariat. Moreover, management's consideration is that the union's member is currently decreasing. It can be shown that many union's member recently submit a form to accounting officer to stop their union member's levy.</li> <li>- HOPL management are willing to meet with the union, has been stated on several occasion.</li> <li>- previously. However, the onus of arranging the meetings rests with the union representatives. HOPL will never decline a meeting.</li> <li>- Specifically, for incident of John Jeffery on 6 June 2020, it has been verified since previous audit, that are:</li> </ul>

	<ul style="list-style-type: none"> <li>The incident has been investigated and all corrective actions recommended have been implemented. The action taken against the employees concerned was determined and agreed to by management in line with the findings and recommendations of the Investigation Officer.</li> <li>Jeffery’s Workers Compensation claim has been processed and an amount awarded in accordance with the PNG Workers Compensation Act based on their assessment of the injury, has been received.</li> <li>Jeffery has raised several grievances regarding this same matter and on each occasion received a response.</li> <li>Audit team noted the Management statement: the matter to be closed and Jeffery has been given guidance on what options he can consider should he remain unsatisfied.</li> </ul>
<p><b>3</b></p>	<p><b>Feedbacks: Baikakea Community – Mr. Daniel Tomare</b></p> <ul style="list-style-type: none"> <li>The relationship with Hargy Oil Palms Limited including land rental, community’s smallholder grower and conservation of Lake Hargy area.</li> <li>So far no complaint. The Baikakea want to expand the plantation but RSPO not allows new development.</li> <li>The community works well with Hargy Oil Palms Limited on conservation of Lake Hargy. The animals and birds still inhabited the conservation area.</li> </ul> <p><b>Audit Team verification and response:</b></p> <ul style="list-style-type: none"> <li>Audit team verified and noted the company plan to cater demand for expansion on 3.4.2.</li> <li>Audit team verified and noted the works on conservation area Lake Hargy in criterion 7.12.7.</li> </ul>
<p><b>4</b></p>	<p><b>Feedbacks: Gomu Women Representative - Mrs. Marie Ronnie</b></p> <ul style="list-style-type: none"> <li>The Gomu Women Representaive confirmed to received information on policy related to prohibit sexual harassment.</li> <li>Hargy Oil Palms Limited assisted in training on Financial Literacy, to help women in smallholder growers block understand financial planning, saving and investment.</li> <li>Gomu Women Representative confirmed to receive training on sewing and cooking meals.</li> </ul> <p><b>Audit Team verification and response:</b></p> <p>Audit team reported the sampled information on training and community development on indicator 4.3.1</p>
<p><b>5</b></p>	<p><b>Feedbacks: Urumaili Community – Mr. Robert Gaa</b></p> <ul style="list-style-type: none"> <li>Hargy Oil Palms Limited as company renting the land, committed to community welfare.</li> <li>The smallholder growers in form of LSS/Land Settlement Scheme and VOP/Village Oil Palms feels the economic benefit from the oil palm business.</li> <li>Hargy Oil Palms Limited assisting Urumaili community in allocating and construction of church and school in Urumaili.</li> </ul> <p><b>Audit Team verification and response:</b></p> <p>Audit team verified the comment; check document and interview; recorded in indicator 4.3.1 as part of community development program.</p>
<p><b>6</b></p>	<p><b>Feedbacks: Bialla Oil Palm Growers Association/BOGA – Mr. Oka Kamale</b></p> <ul style="list-style-type: none"> <li>BOGA and Hargy Oil Palms Limited work together for management of 3600++ smallholders (VOP and LSS) and 21 independent estates with area of 20,000 hectares as FFB suppliers to Hargy Oil Palms Limited’s palm oil mills.</li> <li>The FFB price mechanism have been explained to smallholder members.</li> <li>So far pest attack have been identified by OPIC, OPRA, Hargy Oil Palms Limited and BOGA to ensure correct handling.</li> <li>BOGA and Hargy Oil Palms Limited started program of Super Annuation Fund for smallholder so they can have a saving.</li> <li>BOGA assisted by Hargy Oil Palms Limited to get funding from the World Bank to operates 2 dump trucks and 1 grader for smallholder road maintenance.</li> </ul>

	<p><b>Audit Team verification and response:</b></p> <ul style="list-style-type: none"> <li>- Audit team verified the comment; check document and interview; recorded in indicator 5.1.1, 7.1.1.</li> </ul>
<b>7</b>	<p><b>Feedbacks: CEPA - Mr. Mark Kove</b></p> <ul style="list-style-type: none"> <li>- Our tasks are focused in environmental protection.</li> <li>- Hargy currently applying for amalgamation of environmental permit as a follow up from CEPA inputs.</li> <li>- CEPA was present as government regulatory body in grievance/complaint resolution from a complaint from smallholder related to environmental pollution caused by FFB dumping. CEPA went onsite to have ground verification and write an investigation report. These response have been received by CEPA and CEPA has sent the response to HOPL on 6 January 2022.</li> <li>- So far, CEPA did not received any report/complaint related to marine ecosystem pollution from HOPL operation.</li> </ul> <p><b>Audit Team verification and response:</b></p> <p>Audit team verified the amalgamation of environmental permit as in Indicator 7.8.1.</p> <p>Audit team verified the chronology of complaint, verified the related documentation and record for grievance resolution, indicator 4.2.3.</p>
<b>8</b>	<p><b>Feedbacks: PNG Department of Labour and Industrial Relation</b></p> <ul style="list-style-type: none"> <li>- In general, there is no issue currently related to safety and employment industrial relation.</li> <li>- The Department annually visit to the company to monitor the implementation of safety and employment elements.</li> <li>- The wage and overtime payment have been conducted in accordance with government regulation.</li> <li>- The company also has had the policy of no forced labour, no child labour, and prohibition of pregnant and breast-feeding women working in pesticide-related job.</li> <li>- The common problem is that the local workers are lack in discipline to adhere the company's and government's rules, in particular about alcohol-related issues.</li> <li>- So far, based on monitoring result for over 5 years, the company has shown its cooperation and commitment to adhere the safety and employment regulation.</li> </ul> <p><b>Audit Team verification and response:</b></p> <p>The audit team has verified the safety elements (Criteria 3.6, 6.7), employment (Criteria 3.5, 6.2, 6.3, 6.4, 6.5, 6.6). Detailed verification has been described in respective criterion. There was no non-compliance in those criteria. However, there is an OFI in indicator 6.2.4, regarding to provide more school transport for students, in particular, considering the grievance from parents in Navo region (dated 17 February 2022), requested for student transportation to Bialla Secondary School.</p>
<b>9</b>	<p><b>Feedbacks: Central Nakanai Local Level Government/LLG - Mr. Francis</b></p> <ul style="list-style-type: none"> <li>- Hargy Oil Palms Limited assist the economic growth in the area by providing road access in smallholder area. And also road maintenance.</li> <li>- Hopefully Hargy Oil Palms Limited give more attention to the smallholder growers through support to school, more business opportunity by becoming supplier or encourage small – medium business enterprise.</li> <li>- So far no community complaint to Hargy Oil Palms Limited.</li> </ul> <p><b>Audit Team verification and response:</b></p> <p>Audit team verified and noted as positive comment.</p>
<b>10</b>	<p><b>Feedbacks: Mahoni Na Dari (Marine Conservation NGO) – Mr. Somei Junda.</b></p> <p>As a stakeholder of Hargy Oil Palm and an NGO that does marine conservation work in and around Bialla (where HOPL operates). Mahoni Na Dari work is mainly based around marine conservation and this usually consists of schools and community awareness programs.</p>

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	<p>Mahoni Na Dari inform that all interactions with Hargy have been mainly positive and Hargy assist, with logistics and accommodation (as our base is quite far from Bialla). Recent (2021) interactions between HOPL &amp; Mahoni Na Dari are as follows: Mangrove seedlings from Mahoni Na Dari have been planted in front of the main Hargy Mill to assist with coastal erosion (April, 2021); Mangrove planting and rehabilitation near Kiba Plantation; Consultation for mangrove planting in Ewase village towards the wharf (on-going). Mahoni Na Dari and Hargy Oil Palms Limited planted 120 mangrove seedling in Navo Estate-Kiba Plantation. So far there was no complaint or report related to marine ecosystem pollution, or other environmental negative impact from Hargy operation.</p>
	<p><b>Audit Team verification and response:</b> Audit team verified the data and incorporated into criterion 7.12.6. Audit team noted as positive inputs.</p>
<p><b>11</b></p>	<p><b>Feedbacks: Earthworks Mowing Services (local contractor) – Mr. Geoffrey Sirinjui.</b></p> <ul style="list-style-type: none"> <li>- In the contract No. HOPL2022-12 dated 31 January 2022, also based on payment slips from Hargy, it can be concluded that the contract has been fairly made, legal, and transparent. The payments are conducted fortnightly in accordance with the contract.</li> <li>- The contract has stated that the contractor must adhere the employment legal requirement, including not employ the child labour.</li> </ul>
	<p><b>Audit Team verification and response:</b> The audit team has verified contractor-related requirement and has been described in Criteria 3.6, 6.7. There is no negative issue. Detailed verification has been described in respective criterion.</p>

<b>List of land owner / user contacted</b>					
Name	Years of ownership / used	Land area (ha)	Agreement (Yes / No)	Agreement base on FPIC (Yes/No)	Compliance on the agreement terms and conditions
Mr. Dominic Balpagarea – Ela Lumkere Enterprise	current	351 Ha (as sublease for smallholders)	Yes	Yes	In compliance. See stakeholders comment and reported under indicator 4.4.1 and 4.4.2

<b>Previous land owner / user comment</b>	
	<p><b>Feedbacks: Ela Lumkere Enterprise - Mr. Dominic Balpagarea</b></p> <ul style="list-style-type: none"> <li>- Ela Lumkere has incorporated their business: Certificate of Registration Business Name under Ela Lumkere Enterprise No.6-18707 daetd 15 September 1994; Certificate of Incorporation Ela Lumkeere Enterprise No.1-128091 dated 21 September 2020.</li> <li>- Ela Lumkere has State Lease Title: State Lease Volume 16 Folio 91 for Portion 2039, Milinch Ulawun, Fourmil Talasea, West New Britain Province containing area of 351 Ha, from Survey Plan No.15/Catalogue 789. State lease for 99 years since 17 February 2005.</li> <li>- Ela Lumkere has agreement/sub lease with 39 smallholders to work on the said land parcels, sampled agreement: Memorandum of Agreement between Ela Lumkere Enterprise with James Koldup on 10 August 2019 – valid for 9 years. From this agreement, the sold FFB, the smallholder gets 70% and the landlord gets 30% (mobile card) from farmgate price.</li> <li>- Hargy Oil Palms Limited always pays the fee to Ela Lumkere. So far, there was no complaint reported.</li> <li>- He stated Hargy Oil Palms Limited assist the local level government in repairing and maintaining road condition for better access to FFB/crop sales.</li> </ul>

	<b>Audit Team verification and response:</b>
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	Audit team checked the legal ownership of the land and found in compliance. Reported under indicator 4.4.1 and 4.4.2
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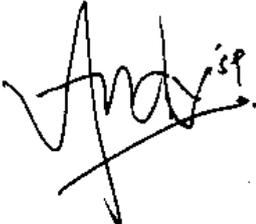
### **3.5 Impartiality and conflict of interest**

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

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

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

Report prepared by	Acceptance of Assessment Conclusion
<b>Name:</b> <b>Andi Pratama Pasaribu</b>	<b>Name:</b>  <b>Craig Gibsone</b>
<b>Company Name:</b> <b>On behalf of BSI Services Malaysia Sdn Bhd</b>	<b>Company Name:</b> <b>Hargy Oil Palms Limited</b>
<b>Title:</b> <b>Lead Auditor</b>	<b>Title:</b> <b>General Manager</b>
<b>Signature:</b> 	<b>Signature:</b> <i>(I the undersigned, being the most senior relevant management representative of the operation seeking or holding certification, agree with the contents of this report and accept the liability in execution of the procedure in the report.)</i> 
<b>Date:</b> <b>05/09/2022</b>	<b>Date:</b> 13-9-2022

**Appendix A: Summary of Findings**

Criterion / Indicator	Assessment Findings	Compliance
<b>Principle 1: Behave ethically and transparently</b>		
<b>Criterion 1.1</b> The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.		
1.1.1 <b>(C)</b> Management documents that are specified in the RSPO P&C are made publicly available.  <b>Smallholder Requirement:</b> Organization that is managing the smallholders shall hold relevant documents and make available to interested parties on request. - Critical (Major) compliance -	Hargy Oil Palm Limited as Certified Management Unit has List of Publicly Available Documents No.REG-SUS-SUS-001-15, issue No.15, dated 18 July 2022.  SOP for Dissemination of Company Information & Documents (Doc. No.PRO-SUS-SUS-002-04, Issue No.4 dated 25 March 2021) was developed to outline how the company's documentation is disseminated both internally and externally. The requests could be made through verbal requests, during stakeholder and/ or consultation meetings, written requests or via phone calls or emails. All the requests will be recorded in the Request for Information Register. Hargy Oil Palms Limited has developed a List of Publicly Available Documents (Doc. No.REG-SUS-SUS-001-15, Issue No.15 dated 18 July 2022) approved by General Manager. The documents are available in the notice board on sites, employee handbook and on request approved by GM. The documents i.a:  - Company's policies (Environment, OH&S Policy, OH&S Plan, Drug & Alcohol Policy, Human Rights Policy, Policy Against Forced or Trafficked Labour, Sexual Harassment Policy, Grievance Policy, Policy on Child Labour, SIPEF Responsible Plantations Policy, Smoke-Free Workplace Policy, Policy Concerning Ethical Conduct, Policy on Protection of Reproductive Rights, Communication Policy, Equal Employment Opportunity Policy, Family Violence Policy, Freedom of Association Policy, etc.)  - SEIA and EIA Register  - HCV documentation	Complied

		<ul style="list-style-type: none"> <li>- Public summary of certification assessment reports</li> <li>- Pollution prevention and reduction plan</li> <li>- Land titles/User Rights (records)</li> <li>- Land acquisition procedure and negotiation procedure</li> <li>- Details of Complaints and Grievances (records)</li> </ul> <p>Besides, all the company's policies and grievance procedure are available in the company's website, <a href="https://www.sipef.com/hq/sustainability/sustainable-approach/">https://www.sipef.com/hq/sustainability/sustainable-approach/</a></p>	
1.1.2	<p>Documented Information is provided in English and accessible to relevant stakeholders. Explanatory information may be provided in writing or orally in Tok Pisin (PNG) or SI Pijin (Solomon Islands)</p> <p>- Minor compliance -</p>	<p>All documented information is available in English. Company made available policy in Tok Pisin: Freedom of Association Policy No.POL-HRD-GEN-009-06, dated 6 June 2022. General language in PNG is using English, however in some procedure also translated in Tok Pisin.</p> <p>Audit team sighted records of information dissemination in Tok Pisin carried out in Navo Estate-Ibana Plantation, management provide communication of grievance procedure to 36 harvesters, 5 wheelers dated 21 July 2022; to 9 loose fruit collectors on 22 March 2022.</p>	Complied
1.1.3	<p><b>(C)</b> Records of requests for information and responses are maintained.</p> <p>- Critical (Major) compliance -</p>	<p>The records of requests for information and responses are available at each site, whilst Grievances are registered centrally at Community Affairs Department and forwarded to Compliance Department. Records of the requests will be registered in the Request for Information Register as per the procedure above.</p> <p>Information requested related process of the oil and to know how it goes in process to the end of getting oil. Action taken by mill processing assistant to response immediately.</p> <p>Community Affairs Department responded to letters from Matililiu United Church, Ewasse dated 27 March 2022; Subject: Expression of Interest to the Maintenance of Church Building (Worth of K50,000) to be Deposit in HOPL</p>	Complied

		<p>account. The letter then responded by related department verified on 15 June 2022.</p> <p>Hargy Estate-Barema Plantation keeps record on incoming inquiry and response. There were 11 inquiries recorded and responded in 2021, there was 1 inquiry recorded and responded to date August 2022. Sample verified: On 21 September 2021 Ano Tumalu from SSEC Church requesting to borrow canvas for youth camp on 25-26 September 2021. Approved by the Manager on 21 September 2021. The canvas was utilized by the Youth Camp, the stakeholder sent word of appreciation letter to Barema Plantation on 30 September 2021.</p>	
<p>1.1.4</p>	<p><b>(C)</b> Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by a nominated management official.</p> <p>- Critical (Major) compliance -</p>	<p>Hargy Oil Palms Limited Communication Policy (Doc. No.POL-HRD-GEN-002-07, Issue No.7 dated 6 June 2022) was established to facilitate the communication process whenever necessary. The communication process is a two-way process at all levels. The methods of communication are such as verbal, written and information posted on notice boards. The Community Affairs Manager is the person to responsible in communication any internal or external affairs related to relevant stakeholders.</p> <p>Beside the policy, Certified Management Unit also established the Procedure of Communication (No.PRO-SUS-EMS-006-15), issued No.15, dated 21 March 2022. The procedure describing appointing of communication responsible persons at each level.</p> <ul style="list-style-type: none"> <li>- General Manager: Responsible for approving these procedures, receiving, documenting, and responding to the relevant communication from external interested parties.</li> <li>- Smallholders Affairs Department: Maintaining awareness of stakeholder attitudes and identifying any issues of potential concern. Ensuring that officers of the department travel to communities who are, or may reasonably be, affected by Company operations to ensure good two-way communication.</li> <li>- Department Managers: Reporting any communication issues to Smallholder Affairs and any environmental issues to the Sustainability Manager.</li> </ul>	<p>Complied</p>

		<p>Department Managers are also responsible for responding to EMS requirements.</p> <ul style="list-style-type: none"> <li>- Sustainability Managers: Assists effective communication of all environmental issues, coordinates all internal and external communication, communicates internal audit reports to relevant management, reports the Management Review.</li> <li>- Supervisors: Conduct team briefings for departmental personnel, report environmental concerns to Department Managers.</li> <li>- All personnel: Report environmental concerns and external communication to Supervisor/Manager.</li> <li>- The Extension Officers will conduct Field Day with smallholders to disseminate information and communicate with the smallholders.</li> <li>- Contractors have signed on contract agreement and briefed on the policy.</li> </ul>	
1.1.5	<p>There is a current list of contact and details of stakeholders and their nominated representatives.</p> <p>- Minor compliance -</p>	<p>List of Interested Parties (Doc. No.REG-COM-GEN-001-11, Issue No.11 dated 20 June 2022) was available to include all the categories of relevant stakeholders such as national, province and local government authorities, oil palm growers, local communities &amp; wards, incorporated land group (ILG) &amp; Landowner companies (LandCos), landowners' associations, NGOs, workers associations, other organizations and goods suppliers. Contact and details of the stakeholders are clearly listed.</p> <p>Audit team verified the HOPL stakeholder list year 2022. The stakeholder list consist of organization name, contact person name, email and/or telephone number and address. There were 15 stakeholders under National Government, 6 stakeholders under Provincial Government, 4 stakeholders under Local Level Government, 10 stakeholders under Oil Palm Growers, 24 stakeholders under Community and Wards, 9 Incorporated Land Groups, 4 Landowners Associations, 4 Non-Governmental Organization, 9 stakeholders under Industry, 1 Worker Associations, 27 Goods Suppliers, 7 Services Suppliers, 5 other Organizations such as Bank and Nasfund.</p>	Complied

		<p>Based on the document, audit team contacted several stakeholders for consultation process: Conservation Environment and Protection Authority/CEPA and Department of Labour and Industrial Relations (National Government), Central Nakanai LLG (Local Level Government), Bialla Oil Palm Grower Association (Oil Palm Growers), Baikakea and Urumaili communities (Local communities and Wards), Ela Lumkere (Incorporated Land Groups), Mahonia Na Dari (Non Government Organization), Worker Union, Social Issue Committee, Earthworks Mowing (Contractor). All of the contacted stakeholders are available for communication and up-to-date/current.</p>	
<p><b>Criterion 1.2</b> The unit of certification commits to ethical conduct in all business operations and transactions.</p>			
<p>1.2.1</p>	<p>A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts by the milling Company. The policy is extended to smallholders through extension services provided by the Company and Government. Smallholders are expected to apply the policy in their own dealings with others.</p> <p><b>Smallholder Requirement:</b>          Organization that is managing the smallholders required to have a written policy committing to a code of ethical conduct and integrity in all operations and transactions          - Minor compliance -</p>	<p>Unit of Certification has had ETHICAL CONDUCT POLICY (POL-HRD-GEN-003-04), issue No: 4, issued date: 30 June 2021.</p> <p>Awareness of this policy:</p> <ol style="list-style-type: none"> <li>1. Hargy POM: 22 May 2022, attended by 22 employees</li> <li>2. Barema POM: 1 August 2022, attended by 157 employees.</li> <li>3. Hargy Estate - Barema Plantation: 3 August 2022, attended by 189 employees.</li> <li>4. Navo POM: 15 July 2022, attended by 13 employees.</li> <li>5. Navo Estate – Ibana Plantation: 21 June 2022, attended by 97 employees.</li> <li>6. Pandi Estate – Bakada Plantation: 9 August 2022, attended by 98 employees.</li> </ol> <p>This policy has been communicated through the Hargy websites and notice boards within their operating sites. The policy emphasized on no illegal gratification and corrupt practices (solicitation and/or acceptance of corrupt payments, making corrupt payments, commission, using company resources), and receiving/giving gifts.</p> <p>This policy also cascading into relevant procedures, such as Contract Management Process (PRO-LEG-CON-001-01), dated 25 October 2021.</p>	<p>Complied</p>

		<p><b>Smallholders:</b>          Associated smallholders have had Policy Concerning Ethical Conduct that issued by OPIC since 19 July 2017. This policy containing: Basic Principles; Conflict of Interest; Illegal Gratification and Corrupt Practice; Gifts and Internal Controls.          Based on interview with extension officer, the ethical conduct policy also re-disseminated during the field day. For example, during the mini field day on 8 August 2022 in Malasi. Through the interview with smallholders member in Malasi obtain information that the smallholders has informed related to the ethical conduct policy.</p>	
1.2.2	<p>A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice.          - Minor compliance -</p>	<p>HOPL imposed internal audits to controls, prevent and detect any corrupt practices. It does this through whistle-blower process. In order to ensure HOPL is dealing with appropriated contractors, the controlled applied is a Triangulation mechanism. Any contract that is proposed by the proposer will approved by the Head of Department and later verified by the Legal Department and Finance Department to ensure that the company has met the country legal requirements.          An internal audit conducted at each unit to ensure implementation of the policy and overall ethical business practice. Internal audit report is recorded and well maintained.</p> <ol style="list-style-type: none"> <li>1. Hargy Mill: conducted on 23 June 2022</li> <li>2. Barema Plantation: conducted on 17 June 2022.</li> <li>3. Barema Mill: RSPO internal audit conducted on 17 June 2022.</li> <li>4. Navo Estate – Ibana Plantation: internal audit conducted on 20 July 2022.</li> <li>5. Navo Mill: internal audit conducted on 13 July 2022.</li> <li>6. Pandi Estate – Bakada Plantation: internal audit conducted on 14 June 2022.</li> </ol>	Complied

		<p>Smallholders:          Internal audit for Smallholders Affairs conducted on 16 May 2022. Sighted 2 internal audit report as follows:</p> <ul style="list-style-type: none"> <li>• Internal audit report of Kabaya and Soi Area. 4 NC's raised during the audit which all the NC's has been closed by the internal auditor.</li> <li>• Internal audit report of Noau Area. 3 NC's raised during the audit which all the NC's has been closed by the internal auditor.</li> </ul>	
<p><b>Principle 2: Operate legally and respect rights</b></p>			
<p><b>Criterion 2.1</b> There is compliance with all applicable local, national and ratified international laws and regulations.</p>			
<p>2.1.1</p>	<p><b>(C)</b> The Unit of Certification complies with legal requirements</p> <p><b>Smallholder Requirement:</b>          Smallholders are to comply with all applicable PNG or Solomon Islands legal requirements. Organization that is managing the smallholders requires to monitor compliance during extension activities. Block inspection reports to provide evidence of compliance.          - Critical (Major) compliance -</p>	<p>The Legal Department Head is responsible to track the changes of the regulations. Through interview, it was confirmed to the assessment team that he tracks the changes on the laws using the Pacific Islands Legal Information Institute (PacLII) website. Sampled referenced regulation:</p> <ul style="list-style-type: none"> <li>• PNG Environment Act (Amendment) 2014</li> <li>• PNG Environmental Code of Practices – Vehicle Workshop &amp; Hydrocarbons, Storage, Resale and Usage</li> <li>• PNG Environmental Code of Practice for Sanitary Landfill Sites</li> <li>• In Hargy POM; the Environment Permit to Hargy Oil Palms Limited, dated 11 January 2001, amendment 16 June 2006, expiry on 31 December 2053.</li> <li>• Environment Permit No.WD-L2(56) date of issue 13 October 1993, date of amendment 16 May 2005 and 26 May 2006, date of expiry 31 December 2028 – for Hargy Oil Palms Limited to carry out works at portions 9, 14, 15, 1081, 1492, 1494 at Bialla District of West New Britain Province; to discharge waste into environment from its premises while carrying out a level 2.</li> </ul> <p>The list of licenses comprise of:</p>	<p>Complied</p>

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		<ul style="list-style-type: none"> <li>• "Certificate of Registration as a Factory – Mill Processing Plant No.14676 for Hargy Oil Palms Limited Hargy Mill, based on Industrial Safety, Health and Welfare Act 1961-1969", until 31 December 2022.</li> <li>• "Certificate of Registration as a Factory No.14680 – Water Treatment Plant for Hargy Oil Palms Limited Hargy Mill, based on Industrial Safety, Health and Welfare Act 1961-1969", until 31 December 2022.</li> <li>• "Certificate of Registration of a Boiler Pressure Vessel No.10810, Registered No.B.1895 (Boiler Number 1) for PT. Atmino Bidrum WT Boiler in Hargy Oil Palms Limited Hargy Mill, based on Industrial Safety, Health and Welfare Act 1961", dated 31 January 2021 until 31 January 2023.</li> <li>• "Certificate of Registration of a Boiler Pressure Vessel No.10811, Registered No.B.1896 (Boiler Number 2) for PT. Atmino Bidrum WT Boiler in Hargy Oil Palms Limited Hargy Mill, based on Industrial Safety, Health and Welfare Act 1961", dated 31 January 2021 until 31 January 2023.</li> </ul> <p>---</p> <p>In Barema POM, Environment Permit No.WD-L2(60) date of issue 30 May 2005, date of amendment 19 November 2012, 14 August 2017, date of expiry 26 June 2030 – for Hargy Oil Palms Limited to carry out works at portions 2038, Milinch Ulawun, Fourmil Talasea West New Britain Province; to capture methane gas from anaerobic wastewater treatment for Barema POM; to discharge waste into environment from its premises while carrying out a level 2 activity associated with agriculture cultivation, Level 2 activity associated with palm oil extraction and processing, Level 2 activity associated with treatment and disposal of industrial waste.</p> <p>"Certificate of Registration as a Factory No.14722 – KCP Workshop for Hargy Oil Palms Limited Barema Mill, based The list of licenses comprises of:</p> <ul style="list-style-type: none"> <li>• on Industrial Safety, Health and Welfare Act 1961-1969", until 31 December 2022.</li> </ul>	
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		<ul style="list-style-type: none"> <li>• "Certificate of Registration as a Factory – Mill Processing Plant No.14723 for Hargy Oil Palms Limited Barema Mill, based on Industrial Safety, Health and Welfare Act 1961- 1969", until 31 December 2022.</li> <li>• "Certificate of Registration as a Factory – Mechanical Parb Shed No.14724 for Hargy Oil Palms Limited Barema Mill, based on Industrial Safety, Health and Welfare Act 1961- 1969", until 31 December 2022.</li> <li>• "Certificate of Registration as a Factory – Warehouse No.14725 for Hargy Oil Palms Limited Barema Mill, based on Industrial Safety, Health and Welfare Act 1961- 1969", until 31 December 2022.</li> <li>• "Certificate of Registration as a Factory No.14726 – Mill Maintenance and Electrical Workshop for Hargy Oil Palms Limited Barema Mill, based on Industrial Safety, Health and Welfare Act 1961-1969", until 31 December 2022.</li> <li>• "Certificate of Registration as a Factory No.14727 – Biogas Plant for Hargy Oil Palms Limited Barema Mill, based on Industrial Safety, Health and Welfare Act 1961-1969", until 31 December 2022.</li> <li>• "Certificate of Registration as a Factory – Kernel Crushing Plant No.14729 for Hargy Oil Palms Limited Barema Mill, based on Industrial Safety, Health and Welfare Act 1961- 1969", until 31 December 2022.</li> <li>• "Certificate of Inspection of a Boiler Pressure Vessel No.10838, Registered No.PV.1334 for Pressure Vessel (Sterilizer #1) in Hargy Oil Palms Limited Barema Mill, based on Industrial Safety, Health and Welfare Act 1961", dated 31 January 2022 until 31 January 2023.</li> <li>• "Certificate of Inspection of a Boiler Pressure Vessel No.10839, Registered No.PV.1335 for Pressure Vessel (Sterilizer #2) in Hargy Oil Palms Limited Barema Mill, based on Industrial Safety, Health and Welfare Act 1961", dated 31 January 2022 until 31 January 2023.</li> <li>• "Certificate of Inspection of a Boiler Pressure Vessel No.10840, Registered No.PV.1336 for Pressure Vessel (Sterilizer #3) in Hargy Oil Palms Limited Barema Mill, based on Industrial Safety, Health and Welfare Act 1961",</li> </ul>	
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		<p>dated 31 January 2022 until 31 January 2023.</p> <ul style="list-style-type: none"> <li>• "Certificate of Inspection of a Boiler Pressure Vessel No.10841, Registered No.PV.1340 for Pressure Vessel (Horizontal Air Receiver) in Hargy Oil Palms Limited Barema Mill, based on Industrial Safety, Health and Welfare Act 1961", dated 31 January 2022 until 31 January 2023.</li> <li>• "Certificate of Inspection of a Boiler Pressure Vessel No.10842, Registered No.PV.3531 for Pressure Vessel (Horizontal Air Receiver) in Hargy Oil Palms Limited Barema Mill, based on Industrial Safety, Health and Welfare Act 1961", dated 31 January 2022 until 31 January 2023.</li> <li>• "Certificate of Inspection of a Boiler Pressure Vessel No.10855, Registered No.PV.1357 for Pressure Vessel (Gas Blower #1) in Hargy Oil Palms Limited Barema Mill, based on Industrial Safety, Health and Welfare Act 1961", dated 31 January 2022 until 31 January 2023.</li> <li>• "Certificate of Inspection of a Boiler Pressure Vessel No.10856, Registered No.PV.1358 for Pressure Vessel (Gas Blower #2) in Hargy Oil Palms Limited Barema Mill, based on Industrial Safety, Health and Welfare Act 1961", dated 31 January 2022 until 31 January 2023.</li> <li>• "Certificate of Inspection of a Boiler Pressure Vessel No.10859, Registered No.PV.3535 for Pressure Vessel (Flare Stack) in Hargy Oil Palms Limited Barema Mill, based on Industrial Safety, Health and Welfare Act 1961", dated 31 January 2022 until 31 January 2023.</li> </ul> <p>---</p> <p>In Navo POM, Environment Permit No. WD-L2B (104) to Hargy Oil Palms Limited, date of issue 11 January 2001, amendment 16 June 2006, expiry on 31 December 2053. The permit to carry out works at Ibana Oil Palm Plantation and Navo Palm Oil Mill within Portion 624, Bialla, West New Britain Province; to discharge waste into environment carrying out level 2 activities associated with agricultural cultivation and palm oil extraction. The list of legal compliance comprises of: Environment</p> <ul style="list-style-type: none"> <li>• "Certificate of Registration as a Factory – Mill Processing Plant No.14714</li> </ul>	
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		<p>for Hargy Oil Palms Limited Navo Mill, based on Industrial Safety, Health and Welfare Act 1961-1969”, until 31 December 2022.</p> <ul style="list-style-type: none"> <li>• “Certificate of Registration as a Factory – Electrical Workshop No.14715 for Hargy Oil Palms Limited Navo Mill, based on Industrial Safety, Health and Welfare Act 1961-1969”, until 31 December 2022.</li> <li>• “Certificate of Registration as a Factory – Receiving Bay No.14716 for Hargy Oil Palms Limited Navo Mill, based on Industrial Safety, Health and Welfare Act 1961-1969”, until 31 December 2022.</li> <li>• “Certificate of Registration as a Factory – Water Treatment Plant No.14717 for Hargy Oil Palms Limited Navo Mill, based on Industrial Safety, Health and Welfare Act 1961-1969”, until 31 December 2022.</li> <li>• “Certificate of Registration as a Factory – Boiler Plant House No.14720 for Hargy Oil Palms Limited Navo Mill, based on Industrial Safety, Health and Welfare Act 1961-1969”, until 31 December 2022.</li> <li>• “Certificate of Inspection of a Boiler Pressure Vessel No.10824, Registered No.PV.2123 for Pressure Vessel (Sterilizer #1) in Hargy Oil Palms Limited Navo Mill, based on Industrial Safety, Health and Welfare Act 1961”, dated 31 January 2022 until 31 January 2023.</li> <li>• “Certificate of Inspection of a Boiler Pressure Vessel No.10825, Registered No.PV.2124 for Pressure Vessel (Sterilizer #2) in Hargy Oil Palms Limited Navo Mill, based on Industrial Safety, Health and Welfare Act 1961”, dated 31 January 2022 until 31 January 2023.</li> <li>• “Certificate of Inspection of a Boiler Pressure Vessel No.10826, Registered No.PV.2125 for Pressure Vessel (Sterilizer #3) in Hargy Oil Palms Limited Navo Mill, based on Industrial Safety, Health and Welfare Act 1961”, dated 31 January 2022 until 31 January 2023.</li> <li>• “Certificate of Inspection of a Boiler Pressure Vessel No.10827, Registered No.PV.1337 for Pressure Vessel (Back Pressure Vessel) in Hargy Oil Palms Limited Navo Mill, based on Industrial Safety, Health and Welfare Act</li> </ul>	
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		<p>1961”, dated 31 January 2022 until 31 January 2023.</p> <ul style="list-style-type: none"> <li>• “Certificate of Inspection of a Boiler Pressure Vessel No.10832, Registered No.B.3132 for PT Atmindo Bidrum Boiler (Boiler #1) in Hargy Oil Palms Limited Navo Mill, based on Industrial Safety, Health and Welfare Act 1961”, dated 31 January 2022 until 31 January 2023.</li> <li>• “Certificate of Inspection of a Boiler Pressure Vessel No.10833, Registered No.B.3133 for PT Atmindo Bidrum Boiler (Boiler #2) in Hargy Oil Palms Limited Navo Mill, based on Industrial Safety, Health and Welfare Act 1961”, dated 31 January 2022 until 31 January 2023.</li> <li>• “Certificate of Inspection of a Boiler Pressure Vessel No.10835, Registered No.PV.3524 for Pressure Vessel (Horizontal Air Receiver) in Hargy Oil Palms Limited Navo Mill, based on Industrial Safety, Health and Welfare Act 1961”, dated 31 January 2022 until 31 January 2023.</li> <li>• “Certificate of Inspection of a Boiler Pressure Vessel No.10836, Registered No.PV.3530 for Pressure Vessel (Horizontal Air Receiver) in Hargy Oil Palms Limited Navo Mill, based on Industrial Safety, Health and Welfare Act 1961”, dated 31 January 2022 until 31 January 2023.</li> </ul> <p>---</p> <p>In Barema Plantation, the list of legal compliance consists of:</p> <ul style="list-style-type: none"> <li>• “License to Keep a Store where Inflammable Liquids and/or Dangerous Goods May Be Kept – Chemical Storage Shed &amp; Mixing Bay, Fertilizer Storage Shed No. 11182 for Hargy Oil Palms Limited, Barema Plantation, based on Industrial Safety, Health and Welfare Act 1953 - 1967”, until 30 September 2022.</li> </ul> <p>---</p> <p>In Navo Estate – Ibana Plantation, Environment Permit No. WD-L2(60) date of issue 11 January 2001, date of amendment 16 June 2006, date of expiry 31 December 2053 – for Hargy Oil Palms Limited to extract water from Ibana River within Portion 624, West New Britain Province.</p>	
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		<p>The list of legal compliance consist of:</p> <ul style="list-style-type: none"> <li>• "License to Keep a Store Where Inflammable Liquids And/Or Dangerous Goods May Be Kept – Diesel Storage Division 1, 2 and 3 (3,000 litres) No.11176 for Hargy Oil Palms Limited Navo Estate Ibana Plantation, based on Inflammable Liquids Act 1953-1968", until 30 September 2022.</li> <li>• "License to Keep a Store Where Inflammable Liquids And/Or Dangerous Goods May Be Kept – Overhead Storage Division 1, 2 and 3 (3,000 litres) No.11176 for Hargy Oil Palms Limited Navo Estate Ibana Plantation, based on Inflammable Liquids Act 1953-1968", until 30 September 2022.</li> </ul> <p>---</p> <p>In Pandi Estate, Environment Permit No. WD-L2B (224) to Hargy Oil Palms Limited, date of issue 9 November 2009, expiry on 9 December 2034. The permit to carry out works at Portion 733, Milinch Ulawun, Fourmil Talasea, West New Britain Province; to discharge waste into environment carrying out level 2 activities associated with agricultural cultivation and palm oil extraction.</p> <p>The list of legal compliance consists of:</p> <ul style="list-style-type: none"> <li>• "License to Keep a Store where Inflammable Liquids and/or Dangerous Goods May Be Kept – overhead storage tank (fuel bowser: 30,000 litres diesel and drum storage petrol), No.11175 for Hargy Oil Palms Limited Pandi Estate Bakada Plantation, based on Industrial Safety, Health and Welfare Act 1961-1969", until 30 September 2022.</li> <li>• "License to Keep a Store where Inflammable Liquids and/or Dangerous Goods May Be Kept – Pumps (3 Fuel Bowsers) No.11190 for Hargy Oil Palms Limited Pandi Estate Bakada Plantation, based on Industrial Safety, Health and Welfare Act 1961-1969", until 30 September 2022.</li> </ul> <p><i>Note: during this audit obtain information that renewal charge for some annual license/permit in mill/estate has been paid but the license/permit still not issued by the government. Unit of certification has showed the last correspondences through the email on 2 August 2022.</i></p>	
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<p>2.1.2</p>	<p>The milling Company has a documented system for ensuring legal compliance in place. This system has a means to track changes to the law and also includes listing and evidence of legal due diligence of all contracted third parties, recruitment agencies, service providers and labour contractors.</p> <p><b>Smallholder Requirement:</b>          Organization that is managing the smallholders shall disseminate information on legal changes to smallholders.          - Minor compliance -</p>	<p>Hargy Oil Palms Limited established Procedure Compliance Obligation No.PRO-COM-EMS-002-10, dated 28 February 2020.</p> <ul style="list-style-type: none"> <li>- This procedure to identify and understand legislations and regulations that apply.</li> <li>- List of legislation and regulation reviewed annually.</li> <li>- Source of relevant legislation: <a href="http://www.paclii.org/pg/legis/consol_act/">http://www.paclii.org/pg/legis/consol_act/</a></li> <li>- any new or changed requirements must be addressed.</li> <li>- The reviewed list of applicable legislations will then be used to review and update Legal Compliance Checklist.</li> <li>- Any nonconformance identified discussed with relevant staff, corrective and/or preventive actions are agreed on and implemented.</li> </ul> <p>Audit team sighted document List of PNG Applicable Legislations No.REG-SUS-GEN-002-12, issue No.10, dated 25 May 2022. The PNG Applicable Legislations comprise of 105 Legislations and PNG Code of Practices. This is an update from last year's 109 legislation and Code of Practices.</p> <p>The newest legislation was Dangerous Drug Act 1952; reviewed on 20 May 2022; commencement date on 13 January 2022.</p> <p>Legal Compliance Checklist, latest version 14 April 2022.</p>	<p>Complied</p>
<p>2.1.3</p>	<p>For Company land, legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries.</p> <p>For Smallholder land, boundaries have been defined by a registered surveyor and portion numbers allocated by the Surveyor General OR boundaries of Customary Land have been defined by traditional means and agreed between neighbours with common boundaries and other interested parties; AND there is no significant dispute over tenure.</p>	<p>Hargy Oil Palms Limited demonstrated that in Navo Estate the boundary stones are maintained:</p> <ul style="list-style-type: none"> <li>- Boundary stone No.130 coordinate 5° 2' 39.63" S and 151° 13' 54.99" E neighboring with Saltamana Independent Estate.</li> <li>- Boundary stone No.136 coordinate 5° 2' 40.42" S and 151° 14' 15.74" E on block 05N01.</li> <li>- Boundary stone No.137 coordinate 5° 2' 40.73" S and 151° 14' 20.58" E on block 05N01.</li> </ul>	<p>Complied</p>

	<p>Smallholder allotment boundaries may be identified by traditional means provided that boundary locations are agreed by all neighbouring parties that share common boundaries.</p> <p><b>Guidance:</b> Significant disputes are those disputes currently before the Courts.</p> <p><b>Smallholders requirement:</b></p> <p>Smallholders, evidence of the "Right to use the land" will be demonstrated by compliance with the following:</p> <p>a) Land title or lease OR uncontested occupancy where</p> <ul style="list-style-type: none"> <li>• boundaries have been defined by a registered surveyor and portion numbers allocated by the Surveyor General or boundaries have been defined by traditional means and agreed between neighbours with common boundaries and other interested parties;</li> <li>• there is no significant dispute over tenure;</li> <li>• Smallholder allotments, boundaries may be identified by traditional means provided that boundary locations are agreed by all neighbouring parties that share common boundaries.</li> </ul> <p>- Minor compliance -</p>	<ul style="list-style-type: none"> <li>- Boundary stone No.138 coordinate 5<sup>0</sup> 2' 40.80" S and 151<sup>0</sup> 14' 27.16" E on block 05N01.</li> </ul> <p>In Pandi Estate the boundary stones are maintained:</p> <ul style="list-style-type: none"> <li>- Boundary stone No.64 coordinate 4<sup>0</sup> 59' 53.10" S and 151<sup>0</sup> 25' 30.81" E near block 11C03.</li> <li>- Boundary stone No.65 coordinate 4<sup>0</sup> 59' 46.07" S and 151<sup>0</sup> 25' 29.38" E on block 11C02 neighboring with Gilo Independent Estate.</li> <li>- Boundary stone No.66 coordinate 4<sup>0</sup> 59' 36.18" S and 151<sup>0</sup> 25' 27.98" E on block 11C02 neighboring with Gilo Independent Estate.</li> <li>- Boundary stone No.67 coordinate 4<sup>0</sup> 59' 25.89" S and 151<sup>0</sup> 25' 26.28" E on block 11C02 near Painava Creek buffer zone.</li> <li>- Boundary stone No.68 coordinate 4<sup>0</sup> 59' 29.00" S and 151<sup>0</sup> 25' 19.02" E on block 11B01 boundary with Gilo Independent Estate.</li> </ul> <p>Hargy Oil Palms demonstrated in Hargy Estate-Barema Plantation the boundary stones are maintained:</p> <ul style="list-style-type: none"> <li>- Boundary stone No.340 coordinate 5<sup>0</sup> 13' 32.38" S and 151<sup>0</sup> 8' 38.62" E.</li> <li>- Boundary stone No.341 coordinate 5<sup>0</sup> 13' 35.90" S and 151<sup>0</sup> 8' 34.64" E.</li> <li>- Hargy Oil Palms Limited performed and recorded HCV/Buffer Zone Inspection Form Barema Plantation-Hargy Estate, period 2 August 2022. The checklist review boundary demarcated with boundary pegs – yes; boundary pegs are clearly visible and identifiable – yes; are the boundary pegs regularly maintained – yes.</li> <li>- Hargy Oil Palms Limited performed and recorded HCV/Buffer Zone Inspection Form Barema Plantation-Hargy Estate, period 13 December 2022. The checklist review boundary demarcated with boundary pegs – no; boundary pegs are clearly visible and identifiable – no; are the boundary pegs regularly maintained – no, some pegs have been removed by LSS.</li> </ul>	
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		<p>Hargy Oil Palms Limited demonstrate monitoring and follow up action to ensure the boundary pegs to be clearly demarcated and visibly maintained.</p> <p>In Hargy Estate (including Barema Plantation) identified 814 boundary pegs, 652 boundary pegs were missing, and 162 boundary pegs are intact. In Navo Estate, identified 333 boundary pegs, 308 boundary pegs were missing and 25 boundary pegs are intact. In Pandi Estate, identified 659 boundary pegs, 621 boundary pegs were missing and 38 boundary pegs are intact.</p> <p>Audit team verified further, HOPL Lands and GIS teams conducted exercises to locate physical boundary markers across all its lease areas. Started in 2020 and was done with use of high precision GPS navigation to determine the status of physical boundary markers on the ground against GPS coordinates from original cadastral survey from the Department of Lands. Documents sighted and verified Plantation Boundary Markers Update_October 2020. The next step was HOPL engaging a registered surveyor to re-survey and re-establish missing boundary markers, since 2021. The plan going forward:</p> <ul style="list-style-type: none"> <li>- Request funding, incorporate into the Lands and GIS team budget for 2023 or alternatively request a special capex for the engagement of a contracted surveyor; responsibility Lands Manager; completion date by August 2023;</li> <li>- Lands and GIS to continue install cement markers as arbitrary control survey points for all estates; responsibility Lands Manager; completion date by August 2023;</li> <li>- For Pandi Estate: Alangily LLB completed 100%, Sabalbala completed 100%, Gamupa LLB completed 100%, Alaba LLB completed 100%, Magalona LLB completed 60%;</li> <li>- Navo Estate: Kiba Plantation completed 90%, Atata Plantation completed 100%, Ibana Plantation completed 100%;</li> <li>- Hargy Estate: Hargy Plantation completed 95%, Barema Plantation completed 60%;</li> </ul>	
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		<p>Smallholders</p> <ul style="list-style-type: none"> <li>- Sampled boundary stone VOP smallholder No.111164 Ume Lowa coordinate 5° 24' 43.07" S and 151° 3' 1.05"E;</li> <li>- Sampled boundary stone VOP smallholder No.111132 Robert Teia coordinate 5° 25' 13.48" S and 151° 3' 10.74" E;</li> <li>- Sampled boundary stone LSS smallholder No.010272 Suarua Elias coordinate 5° 22' 13.10" S and 151° 3' 2.68" E;</li> <li>- Sampled boundary LSS smallholder No.010220 Justina Pali coordinate 5° 21' 32.42" S and 151° 2' 50.48" E;</li> <li>- Sampled boundary stone LSS smallholder No.010188 Kangi Waugu coordinate 5° 21' 18.86" S and 151° 3' 7.18" E;</li> <li>- Sampled boundary stone VOP smallholder No.350061 Parfrey Peni coordinate 5° 19' 41.19" S and 151° 1' 41.05" E;</li> <li>- Sampled boundary stone VOP smallholder No.350044 Jack Amos coordinate 5° 19' 53.91" S and 151° 1' 28.18" E;</li> <li>- Sampled boundary stone VOP smallholder No.101039 Ephraim Vorit coordinate 5° 22' 48.12" S and 151° 1' 34.88" E;</li> <li>- Sampled boundary stone VOP smallholder No.101017 Mataururu United Church coordinate 5° 22' 57.90" S and 151° 1' 29.13" E;</li> <li>- Sampled boundary stone VOP smallholder No.101082 Michael Palia coordinate 5° 22' 55.98" S and 151° 1' 52.04" E;</li> <li>- Sampled boundary stone VOP smallholder No.101080 Michael Rakua coordinate 5° 22' 45.60" S and 151° 1' 50.28" E;</li> <li>- Sampled boundary stone VOP smallholder No.171738 Paul Seria coordinate 5° 21' 13.17" S and 151° 1' 22.94" E;</li> <li>- Sampled boundary stone VOP smallholder No.171737 Willy Mulai coordinate 5° 21' 36.98" S and 151° 1' 10.13" E;</li> </ul>	
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		<ul style="list-style-type: none"> <li>- Sampled boundary stone VOP smallholder No.181845 Rachael Kipoel coordinate 5° 14' 36.04" S and 151° 3' 7.26" E;</li> <li>- Sampled boundary stone VOP smallholder No.121203 Palibutu Tika coordinate 5° 17' 16.42" S and 151° 1' 21.12" E;</li> <li>- Sampled boundary stone VOP smallholder No.120112 Kiolly Delford coordinate 5° 17' 22.21" S and 151° 1' 37.88" E;</li> <li>- Sampled boundary stone VOP smallholder No.120119 Junai Gaa coordinate 5° 17' 57.40" S and 151° 2' 22.28" E;</li> <li>- Sampled boundary stone VOP smallholder No.121260 Rupen Balele coordinate 5° 17' 50.45" S and 151° 1' 15.40" E;</li> <li>- Sampled boundary stone VOP smallholder No.121265 Moses Peni coordinate 5° 18' 1.43" S and 151° 2' 32.72" E;</li> <li>- Sampled boundary stone VOP smallholder No.121218 Kit Walo coordinate 5° 17' 55.56" S and 151° 2' 31.65" E;</li> <li>- Sampled boundary stone VOP smallholder No.121266 Kevin Gaa coordinate 5° 17' 46.69" S and 151° 2' 8.36" E;</li> </ul> <p>Smallholders No.171701 Ming Kompot Tovole, VOP smallholder of 2 Ha.</p> <ul style="list-style-type: none"> <li>- Had been issued with CLUA previously. He was planning for replanting in 2016, therefore applying for CLUA back in 2016; CLUA No.171701 from Uge Uge Clan, for land known as Buluta of Matililiu VOP area, period of 25 years.</li> <li>- On 24 February 2017 Uge Uge Clan of Ewasse Village sent a letter stating this particular block was in dispute till date, dispute of attempts to resolve this issue by both clans from Matililu and Ewasse Village. Based on interview with extension officer the land have not been replanted ever since.</li> </ul>	
<p><b>Criterion 2.2:</b> All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements</p>			

<p>2.2.1</p>	<p>A list of contracted parties is maintained. Contracted parties include parties with whom a formal documented contract is in place and Smallholders where the contract is implied through the Smallholder offering fruit for sale by placing it at the pick-up point and the Company accepting the Smallholders offer by collecting it. The price to be paid and other conditions of the transaction are communicated by the Company. Each Smallholder pick-up is a separate transaction.</p> <p><b>Guidance:</b> The Company docket issued when small-holder fruit is collected is evidence of the contract for that transaction.</p> <p>- Minor compliance -</p>	<p>Unit of Certification has "2022 Contractors Listings" for all HOPL operating sites. According to the list, there were 85 existing contracts for Mill and Estates, and 15 contractors for FFB/Loose fruit cartage. The contract contain information of:</p> <ul style="list-style-type: none"> <li>• Contracting Department,</li> <li>• Contract Owner</li> <li>• Status</li> <li>• Contract reference</li> <li>• Contractor</li> <li>• Commencement date</li> <li>• Expired date</li> <li>• Scope of works</li> <li>• Location of services to be rendered</li> <li>• Contractor representatives</li> <li>• Contact details</li> <li>• Contractor mailing detail</li> <li>• Contractor emailing address</li> <li>• Physical address.</li> </ul> <p>Sample of contract seen are:</p> <ul style="list-style-type: none"> <li>- HOPL2022-012. Loose Fruit Collection &amp; Delivery – VOP Blocks to Barema Mill. Contractor name: Earthworks &amp; Mowing Services. Dated 1 January 2022 to 30 June 2023.</li> <li>- HOPL2022-013. Loose Fruit Collection &amp; Delivery – VOP Blocks to Barema Mill. Contractor name: Membu Welding &amp; Construction Ltd. Dated 1 January 2022 to 30 June 2023.</li> </ul>	<p>Complied</p>
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		<p>- HOPL2022-007. FFB Self Delivery – Bialla Project Area. Contractor name: Alaba Development Corporation. Dated 1 January 2022 to 30 June 2023.</p> <p>- HOPL2022-008. FFB Self Delivery – VOP Blocks to Hargy Mill. Contractor name: Alaba Development Corporation. Dated 1 January 2022 to 30 June 2023.</p> <p>Smallholders contractor list 2022 (covering the information of contractor name, scope of works, contract business/company, contact details and number of contractor employees):</p> <ul style="list-style-type: none"> <li>• MU-UMATA Mini Oil Palm Estate: FFB Cartage/Self Delivery</li> <li>• Earthworks &amp; Mowing Services: Loose Fruit Cartage</li> <li>• Membu Welding &amp; Construction Ltd: Self Delivery Contract</li> <li>• Alaba Development Corporation: Self Delivery Contract</li> <li>• WNB Solar Distributors: FFB Cartage Contract</li> <li>• Endy Estate: Self Delivery Contract</li> <li>• REBS Trading: Loose Fruit Cartage</li> <li>• Kijomhal Transport: FFB Cartage/Self Delivery</li> <li>• K.E.D Contractor: FFB Cartage/Self Delivery</li> <li>• Remaling Independent Estate: Self Delivery Contract</li> <li>• Independent Estate: Self Delivery Contract</li> <li>• Development Estate: Self Delivery Contract</li> </ul> <p>All the contracted parties are documented and well maintained by Legal Department.</p>	
2.2.2	All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by all parties to the contract.	Unit of certification had some contract with third parties for their operational activity. All the contracts already mentioned specific clause on meeting applicable legal requirements.	Complied

	<p><b>Guidance:</b> Companies may have standard conditions of supply for Smallholders which include this requirement.</p> <p>- Minor compliance -</p>	<p>On clause 17. Statutory Requirements: "the contractor must have the following valid statutory documents and shall provide copies upon request by HOPL as and when required:</p> <ul style="list-style-type: none"> <li>i. Certificate of registration issued by the investment promotion authority (IPA);</li> <li>ii. Taxpayer's registration certificate issued by internal revenue commission (IRC);</li> <li>iii. Certificate of compliance issued by internal revenue commission (IRC);</li> <li>iv. Trading license issued by East Nakanai Local Level Government (ENLLG);</li> <li>v. MVIL Registration certificate and road worthiness safety stickers for vehicle usage under this contract;</li> <li>vi. Workers Compensation Insurance Cover;</li> <li>vii. Other relevant certificates.</li> </ul> <p>Sample of contract seen are:</p> <ul style="list-style-type: none"> <li>- HOPL2022-012. Loose Fruit Collection &amp; Delivery – VOP Blocks to Barema Mill. Contractor name: Earthworks &amp; Mowing Services. Dated 1 January 2022 to 30 June 2023.</li> <li>- HOPL2022-013. Loose Fruit Collection &amp; Delivery – VOP Blocks to Barema Mill. Contractor name: Membu Welding &amp; Construction Ltd. Dated 1 January 2022 to 30 June 2023.</li> <li>- HOPL2022-007. FFB Self Delivery – Bialla Project Area. Contractor name: Alaba Development Corporation. Dated 1 January 2022 to 30 June 2023.</li> <li>- HOPL2022-008. FFB Self Delivery – VOP Blocks to Hargy Mill. Contractor name: Alaba Development Corporation. Dated 1 January 2022 to 30 June 2023.</li> </ul>	
2.2.3	All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour. Where young	Unit of certification had some contract with third parties for their operational activity. All the contracts already mentioned specific clause on disallowing child,	Complied

	<p>workers are employed, the contracts include a clause for their protection.</p> <p><b>Guidance:</b> Companies may have standard conditions of supply for Smallholders which include this requirement.</p> <p>- Minor compliance -</p>	<p>forced and trafficked labour. Where young workers are employed, the contracts include a clause for their protection. In point 11. Mentioned "The contractor must meet minimum legal terms and conditions of the PNG legislation regarding employment".</p> <p>Sample of contract seen are:</p> <ul style="list-style-type: none"> <li>- HOPL2022-012. Loose Fruit Collection &amp; Delivery – VOP Blocks to Barema Mill. Contractor name: Earthworks &amp; Mowing Services. Dated 1 January 2022 to 30 June 2023.</li> <li>- HOPL2022-013. Loose Fruit Collection &amp; Delivery – VOP Blocks to Barema Mill. Contractor name: Membu Welding &amp; Construction Ltd. Dated 1 January 2022 to 30 June 2023.</li> <li>- HOPL2022-007. FFB Self Delivery – Bialla Project Area. Contractor name: Alaba Development Corporation. Dated 1 January 2022 to 30 June 2023.</li> <li>- HOPL2022-008. FFB Self Delivery – VOP Blocks to Hargy Mill. Contractor name: Alaba Development Corporation. Dated 1 January 2022 to 30 June 2023.</li> </ul>	
<p><b>Criterion 2.3:</b> All FFB supplies from outside the unit of certification are from legal sources.</p>			
<p>2.3.1</p>	<p><b>(C)</b> For all directly sourced FFB, the mill requires:            Company plantations, this will be Division or Sub-division, for Smallholder fruit, this will be Smallholder name, Division or Sub-division.            Proof of the ownership status or the right/claim to the land by the grower/smallholder.            Milling Companies in PNG and the Solomon Islands may only source fruit from their own plantations and directly from Independent Smallholders in geographic proximity that are participants in the Unit of Certification of the applicable smallholder group.</p>	<p>Hargy Oil Palms Limited consist of three Palm Oil Mill which supplied by 3 Own Estates (Hargy Estate, Navo Estate and Pandi Estate) and Smallholders.            The land titles for lands that was developed by HOPL are available and kept onsite – see 4.4.1.            There are no changes of directly source FFB from previous certificate under Hargy scope.</p>	<p>Complied</p>

	- Critical (Major) compliance -														
2.3.2	No fruit is to be indirectly sourced through third party traders.	Hargy Mill, Navo Mill and Barema Mill only receives FFB's from their supply base. No third parties FFB entering the mills.	Complied												
<b>Principle 3: Optimise productivity, efficiency, positive impacts and resilience</b>															
<b>Criterion 3.1:</b> There is an implemented management plan that aims to achieve long-term economic and financial viability.															
3.1.1	<p><b>(C)</b> A business or management plan (minimum three years) is documented by the Milling Company that includes the projected contribution of fruit supplied by Smallholders that are within the Unit of Certification.</p> <p>- Critical (Major) compliance -</p>	<p>HOPL had a ten years business plan initiated, compiled and distributed from The CEO's office. The document details among others the following data:</p> <ul style="list-style-type: none"> <li>- Annual crop from plantation estates and the smallholders.</li> <li>- Age profile, year planted &amp; YPH (ranges from 17.59 – 30.06)</li> <li>- The distribution of crop to the 3 mills to ensure optimum capacity.</li> <li>- Targeted extraction ratios CPO Hargy Mill 23.96%; Navo Mill 24.50%; Barema Mill 25.00%; average 24.53%; and CPKO Hargy Mill 2.16%; Barema Mill 2.08%.</li> <li>- Production cost of both estates and mills.</li> <li>- Projected Profit/Loss statement.</li> </ul> <p>The projected crop for a duration of 2019 - 2029 was sighted and summarised below:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: left;">Source of FFB</th> <th style="text-align: right;">Total FFB 2019 - 2029</th> <th style="text-align: right;">% Contribution</th> </tr> </thead> <tbody> <tr> <td>Company Plantation</td> <td style="text-align: right;">3,924,222</td> <td style="text-align: right;">61.42</td> </tr> <tr> <td>Growers</td> <td style="text-align: right;">2,464,588</td> <td style="text-align: right;">38.58</td> </tr> <tr> <td><b>Total</b></td> <td style="text-align: right;"><b>6,388,811</b></td> <td style="text-align: right;"><b>100.00</b></td> </tr> </tbody> </table>	Source of FFB	Total FFB 2019 - 2029	% Contribution	Company Plantation	3,924,222	61.42	Growers	2,464,588	38.58	<b>Total</b>	<b>6,388,811</b>	<b>100.00</b>	Complied
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Mill	CPO-ER	Total CPO 2019 - 2029	CPKO-ER	Total CPKO 2019 - 2029
Hargy Mill	23.96	453,468	2.16	40,937
Navo Mill	24.50	628,675	-	-
Barema Mill	25.00	482,554	2.08	93,506
Total	24.49	1,564,697	2.10	134,443

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

The cost of relating to RSPO is reflected under item environment, whilst safety is absorbed under item health. PPE is taken into item staff welfare. All other related figures in details are available in soft copy and maintained in The CEO's Office. It is treated with full confidentiality released on discretion of the management.

In conclusion the financial plan for the organisation has been prepared in comprehensive and adequate to address the direction of the business for the next 10 years.

This is also made available as summarised below similar to the one prepared for the estates. The smallholders data is prepared through assistance given by OPIC and also the HOPL smallholders department. These are subjects discussed among others during the monthly extension meeting between the management and the smallholders.

Based on 2022 Business Plan Overview, the HOPL 2022 targets are:

Description	2022 Target
FFB	

		<ul style="list-style-type: none"> <li>• Company</li> </ul>	347,070 Tons		
		<ul style="list-style-type: none"> <li>• Smallholders</li> </ul>	221,438 Tons		
		Total FFB	568,508 Tons		
		Extraction Rates			
		<ul style="list-style-type: none"> <li>• OER</li> </ul>	24.41%		
		<ul style="list-style-type: none"> <li>• PKOER</li> </ul>	2.01%		
		FFA	<3.5%		
		Oil Loses	<1.57%		
		Oil Production			
		<ul style="list-style-type: none"> <li>• CPO</li> </ul>	138,795 Tons		
		<ul style="list-style-type: none"> <li>• PK</li> </ul>	11,429 Tons		
		Planting			
		<ul style="list-style-type: none"> <li>• New Planting</li> </ul>	0		
		<ul style="list-style-type: none"> <li>• Replant (HP)</li> </ul>	750 Ha		
		<ul style="list-style-type: none"> <li>• Replant (SH)</li> </ul>	500 Ha		
		<p><b>CAP Effectiveness of Previous NC in this indicator:</b>            HOPL has provided Pre Audit Information during this audit. The data contain the consistent data compare with the previous assessment. Otherwise, all the smallholders sampled has managed their own blocks. Based on that facts, the effectiveness of CAP has been satisfactorily demonstrated.</p>			

<p>3.1.2</p>	<p>The Milling Companies develop an annual replanting programme for Company plantations projected for a minimum of five years with yearly review.</p> <p><b>Smallholder requirements:</b>          Organization that is managing the smallholders develop replanting program for smallholders.          - Minor compliance -</p>	<p>The information of annual replanting program for the entire estates in the Hargy Palm Oil Limited (HOPL) is available. Below is the latest revision of replanting program, issued by General Manager of HOPL on 27 May 2021, based on HOPL 5 years Development &amp; Replant 2021.</p> <p>Contents of which were sighted and shown below; figures in hectares otherwise stated.</p> <p>Replanting</p> <table border="1" data-bbox="1025 619 1942 1082"> <thead> <tr> <th>Estate/ Plantation</th> <th>2021</th> <th>2022</th> <th>2023</th> <th>2024</th> <th>2025</th> <th>2026</th> </tr> </thead> <tbody> <tr> <td>Hargy Estate / Hargy Plantation</td> <td>426.56</td> <td>81.00</td> <td>-</td> <td>235.19</td> <td>-</td> <td>-</td> </tr> <tr> <td>Hargy Estate / Brema Plantation</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> </tr> <tr> <td>Navo Estate / Atata-Kiba Plantation</td> <td>275.74</td> <td>750.13</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> </tr> <tr> <td>Navo Estate / Ibana Plantation</td> <td>-</td> <td>-</td> <td>534.63</td> <td>200.41</td> <td>566.85</td> <td>602.48</td> </tr> <tr> <td><b>Total</b></td> <td><b>702.30</b></td> <td><b>831.13</b></td> <td><b>534.63</b></td> <td><b>525.60</b></td> <td><b>566.85</b></td> <td><b>602.48</b></td> </tr> </tbody> </table> <p>Total actual replanting on 2021 was 672.66 Ha.</p> <p>Replanting in Smallholders are managed incorporation with Oil Palm Industry Corporation (OPIC). There is proposed smallholder plantings consist of 500.00 Ha in 2021; 683.00 Ha in 2022; 683.00 Ha in 2023, 683.00 Ha in 2024; 683.00 Ha in 2025; and 683.00 Ha in 2026. During the field visit, there was some</p>	Estate/ Plantation	2021	2022	2023	2024	2025	2026	Hargy Estate / Hargy Plantation	426.56	81.00	-	235.19	-	-	Hargy Estate / Brema Plantation	-	-	-	-	-	-	Navo Estate / Atata-Kiba Plantation	275.74	750.13	-	-	-	-	Navo Estate / Ibana Plantation	-	-	534.63	200.41	566.85	602.48	<b>Total</b>	<b>702.30</b>	<b>831.13</b>	<b>534.63</b>	<b>525.60</b>	<b>566.85</b>	<b>602.48</b>	<p>Complied</p>
Estate/ Plantation	2021	2022	2023	2024	2025	2026																																							
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Navo Estate / Atata-Kiba Plantation	275.74	750.13	-	-	-	-																																							
Navo Estate / Ibana Plantation	-	-	534.63	200.41	566.85	602.48																																							
<b>Total</b>	<b>702.30</b>	<b>831.13</b>	<b>534.63</b>	<b>525.60</b>	<b>566.85</b>	<b>602.48</b>																																							

		<p>replanting activity in 2021 for example in Block 311578 on behalf of Rusiat Wauria – LSS Soi Section 2</p> <p>Mumata Independent Estate has a projection of production for period 2022-2028</p> <table border="1" data-bbox="1025 507 1944 608"> <thead> <tr> <th>2022</th> <th>2023</th> <th>2024</th> <th>2025</th> <th>2026</th> <th>2027</th> <th>2028</th> </tr> </thead> <tbody> <tr> <td>551</td> <td>551</td> <td>551</td> <td>522</td> <td>522</td> <td>522</td> <td>522</td> </tr> </tbody> </table>	2022	2023	2024	2025	2026	2027	2028	551	551	551	522	522	522	522	
2022	2023	2024	2025	2026	2027	2028											
551	551	551	522	522	522	522											
<p>3.1.3</p>	<p>The Milling Company holds management reviews at planned intervals appropriate to the scale and nature of the activities undertaken.</p> <p>- Minor compliance -</p>	<p>There is Procedure of Management Review (PRO-SUS-EMS-017-07) Issue no.7 dated 8 March 2021. The management review is conducted annually at planned intervals, to confirm that the standard implementation is suitable, adequate and effective for meeting the desired level performance and to identify and plan future improvement.</p> <p>Hargy Oil Palms Limited have conducted the 2021 Management Review – Hargy Oil Palms Limited (HOPL), on 11 May 2022. The management review attended by the GM HOPL, HOD VWS, HOD Finance, HOD Construction, HOD Smallholder Affairs, HOD Plantations, SHAAS Manager, HOD HR, HOD Engineering, HOD Sustainability.</p> <p>The management review agenda, as recorded in minutes of management review meeting dated 26 March 2021 has included:</p> <ul style="list-style-type: none"> <li>• Actions/Follow up from previous management review.</li> <li>• Changes to the Management System.</li> <li>• Environmental Objectives &amp; Targets / Environments Performances.</li> <li>• Process Performance and Product Conformity.</li> <li>• Results of Internal Audits/Status of preventive and corrective actions.</li> <li>• Customer feedback from interested parties.</li> <li>• Adequacy of resources</li> <li>• Opportunities/recommendation for improvement</li> </ul>	<p>Complied</p>														

<b>Criterion 3.2:</b> The unit of Certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable Continuous improvement in key operations.			
3.2.1	<p><b>(C)</b> The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification.</p> <p>- Critical (Major) compliance -</p>	<p>HOPL has document of Action Plan for Continual Improvement in Sustainable Performance (PLN-COM-GEN-001-017), Issue No.18, dated 1 January 2022.</p> <p>The Action Plan for Continual Improvement identifies the planned actions to further improve its performance in the key areas of:</p> <ul style="list-style-type: none"> <li>• Minimising the use of Certain Pesticides;</li> <li>• Reducing negative and enhancing positive Environmental Impacts;</li> <li>• Waste reduction;</li> <li>• Pollution and emissions, and;</li> <li>• Social Impacts.</li> </ul> <p>HOPL commits to maintaining and reporting on progress implementing this improvement plan commencing 2022 and reviewing it annually. By following this plan, HOPL continually improve its performance.</p>	Complied
3.2.2	<p>As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the RSPO metrics template.</p> <p>- Minor Compliance -</p>	<p>Unit of certification has sent the RSPO Metric Template on 22 July 2022 which contain the summary data as follows:</p> <ul style="list-style-type: none"> <li>• Economic indicators: Total production volume of FFB; all FFB are certified since all supply bases are certified under HOPL; Yield (land productivity); Total production volume of certified PO and PK; Total sales volume of certified PO and certified PK;</li> <li>• Social indicators: Demographic breakdown for workers/labour; Training for workers and smallholders; Inclusion of smallholders; Lost time injury frequency rate (LTIFR); Complaints and Grievances.</li> <li>• Environmental indicators: Pesticide use; Freshwater usage; Biodiversity.</li> </ul> <p><b>CAP Effectiveness of Previous NC in this indicator:</b></p>	Complied

		Based on document verification, unit of certification has been submitted the RSPO Metric Template on 22 July 2022. In accordance with CAP submitted, this minor nonconformity <b>satisfactorily closed</b> .							
<b>Criterion 3.3:</b> Operating procedures are Appropriately documented, consistently implemented and monitored.									
3.3.1	<p><b>(C)</b> Standard Operating Procedures (SOPs) for the unit of certification are in place.</p> <p><b>Smallholder requirements:</b>          Organization that is managing the smallholders provides relevant SOP of smallholding operations to smallholders.</p> <p>- Critical (Major) compliance -</p>	<p>HOPL had a documented Manual and Standard Operating Procedure (SOP) are indexed according for the subjects and scope covered. Copies are available in the estates and mill audited. Therein is shown issue no and date of revision. All SOPs are issued by the Environmental &amp; Sustainability Manager. Format of SOP is standard through all the estates and mills. e.g.</p> <table border="1" data-bbox="1032 695 1724 746"> <tr> <td>PRO</td> <td>ESD</td> <td>GEN</td> <td>001</td> <td>09</td> <td>New Development</td> </tr> </table> <p>Based on updated List of Approved Documents (REG-COM-EMS-002-018), documented information for the whole operation of HOPL are divided into sections as follow, including samples of procedures:</p> <p><b>Manuals:</b></p> <ul style="list-style-type: none"> <li>- MAN-SUS-EMS-001-13; EMS Manual; Rev.13; dated 30 March 2022.</li> <li>- MAN-SUS-SCC-001-03; HOPL SCC Manual; Rev.3; dated 10 March 2021.</li> <li>- MAN-PLT-HAR-001-06; Harvesting Manual; Rev.6; dated 18 July 2022.</li> <li>- MAN-PLT-UPK-002-01; Oil Palm Inorganic Fertilizer Management Practices Manual; Rev.1; dated 31/03/2021.</li> <li>- MAN-HRD-GEN-001-02; HR Operations Manual; Rev.2; dated 1 June 2021.</li> </ul> <p><b>General Procedures:</b></p> <ul style="list-style-type: none"> <li>- PRO-SUS-GEN-001-11; New Development Procedure; Rev.11; dated 12 May 2021.</li> <li>- PRO-SUS-GEN-003-10; Upkeep Management; Rev.10; dated 12 May 2021.</li> <li>- PRO-SUS-GEN-004-12; Pesticides Management SOP; Rev.12; dated 12 May 2021.</li> </ul>	PRO	ESD	GEN	001	09	New Development	Complied
PRO	ESD	GEN	001	09	New Development				

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		<ul style="list-style-type: none"> <li>- PRO-SUS-GEN-005-11; SOP for Nursery Practices; Rev.11; dated 21 June 2022.</li> <li>- PRO-SUS-GEN-006-12; SOP for CPO Milling; Rev.12; dated 12 May 2021.</li> <li>- PRO-SUS-GEN-007-12; SOP for PKO Milling Practices; Rev.12; dated 12 May 2021.</li> <li>- PRO-SUS-GEN-008-12; SOP for Waste Management Practice; Rev.12; dated 12 May 2021.</li> <li>- PRO-SUS-GEN-009-10; SOP for Compost Management; Rev.10; dated 12 May 2021.</li> <li>- PRO-SUS-GEN-010-11; SOP for Hydrocarbons Management; Rev.11; dated 12 May 2021.</li> <li>- PRO-SUS-GEN-011-13; SOP for Palm Oil Mill Effluent Management; Rev.13; dated 30 May 2022.</li> <li>- PRO-SUS-GEN-012-14; SOP for Shipping; Rev.14; dated 12 May 2021.</li> <li>- PRO-SUS-GEN-013-11; SOP for Transport; Rev.11; dated 12 May 2021.</li> <li>- PRO-SUS-GEN-014-11; SOP for Compound Management; Rev.11; dated 12 May 2021.</li> <li>- PRO-SUS-GEN-015-11; SOP for Central Stores; Rev.11; dated 12 May 2021.</li> <li>- PRO-SUS-GEN-016-10; SOP for Construction; Rev.10; dated 12 May 2021.</li> <li>- PRO-SUS-GEN-017-03; SOP for HOPL Planting Approval; Rev.3; dated 18 March 2021.</li> <li>- PRO-SUS-GEN-018-02; SOP for Conservation Areas SOP; Rev.2; dated 18 March 2021.</li> </ul> <p><b>Sustainability Department - EMS Procedures:</b></p>	
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		<ul style="list-style-type: none"> <li>- PRO-SUS-EMS-001-11; Environmental Aspects; Rev.11; dated 8 March 2021.</li> <li>- PRO-SUS-EMS-002-12; Compliance Obligation; Rev.12; dated 21 March 2022.</li> <li>- PRO-SUS-EMS-003-11; Environmental Objectives; Rev.11; dated 21 March 2022.</li> <li>- PRO-SUS-EMS-004-11; Organizational Roles, Responsibilities and Authorities; Rev.11; dated 21 March 2022.</li> </ul> <p><b>Sustainability Department - EMS Procedures:</b></p> <ul style="list-style-type: none"> <li>- PRO-SUS-SUS-001-03; Mechanism to Check Consistent Implementation of Procedures; Rev.3; dated 8 March 2021.</li> <li>- PRO-SUS-SUS-002-04; Dissemination of Company Information &amp; Documents; Rev.4; dated 25 March 2021.</li> <li>- PRO-SUS-SUS-004-07; Grievance Mechanism; Rev.7; dated 27 June 2022.</li> <li>- PRO-SUS-SUS-005-01; RSPO Metric SOP; Rev.1; dated 27 June 2022.</li> </ul> <p><b>Supply Chain Certification Procedures:</b></p> <ul style="list-style-type: none"> <li>- PRO-SUS-SCC-005-02; OutSourcing Activities; Rev.2; dated 10 March 2021.</li> <li>- PRO-SUS-SCC-006-02; Sales and Goods Out; Rev.2; dated 10 March 2021.</li> <li>- PRO-SUS-SCC-011-03; Claims; Rev.3; dated 10 March 2021.</li> <li>- PRO-SUS-SCC-013-02; Management Review; Rev.2; dated 10 March 2021.</li> <li>- PRO-SUS-SCC-014-02; Production of CPO; Rev.2; dated 10 March 2021.</li> <li>- PRO-SUS-SCC-015-02; Receive of Fresh Fruit Bunch (FFB); Rev.2; dated 10 March 2021.</li> </ul>	
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		<ul style="list-style-type: none"> <li>- PRO-SUS-SCC-016-02; Collection and Transport of Fresh Fruit Bunch (FFB); Rev.2; dated 10 March 2021.</li> <li>- OHS Procedures:</li> <li>- PRO-SUS-OHS-001-03; First Aid Handling; Rev.3; dated 26 March 2021.</li> <li>- PRO-SUS-OHS-002-02; Basic Operating Operators Guide for Garbage Truck; Rev.3; dated 26 March 2021.</li> <li>- PRO-SUS-OHS-003-05; PPE; Rev.5; dated 18 March 2021.</li> <li>- ERP-SUS-GEN-001-10; Volcano Eruption Evacuation Response Plan; Rev.10; dated 22 May 2021.</li> <li>- ERP-SUS-GEN-002-10; Flooding Rivers Evacuation Response Plan; Rev.10; dated 22 May 2021.</li> <li>- ERP-SUS-GEN-003-10; Mills Factories Fire Evacuation Response Plan; Rev.10; dated 22 May 2021.</li> <li>- ERP-SUS-GEN-004-10; Bialla Tank Farm Tanker Terminal Fire Emergency Standard Response Procedure; Rev.10; dated 22 May 2021.</li> <li>- ERP-SUS-GEN-005-10; Bialla Tanker Terminal Oil Spill Standard Response (Involving People) Procedure; Rev.10; dated 22 May 2021.</li> <li>- Procedures Engineering Department – Laboratory.</li> <li>- Procedures Engineering Department – Process.</li> <li>- Procedures Engineering Department – Biogas.</li> <li>- Procedures Engineering Department – Maintenance.</li> <li>- Procedures Engineering Department – Shipping.</li> <li>- Procedures Engineering Department – General.</li> <li>- Procedures Vehicle Workshop.</li> <li>- Procedures Community Affairs Department – General.</li> <li>- Procedures Community Affairs Department – Security.</li> <li>- Procedures Community Affairs Department – Lands.</li> </ul>	
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		<ul style="list-style-type: none"> <li>- Procedures Smallholders Affairs Department – Community Engagement.</li> <li>- Procedures Smallholders Affairs Department – Smallholder Agriculture Advisory Services.</li> <li>- Procedures Smallholders Affairs Department – Smallholder Transport.</li> <li>- Procedures Human Resource Department – Health.</li> <li>- Procedures Human Resource Department – General.</li> <li>- Procedures Construction Department – Joinery.</li> <li>- Procedures Plantation – General.</li> <li>- Procedures Plantation – Ancillary.</li> <li>- Procedures Plantation – Upkeep.</li> <li>- Procedures Plantation – Harvesting.</li> <li>- Procedures Legal.</li> <li>- Procedures Finance Department – General.</li> </ul> <p>All procedures are in English and in certain specific areas being translated to Tok Pisin.</p> <p>The company has issued Statement from the CEO/Director Hargy Oil Palms Limited – COVID 19, dated 23 March 2020. HOPL are absolutely committed to the safety and wellbeing of all employees and their dependents. A number of measures have already been introduced to support the government’s intent to restrict COVID-19 spreading. These measures are constantly being reviewed and adjusted as the situation dictates and fit within the requirements of the State of Emergency (SOE).</p> <p>During pandemic, HOPL had specific COVID-19 mechanism which consist of:</p> <ul style="list-style-type: none"> <li>- HOPL Statement from CEO regards to Covid19, dated 23 March 2020.</li> <li>- SOP Infection Prevention Control Guideline for COVID-19 Treatment/Isolation Centre (Area 8), dated 13 April 2020.</li> </ul>	
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		<ul style="list-style-type: none"> <li>- FOR-HRD-HEA-005-01; Rules and Services for Persons Undergoing Quarantine; Issue no.1; dated 22 April 2021.</li> <li>- PRO-HRD-HEA-006-03; HOPL Quarantine Procedure - COVID 19; Issue no.3; dated 22 April 2021.</li> <li>- PRO-HRD-HEA-007-01; Standard Operating Procedure Management of COVID 19 In the Workplace; Issue no.1; dated 22 April 2021.</li> </ul> <p>All the procedures reviewed annually and updated/revised if needed. All the SOP's document is available in respective unit or in softcopy.</p>	
3.3.2	<p>A mechanism to check consistent implementation of procedures is in place.</p> <p><b>Smallholder requirements:</b> Organization that is managing the smallholders maintains production records and field day attendance records as evidence of improved performance.</p> <p>- Minor Compliance -</p>	<p>Mechanism to check consistent implementation of procedures is in place from the lowest level of supervisory to the highest level like by The General Manager and external parties. On the Head office level, the following among others are made:</p> <ul style="list-style-type: none"> <li>• Regular evaluation of all procedures will be made annually 2 times/year audit by the Compliance Department, Workplace inspection by RSPO representative on monthly basis.</li> <li>• Chief Engineer visits to the mills.</li> <li>• Head of Plantation field inspection.</li> <li>• General Manager or Consultant Inspection.</li> </ul> <p><b>Palm Oil Mill</b></p> <p>The Mill Manager inspects the mill on a daily basis. The Engineers, Supervisors monitors the entire production performance and product quality. This is made through the mill rounds and supervisions. The checklist forms sighted during the audit are sterilizer safety operation checklist, press station checklist. The product/lab data sheet is checked hourly by shift superintendent to ensure conformity to quality standard of all process parameters. Monthly figures are analyzed/recommended for improved performance. Chief Engineer does regular visits to all the 3 mills and with a report being established.</p>	Complied

		<p>Technically there is no specific document, but the Chief Engineering always reported the visit issue/daily monitoring issue through the email. For example, the issue on 2 August 2022 in Barema Mill related to the water hardness (due to the softener/RO plant leakage). This issue has been fixed in accordance to the detail of email Chief Engineering record.</p> <p><b>Plantation</b></p> <p>The Head of Plantation visited estates for the field inspection. A standard report is made to the management of the operating units. The report was being checked and discussed. Estates provide remedial plan/action taken. The report contains:</p> <ul style="list-style-type: none"> <li>• Sections inspected immature, mature, new development.</li> <li>• Action points to be taken before next visit and completion date.</li> <li>• Harvesters productivity / standards</li> <li>• Upkeep standard / Pest &amp; Diseases</li> <li>• RSPO related requirement</li> <li>• Documentation compliance.</li> </ul> <p><b>Smallholders:</b></p> <p>Internal audit for Smallholders Affairs conducted on 16 May 2022. Sighted 2 internal audit report as follows:</p> <ul style="list-style-type: none"> <li>• Internal audit report of Kabaya and Soi Area. 4 NC's raised during the audit which all the NC's has been closed by the internal auditor.</li> <li>• Internal audit report of Noau Area. 3 NC's raised during the audit which all the NC's has been closed by the internal auditor.</li> </ul>	
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		<p>HOPL by its Smallholders Affairs has conducted field day to maintain knowledge of smallholders of sustainable production and best agriculture practices. Available records of field day facilitated by HOPL – PNGOPRA, e.g.</p> <ol style="list-style-type: none"> <li>1. Malasi Area: Mini Field Day on 8 August 2021, facilitate by OPIC, PNG-OPRA, HOPL-SHAAS &amp; LANDS. Attended by 70 participants. The topic of the field day was related to: <ul style="list-style-type: none"> <li>➤ Production and Best Management Practices,</li> <li>➤ RSPO Principles &amp; Criteria,</li> <li>➤ Fertilizer, Pest and Disease</li> <li>➤ Land ownership requirements</li> </ul> </li> <li>2. Malasi Area: Mini Field Day on 23 March 2022, facilitate by HOPL-SHAAS (Karen S. Rickian, Cleophas Gavuli and Paul Asei). Attended by 35 participants. The topic of the field day was related to: <ul style="list-style-type: none"> <li>➤ FFB Price Calculation,</li> <li>➤ Best Management Practices,</li> <li>➤ Fertilizer and Mama Loose Fruit</li> </ul> </li> <li>3. Barema Section 2: RSPO Awareness and Block Inspection Report Training on 13 October 2021, facilitate by HOPL-SHAAS and Sustainability Department (Gabriel Peka, Stephanie Silik and Fidelis Hiamangi). Attended by 25 participants. The topic of the meeting was related to RSPO requirement (legal requirement, chemical usage, waste management, fire use, child labour, ethical conduct policy, buffer zone, RTE species) and Block Inspection Report awareness (block upkeep, fertilizer application, harvesting and road access).</li> <li>4. Barema Section 5 &amp; 6: RSPO Awareness and Block Inspection Report Training on 10 November 2021, facilitate by HOPL-SHAAS extension officer (Gabriel Peka). Attended by 24 participants. The topic of the meeting was related to RSPO requirement (legal requirement, chemical usage, waste management, fire use, child labour, ethical conduct policy, buffer zone,</li> </ol>	
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		<p>RTE species) and Block Inspection Report awareness (block upkeep, fertilizer application, harvesting and road access).</p> <ol style="list-style-type: none"> <li>5. Barema Section 9: Awareness Training of Production on 9 May 2022, facilitate by HOPL-SHAAS extension officer (Gabriel Peka). Attended by 24 participants. The topic of the meeting was related to Best Management Practices (harvesting, fertilizer application, tool &amp; chemical glyphosate and replanting).</li> <li>6. Sovula VOP: Awareness Training of Best Management Practices on 13 July 2021, facilitate by HOPL-SHAAS extension officer (Gabriel Peka). Attended by 24 participants. The topic of the meeting was related to Best Management Practices (fertilizer application, depletion and restoraron).</li> <li>7. Sovula VOP – Main Village Ground: RSPO Awareness and Block Inspection Report Training on 10 October 2021, facilitate by HOPL-SHAAS extension officer (Gabriel Peka). Attended by 37 participants. The topic of the meeting was related to RSPO requirement (legal requirement, chemical usage, waste management, fire use, child labour, ethical conduct policy, buffer zone, RTE species) and Block Inspection Report awareness (block upkeep, fertilizer application, harvesting and road access).</li> <li>8. Ole Village: RSPO Awareness and Best Management Practices Training on 18 July 2022, facilitate by HOPL-SHAAS extension officer (Michael Tony and Jude Vitikut). Attended by 22 participants. The topic of the meeting was related to RSPO requirement (ethical conduct, child labour, bell hevi/grievance procedure, fire watch, environmental protection, and chemical usage) and best management practices (block upkeep, fertilizer application, harvesting and replanting).</li> <li>9. Wilelo Section 12: Mini field day on 26 October 2021, facilitate by HOPL-SHAAS &amp; PMB - Kimbe. Attended by 31 participants. The topic of the field day was related to:             <ul style="list-style-type: none"> <li>➤ Chemical issuance and usage</li> <li>➤ Production</li> </ul> </li> </ol>	
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		<ul style="list-style-type: none"> <li>➤ Health and safety</li> <li>➤ Fertilizer application</li> <li>➤ Pest and disease</li> </ul> <p>10. Wilelo LSS: RSPO Awareness Training on 12 July 2022, facilitate by HOPL-SHAAS extension officer (Alphonse Olemba) and HOPL-SHAAS manager (Morgane Commans). Attended by 18 participants. The topic of the meeting was related to RSPO Smallholders (ethical conduct policy, child labour, chemical usage, waste management, buffer zone, RTE species, new planting and replanting area and grievance procedure).</p> <p>11. Wilelo Community Hall: FFB Price Calculation Awareness Training on 13 December 2021, facilitate by HOPL-SHAAS (Karen S. Rickian, Cleophas Gavuli and Paul Asei) and HOPL-SHAAS extension officer (Alphonse Olemba). Attended by 48 participants. The topic of the field day was related to: FFB price calculation and grievance procedure.</p> <p>12. Gamupa VOP: RSPO Awareness Training on 5 June 2022, facilitate by HOPL-SHAAS extension officer and Sustainability Department Officer (Billy Werake and Fidelis Hiamangi). Attended by 48 participants. The topic of the meeting was related to RSPO Smallholders (ethical conduct policy, child labour, chemical usage, waste management, buffer zone, RTE species, new planting and replanting area and grievance procedure).</p> <p>13. Nantabu VOP: RSPO Awareness Training on 31 July 2022, facilitate by HOPL-SHAAS extension officer (Billy Werake). Attended by 24 participants. The topic of the meeting was related to RSPO Smallholders (ethical conduct policy, child labour, chemical usage, waste management, buffer zone, RTE species, new planting and replanting area and grievance procedure).</p> <p>14. Apupul Community Hall: FFB Price Calculation Awareness Training on 16 December 2021, facilitate by HOPL-SHAAS extension officer (John Ken) and HOPL-SHAAS Manager (Morgane Commans). Attended by 41</p>	
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		<p>participants. The topic of the meeting was related to: FFB price calculation and grievance procedure.</p> <p>15. Urumaili Village: RSPO Awareness and Best Management Practices Training on 18 July 2022, facilitate by HOPL-SHAAS extension officer (Karen Rickian). Attended by 24 participants. The topic of the meeting was related to RSPO requirement (ethical conduct, child labour, bell hevi/grievance procedure, fire watch, environmental protection, and chemical usage) and best management practices (block upkeep, fertilizer application, harvesting and replanting).</p> <p>16. Sege Village: Awareness on New and Additional Plantings on 20 September 2021, facilitate by HOPL-SHAAS extension officer (Michael Tony). Attended by 33 participants.</p> <p>17. Soi Section 3 &amp; 4: Awareness Training of Crop Quality and Best Management Practices on 3 July 2022, facilitate by HOPL-SHAAS extension officer (Manuel Vikun and Joseph Meleskit) and HOPL-SHAAS Manager (Morgane Commans). Attended by 56 participants. The topic of the meeting was related to crop quality and Best Management Practices (path and circle weeding, pruning, frond stacking, cover crop planting).</p> <p>18. Soi Section 9: Awareness Training of Crop Quality and Best Management Practices on 26 June 2022, facilitate by HOPL-SHAAS extension officer (Manuel Vikun) and PNG-OPRA Officer (Charles Baleko). Attended by 32 participants. The topic of the meeting was related to fertilizer application.</p> <p>19. Soi Community: Awareness Training of Crop Quality and Best Management Practices on 5 January 2022, facilitate by HOPL-SHAAS extension officer (Manuel Vikun, Karen S. Rickian, Cleophas Gavuli and Gideon) and HOPL-SHAAS Manager (Morgane Commans). Attended by 36 participants. The topic of the meeting was related to RSPO Awareness and.</p> <p>20. Soi Section 6: Awareness Training on Best Management Practices on 15 June 2022, facilitate by HOPL-SHAAS extension officer (Manuel Vikun). Attended by 21 participants. The topic of the meeting was related to block</p>	
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		<p>upkeep (path and circle weeding, pruning, frond stacking, cover crop planting).</p> <p>21. Kabaya Section 2: RSPO Awareness and Best Management Practices Training on 27 October 2021, facilitate by HOPL-SHAAS extension officer (Andy Samuel and Temah Ima). Attended by 24 participants. The topic of the meeting was related to RSPO requirement (ethical conduct, child labour, bell hevi/grievance procedure, fire watch, environmental protection, and chemical usage) and best management practices (block upkeep, fertilizer application, harvesting and replanting).</p> <p>22. Muumata – Independent Estate: RSPO Policies and Best Management Practices Training on 3 August 2022, facilitate by HOPL-SHAAS extension officer (Billy Werake). Attended by 10 participants. The topic of the meeting was related to RSPO requirement (ethical conduct, child labour, bell hevi/grievance procedure, fire watch, environmental protection, and chemical usage) and best management practices (block upkeep, fertilizer application, harvesting and replanting).</p> <p><b>CAP Effectiveness of Previous NC in this indicator:</b>          Based on document verification, unit of certification has been conducted the smallholders training/field day as above. The Monitoring of Pollution Control Device was installed and performed regularly in accordance with SOP Waste Management Plan No.PLN-SUS-EMS-001-011 Section 7.0 Hargy Palm Oil Mills. In accordance with CAP submitted, this minor nonconformity <b>satisfactorily closed</b>.</p>	
3.3.3	<p>Records of monitoring and any actions taken are maintained and available.</p> <p>- Minor Compliance -</p>	<p>Records of monitoring and any actions taken are maintained and available, as examples:</p> <p><b>Palm Oil Mill</b></p> <p>The Mill Manager inspects the mill on a daily basis. The Engineers, Supervisors monitors the entire production performance and product quality. This is made through the mill rounds and supervisions. The checklist forms sighted during</p>	Complied

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		<p>the visit are sterilizer safety operation checklist, press station checklist. The product/lab data sheet is checked hourly by shift superintendent to ensure conformity to quality standard of all process parameters. Monthly figures are analyzed/recommended for improved performance. Chief Engineer does regular visits to all the 3 mills and with a report being established. For examples:</p> <p>Hargy Mill:</p> <ul style="list-style-type: none"> <li>• Hargy POM RSPO Internal Audit report 13 June 2022. There are 1 (one) Major NC regarding awareness record; there are 2 (two) minor NC obtained.</li> </ul> <p>Barema Mill:</p> <ul style="list-style-type: none"> <li>• Barema POM RSPO Internal Audit report 17 June 2022. There are 4 (four) Minor NC identified only. The nonconformities related to training records, minimum record of PPE in store, housekeeping and emergency drill plan that was conducted as per scheduled. All the NC's has been closed satisfactorily by the management and submitted to the internal auditor.</li> <li>• EHS Internal audit on 25 July 2022, conducted by HS Officer. During this audit obtains information that all the findings has been satisfactorily closed.</li> <li>• Technically there is no specific document, but the Chief Engineering always reported the visit issue/daily monitoring issue through the email. For example, the issue on 2 August 2022 in Barema Mill related to the water hardness (due to the softener/RO plant leakage). This issue has been fixed in accordance to the detail of email Chief Engineering record.</li> </ul> <p>Navo Mill:</p>	
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		<p>Sample taken: RSPO Internal Audit report on 13 July 2022. There are 10 (ten) NC's identified related to fire extinguisher was not checked, waste handling, waste burning in compound areas, missing MSDS, unlabeled bin, leaking valve out and wastewater record. All the NC's has been corrected and satisfactorily closed.</p> <p><b>Plantation:</b> Head of Plantation visited estates for the field inspection. A standard report is made to the management of the operating units. The report was being checked and discussed. Estates provide remedial plan/action taken. The report contains:</p> <ul style="list-style-type: none"> <li>• Sections inspected immature, mature, new development.</li> <li>• Action points to be taken before next visit and completion date.</li> <li>• Harvesters productivity / standards</li> <li>• Upkeep standard / Pest &amp; Diseases</li> <li>• RSPO related requirement</li> <li>• Documentation compliance.</li> </ul> <p>There are several visit related estate performances conducted to the plantation in 2021 - 2022, such as:</p> <ul style="list-style-type: none"> <li>• Internal audit that conducted by the Internal Audit Department on 17 June 2022. During the audit, obtain information there that the total worked hours and total piece rates which did not balance on the timesheet and pay slip. This nonconformity has been satisfactorily closed by the auditee.</li> <li>• RSPO P&amp;C PNG &amp; SI NI 2019 Internal Audit Report of Ibana Plantation, on 20 June 2022. There is no NC obtained during this audit.</li> <li>• RSPO P&amp;C PNG &amp; SI NI 2019 Internal Audit Report of Pandi Estate – Bakada Plantation, on 14 June 2022. There are 4 (four) critical</li> </ul>	
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		<p>nonconformities and 3 (three) minor nonconformities obtained during this audit.</p> <p><b>Smallholder</b>          Internal audit for Smallholders Affairs conducted on 16 May 2022. Sighted 2 internal audit report as follows:</p> <ul style="list-style-type: none"> <li>• Internal audit report of Kabaya and Soi Area. 4 NC's raised during the audit which all the NC's has been closed by the internal auditor.</li> <li>• Internal audit report of Noau Area. 3 NC's raised during the audit which all the NC's has been closed by the internal auditor.</li> </ul>	
<p><b>Criterion 3.4:</b> A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.</p>			
<p>3.4.1</p>	<p><b>(C)</b> In new plantings or operations including mills, an independent SEIA, undertaken through a participatory methodology involving the affected stakeholders and including the impacts of any smallholder/outgrower scheme, is documented.</p> <p><b>Guidance:</b> SEIA will be undertaken where:</p> <p>a) It is required by law; or</p> <p>b) The certified operation meets any of these thresholds:</p> <ol style="list-style-type: none"> <li>1. Land conversion exceeding 500 hectares;</li> <li>2. Additional water withdrawal exceeding 500,000 cubic meters per year for irrigation or processing; or</li> <li>3. Additional industrial wastewater discharge exceeding 10,000 cubic meters per year.</li> </ol> <p>The SEIA may be comprised of separate documents being a Social Impact Assessment and an Environmental Impact Assessment</p>	<p>Hargy Oil Palm Limited has conducted an "Update of the 2009 Social Impact Assessment &amp; a Social Management Plan" dated November 2013. The assessment has covered for the nuclear estates, land settlement scheme (LSS), village oil palm and independent estates. Major social risks were identified such as in-migration and natural population increase, pressures on public infrastructure and services. Stakeholder engagement was carried out by consulted local government leaders, selected community representatives and local NGOs. Site visit to the villages and LSS blocks was conducted during the assessment.</p> <p>"Hargy Oil Palms Limited Update of the 2009 Social Impact Assessment and A Social Management Plan – November 2013". The study conducted by Roland Allbrook Consulting, November 2013. This study covers an area of 26,000 Ha: 12,540 Ha directly under Hargy and 13,565 Ha under smallholders. The area interviewed: Sulu village, Gomu village, Bageta village, Painave village, Noau village, Gigipuna village and Kiava village, Wilelo LSS.</p>	<p>Complied</p>

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	<p>provided there is collaboration in the production of the documents to ensure coordination.</p> <ul style="list-style-type: none"> <li>- Critical (Major) compliance -</li> </ul>	<p>"Hargy Oil Palms Limited Bialla West New Britain Province Social and Environment Impact Assessment Report – August 2007". The study carried out by Mr. Narua Lovai, Imeana Ecosystem Services.</p> <p>"Barema Oil Palm Estate Social and Environmental Impact Assessment Report – August 2007". The study carried out by Narua Lovai, Imeana Ecosystem Services. The area of study covers area of 2,500 Ha in Barema area. Consultation with local villages along Barema River.</p>													
<p>3.4.2</p>	<p>For the unit of certification, a SEIA is available and social and environmental management and monitoring plans have been developed with participation of affected stakeholders. The SEIA shall be reviewed as a minimum once every two years and updated as necessary, in those cases where the review has concluded that changes shall be made to current practices. In any case, the complete SEIA shall be updated at least every ten years to evaluate the cumulative effect of incremental changes. There shall be evidence that the review includes the participation of affected stakeholders.</p> <p><b>Smallholder requirements:</b>          Improvements suggested at the pre-planting inspection should be noted on the inspection form.</p> <ul style="list-style-type: none"> <li>- Minor Compliance -</li> </ul>	<p>A Social Management Plan was developed together with the SIA conducted on November 2013. Hargy Oil Palms Limited has reviewed and updated the Social Management Plan on July 2022. The plan has included the objectives, components, responsibility, actions taken, comment and new target date.</p> <p>Social Management/Improvement Plan – update July 2022</p> <table border="1" data-bbox="1032 791 1944 1302"> <thead> <tr> <th data-bbox="1032 791 1339 906">Activity/Aspect</th> <th data-bbox="1339 791 1621 906">Monitoring</th> <th data-bbox="1621 791 1789 906">Target</th> <th data-bbox="1789 791 1944 906">Status at August 2022</th> </tr> </thead> <tbody> <tr> <td data-bbox="1032 906 1339 1118">Encroachment on buffer zone (shortage of subsistence agricultural land, carelessness, house building through in-migration)</td> <td data-bbox="1339 906 1621 1118"> <ul style="list-style-type: none"> <li>- Smallholder affairs;</li> <li>- Land allocated for gardening purposes in worker compound</li> </ul> </td> <td data-bbox="1621 906 1789 1118">Minimise risk and adverse impact on HOPL activities</td> <td data-bbox="1789 906 1944 1118">In place and ongoing</td> </tr> <tr> <td data-bbox="1032 1118 1339 1302">Problems with effluent from mills and community engagement</td> <td data-bbox="1339 1118 1621 1302"> <ul style="list-style-type: none"> <li>- Sustainability</li> <li>- Regular environmental monitoring on effluent</li> </ul> </td> <td data-bbox="1621 1118 1789 1302"></td> <td data-bbox="1789 1118 1944 1302">In place and ongoing</td> </tr> </tbody> </table>	Activity/Aspect	Monitoring	Target	Status at August 2022	Encroachment on buffer zone (shortage of subsistence agricultural land, carelessness, house building through in-migration)	<ul style="list-style-type: none"> <li>- Smallholder affairs;</li> <li>- Land allocated for gardening purposes in worker compound</li> </ul>	Minimise risk and adverse impact on HOPL activities	In place and ongoing	Problems with effluent from mills and community engagement	<ul style="list-style-type: none"> <li>- Sustainability</li> <li>- Regular environmental monitoring on effluent</li> </ul>		In place and ongoing	<p>Complied</p>
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		Protection of sacred and heritage sites in Kiba village	- Plantation - Old village site is not use for plantation operation, set aside.		In place and ongoing	
		Comprehensive community consultation be used for keeping external communities informed about HOPL activities.	- SHA – Lands and community engagement - Land negotiation SOP in place - FPIC where required withing the operations.	Establish the basis for keeping communities aware and informed to pending expansion activities	In place and ongoing	
		Establishing an effective communication strategy especially regarding expansion	- SHA – Lands and community engagement - Smallholder Affairs targets external relation through community meetings and visit		In place and ongoing	
		Business Development Program for Growers	- SHA – Lands and community engagement - Financial literacy training	Establishment of Mama Lus Fruit advisory group	In place and ongoing	
		Prohibit child labor (subject to traditional	- Human Resources/ Smallholder Affairs	Ensure the mechanism is in place	In progress	

		family activities on VOP and LSS blocks)	- Training program developed to use in training to smallholder regarding child labour policy - Child minding facility	and does not interfere with child's educational opportunities		
		Comments from VOPs and LSS block holders indicate lack of understanding as to the mechanism for farm gate price.	- Business development - Explanation on FFB price formula provided to growers through smallholder training	Document and explain mechanism for the fixing of farm gate prices	Ongoing	
		Examine the current grievance system and efficacy and reach.	- Sustainability - Grievance database set up to allows communication and management through one centralized location	System operational and working well	In place	
		With upwards of 25,000 people living in the compounds, coming directly under responsibility of company. Health, security, social pressures caused by	- Human Resources - Housing inspections - Housing maintenance	Establish and maintain a management system for the welfare of workers and their families in	In place as part of HR process. Ongoing.	

		close living conditions and high population density.		the compounds										
		Reported that greatest cause of dismissal from company employment is breaches in the compound, often leads to squatter settlements. Timely repatriation of terminated and retired employee as per company policy	- Human Resources - Housing inspections - Housing maintenance											
3.4.3	<p><b>(C)</b> The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.</p> <p><b>Smallholder requirements:</b>  Management improvements suggested by organization managing the smallholders during routine block inspections shall be implemented as practicable.  - Critical (Major) compliance -</p>	<p>Hargy Oil Palms Limited established HOPL Environmental Monitoring Program No. PLN-SUS-EMS-002-10 with its latest status as of 30 May 2022:</p> <table border="1"> <thead> <tr> <th>Activity/Aspect</th> <th>Monitoring</th> <th>Target</th> <th>Status at August 2022</th> </tr> </thead> <tbody> <tr> <td>Land Clearing Impact: Vegetation removal; Land development; Soil Disturbance; Soil erosion</td> <td>Visual Environment Permit Compliance Evaluation – Annual; Internal audit – bi-Annual; Site EHS inspections - monthly</td> <td>Land clearing within boundaries as per EP condition;</td> <td>Complies, continue monitoring as required</td> </tr> </tbody> </table>				Activity/Aspect	Monitoring	Target	Status at August 2022	Land Clearing Impact: Vegetation removal; Land development; Soil Disturbance; Soil erosion	Visual Environment Permit Compliance Evaluation – Annual; Internal audit – bi-Annual; Site EHS inspections - monthly	Land clearing within boundaries as per EP condition;	Complies, continue monitoring as required	Complied
Activity/Aspect	Monitoring	Target	Status at August 2022											
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		<p>Buffer zone establishment</p> <p>Impact: Reduce soil erosion</p>	<p>Visual Environment Permit Compliance Evaluation – Annual; Internal audit – bi-Annual; Site EHS inspections - monthly</p>	<p>Nil erosion</p>	<p>Complies, however there are incidences of buffer encroachment.</p>	
		<p>Boiler operation &amp; steam use</p> <p>Impact: Ash &amp; smoke emission</p>	<p>Visual Every hour (during operation hour)</p>	<p>&lt; Ringelmann 2 (40%) for 80% of operating time</p>	<p>Being monitored as required and is generally compliant</p>	
		<p>Chemical storage and use</p> <p>Impact: Ash &amp; smoke emission</p>	<p>Visual Site EHS inspections – monthly Internal audit – bi-Annual;</p>	<p>0 major chemical spill</p>	<p>Zero spill recorded. Monitoring ongoing.</p>	
		<p>POME treatment; POME irrigation</p> <p>Impact:</p>	<p>Lab. analysis POME testing (internal)</p>	<p>pH:5-9 BOD: 100mg/L Oil &amp;grease: 50mg/L</p>	<p>Some variation evident, in general compliant.</p>	

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		<p>Effluent quality;          Overflow from reactor tank &amp; ponds;          Run offs &amp; valve leakage;          Inadequate treatment &amp; overflow;          Anaerobic digestion</p>	<p>POME testing (external)          POME monitoring (weekly)</p>	<p>DO: &lt;6mg/L          0 (zero) overflows</p>	<p>Discrepancies exist between local and external analysis          De-silting of ponds continues.          There have been no overflow.          Complies, continue monitoring          One overflow recorded at Navo Mill in Feb 2021 due to heavy rainfall.          Improvement to the pond include bunding and additional holding pond.</p>	
		<p>Petroleum hydrocarbons</p> <p>Impact:          Leaks &amp; Spillages</p>	<p>Visual          Site monthly EHS inspections          Internal audit – bi annual</p>	<p>0 (zero) major spills</p>	<p>Complies, continue monitoring</p>	
		<p>Fuel and lubricant storage</p>	<p>Visual</p>	<p>0 (zero) spills</p>	<p>Complies, continue monitoring</p>	

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

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		Impact: Road accident/ spillage	Internal audit – bi annual			
		CPO Transfer to ship  Impact: Spillages into sea	Visual 24 hours supervision during loading Site monthly EHS inspections Internal audit – bi annual	0 (zero) spills	No spills in the last 12 months	
		Workshop Operation  Impact: Storm water run offs	Visual Site monthly EHS inspections Internal audit – bi annual	0 (zero) spills	Complies, continue monitoring	
		Gravel extraction  Impact: Vegetation removal	Visual Environmental Permit Compliance Evaluation - annual	Within boundaries	Complies, continue monitoring	
		Use of fossil fuel  Impact: Spill, leakage	Visual Site monthly EHS inspections Internal audit – bi annual	0 (zero) major spills	Complies, continue monitoring	

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.</p> <p>- Minor Compliance -</p>	<p>HOPL has developed Human Resource Operations Manual (Doc. No.: MAN-HRD-GEN-001-02, Issue No.: 2 dated 1 June 2021) to outline the recruitment, selection, hiring, promotion, retirement and termination. Based on interview with sample of workers in Mills and Estates, employment procedure has been disseminated clearly through the employment contract.</p> <p>The employment contracts have included the clauses of Position; Grade/Level; Remuneration (fortnightly basis); Designation/Start Date; Place of Recruitment; Working Hours; Working Schedule (7am-4.30pm, Fri 7am-2.30pm, Sat 7am-12pm); Overtime; Annual Leave (11 working days); Sick Leave (6 days/annum); Superannuation (6% employee, 8.4% employer) in accordance with PNG Superannuation Act; Probation Period (6 months); Medical Clearance; Maternity Leave (12 weeks and full pay after 12 months working) – refer to employee handbook for other conditions of maternity leave; Housing; Medical Treatment: worker and declared dependants receive medical treatment at no cost to the limit of the services available at HOPL clinics; Salary Review; Company Policy &amp; RSPO; Transfer; Confidentiality of Information; and Termination of this Agreement.</p>	Complied
3.5.2	<p>Employment procedures are implemented, and records are maintained.</p> <p>- Minor Compliance -</p>	<p>Employment procedure are implemented and records are maintained to demonstrate that workers are employed or promoted base on capabilities and skills. Based on employment documents that have been reviewed, it can be concluded that all employment procedure are implemented properly, in in particular there is no indication of discrimination in recruitment processes. The promotions are conducted based on performance evaluation.</p> <p>The sample of procedure implementation among others:</p> <ul style="list-style-type: none"> <li>- Termination decree dated 20 June 2022 for Samuel Aisoli (Berema POM), because he did not present in the weekdays for about one months. His superannuation (pension) fund has been paid accordingly with the regulation stated by National Superannuation Funding (NASFUND) Office.</li> </ul>	Complied

		<ul style="list-style-type: none"> <li>- Promotion Decree of Salary Increment dated 13 August 2021 for Meingo Stantion (Berema POM). The promotion has been conducted based on assessment.</li> </ul>	
<b>Criterion 3.6:</b> An occupational health and safety (H&S) plan is documented, effectively communicated and implemented.			
3.6.1	<p><b>(C)</b> All operations are risk assessed to identify H&amp;S issues. Mitigation plans and procedures are documented and implemented.</p> <p><b>Smallholder requirements:</b>          Organization managing the smallholders to provide advice and training on identification and control of risks through extension activities.</p> <ul style="list-style-type: none"> <li>- Critical (Major) compliance -</li> </ul>	<p>As subsidiary of SIPEF, the company recognized that a safe and healthy workplace is the most important element. The Policy on Occupational Health and Safety was established which was signed by General Manager of Hargy Oil Palms Limited, issue No.4, dated 16 December 2015. The OHS Plan (PLN-COM-OHS-001-10) has been established. The latest review of health and safety elements has been included in annual HOPL Management Review that recently has been conducted on 11 May 2022.</p> <p>The OHS plan has included the Hazard and risk assessment register, safety training and PPE records, OSH committee meeting, emergency procedure, medical care &amp; accident insurance, incident/accident investigation and lost time accidents.</p> <p>Hazard and Risk Assessment (REG-ESD-OHS-001-11) has been conducted updated for 2022 for all activity in Mills, Estates/Plantations. The risk assessment for plantation has been included activities for smallholders, such as harvesting, wheeling, and spraying.</p> <p>Based on field observation in smallholders farm, it can be seen that they have built pesticide shelter to keep pesticides and PPEs (apron, mask, rubber gloves) and land fill for chemical waste.</p> <p><b>Verification of previous NC effectiveness</b></p> <p>Auditors have verified the effectiveness closure of previous NC, that the Health and Safety risk assessment, training and implementation was not consistently implemented, such as:</p> <ul style="list-style-type: none"> <li>- Risk assessments, mitigation plans and H&amp;S issues of all operations are not thoroughly identified.</li> </ul>	Complied

		<ul style="list-style-type: none"> <li>- Training on identification and control of risks for smallholders suspended blocks was not available.</li> <li>- Procedure was not implemented properly.</li> </ul> <p>In this ASA 2.4 audit, the company has shown the risk assessment of 2022 (Doc. REG-SUS-OHS-002-12_HOPL Plantation Risk Register 2022), and there is no change of SOP of Personal Protective Equipment (SOP No. PRO-SUS-OHS-003-06) and SOP of Chemical Weeding (PRO-PLT-UPK-006-03).</p> <p>Based on document review, filed observation and interview with workers, it can be concluded that the correction and corrective actions are still effective until ASA 2.4 based on these evidences:</p> <ul style="list-style-type: none"> <li>- risk assessment of 2022 and SOP of Personal Protective Equipment are still relevant compared to previous verification.</li> <li>- Loose fruits collecting activities has been identified and stated as low risk.</li> <li>- Fertilizer applicator requires gloves and apron, and the implementation has been verified in the field. The workers are do not required mask, because the risk still can be prevent by application (spreading) technique.</li> <li>- Training program for smallholders ex-suspended blocks are available and implemented.</li> <li>- It has been verified that all spraying workers in all plantations did not wear inner clothing inside the coverall. All plantations have provided locker to keep clean clothing and shower for worker to cleanse after work.</li> </ul>	
3.6.2	<p><b>(C)</b> The effectiveness of the H&amp;S plan to address health and safety risks to people is monitored.</p> <p>- Critical (Major) compliance -</p>	<p>Monthly monitoring of Environmental, Health &amp; Safety risks has been conducted for every unit of certification by dedicated EHS Officer. Sample of monitoring records that have been seen among others:</p> <ul style="list-style-type: none"> <li>- Hargy Palm Oil Mill, recently has been conducted on 31 July 2022 by Wayne Sarero.</li> </ul>	Complied

		<ul style="list-style-type: none"> <li>- Barema POM, recently has been conducted on 22 July 2022 by Paul Maron.</li> <li>- Navo POM, recently has been conducted on 09 August 2022 by David Tautele.</li> <li>- Hargy Estate - Barema Plantation, recently has been conducted on 22 July 2022 by Paul Maron.</li> <li>- Pandi Estate – Bakada Plantation has been conducted on 13 July 2022 by Michael Silpaga.</li> <li>- Navo Estate – Imana Plantation, recently has been conducted on 27 July 2022 by David Waim.</li> </ul>	
<b>Criterion 3.7:</b> All staff, workers, Scheme Smallholders, outgrowers, and contract workers are appropriately trained.			
3.7.1	<p><b>(C)</b> A documented programme that provides training is in place, which is accessible to those who will be affected by the programme, taking into account gender-specific needs, and which covers applicable aspects of the RSPO P&amp;C, in a form they understand, and which includes assessments of training.</p> <p><b>Smallholder requirements:</b>          Organization managing the smallholders to provide advice and ongoing support to Smallholders through field days and visits to Smallholder blocks.          - Critical (Major) compliance -</p>	<p>All workers involved in the operation have been adequately trained in safe working practices, stated in 2022 HOPL Workforce Development Training Calendar was established. This training comprises monthly calendar (date), items of training, targeted audiences, facilitator, duration, and venue.</p> <p>This training program purposed for workers, smallholders, Muumata Independent Estate, and contractors. The type of training comprises best practices, safety, environmental, financial literacy, customer services, company’s policies, etc.</p> <p>Based on interview with smallholders, they said that Hargy’s Smallholders or Sustainability Staffs have regularly visited them to monitor the best practices and safety implementation.</p>	Complied
3.7.2	<p>Records of training are maintained, where appropriate on an individual basis. Appropriate records include records of training or evidence of competency for trade qualifications, boiler operation and other safety related activities such as chemical handling</p>	<p>The company has demonstrated that training records are maintained. The documentation comprise minutes per training and individual basis training record.</p> <p>Some training records that have been seen as below:</p> <ul style="list-style-type: none"> <li>- Mills and Estates have had trade’s mans in their workshop, For instance in Navo Mill, certificate record of trade qualification in the name of Jonah</li> </ul>	Complied

	<p><b>Smallholder requirements:</b>          Smallholder training records are maintained.          - Minor Compliance -</p>	<p>Marsian, who has good qualification of tradesman based on three certificates of three apprenticeships issued by Port Moresby Technical College in June 2014, March 2015 and November 2015 respectively.</p> <ul style="list-style-type: none"> <li>- First Aider Training for 18 first aider in Berema POM, conducted by PNG Red Cross Society on 21-22 July 2021.</li> <li>- Safety regarding work safety and how to safe lifting for storeman. Location: Navo POM, conducted on 28 August 2022.</li> <li>- Safety working practice for boiler operation. Location: Navo POM, conducted on 26 May 2022.</li> <li>- Safety working practice for spraying worker. Location: Ibane Plantation, conducted on 01 April 2022.</li> <li>- Safety working practice for spraying worker. Location: Pandi Estate - Bakada Plantation, conducted on 09 August 2022.</li> <li>- Training for smallholder: e.g. Joel Wai – Division 2 Barema Area, has attended training of agricultural safety and spraying methods on 2 August 2021.</li> </ul> <p>Sample of individual basis training record also has been verified. For instance, training record of Yangenao Eleasar (Lab Analiyst of Hargy POM) has shown trainings that attended since February 2018 to July 2022, comprising best practices related trainings, safety related training, waste management trainings, etc.</p> <p>Based on field verification, it can be seen that the simplified policies and procedures (e.g related to safety and emergency response) also have been stucked in information boards in Mill’s and Plantation’s offices, workshop, stores, housing, clinics, as well as in Muumata Independent Estate Office.</p> <p>Based on interview with workers in Mills and Plantations, as well as smallholders and Muumata Independent Estate, it can be concluded that all workers and smallholders have been given regular trainings and understood related to safety, best practices, and company’s policies.</p>	
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		<p><b>Verification of previous minor NC:</b></p> <p>During ASA 2.3, there was a NC regarding the company has not provided evidence training records for suspended smallholders. At ASA 2.4, the company has provided evidence of NC closure, that are:</p> <ul style="list-style-type: none"> <li>- Training Program of 2022, that has included smallholders training (including ex-suspended smallholders).</li> <li>- Training records for suspended smallholders related RSPO certification (best practices/safety, spraying, weeding, manuring, pruning, FFB pricing/payment, grievance, company's policy) on 28 September 2021, 4 October 2021, 17 November 2021, 11 July 2022 and 22 July 2022.</li> <li>- Quarterly internal audits by Sustainability to verify effectiveness of established smallholder training program in place.</li> <li>- Based on field observation and interview with suspended smallholder (Waimal Kepo, No. 031472), he has been given trainings related RSPO requirements. He has understood the oil palm best practices, pricing mechanism and payment, how to submit a grievance, and prohibition of child labor and forced labour. He can show evidence of land title, and records of harvesting (docks and payment slips). Moreover, the block is well maintained, the ground is slashed and the fronds are pruned.</li> <li>- For quarterly internal audit, it will be conducted in the future considering full training and preparation have just been finished before the RSPO external audit (the last training on 22 July 2022).</li> </ul> <p>Based on verification of correction, root cause analysis, and corrective actions, this non-conformity has been complied and closed.</p>	
3.7.3	Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed.	Hargy Oil Palms Limited have prepared training plan for RSPO SCCS under document "Hargy Oil Palms Limited Sustainability Department Training Calendar for 2022":	Complied

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<p>- Minor Compliance -</p>	<p>- RSPO Supply Chain Certification Standard 2020 scheduled for 16-20 May 2022. The targeted participant is 25 RSPO representatives, mill laboratory supervisors, mill safety officers.</p> <p>- RSPO Rules on Market Communication and Claims Training scheduled for 23 May 2022. The targeted participant is 25 RSPO representatives, mill laboratory supervisors, mill safety officers.</p> <p>Barema POM: RSPO Supply Chain Standards training provided for Thomas Tade (RSPO/OHS Officer), Daniel Wimbi (maintenance), Mek Tangu (QC Lab Assistance), Jimmila Muge (weighbridge clerk), Edgar Bennah (KCP Operator), Richard Karrek (Laboratory Analyst), Alfred Baimo (KCP Fitter), Sapak Papah (QC Lab Supervisor) on 9 May 2022. Trainer Mr. Fidelis Hiamangi (attended RSPO SCCS Training with BMTrada).</p> <p>RSPO Supply Chain Standards training provided for Team in Hargy POM: Peterson Chiang (Shipping Clerk), Jeffrey Penias (Supervisor), Karl Paki (KCP), Daniel Topupul (KCP), Gergory Robin (Laboratory analyst), Martin Karap (KCP operator), Leila Lepakot (Shipping Superintendent) on 11 May 2022. Trainer Mr. Fidelis Hiamangi (attended RSPO SCCS Training with BMTrada). Training material evident, and also explaining Multi-site requirement and its implementation in Hargy Oil Palms Limited.</p> <p>Hargy KCP provided with training on RSPO Rules on Market Communication and Claims:          Training provided for Hargy Engineering/dispatch Team: Nathan Niahory (team leader oil tanker), Peterson Channel (Shipping clerk), Martin Karao (KCP operator), Karl Paki (KCP), Leonard Nurue (Lab Analyst), Daniel Topupul (KCP), Henson Kling (Pump attendant) on 12 May 2022. Trainer Mr. Fidelis Hiamangi and training material evident.</p>	
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Audit team interviewed with Mr. Ezekiel Pais (Barema POM) & Mr. Joel Temon and Mr. Ben Laveliu (Hargy POM), weighbridge operator and loading ramp attendant. The weighbridge operator responsible for check, record and control incoming material and palm product dispatch. The weighbridge operators have been trained; they understood their task, role and critical area related to receiving and transporting of palm product (record keeping, accuracy). The weighbridge operator understands the use and check of RSPO certificate number, supply chain module in the transport ticket.

Individual training record:

- Yangenao Eleasar (Laboratory Analyst) provided with training on RSPO SCCS Sales and Goods Out dated 14 June 2022;
- Gregory Robin (Laboratory Analyst) provided with training on RSPO SCCS and Modular Requirement on 11 May 2022;
- Allan Ismael (Laboratory Sampled) provided with training on training on RSPO SCCS Sales and Goods Out dated 14 June 2022;
- Florian Kun (biogas lab analyst) provided with training on RSPO SCCS Modular Requirement-Multisite Certification-RSPO SCCS for Mills-RSPO Trademark and Logo on 10 May 2022;
- Ezekiel Pais (weighbridge clerk) provided with training on RSPO SCCS and RSPO SCCS documented procedure on 6 June 2022;
- Harrison Menine (weighbridge clerk) and Dominic Baki (Laboratory Sampler) provided with training on Refresher Training on Understanding RSPO SCCS Criteria on 12 January 2022;

**Criterion 3.8:** Supply chain requirement for mills (note: all supply chain requirements are considered as critical (C). However it will not contribute to suspension if there is more than 5 non-compliance within a principle)

<p>3.8.1</p>	<p><b>Identity Preserved Module</b>  A mill is deemed to be Identity Preserved (IP) if the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO Principles and Criteria (RSPO P&amp;C), or against the Group Certification scheme.  Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. If a mill process certified and uncertified FFB without physically separating them, then only Mass Balance Module is applicable.</p>	<p>Hargy Oil Palms Limited is implementing Module D for CPO Mills: Identity Preserved. Hargy Palm Oil Mills consist of 3 certified palm oil mills: Hargy POM, Barema POM and Navo POM. Each palm oil mill only receiving certified FFB from company owned plantation: Hargy Plantation, Navo Plantation and Pandi Plantation; as well as from certified smallholders.  Verification of volumes and sources of certified FFB entering the palm oil mills catered by transport fleet. The transport fleet is organized to certain FFB pick up scheduled.  Referring to HOPL procedure Collection and Transport of FFB No.PRO-COM-SCC-016 section 2.1: "Within company estates, as the FFB/LF is harvested it is placed at designated locations called "market places". The nominated recorder takes the bunch count and records it on the Rollover form. A scissors tractor with trailer then picks up the FFB/loose fruit from the market place and as they do the pick up the driver records the number of bunches of FFB in the FFB collection docket based on the information on the rollover form. The FFB collection docket shows the plantation name, division, field and block where FFB/loose fruit is from and the bunch count. This docket also indicates the supply chain certification model (Identity Preserved) used, by means of either a "IP" stamp on the docket or "IP" pre-printed on the docket. The Latitude/Longitude of this location can be determined from GIS records as required.</p>	<p>Complied</p>
<p>3.8.2</p>	<p><b>Mass Balance Module</b>  A mill is deemed to be Identity Preserved (IP) if the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO Principles and Criteria (RSPO P&amp;C), or against the Group Certification scheme.</p>	<p>HOPL implement Identity Preserved. This indicator is not applicable.  Not applicable.</p>	<p>Not Applicable</p>
<p>3.8.3</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&amp;C certification report. This figure represents the total volume of certified oil palm</p>	<p>The estimated annual tonnage for certified FFB processed, CPO and PK production are available in the Estate and Mill annual production budget for 12 months since last surveillance assessment. The FFB tonnage received from all</p>	<p>Complied</p>

	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>certified supply bases (company-owned plantation and associated smallholders).</p> <p>The estimated for CPO and PK production from Hargy POM, Barema POM and Navo POM is recorded under the public summary report and the RSPO certificate for Hargy Oil Palms Limited. The actual CPO and PK production were verified during each subsequent annual surveillance assessment visit to ensure that certified mill only deliver the allowed tonnage for the year.</p> <p>BSI Group as certification body has submitting estimated of FFB received, CPO and PK produced to RSPO Public Summary Report and the RSPO PalmTrace system.</p> <p>Hargy POM: FFB 148,271.15 MT; CPO 35,255.54 MT; PK 7,635.98 MT;          Barema POM: FFB 191,630.40 MT; CPO 47,861.28 MT; PK 9,868.97 MT;          Navo POM: FFB 222,893.45 MT; CPO 54,742.63 MT; PK 11,479.01 MT;</p>	
3.8.4	The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.	<p>Hargy Oil Palms Limited, under SIPEF Group, Belgium – holds RSPO membership number 1-0021-05-000-00, since 7 December 2005.</p> <p>Hargy POM PalmTrace ID: RSPO_PO10000 00053.          Barema POM PalmTrace ID: RSPO_PO10000 01655.          Navo POM PalmTrace ID: RSPO_PO10000 00105.</p>	Complied
3.8.5	<p>Documented procedures</p> <p>The mill shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:</p> <ul style="list-style-type: none"> <li>a. Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements.</li> <li>b. Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements</li> </ul>	<p>HOPL also have a Supply Chain manual under MAN-COM-SCC-001-03, RSPO Supply Chain Certification Manual dated 10 March 2021. The document mentions on page 4 that Chief Executive Officer of HOPL has overall responsibility for and authority over the implementation of RSPO Supply Chain Certification and compliance with applicable requirements. This mean includes inform client about termination or suspension within 3 business days from the day of termination or suspension.</p> <p>Hargy Oil Palms Limited has established set of Standard Operating Procedure to ensure the implementation of all elements of the RSPO Supply Chain</p>	Complied

	<p>(including training records).</p> <p>c. Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the mill’s procedures for the implementation of this standard.</p> <p>d. The mill shall have documented procedures for receiving and processing certified and non-certified FFBs including ensuring no contamination in the IP mill.</p>	<p>Certification Standards in Hargy’s Palm Oil Mills. The procedures have been updated in 10 March 2021. The procedures are:</p> <ul style="list-style-type: none"> <li>- PRO-SUS-SCC-016-03, Receipt of Fresh Fruit Bunch – Collection of FFB/Loose Fruit in Company Estate/Smallholders Block by Company Truck or Contractor, update 1 June 2022.</li> <li>- PRO-SUS-SCC-015-02, Receipt of Fresh Fruit Bunch SOP, update 10 March 2021.</li> <li>- PRO-SUS-SCC-014-02, Production of Crude Palm Oil, Update 10 March 2021.</li> <li>- PRO-SUS-SCC-004-02, Non Conformance, update 10 March 2021;</li> <li>- PRO-SUS-SCC-005-02, Outsourcing Activities, update 10 March 2021;</li> <li>- PRO-SUS-SCC-006-02, Sales and Goods Out, update 10 March 2021;</li> <li>- PRO-SUS-SCC-007-02, Receipt of Transaction, update 10 March 2021;</li> <li>- PRO-SUS-SCC-008-02, Training, update 10 March 2021;</li> <li>- PRO-SUS-SCC-009-02, Record Keeping, update 10 March 2021;</li> <li>- PRO-SUS-SCC-010-02, Conversion Factor, update 10 March 2021;</li> <li>- PRO-SUS-SCC-011-03, Claims, update 10 March 2021;</li> <li>- PRO-SUS-SCC-012-02, Complaints, update 10 March 2021;</li> <li>- PRO-SUS-SCC-013-02, Management Review, update 10 March 2021.</li> </ul> <p>Training records verified:</p> <p>Barema POM: RSPO Supply Chain Standards training provided for Thomas Tade (RSPO/OHS Officer), Daniel Wimbi (maintenance), Mek Tangu (QC Lab Assistance), Jimmila Muge (weighbridge clerk), Edgar Bennah (KCP Operator), Richard Karrek (Laboratory Analyst), Alfred Baimo (KCP Fitter), Sapak Papah (QC Lab Supervisor) on 9 May 2022. Trainer Mr. Fidelis Hiamangi (attended RSPO SCCS Training with BMTrada).</p>	
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		<p>RSPO Supply Chain Standards training provided for Team in Hargy POM: Peterson Chiang (Shipping Clerk), Jeffrey Penias (Supervisor), Karl Paki (KCP), Daniel Topupul (KCP), Gergory Robin (Laboratory analyst), Martin Karap (KCP operator), Leila Lepakot (Shipping Superintendent) on 11 May 2022. Trainer Mr. Fidelis Hiamangi (attended RSPO SCCS Training with BMTrada). Training material evident, and also explaining Multi-site requirement and its implementation in Hargy Oil Palms Limited.</p> <p>Hargy KCP provided with training on RSPO Rules on Market Communication and Claims:</p> <p>Training provided for Hargy Engineering/dispatch Team: Nathan Niahory (team leader oil tanker), Peterson Channel (Shipping clerk), Martin Karao (KCP operator), Karl Paki (KCP), Leonard Nurue (Lab Analyst), Daniel Topupul (KCP), Henson Kling (Pump attendant) on 12 May 2022. Trainer Mr. Fidelis Hiamangi and training material evident.</p> <p>Individual training record:</p> <ul style="list-style-type: none"> <li>- Yangenao Eleasar (Laboratory Analyst) provided with training on RSPO SCCS Sales and Goods Out dated 14 June 2022;</li> <li>- Gregory Robin (Laboratory Analyst) provided with training on RSPO SCCS and Modular Requirement on 11 May 2022;</li> <li>- Allan Ismael (Laboratory Sampled) provided with training on training on RSPO SCCS Sales and Goods Out dated 14 June 2022;</li> <li>- Florian Kun (biogas lab analyst) provided with training on RSPO SCCS Modular Requirement-Multisite Certification-RSPO SCCS for Mills-RSPO Trademark and Logo on 10 May 2022;</li> <li>- Ezekiel Pais (weighbridge clerk) provided with training on RSPO SCCS and RSPO SCCS documented procedure on 6 June 2022;</li> </ul>	
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<p>3.8.6</p>	<p>Internal Audit</p> <p>i. The mill shall have a written procedure to conduct annual internal audit to determine whether the mill;</p> <p>a. Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</p> <p>b. Effectively implements and maintains the standard requirements within its organisation.</p> <p>ii. Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non-conformities shall be subject to management review at least annually. The mill shall maintain the internal audit records and reports.</p>	<p>HOPL has a written procedure of Internal Audit No.PRO-SUS-EMS-016-12 dated 8 March 2021 to conduct annual internal audit to verify that HOPL:</p> <ul style="list-style-type: none"> <li>- Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communication and Claims Documents.</li> <li>- Effectively implements and maintains the standard requirements within its organization.</li> </ul> <p>Non conformities found as part of the internal audit shall be issued corrective action requests. The result of the internal audits and all actions taken to correct non-conformities are available to the certification body upon request. The outcome of internal audit are reviewed by top management at the annual management review. The internal audit have been carried out by Compliance Department for Hargy POM, Navo POM and Barema POM.</p> <p>The internal audit have been carried out by Sustainability Department for Hargy POM, Barema POM and Navo POM.</p> <ul style="list-style-type: none"> <li>- Internal audit Plan 19-26 April 2022 for RSPO P&amp;C 2018 and RSPO Supply Chain Certification Standard 2020; 19 April 2022 for Navo POM; 20 April 2022 for Barema POM; 25 April 2022 for Hargy POM.</li> <li>- Internal audit for Hargy POM carried out 25 April 2022. The auditors are Douglas Morris, Stephanie Silik.</li> <li>- Internal Audit for Barema POM, carried out 20 April 2022. The auditor Fidelis Hiamangi, Douglas Morris, Stephanie Silik.</li> <li>- Internal audit for Navo POM carried out 23-25 March 2022. The auditors are Fidelis Hiamangi. NCs related to supply chain training program. Navo POM have been prepared training program to close the NC on 2 May 2022. Evidence sighted RSPO SCCS training program year 2022.</li> </ul> <p>The auditor, Fidelis Hiamangi attended RSPO Lead Auditor Course on RSPO SCC Standards 2020, RSPO Rules on Market Communication and Claims 2019, by BM Trada on 1-4 March 2021.</p>	<p>Complied</p>
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		<p>Management review carried out on 11 May 2022, attended by Sustainability Head of Department, Human Capital Head of Department, General Manager, Engineering Head of Department, Vehicle Workshop Head of Department, Smallholder Affairs Head of Department, Internal Audit Head of Department, Finance Head of Department, Security Manager, Construction Head of Department. The management review meeting discuss agenda: Action/Follow Up from Previous Management Review, Changes to the Management System, Objective-Target-Program/Environmental Performance, Process Performance and Product Conformity, Result of Internal Audit/Status of Preventive and Corrective Action, Customer Feedback from Interested Parties, Adequacy of Resources, Continuing Suitability and Adequacy of Management and Certification System.</p>	
<p>3.8.7</p>	<p><b>Purchasing and Goods In</b></p> <ul style="list-style-type: none"> <li>i. The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.</li> <li>ii. The mill shall inform the CB immediately if there is a projected overproduction of certified tonnage.</li> <li>iii. The mill shall have a mechanism in place for handling non-conforming FFB and/or documents.</li> </ul>	<p>Hargy Oil Palms Limited established RSPO Supply Chain Certification Manual No. MAN-SUS-SCC-001-03 dated 10 March 2021.</p> <p>SOP Receipt of Fresh Fruit Bunch (FFB) No.PRO-SUS-SCC-015-02 dated 10 March 2021.</p> <ul style="list-style-type: none"> <li>- All FFB/LF from the company plantations and smallholders within the unit of certification are received by each mill through the weighbridge.</li> <li>- On arrival, the weighbridge clerks check the documentation accompanying the FFB brought in to verify it comes from the certified supply base (company or smallholder). If, for any reason, a smallholder within the certified supply base has been suspended for compliance reasons, their identity is provided to the weighbridge operator on a list of suspended smallholders. The Weighbridge operator checks that none of the documentation is for FFB from a suspended smallholder on that list. If it is, the FFB is not accepted.</li> <li>- The weighbridge operator further verifies that relevant documentation have the 'IP' notation.</li> <li>- Should FFB be brought in not signifying the supply chain module (IP) then the FFB is to be deemed uncertified material and is to be rejected after</li> </ul>	<p>Complied</p>

		<p>investigation to identify the source and determine the reason for IP to be omitted from the documentation. If the reason is a clerical error, the PK may be accepted after receipt of corrected documentation.</p> <ul style="list-style-type: none"> <li>- Under no circumstances will any FFB that does not meet IP requirements be processed in a Hargy Mill.</li> </ul> <p>Hargy Oil Palms Limited have a mechanism in place for handling non-conforming oil palm products and/or documents under Non-Conformance Procedure No.PRO-SUS-SCC-004-02 dated 10 March 2021.</p> <p>Sample of FFB receiving at Hargy POM:</p> <ul style="list-style-type: none"> <li>- FFB IP Collection Docket No.396281 from Hargy Plantation, block 18E01 and 18E02, date 27 May 2022, total 522 bunches. FFB Receiving Slip Hargy POM No.FFBIP22007206W date 27 May 2022; Hargy Plantation-Makakiwa Division, Block 18E01 and 18E02; 522 Bunches; Nett Weight 5.36 MT; Vehicle VH02; Product FFBIP RSPO535739.</li> </ul> <p>Sample of FFB receiving at Barema POM:</p> <ul style="list-style-type: none"> <li>- FFB IP Collection Docket No.353795 from Barema Plantation, block 07D28, date 8 August 2022, total 444 bunches. FFB Receiving Slip Barema POM No.FFBIP22010291W date 8 August 2022; Barema Plantation, Block 07D28; 444 Bunches; Nett Weight 9.94 MT; Vehicle VH10; Product FFBIP RSPO535739.</li> <li>- Onboard Crane Sales/Weigh Docket No.000264 from Smallholder No.11420 (Mama cad), 1405 (Mama cad), 1405 (Papa cad), 1397 (Papa cad), 1406 (Mama cad). FFB Receiving Slip Barema POM No.FFBIP22010395W date 10 August 2022; Maututu Smallholders; Nett Weight 12.90 MT; Vehicle VC10; Product FFBIP RSPO535739.</li> </ul> <p>Sample of FFB receiving at Navo POM:</p> <ul style="list-style-type: none"> <li>- FFB IP Collection Docket No.376015 from Pandi Estate-Gamupa Plantation, block 14A05, date 22 April 2022, total 1058 bunches. FFB Receiving Slip</li> </ul>	
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		<p>Navo POM No.FFB22006746W date 23 April 2022; Pandi Estate-Gamupa Plantation, Block14A05; 1058 Bunches; Nett Weight 14.78 MT; Vehicle VH31; Product FFBIP RSPO535739.</p> <ul style="list-style-type: none"> <li>- FFB Receiving Slip Navo POM No.FFB220005409W date 31 March 2022; Meramera-Gilo Smallholders; Nett Weight 15.66 MT; Vehicle HOPL Smallholder; Product FFBIP RSPO535739.</li> </ul> <p>Despatch slip for CPO cartage from Navo POM to Hargy POM and PK cartage from Navo POM to Barema POM:</p> <ul style="list-style-type: none"> <li>- Navo POM Despatch Slip No.CPOIP22000500W dated 31 March 2022; Destination Hargy POM; Nett weigh 33.14 MT; Product CPO IP RSPO535739; Vehicle VP06;</li> <li>- Navo POM Despatch Slip No.PKIP22000197W dated 31 March 2022; Destination Barema POM; Nett weigh 16.20 MT; Product PKIP RSPO535739; Vehicle VH23;</li> </ul>	
3.8.8	<p>Sales and Goods Out</p> <p>The supplying mill shall ensure that the following minimum information for RSPO certified products is made available in document form. The information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation):</p> <ol style="list-style-type: none"> <li>The name and address of the buyer;</li> <li>The name and address of the seller;</li> <li>The loading or shipment / delivery date;</li> <li>The date on which the documents were issued;</li> <li>RSPO certificate number;</li> </ol>	<p>Hargy Oil Palms Limited has established RSPO Supply Chain Certification Manual No.MAN-COM-SCC-001-03 dated 10 March 2021 and Procedure of Sales and Goods Out No.PRO-SUS-SCC-006-02 dated 10 March 2021. The documents explain that record of final tonnage shipped was recorded in the FOSFA Combined Weight Certificate &amp; Loading Report. Shipping documents such as Contract documents, Sales advice and FOSFA Combined Weight &amp; Loading Report include the information.</p> <p>Sales of CPO under PalmTrace, such as Hargy POM Sales of CPO:</p> <ul style="list-style-type: none"> <li>• PalmTrace transaction No.TR-22f09df1-7178 confirmed date 24 February 2022: Contract No.PHO-11104. Product: Crude Sustainable Palm Oil/SG. Quantity: 510 MT. Seller: Hargy Oil Palms Limited. End Buyer: Cargil B.V. Tanker Bill of Lading No.BIA/ROT-15, dated 28 January 2022. Shipper: Hargy Oil Palms Limited, Private Mail Bag Kimbe, West New Britain Province, Papua New Guinea. Notify Address: Cargil B.V. Croe Inbound,</li> </ul>	Complied

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	<p>f. A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations);</p> <p>g. The quantity of the products delivered;</p> <p>h. Any related transport documentation;</p> <p>i. A unique identification number.</p>	<p>21<sup>st</sup> Floor Evert Van De Beekstraat 378 NL-2311 CZ, Schiphol. Tanker: MT Jade Blosson. Voyage: V2201. Loaded at port: Bialla, Papua New Guinea. Delivered to port: Rotterdam. Commodity: Crude Sustainable Palm Oil/SG RSPO Certificate No.RSPO535739. Volume 510.00 MT. Reference to Contract No.PHO-11104 SG.</p> <ul style="list-style-type: none"> <li>• PalmTrace transaction No.TR-94c2762b-3c04 confirmed date 24 February 2022: Contract No.PHO-11116. Product: Crude Sustainable Palm Oil/SG. Quantity: 255 MT. Seller: Hargy Oil Palms Limited. End Buyer: Cargil B.V. Tanker Bill of Lading No.BIA/ROT-16, dated 28 January 2022. Shipper: Hargy Oil Palms Limited, Private Mail Bag Kimbe, West New Britain Province, Papua New Guinea. Notify Address: Cargil B.V. Croe Inbound, 21<sup>st</sup> Floor Evert Van De Beekstraat 378 NL-2311 CZ, Schiphol. Tanker: MT Jade Blosson. Voyage: V2201. Loaded at port: Bialla, Papua New Guinea. Delivered to port: Rotterdam. Commodity: Crude Sustainable Palm Oil/SG RSPO Certificate No.RSPO535739. Volume 255.00 MT. Reference to Contract No.PHO-11116 SG.</li> <li>• PalmTrace transaction No.TR-d7c419a8-a4b7 confirmed date 21 April 2022: Contract No.PHO-11226. Product: CSPO/SG. Quantity: 966.67 MT. Seller: Hargy Oil Palms Limited. End Buyer: Olenex SARL. Tanker Bill of Lading No.BIA/ROT-22, dated 18 April 2022. Shipper: Hargy Oil Palms Limited, Private Mail Bag Kimbe, West New Britain Province, Papua New Guinea. Notify Address: Olenex SARL A One Business Center LA Piece 4 CH-1180 Rolle Switzerland. Tanker: MT Stena Convoy. Voyage: V2201. Loaded at port: Bialla, Papua New Guinea. Delivered to port: Rotterdam. Commodity: Crude Sustainable Palm Oil/SG RSPO Certificate No.RSPO535739. Volume 966.67 MT. Reference to Contract No.PHO-11226SG.</li> </ul> <p>Barema POM Sales of PK:</p>	
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		<ul style="list-style-type: none"> <li>• PalmTrace transaction No.TR-995b2dbc-0348 confirmed date 1 February 2022: Contract No.PHKO-10112. Product: CSPK/SG. Quantity: 1,367.82 MT. Seller: Barema POM-SIPEF. Buyer: Hargy Oil Palms - KCP.</li> </ul> <p>Barema POM Sales of CPO:</p> <ul style="list-style-type: none"> <li>• PalmTrace transaction No.TR-150c6414-9897 confirmed date 13 December 2021: Contract No.PHO-10832. Product: Crude Sustainable Palm Oil/SG. Quantity: 245 MT. Seller: SIPEF Barema POM. End Buyer: Cargil B.V. Refined Oils Europe. Tanker Bill of Lading No.BIA/ROT-01, dated 28 October 2021. Shipper: Hargy Oil Palms Limited, Private Mail Bag Kimbe, West New Britain Province, Papua New Guinea. Notify Address: Cargil B.V. Croe Inbound, 21<sup>st</sup> Floor Evert Van De Beekstraat 378 NL-2311 CZ, Schiphol. Tanker: MTM Potomac. Voyage: V2101. Loaded at port: Bialla, Papua New Guinea. Delivered to port: Rotterdam. Commodity: Crude Sustainable Palm Oil/SG RSPO Certificate No.RSPO535739. Volume 510.00 MT. Reference to Contract No.PHO-10832SG.</li> <li>• PalmTrace transaction No.TR-094c687b-8222 confirmed date 17 February 2022: Contract No.PHO-11127. Product: CSPO/SG. Quantity: 510 MT. Seller: SIPEF Barema POM. End Buyer: Cargil B.V. Refined Oils Europe. Tanker Bill of Lading No.BIA/ROT-19, dated 25 December 2021. Shipper: Hargy Oil Palms Limited, Private Mail Bag Kimbe, West New Britain Province, Papua New Guinea. Notify Address: Cargil B.V. Croe Inbound, 21<sup>st</sup> Floor Evert Van De Beekstraat 378 NL-2311 CZ, Schiphol. Tanker: MT Clearocean Mesquite. Voyage: V2101. Loaded at port: Bialla, Papua New Guinea. Delivered to port: Rotterdam. Commodity: Crude Sustainable Palm Oil/SG RSPO Certificate No.RSPO535739. Volume 510.00 MT. Reference to Contract No.PHO-11127SG.</li> <li>• PalmTrace transaction No.TR-c83c2048-ca15 confirmed date 13 December 2021: Contract No.PHO-11073. Product: CSPO/SG. Quantity: 513.12 MT. Seller: SIPEF Barema POM. End Buyer: Cargil B.V. Refined Oils Europe. Tanker Bill of Lading No.BIA/ROT-17, dated 14 October 2021. Shipper: Hargy Oil Palms Limited, Private Mail Bag Kimbe, West New Britain</li> </ul>	
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		<p>Province, Papua New Guinea. Notify Address: Cargil B.V. Croe Inbound, 21<sup>st</sup> Floor Evert Van De Beekstraat 378 NL-2311 CZ, Schiphol. Tanker: MT Pacific Ruby. Voyage: V2101. Loaded at port: Bialla, Papua New Guinea. Delivered to port: Rotterdam. Commodity: Crude Sustainable Palm Oil/SG RSPO Certificate No.RSPO535739. Volume 513.12 MT. Reference to Contract No.PHO-11073SG.</p> <p>Navo POM Sales of PK:</p> <ul style="list-style-type: none"> <li>• PalmTrace transaction No.TR-a62ade79-b695 confirmed date 24 May 2022: Contract No.PHKO-10122. Product: CSPK/SG. Quantity: 2,222.61 MT. Seller: Navo POM-SIPEF. Buyer: Hargy Oil Palms - KCP.</li> <li>• PalmTrace transaction No.TR-6a6c3961-2aee confirmed date 7 July 2022: Contract No.PHKO-10124. Product: CSPK/SG. Quantity: 2,223.02 MT. Seller: Navo POM-SIPEF. Buyer: Hargy Oil Palms - KCP.</li> </ul> <p>Navo POM Sales of CPO:</p> <ul style="list-style-type: none"> <li>• PalmTrace transaction No.TR-409828cf-19cd confirmed date 20 March 2022: Contract No.PHO-11121. Product: CSPO/SG. Quantity: 501.45 MT. Seller: Navo POM-SIPEF. End Buyer: Cargil B.V. Refined Oils Europe. Tanker Bill of Lading No.BIA/ROT-16, dated 7 December 2021. Shipper: Hargy Oil Palms Limited, Private Mail Bag Kimbe, West New Britain Province, Papua New Guinea. Notify Address: Cargil B.V. Croe Inbound, 21<sup>st</sup> Floor Evert Van De Beekstraat 378 NL-2311 CZ, Schiphol. Tanker: Dianella. Voyage: V2101. Loaded at port: Bialla, Papua New Guinea. Delivered to port: Rotterdam. Commodity: Crude Sustainable Palm Oil/SG RSPO Certificate No.RSPO535739. Volume 501.44 MT. Reference to Contract No.PHO-11121SG.</li> <li>• PalmTrace transaction No.TR-753d4d6b-dfaa confirmed date 2 August 2022: Contract No.PHO-11272. Product: CSPO/SG. Quantity: 495.52 MT. Seller: Navo POM-SIPEF. End Buyer: Olenex SARL. Tanker Bill of Lading No.BIA/ROT-27, dated 20 May 2022. Shipper: Hargy Oil Palms Limited, Private Mail Bag Kimbe, West New Britain Province, Papua New Guinea.</li> </ul>	
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		<p>Notify Address: Olenex SARL A One Business Center LA Piece 4 CH-1180 Rolle Switzerland. Tanker: MT Dianella V.2202. Voyage: V2202. Loaded at port: Bialla, Papua New Guinea. Delivered to port: Rotterdam. Commodity: Crude Sustainable Palm Oil/SG RSPO Certificate No.RSPO535739. Volume 495.52 MT. Reference to Contract No.PHO-11272SG.</p> <ul style="list-style-type: none"> <li>• PalmTrace transaction No.TR-0c6932c0-cc59 confirmed date 8 August 2022: Contract No.PHO-11371. Product: CSPO/SG. Quantity: 2,004.27 MT. Seller: Navo POM-SIPEF. End Buyer: Sime Darby Oils Zwijndrecht Refinery BV. Tanker Bill of Lading No.BIA/ROT-13, dated 16 July 2022. Shipper: Hargy Oil Palms Limited, Private Mail Bag Kimbe, West New Britain Province, Papua New Guinea. Notify Address: Sime Darby Oils Zwijndrecht Refinery BV, Lindtsedijk 8, 3336LE Zwijndrecht, Netherlands. Tanker: MT Stena Conductor. Voyage: V2202. Loaded at port: Bialla, Papua New Guinea. Delivered to port: Rotterdam. Commodity: Crude Sustainable Palm Oil/SG RSPO Certificate No.RSPO535739. Volume 2004.27 MT. Reference to Contract No.PHO-11371SG.</li> <li>• PalmTrace transaction No.TR-067fbdc6-36a6 confirmed date 20 March 2022: Contract No.PHO-10833. Product: CSPO/SG. Quantity: 251.46 MT. Seller: Navo POM-SIPEF. End Buyer: Cargil B.V. Refined Oils Europe. Tanker Bill of Lading No.BIA/ROT-01, dated 7 December 2021. Shipper: Hargy Oil Palms Limited, Private Mail Bag Kimbe, West New Britain Province, Papua New Guinea. Notify Address: Cargil B.V. Croe Inbound, 21<sup>st</sup> Floor Evert Van De Beekstraat 378 NL-2311 CZ, Schiphol. Tanker: MT Dianella. Voyage: V2101. Loaded at port: Bialla, Papua New Guinea. Delivered to port: Rotterdam. Commodity: Crude Sustainable Palm Oil/SG RSPO Certificate No.RSPO535739. Volume 251.46 MT. Reference to Contract No.PHO-10833SG.</li> </ul> <p>Information for RSPO certified products made available:</p>	
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		<ul style="list-style-type: none"> <li>• The name and address of the buyer: Cargil B.V. Croe Inbound, 21<sup>st</sup> Floor Evert Van De Beekstraat 378 NL-2311 CZ, Schiphol;</li> <li>• The name and address of the seller: Hargy Oil Palms Limited, Private Mail Bag Kimbe, West New Britain Province, Papua New Guinea;</li> <li>• The loading or shipment/ delivery date: 7 December 2021;</li> <li>• The date on which the documents were issued: 7 December 2021;</li> <li>• A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations): Crude Sustainable Palm Oil/SG;</li> <li>• The quantity of the products delivered: 251.46 MT;</li> <li>• Any related transport documentation: Bill of Lading No.BIA/ROT-01, dated 7 December 2021;</li> <li>• Supply chain certificate number of the seller: RSPO535739;</li> <li>• A unique identification number: Contract No.PHO-10833 SG.</li> </ul>	
3.8.9	<p><b>Outsourcing Activities</b></p> <p>i. The mill shall not outsource its milling activities. In cases where he mill outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the mill holding the certificate shall ensure that the independent third party complies with relevant requirements of this RSPO Supply Chain Certification</p> <p>ii. The mill shall ensure the following:</p> <p>a. The mill has legal ownership of all input material to be included in outsourced processes</p> <p>b. The mill has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the mill to ensure that certification body (CB) has</p>	<p>Hargy Oil Palms Limited performs outsourcing activities for FFB transport, when the CH have legal ownership of the material (FFB).</p> <p>Contract with FFB transport contractor:  Contract No.HOPL 2022-012. Contract Type: Loose Fruit Collection and Delivery Contract as Instructed and Approved by Head of Department and the General Manager of Hargy Oil Palms Limited and Earthworks Mowing Services Trading. Vehicle Reg. No.KAI 823. Agreement period 1 January – 31 December 2022. Location of Services: Smallholder Division III and be supervised by an approved manager or supervisor of HOPL. Schedule of Rates available. Sign date 31 January 2022 and ends 31 December 2022 for delivery contract. The signee from Earthworks Mowing Services was Mr. Geoffrey Kenny Sirinjui.</p> <p>Section 17. RSPO Compliance – Contractor shall adhere to RSPO Principle and Criteria during performance of contract: a) implement RSPO supply chain certification standards including principles and criteria, provide access to</p>	Complied

	<p>access to the outsourcing contractor or operation if an audit is deemed necessary.</p> <p>c. The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</p> <p>d. The mill shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and all information, when this is announced in advance.</p>	<p>accredited certification bodies to undertake regular audit and investigation into business operations-system-company information when necessary.</p>																						
3.8.10	<p>The mill shall record the names and contact details of all contractors used for the physical handling of RSPO certified oil palm products.</p>	<p>Name and contact details of trucking contractor:</p> <table border="1" data-bbox="1032 759 1942 1398"> <thead> <tr> <th>Contractor</th> <th>Contact Person</th> <th>Contact Number/Address</th> </tr> </thead> <tbody> <tr> <td>Kijomhal Transport (FFB cartage contract)</td> <td>Allan Zairere</td> <td>PO BOX 98, Bialla West New Britain</td> </tr> <tr> <td>Endy Estate (FFB Cartage Contract)</td> <td>Mr. Senis Awe</td> <td>PO BO 129, Bialla, West New Britain, Ph: 79784842</td> </tr> <tr> <td>Remailing Independent Estate (FFB Cartage Contract)</td> <td>Alois Gonggi</td> <td>Mobile No. (+675) 72148***</td> </tr> <tr> <td>Alaba Development Corporation (FFB Cartage Contract)</td> <td>Nixon Volele</td> <td>PO BOX 172, Bialla 624</td> </tr> <tr> <td>Rebs Trading (Loose Fruit Cartage)</td> <td>Mr. Rebon Gavuli</td> <td>PO BOX 172, Bialla, West New Britain, Ph: 79314065</td> </tr> <tr> <td>Membu Welding &amp; Construction Ltd</td> <td>Eric Wali</td> <td>PO BOX 231, Bialla West New Britain, Ph: 73218916</td> </tr> </tbody> </table>	Contractor	Contact Person	Contact Number/Address	Kijomhal Transport (FFB cartage contract)	Allan Zairere	PO BOX 98, Bialla West New Britain	Endy Estate (FFB Cartage Contract)	Mr. Senis Awe	PO BO 129, Bialla, West New Britain, Ph: 79784842	Remailing Independent Estate (FFB Cartage Contract)	Alois Gonggi	Mobile No. (+675) 72148***	Alaba Development Corporation (FFB Cartage Contract)	Nixon Volele	PO BOX 172, Bialla 624	Rebs Trading (Loose Fruit Cartage)	Mr. Rebon Gavuli	PO BOX 172, Bialla, West New Britain, Ph: 79314065	Membu Welding & Construction Ltd	Eric Wali	PO BOX 231, Bialla West New Britain, Ph: 73218916	Complied
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		<table border="1"> <tr> <td>Muumata Mini Oil Palm Estate</td> <td>James Kaiwa</td> <td>PO BOX 159, Bialla West New Britain Province, Ph: 71043245</td> </tr> <tr> <td>Earthworks &amp; Mowing Services</td> <td>Mr. Geoffrey Kenny Sirinjui</td> <td>OPIC Barema PO BOX 141, Bialla, West New Britain Province, Ph: 71767070</td> </tr> </table> <p>Name and contact details of shipping company:  Paradise Shipping &amp; Logistics Limited, PO BOX 3580, Lae – Morobe Province, Papua New Guinea. Contact Person: Mr. Joe Auteke. Contact No.793****48.</p>	Muumata Mini Oil Palm Estate	James Kaiwa	PO BOX 159, Bialla West New Britain Province, Ph: 71043245	Earthworks & Mowing Services	Mr. Geoffrey Kenny Sirinjui	OPIC Barema PO BOX 141, Bialla, West New Britain Province, Ph: 71767070	
Muumata Mini Oil Palm Estate	James Kaiwa	PO BOX 159, Bialla West New Britain Province, Ph: 71043245							
Earthworks & Mowing Services	Mr. Geoffrey Kenny Sirinjui	OPIC Barema PO BOX 141, Bialla, West New Britain Province, Ph: 71767070							
3.8.11	The mill shall inform its CB in advance prior to conduct of its next audit of the names and contact details of any new contractor used for the physical handling of RSPO certified oil palm products.	Hargy Oil Palms Limited informed BSI of the new contractor used for FFB transport from smallholder blocks to HOPL's palm oil mills.	Complied						
3.8.12	<p>Record keeping</p> <ul style="list-style-type: none"> <li>i. The mill shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements.</li> <li>ii. Retention times for all records and reports shall be a minimum of two (2) years and shall comply with relevant legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock.</li> <li>iii. For Identity Preserved Module, the mill shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.</li> <li>iv. For Mass Balance Module, the mill: <ul style="list-style-type: none"> <li>a. Shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis.</li> </ul> </li> </ul>	<p>Hargy POM, Barema POM and Navo POM maintains accurate, complete, up-to-date and accessible records and reports covering all aspects of RSPO Supply Chain Certification Standard requirements. The organization has implemented RSPO Supply Chain Certification Standard based on RSPO Supply Chain Certification Manual (MAN-SUS-SCC-001-03 Issue no.3 dated 10 March 2021; SOP SCCS Internal Audit (FOR-SUS-SUS-001-03 dated 25 March 2021). Hargy Oil Palms Limited can demonstrate that all record and report are maintained accuracy, completeness and up-to-date. Sample seen:</p> <ul style="list-style-type: none"> <li>- Daily Production Figure of Hargy POM for 10 March 2022 mentioned that FFB Stock B/F was 111.32 Tons; FFB received was 561.58 Tons; FFB processed was 571.09 Tons; stock C/F was 101.80 Tons; FFB processed year to date was 28,766.01 Tons. CPO IP Stock B/F was 12,951.66 Tons; Produced was 132.70 Tons; Received was 53.62 Tons; Dispatched was 0 Tons; Stock C/F was 13,137.98 Tons. PK IP Stock B/F was 59.97 Tons; Received was 0 Ton; Produced was 29.56 Tons; Stock C/F was 58.91 Tons. Mill Throughput month to date was 47.62 tons/hour; year to date was 46.24 tons/hour. CPO Extraction Rate month to date was 23.38%; year to</li> </ul>	Complied						

	<p>b. All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO.</p> <p>c. The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock).</p>	<p>date was 24.44%. PK Extraction Rate month to date was 5.19%; year to date was 5.19%.</p> <ul style="list-style-type: none"> <li>- Daily Production Figure of Barema POM for 1 December 2021, mentioned that FFB Stock B/F was 0 Tons; FFB received was 1009.10 Tons; FFB processed was 928.10 Tons; stock C/F was 81.00 Tons; FFB processed year to date was 187,099.46 Tons. CPO IP Stock B/F was 2,233.20 Tons; Produced was 325.45 Tons; Stock C/F was 2,558.66 Tons. PK IP Stock B/F was 221.43 Ton; Received is 46.78 Tons; Produced was 48.91 Tons; Stock C/F was 242.12 Tons. Mill Throughput month to date was 38.67 ton/hour; year to date was 42.71 ton/hour. CPO Extraction Rate month to date was 35.07%; year to date was 25.71%. PK Extraction Rate month to date was 5.27%; year to date was 5.15%.</li> </ul> <p>Daily Production Figure of Barema POM for 10 August 2022, mentioned that FFB Stock B/F was 917.00 Tons; FFB received was 276.98 Tons; FFB processed was 640.98 Tons; stock C/F was 553.00 Tons; FFB processed year to date was 130,742.60 Tons. CPO IP Stock B/F was 1,318.61 Tons; Produced was 161.17 Tons; Stock C/F was 1,231.43 Tons. PK IP Stock B/F was 244.51 Ton; Received was 47.42 Tons; Produced was 32.04 Tons; Stock C/F was 250.43 Tons. Mill Throughput month to date was 44.79 ton/hour; year to date was 43.57 ton/hour. CPO Extraction Rate month to date was 24.67%; year to date was 25.66%. PK Extraction Rate month to date was 5.03%; year to date was 5.04%.</p> <ul style="list-style-type: none"> <li>- Daily Production Figure of Navo POM for 10 March 2022, mentioned that FFB Stock B/F was 268.17 Tons; FFB received was 1,082.54 Tons; FFB processed was 1,042.24; stock C/F 308.46 Tons; FFB processed year to date was 42,690.93 Tons. CPO IP Stock B/F was 2,240.73 Ton; Produced was 252.82 Tons; Stock C/F was 2,184.17 Tons. PK IP Stock B/F was 85.59 Tons; Despatched was 43.72 Tons; Produced was 54.20 Tons; Stock C/F is 96.07 Tons. Mill Throughput month to date was 51.07 tons/hour; year to date was 51.35 ton/hour. CPO Extraction Rate month to date was</li> </ul>	
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		<p>24.57%; year to date was 26.08%. PK Extraction Rate month to date was 4.74%; year to date was 5.07%.</p> <p>"HOPL RSPO Supply Chain Certification Manual No.MAN-COM-SCC-001-03 dated 10 March 2021". In section 5.9.2 Record Keeping stated retention times for all records and reports is a minimum of two (2) years and complies with legal and regulatory requirements. The records confirm the certified status of raw materials or products held in stock.</p> <p>Based on record review in Hargy POM, Barema POM and Navo POM: FFB delivery docket, weighbridge ticket, CPO dispatch slip, PK dispatch slip, daily production report from 2021 can be retrieved.</p> <p>HOPL uses Identity Preserved Module for the Palm Oil Mill, as evidence above, the mills has record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.</p>	
3.8.13	<p><b>Extraction Rate</b></p> <p>The oil extraction rate (OER) and the kernel extraction rate (KER) shall be applied to provide a reliable estimate of the amount of certified CPO and PK from the associated inputs. Mill shall determine and set their own extraction rates based upon past experience, documented and applied it consistently.</p>	<p>The OER and KER are applied to provide reliable estimate of amount of certified CPO and PK from each palm oil mills. CPOER and PKER are monitored and documented in Daily Production Figure.</p> <p>Based on Mill Daily Production Figure dated 10 March 2022, the mills have recorded extraction rate daily,</p> <ul style="list-style-type: none"> <li>- In Hargy POM the CPO Extraction Rate month to date was 23.38%; year to date was 24.44%. PK Extraction Rate month to date was 5.19%; year to date was 5.19%.</li> <li>- In Barema POM the CPO Extraction Rate month to date was 24.67%; year to date was 25.66%. PK Extraction Rate month to date was 5.03%; year to date was 5.04%.</li> <li>- In Navo POM the CPO Extraction Rate month to date was 24.57%; year to date was 26.08%. PK Extraction Rate month to date was 4.74%; year to date was 5.07%.</li> </ul>	Complied
3.8.14	<p>Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.</p>	<p>HOPL Mills have updated CPO and PK extraction in daily basis to ensure accuracy against actual performance.</p>	Complied

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<p>3.8.15</p>	<p><b>Processing</b>          For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation.</p>	<p>The procedure for production recording as in PRO-SUS-SCC-009-02, Record Keeping dated 10 March 2021 - has rules out a record keeping for RSPO certified FFB CPO and PK.          At the moment, all FFB sources are certified. There are no non-certified FFB sources coming to Hargy POM, Barema POM and Navo POM.          All records are provided and traceable such as Daily Production Report for Hargy POM, Barema POM and Navo POM as well as Quarterly Balance Report.          Barema POM and Navo POM delivering their certified CPO product to the HOPL Bulking Station which located in Hargy POM and downgrading certified CPO "IP" into "SG" in Bulking Station due to mixing certified CPO product in tanks, then exported through bulking tanks and a jetty managed exclusively by HOPL.</p>	<p>Complied</p>
<p>3.8.16</p>	<p><b>Registration of Transactions</b></p> <p>i. Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date.</p> <p>ii. Remove: RSPO certified volumes sold under different scheme or as conventional, or in case of underproduction, loss or damage shall be removed in the RSPO IT platform.</p>	<p>Hargy Oil Palms Limited have registered all of their POM into RSPO PalmTrace. Hargy Oil Palms Limited, under SIPEF Group, Belgium – holds RSPO membership number 1-0021-05-000-00, since 7 December 2005.          Hargy POM PalmTrace ID: RSPO_PO10000 00053.          Barema POM PalmTrace ID: RSPO_PO10000 01655.          Navo POM PalmTrace ID: RSPO_PO10000 00105.</p> <p>Hargy POM Shipping Announcement for Sales of CPO:</p> <ul style="list-style-type: none"> <li>• PalmTrace transaction No.TR-22f09df1-7178 confirmed date 24 February 2022: Contract No.PHO-11104. Product: Crude Sustainable Palm Oil/SG. Quantity: 510 MT. Seller: Hargy Oil Palms Limited. End Buyer: Cargil B.V. Tanker Bill of Lading No.BIA/ROT-15, dated 28 January 2022. Shipper: Hargy Oil Palms Limited, Private Mail Bag Kimbe, West New Britain Province, Papua New Guinea. Notify Address: Cargil B.V. Croe Inbound, 21<sup>st</sup> Floor Evert Van De Beekstraat 378 NL-2311 CZ, Schiphol. Tanker: MT Jade Blosson. Voyage: V2201. Loaded at port: Bialla, Papua New Guinea. Delivered to port: Rotterdam. Commodity: Crude Sustainable Palm Oil/SG</li> </ul>	<p>Complied</p>

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		<p>RSPO Certificate No.RSPO535739. Volume 510.00 MT. Reference to Contract No.PHO-11104 SG.</p> <ul style="list-style-type: none"> <li>• PalmTrace transaction No.TR-94c2762b-3c04 confirmed date 24 February 2022: Contract No.PHO-11116. Product: Crude Sustainable Palm Oil/SG. Quantity: 255 MT. Seller: Hargy Oil Palms Limited. End Buyer: Cargil B.V. Tanker Bill of Lading No.BIA/ROT-16, dated 28 January 2022. Shipper: Hargy Oil Palms Limited, Private Mail Bag Kimbe, West New Britain Province, Papua New Guinea. Notify Address: Cargil B.V. Croe Inbound, 21<sup>st</sup> Floor Evert Van De Beekstraat 378 NL-2311 CZ, Schiphol. Tanker: MT Jade Blosson. Voyage: V2201. Loaded at port: Bialla, Papua New Guinea. Delivered to port: Rotterdam. Commodity: Crude Sustainable Palm Oil/SG</li> <li>• RSPO Certificate No.RSPO535739. Volume 255.00 MT. Reference to Contract No.PHO-11116 SG.</li> <li>• PalmTrace transaction No.TR-d7c419a8-a4b7 confirmed date 21 April 2022: Contract No.PHO-11226. Product: CSPO/SG. Quantity: 966.67 MT. Seller: Hargy Oil Palms Limited. End Buyer: Olenex SARL. Tanker Bill of Lading No.BIA/ROT-22, dated 18 April 2022. Shipper: Hargy Oil Palms Limited, Private Mail Bag Kimbe, West New Britain Province, Papua New Guinea. Notify Address: Olenex SARL A One Business Center LA Piece 4 CH-1180 Rolle Switzerland. Tanker: MT Stena Convoy. Voyage: V2201. Loaded at port: Bialla, Papua New Guinea. Delivered to port: Rotterdam. Commodity: Crude Sustainable Palm Oil/SG</li> </ul> <p>RSPO Certificate No.RSPO535739. Volume 966.67 MT. Reference to Contract No.PHO-11226SG.</p> <p>Barema POM Shipping Announcement for Sales of PK:</p> <ul style="list-style-type: none"> <li>• PalmTrace transaction No.TR-995b2dbc-0348 confirmed date 1 February 2022: Contract No.PHKO-10112. Product: CSPK/SG. Quantity: 1,367.82 MT. Seller: Barema POM-SIPEF. Buyer: Hargy Oil Palms - KCP.</li> </ul> <p>Barema POM Shipping Announcement for Sales of CPO:</p>	
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		<ul style="list-style-type: none"> <li>• PalmTrace transaction No.TR-150c6414-9897 confirmed date 13 December 2021: Contract No.PHO-10832. Product: Crude Sustainable Palm Oil/SG. Quantity: 245 MT. Seller: SIPEF Barema POM. End Buyer: Cargil B.V. Refined Oils Europe. Tanker Bill of Lading No.BIA/ROT-01, dated 28 October 2021. Shipper: Hargy Oil Palms Limited, Private Mail Bag Kimbe, West New Britain Province, Papua New Guinea. Notify Address: Cargil B.V. Croe Inbound, 21<sup>st</sup> Floor Evert Van De Beekstraat 378 NL-2311 CZ, Schiphol. Tanker: MTM Potomac. Voyage: V2101. Loaded at port: Bialla, Papua New Guinea. Delivered to port: Rotterdam. Commodity: Crude Sustainable Palm Oil/SG RSPO Certificate No.RSPO535739. Volume 510.00 MT. Reference to Contract No.PHO-10832SG.</li> <li>• PalmTrace transaction No.TR-094c687b-8222 confirmed date 17 February 2022: Contract No.PHO-11127. Product: CSPO/SG. Quantity: 510 MT. Seller: SIPEF Barema POM. End Buyer: Cargil B.V. Refined Oils Europe. Tanker Bill of Lading No.BIA/ROT-19, dated 25 December 2021. Shipper: Hargy Oil Palms Limited, Private Mail Bag Kimbe, West New Britain Province, Papua New Guinea. Notify Address: Cargil B.V. Croe Inbound, 21<sup>st</sup> Floor Evert Van De Beekstraat 378 NL-2311 CZ, Schiphol. Tanker: MT Clearocean Mesquite. Voyage: V2101. Loaded at port: Bialla, Papua New Guinea. Delivered to port: Rotterdam. Commodity: Crude Sustainable Palm Oil/SG RSPO Certificate No.RSPO535739. Volume 510.00 MT. Reference to Contract No.PHO-11127SG.</li> <li>• PalmTrace transaction No.TR-c83c2048-ca15 confirmed date 13 December 2021: Contract No.PHO-11073. Product: CSPO/SG. Quantity: 513.12 MT. Seller: SIPEF Barema POM. End Buyer: Cargil B.V. Refined Oils Europe. Tanker Bill of Lading No.BIA/ROT-17, dated 14 October 2021. Shipper: Hargy Oil Palms Limited, Private Mail Bag Kimbe, West New Britain Province, Papua New Guinea. Notify Address: Cargil B.V. Croe Inbound, 21<sup>st</sup> Floor Evert Van De Beekstraat 378 NL-2311 CZ, Schiphol. Tanker: MT Pacific Ruby. Voyage: V2101. Loaded at port: Bialla, Papua New Guinea. Delivered to port: Rotterdam. Commodity: Crude Sustainable Palm Oil/SG</li> </ul>	
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		<p>RSPO Certificate No.RSPO535739. Volume 513.12 MT. Reference to Contract No.PHO-11073SG.</p> <p>Navo POM Shipping Announcement for Sales of PK:</p> <ul style="list-style-type: none"> <li>• PalmTrace transaction No.TR-a62ade79-b695 confirmed date 24 May 2022: Contract No.PHKO-10122. Product: CSPK/SG. Quantity: 2,222.61 MT. Seller: Navo POM-SIPEF. Buyer: Hargy Oil Palms - KCP.</li> <li>• PalmTrace transaction No.TR-6a6c3961-2aee confirmed date 7 July 2022: Contract No.PHKO-10124. Product: CSPK/SG. Quantity: 2,223.02 MT. Seller: Navo POM-SIPEF. Buyer: Hargy Oil Palms - KCP.</li> </ul> <p>Navo POM Shipping Announcement for Sales of CPO:</p> <ul style="list-style-type: none"> <li>• PalmTrace transaction No.TR-409828cf-19cd confirmed date 20 March 2022: Contract No.PHO-11121. Product: CSPO/SG. Quantity: 501.45 MT. Seller: Navo POM-SIPEF. End Buyer: Cargil B.V. Refined Oils Europe. Tanker Bill of Lading No.BIA/ROT-16, dated 7 December 2021. Shipper: Hargy Oil Palms Limited, Private Mail Bag Kimbe, West New Britain Province, Papua New Guinea. Notify Address: Cargil B.V. Croe Inbound, 21<sup>st</sup> Floor Evert Van De Beekstraat 378 NL-2311 CZ, Schiphol. Tanker: Dianella. Voyage: V2101. Loaded at port: Bialla, Papua New Guinea. Delivered to port: Rotterdam. Commodity: Crude Sustainable Palm Oil/SG RSPO Certificate No.RSPO535739. Volume 501.44 MT. Reference to Contract No.PHO-11121SG.</li> <li>• PalmTrace transaction No.TR-753d4d6b-dfaa confirmed date 2 August 2022: Contract No.PHO-11272. Product: CSPO/SG. Quantity: 495.52 MT. Seller: Navo POM-SIPEF. End Buyer: Olenex SARL. Tanker Bill of Lading No.BIA/ROT-27, dated 20 May 2022. Shipper: Hargy Oil Palms Limited, Private Mail Bag Kimbe, West New Britain Province, Papua New Guinea. Notify Address: Olenex SARL A One Business Center LA Piece 4 CH-1180 Rolle Switzerland. Tanker: MT Dianella V.2202. Voyage: V2202. Loaded at port: Bialla, Papua New Guinea. Delivered to port: Rotterdam. Commodity:</li> </ul>	
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		<p>Crude Sustainable Palm Oil/SG RSPO Certificate No.RSPO535739. Volume 495.52 MT. Reference to Contract No.PHO-11272SG.</p> <ul style="list-style-type: none"> <li>• PalmTrace transaction No.TR-0c6932c0-cc59 confirmed date 8 August 2022: Contract No.PHO-11371. Product: CSPO/SG. Quantity: 2,004.27 MT. Seller: Navo POM-SIPEF. End Buyer: Sime Darby Oils Zwijndrecht Refinery BV. Tanker Bill of Lading No.BIA/ROT-13, dated 16 July 2022. Shipper: Hargy Oil Palms Limited, Private Mail Bag Kimbe, West New Britain Province, Papua New Guinea. Notify Address: Sime Darby Oils Zwijndrecht Refinery BV, Lindtsedijk 8, 3336LE Zwijndrecht, Netherlands. Tanker: MT Stena Conductor. Voyage: V2202. Loaded at port: Bialla, Papua New Guinea. Delivered to port: Rotterdam. Commodity: Crude Sustainable Palm Oil/SG RSPO Certificate No.RSPO535739. Volume 2004.27 MT. Reference to Contract No.PHO-11371SG.</li> <li>• PalmTrace transaction No.TR-067fdbc6-36a6 confirmed date 20 March 2022: Contract No.PHO-10833. Product: CSPO/SG. Quantity: 251.46 MT. Seller: Navo POM-SIPEF. End Buyer: Cargil B.V. Refined Oils Europe. Tanker Bill of Lading No.BIA/ROT-01, dated 7 December 2021. Shipper: Hargy Oil Palms Limited, Private Mail Bag Kimbe, West New Britain Province, Papua New Guinea. Notify Address: Cargil B.V. Croe Inbound, 21<sup>st</sup> Floor Evert Van De Beekstraat 378 NL-2311 CZ, Schiphol. Tanker: MT Dianella. Voyage: V2101. Loaded at port: Bialla, Papua New Guinea. Delivered to port: Rotterdam. Commodity: Crude Sustainable Palm Oil/SG RSPO Certificate No.RSPO535739. Volume 251.46 MT. Reference to Contract No.PHO-10833SG.</li> </ul> <p>Information for RSPO certified products made available:</p> <ul style="list-style-type: none"> <li>• The name and address of the buyer: Cargil B.V. Croe Inbound, 21<sup>st</sup> Floor Evert Van De Beekstraat 378 NL-2311 CZ, Schiphol;</li> <li>• The name and address of the seller: Hargy Oil Palms Limited, Private Mail Bag Kimbe, West New Britain Province, Papua New Guinea;</li> </ul>	
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		<ul style="list-style-type: none"> <li>• The loading or shipment/ delivery date: 7 December 2021;</li> <li>• The date on which the documents were issued: 7 December 2021;</li> <li>• A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations): Crude Sustainable Palm Oil/SG;</li> <li>• The quantity of the products delivered: 251.46 MT;</li> <li>• Any related transport documentation: Bill of Lading No.BIA/ROT-01, dated 7 December 2021;</li> <li>• Supply chain certificate number of the seller: RSPO535739;</li> <li>• A unique identification number: Contract No.PHO-10833 SG.</li> </ul> <p>Information are available in across range of document, such as Sales Contract, Tanker Bill of Lading, Shipping Announcement.</p> <p>There is no remove implemented, because all RSPO certified quota sold and registered into RSPO PalmTrace.</p>	
3.8.17	<p><b>Claims</b></p> <p>The mill shall only make claims regarding the production of RSPO certified oil that are in compliance with the RSPO Rules on Market Communications and Claims.</p>	<p>The mechanism for claims is stated in Hargy Oil Palms Limited RSPO Supply Chain Certification Manual No.MAN-SUS-SCC-001-03 dated 10 March 2021. Sample of document verified, Daily Production Figure, Weighbridge Card, Sales Contract, Tanker Bill of Lading, company letter head, website and emails demonstrated that there is no RSPO corporate logo or Trade Mark logo displayed in those documents. Hargy Oil Palms Limited has aware and comply with the RSPO Rules on Market Communication and Claims.</p>	Complied
<b>General corporate communications</b>			
4.1	<p>A corporate communication is one made by any RSPO member that highlights its membership of the RSPO and/or its commitment to the principles of the RSPO. Corporate communication is an 'off-product' claim.</p>	<p>The following was communicated in the group website:  <a href="https://www.sipef.com/">https://www.sipef.com/</a>  Hargy Oil Palms Limited (HOPL) is a subsidiary company of SIPEF Group. SIPEF Goupr is producing and selling palm products, such as crude palm oil, palm</p>	Complied

		kernels and crude palm kernel oil, as well as natural rubber, tea in bulk, green bananas, flowers and foliage. All our products are 100% traceable to the source. 100% RSPO compliant with all criteria for processing RSPO certified oil palm products in the Group.	
4.2	<p>In corporate communications a member is allowed to:</p> <ul style="list-style-type: none"> <li>a. Display its RSPO membership status</li> <li>b. Display the RSPO web address (www.rspo.org)</li> <li>c. State that the member supports the work of the RSPO</li> <li>d. State the member’s history with regard to the RSPO.</li> <li>e. Use the RSPO trademark to promote its membership of the RSPO.</li> </ul> <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>	The communication in <a href="https://www.sipef.com/">https://www.sipef.com/</a> states that all products are 100% traceable to the source and 100% compliant with all criteria for processing RSPO certified oil palm products in the Group.	Complied
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.	<p>The communication in <a href="https://www.sipef.com/">https://www.sipef.com/</a> does not do that.</p> <p>There is clear that no statement may lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products.</p>	Complied
4.4	Members must ensure that all communication is consistent, clear and cannot mislead consumers or other stakeholders as to the certified content of oil palm products in the member’s own products.	The communication in <a href="https://www.sipef.com/">https://www.sipef.com/</a> is consistent, clear and not mislead consumers or other stakeholders as to the certified content of oil palm products in the HOPL’s own products.	Complied
4.5	Members are not allowed to use the RSPO corporate logo as shown in the RSPO Rules on Market Communications & Claims document. This is for the sole use of the RSPO secretariat.	There is no RSPO corporate logo has been used in the website, official documents, or official letterhead template.	Complied
<b>Business to business communications</b>			

5.1	Business to Business communication relates to RSPO members in the supply chain selling to and/or communicating with other organizations in the supply chain about the use of certified sustainable oil palm products.	The business to business communication is through the delivery documents. However the communication is mainly of the RSPO certificate number and product description. There is no trademark used.	Complied
5.2	When confirming the sale of certified oil palm products, members must adhere to the requirements of the RSPO SCCS. This includes stating the supply chain model and certificate number under which the claim is being made.	The business to business communication is through the delivery documents. However the communication is mainly of the RSPO certificate number and product description. There is no trademark used.	Complied
5.3	<p>Where a distributor or wholesaler takes title to products containing certified sustainable oil palm products, the requirements of the RSPO SCCS can follow either of two options:</p> <p>a. If the distributor or wholesaler holds only a Distributor license, it may only communicate RSPO-certified oil palm products by linking the product to the manufacturer using the manufacturer’s SCCS certificate number. This covers both brand and own brand products. However, in the case of own brand products it is essential that customers are aware that the product has been made on behalf of the distributor or wholesaler, with specific evidence either through on-pack claims or documentation.</p> <p>b. If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2.</p>	HOPL is not a distributor or wholesaler. Not Applicable.	Not Applicable
<b>Business to consumer communication</b>			
6.1	Only RSPO members that have supply chain certification are allowed to make business to consumer claims about the certified sustainable oil palm products contained within product(s), which are known as ‘product-specific’ claims. Product-specific claims are voluntary.	There was no business to consumer communication as this is an upstream activity certification. Not applicable.	Not Applicable

6.2	Only RSPO members who have supply chain certification are authorised to use the RSPO trademark and/or RSPO label, with the exception of RSPO Credits and of retailers in accordance with 6.8 below.	There was no business to consumer communication as this is an upstream activity certification. Not applicable.	Not Applicable
6.3	When on-pack claims on RSPO-certified sustainable oil palm products are used, the RSPO trademark and associated identification number must be present.	There was no business to consumer communication in Hargy Oil Palms Limited's RSPO Supply Chain Certification Standard implementation, as this is an upstream activity certification. Not applicable.	Not Applicable
6.4	Business to consumer communication shall not include information about the claimant's RSPO membership status.	There was no business to consumer communication in Hargy Oil Palms Limited's RSPO Supply Chain Certification Standard implementation, as this is an upstream activity certification. Not applicable.	Not Applicable
6.5	Members shall not communicate to consumers' information about their suppliers' RSPO membership status.	There was no business to consumer communication in Hargy Oil Palms Limited's RSPO Supply Chain Certification Standard implementation, as this is an upstream activity certification. Not applicable.	Not Applicable
6.6	Use of the RSPO trademark is restricted to claims about RSPO-certified sustainable palm oil products and it is not authorised for use in relation to any other ingredient.	There was no business to consumer communication in Hargy Oil Palms Limited's RSPO Supply Chain Certification Standard implementation, as this is an upstream activity certification. Not applicable.	Not Applicable
6.7	Use of any other trademark or logo to highlight the presence of RSPO-certified sustainable oil palm products is an unauthorised product-specific claim.	There was no business to consumer communication in Hargy Oil Palms Limited's RSPO Supply Chain Certification Standard implementation, as this is an upstream activity certification. Not applicable.	Not Applicable
6.8	RSPO members who are retailers or food service companies can apply for an RSPO trademark license for use in business to consumer communications, provided they can demonstrate the validity of	There was no business to consumer communication in Hargy Oil Palms Limited's RSPO Supply Chain Certification Standard implementation, as this is an upstream activity certification.	Not Applicable

	<p>these claims to an RSPO-accredited certification body (CB). This will be undertaken via a remote audit, prior to the trademark use, during which the retailer or food service company will need to demonstrate that the use of the trademark is in compliance with the rules contained within this document and that the claim itself can be supported through a certified supply chain. Any other palm oil claims, including those highlighting the absence of palm oil, must be highlighted to the CB during the audit to ensure that all claims comply with the requirements of these rules. The CB will confirm the outcome of these audits, to be conducted annually, to RSPO who may continue to grant a trademark license or withdraw permission based upon the audit findings. This is in keeping with the rules applying to RSPO supply chain certified members. The guidance document for audits is available on <a href="http://www.rspo.org">www.rspo.org</a>.</p>	<p>Not applicable.</p>	
<p><b>MODULE A – IDENTITY PRESERVED &amp; SEGREGATED SPECIFIC RULES</b></p>			
<p><b>Certified oil palm content (IP)</b></p>			
	<p>For IP, 95% or above of the oil palm content must be RSPO IP-certified.</p>	<p>Hargy Oil Palms Limited is certified for production of RSPO CPO and PK, the supply chain module is IP, therefore all claim based on 100% certified palm product.          Barema POM and Navo POM delivering their certified CPO product to the HOPL Bulking Station which located in Hargy POM. Due to mixing of certified CPO product in tanks, then exported through bulking tanks and a jetty managed exclusively by HOPL, therefore all certified CPO are downgraded from "IP" into "SG". Hargy Oil Palms Limited sold their RSPO certified product as SG (multi mill).</p>	<p>Complied</p>
	<p>For SG, 95% or above of the oil palm content must be SG, or a combination of SG and IP.</p>	<p>Hargy Oil Palms Limited is certified for production of RSPO CPO and PK, the supply chain module is IP, therefore all claim based on 100% certified palm product.</p>	<p>Complied</p>

		Barema POM and Navo POM delivering their certified CPO product to the HOPL Bulking Station which located in Hargy POM. Due to mixing of certified CPO product in tanks, then exported through bulking tanks and a jetty managed exclusively by HOPL, therefore all certified CPO are downgraded from "IP" into "SG". Hargy Oil Palms Limited sold their RSPO certified product as SG (multi mill).	
	Where there is any percentage of non-certified oil palm within the product, the reason for this must be fully justified and an action plan for moving to fully certified oil palm must be in place, in accordance with the requirements of the RSPO SCCS. In addition, the volume of non-certified oil palm products must be covered by the purchase of RSPO Credits of equivalent volume.	Hargy Oil Palms Limited is certified RSPO CPO and PK, the supply chain module is IP, therefore all claim based on 100% certified palm product.	Complied
<b>Labelling and trademark (IP)</b>			
	Members are allowed to use the RSPO label in one of the following ways: a. RSPO trademark which includes the tag 'CERTIFIED' or b. RSPO trademark which includes the tag 'This product contains certified sustainable palm oil'. Wherever a RSPO trademark is displayed, the applicable trademark license number must be shown immediately under or next to the trademark or the 'statement'. Font must be Calibri, font size must be at least 4pt (1.4 mm or 0.06 inch). In on-pack communications, the RSPO trademark can be printed anywhere on the pack.	There was no on product label claims for the RSPO Supply Chain implementation in Hargy Oil Palms Limited mills. Not Applicable	Not Applicable
<b>Messaging (IP)</b>			
	Messaging ALLOWED in storytelling in product-related communications may include some or all of the following elements: <ul style="list-style-type: none"> <li>The oil palm products contained in this product have been certified to come from RSPO sources. <a href="http://www.rspo.org">www.rspo.org</a></li> </ul>	There was no on product label claims for the RSPO Supply Chain implementation in Hargy Oil Palms Limited mills. Not Applicable	Not Applicable

	<ul style="list-style-type: none"> <li>• By choosing this product, you are sure it contains RSPO-certified palm oil. For more information: <a href="http://www.rspo.org">www.rspo.org</a></li> <li>• RSPO-certified sustainable oil palm products were kept apart from other oil palm products throughout the supply chain. <a href="http://www.rspo.org">www.rspo.org</a></li> <li>• Certified sustainable oil palm products can be traced back to RSPO-certified mills and plantations. <a href="http://www.rspo.org">www.rspo.org</a></li> <li>• The entire supply chain is monitored by independent, RSPO-accredited auditors. <a href="http://www.rspo.org">www.rspo.org</a></li> <li>• RSPO-certified sustainable palm oil has been produced to stringent environmental and social criteria. <a href="http://www.rspo.org">www.rspo.org</a></li> <li>• References to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown by company records.</li> </ul>		
<p><b>Principle 4: Respect community and human rights and deliver benefits</b></p>			
<p><b>Criterion 4.1:</b> The unit of Certification respects human rights, which includes respecting the rights of Human Rights Defenders.</p>			
<p>4.1.1</p>	<p><b>(C)</b> A policy to respect human rights, including Prohibiting retaliation against Human Rights Defenders (HRD), is documented and communicated to all levels of the workforce, operations, supply chain and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.</p> <p>- Critical (Major) compliance -</p>	<p>Hargy Oil Palms Limited has developed Policy on Human Rights (Doc. No.POL-HRD-GEN-005-05, Issue No.5 dated 6 June 2022) approved by CEO. The company is recognizing the Human Rights are universal and apply to all without any form of distinction. They support the implementation of the International Bill of Human Rights, the UN guiding principles on business and human rights and of the ILO Declaration on Fundamental Principles and Rights at Work. Hargy Oil Palm Ltd is prohibits retaliation against Human Rights Defenders (HRD) and complainants including intimidation and harassment by HOPL employees and contracted services. The contractors and their employees that provided services to the company have signed on the Contractor Induction</p>	<p>Complied</p>

		<p>Agreement and Employee Induction Checklist to acknowledge compliance on RSPO and legal requirements.</p> <ul style="list-style-type: none"> <li>- In Hargy Estate-Barema Plantation, management provided presentation on Environmental Policy and Human Rights Policy to 12 loose fruit collectors and 12 harvesters on 17 July 2022.</li> <li>- In Pandi Estate-Bakada Plantation, management provided company policies awareness on human rights to 1 male field supervisor, 1 male overseer, 3 male fertilizer distributors and 14 female fertilizer applicators, dated 21 July 2022.</li> </ul>	
4.1.2	<p>The unit of certification does not instigate violence or use any form of harassment, including the use of mercenaries and paramilitaries in their operations.</p> <p>- Minor compliance -</p>	<p>Based on interview with stakeholders Baikakea community, Mahonia Na Dari (NGO), Bialla Oil Palm Growers Associations (smallholder organization), it was known that HOPL never instigate violence or use any form of harassment, including use of mercenaries and paramilitaries in the operation.</p>	Complied
<p><b>Criterion 4.2:</b> There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties</p>			
4.2.1	<p><b>(C)</b> The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistle-blowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.</p> <p>- Critical (Major) compliance -</p>	<p>The procedure of Grievance Mechanism (No.PRO-SUS-SUS-004-07, issued 27 June 2022). Section 12.1 Time schedule for grievance procedure process is 30 days (Day 29 Deadline for submission to CA Department about final response; Day 30 Closing of the grievance and briefing of response to complainants).</p>	Complied
4.2.2	<p>Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.</p> <p>- Minor compliance -</p>	<p>Grievance Mechanism (Doc. No.: PRO-COM-GEN-017-04, Issue No.: 4 dated 19 June 2021) was developed to provide a way to reduce risks from company employees, offer external stakeholders an effective avenue for expressing concerns achieving remedies, and promote a mutually constructive relationship with all relevant stakeholders and the company. Community Affairs Manager will be the primary interface between HOPL and any external stakeholders intending to raise their grievance whereas Security Department and Human Resource Department will be the primary interface between HOPL and company</p>	Complied

		<p>employees on grievances related to social safety, security nature and employment of employees. Business Development Officer form a centralized reporting, Grievance Tracking Database and will ensure all grievances are channelled to relevant departments. The target to response and provides feedback to 100% of grievances within 7 days dealing directly with the person raising the grievance. Mechanism to receive grievance such as:</p> <ul style="list-style-type: none"> <li>• Requests, Complaints, Grievances and Disputes Register Form – Company employees</li> <li>• Form of letter or verbally to register in Requests, Complaints, Grievances and Disputes Register Form – External stakeholders and contractors</li> </ul>	
4.2.3	<p>The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders.</p> <p>- Minor compliance -</p>	<p>Reviewed the Grievance Records July 2021 – August 2022 for the closed issues. Sampled the following Complaints, Grievance &amp; Disputes Register Form and records of the closure of complaint. Audit team continue to review grievance resolution process:</p> <ul style="list-style-type: none"> <li>- Grievance raised regarding environmental damage resulting from FFB oil spill at Soi LSS between 2019 and 2020. HOPL received the grievance on 7 January 2021 and responding on 14 January 2021.</li> <li>- And the Soi LSS sent letter on 21 May 2021; Subject: Compensation for environmental damaged cause to water source by Hargy Oil Palm Limited at Soi LSS area. The letter attached Document letter of the concern parties for the environmental damages to Soi LSS oil palm block Bialla West New Britain Province. Including letter from West New Britain Provincial Administrator Environment and Climate Change Unit sent on 23 February 2020 with subject Presentation of Brief Report on Rotten Palm Oil Causing Pollution to Soi LSS Blocks of East Nakanai LLG.</li> <li>- Minutes of Meeting with Local Planning Committee on 4 June 2021, discussing agenda related to environmental damage – Soi LSS, Ela Lumkere Independent Estate, Portion 339 and 286 Tiauru. Internal discussion that at the time in which the allged event occurred the Soi/Kabaya bridge was</li> </ul>	Complied

		<p>destroyed due to heavy rainfall, thus making access to the crop with company truck impossible, therefore the crop become rotten.</p> <ul style="list-style-type: none"> <li>- Minutes of Meeting dated 5 July 2021 on topic Soi Environmental Claim.</li> <li>- Attendance list of Site Inspection Soi dated 21 July 2021 on topic Soi Environmental Damage Claim, attended by Hargy Oil Palms Limited representative, Soi block holders, CEPA.</li> <li>- Minutes of Meeting dated 22 July 2021 on topic Soi Environmental Damage Claim, attended by Hargy Oil Palms Limited representative, Soi block holders, OPIC, CEPA. Both parties agreed to wait the outcome of CEPA report.</li> <li>- CEPA Investigation Report for the Soi LSS block holders Environmental Damages Claim, Biiala District, West New Britain Province 18-23 July 2021. Recommendation from the report: Convene a meeting for the complainant, company officials, provincial authorities and CEPA; the affected parties resolve to negotiate a settlement pursuant Section 8 and Section 115 of Environment Act 2000. Conclusions: The finding concludes that environmental harm to properties and lives of people; Estimated compensation of K60million by the complainant is unrealistic and unreasonable; etc.</li> <li>- Letter from Hargy Oil Palms Limited to CEPA dated 25 November 2021; Subject Soi 1-10 LSS Environment Damage Complaint and Letter of Demand Report. The letter emphasize on points: Soi LSS oil palm blocks situated within Agricultural State Lease property and not customary land; the investigation report recommends HPOL to compensate Soi oil palm block holders pursuant to section 8 and 115 of Environment Act 2000 – however these provisions only allow for fines to CEPA; the investigation carried out by CEPA 18-23 July 2021 was not able to find objective evidence of either the incident or its impacts; HOPL compliance to Environment Act 2000 and all of its environmental permits covers all plantations and mills and does not include the smallholders.</li> </ul>	
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4.2.4	<p>The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator.</p> <p>- Minor compliance -</p>	<p>As per the Grievance Mechanism mentioned in indicator 4.2.2, the complainant has the option of accessing independent legal and technical advice of their choice and the ability to choose individuals or groups to support them as well as option of a third party mediator.</p> <p>Audit team continue to review grievance resolution process with smallholder, the complainants and HOPL agreed to invite CEPA as government regulatory body to act as third-party mediator.</p>	Complied
<p><b>Criterion 4.3:</b> The unit of Certification contributes to local sustainable development as agreed by local communities.</p>			

<p>4.3.1</p>	<p>Contributions to community development that are based on the results of consultation with local communities are demonstrated.</p> <p><b>Smallholder requirements:</b>          Smallholder should participate in Field days and other extension activities delivered by organization managing the smallholders. All records shall be maintained.</p> <p>- Minor compliance -</p>	<p>Hargy Oil Palms Limited demonstrate the community development program was prepared in response to result of consultation with local communities. Audit team verified meeting records/minutes of meeting:</p> <ul style="list-style-type: none"> <li>- Briefing of meeting with West New Britain Provincial Health Authority dated 11 April 2022. The meeting explaining the proposal for Lalopo Medium Term Development Plan III.</li> <li>- Meeting with canteen operators 13 July 2022, with 11 trading/canteen business owners in all HOPL operation.</li> </ul> <p>Hargy Oil Palms Limited made community development projects/planning 2022.</p> <table border="1" data-bbox="1025 767 1944 1321"> <thead> <tr> <th>Activity</th> <th>Timeline</th> <th>Remarks</th> </tr> </thead> <tbody> <tr> <td>           Business Development            - Assisting business development team in basket survey            - Working on basic bookkeeping training for Kabaya Youth &amp; Women Associations         </td> <td>May – June</td> <td>Completed</td> </tr> <tr> <td>           Community Engagement            - Continuous Support to Navo Sporting activity            - Compile listing for food handler training            - Misis Kolos Sewing Training for employees and SHA women + female spouses            - Turtle bag donation to Kabaya Early Childhood and Lolobau school            - Environment Day         </td> <td>May – June</td> <td>Some activity already carried out</td> </tr> </tbody> </table>	Activity	Timeline	Remarks	Business Development - Assisting business development team in basket survey - Working on basic bookkeeping training for Kabaya Youth & Women Associations	May – June	Completed	Community Engagement - Continuous Support to Navo Sporting activity - Compile listing for food handler training - Misis Kolos Sewing Training for employees and SHA women + female spouses - Turtle bag donation to Kabaya Early Childhood and Lolobau school - Environment Day	May – June	Some activity already carried out	<p>Complied</p>
Activity	Timeline	Remarks										
Business Development - Assisting business development team in basket survey - Working on basic bookkeeping training for Kabaya Youth & Women Associations	May – June	Completed										
Community Engagement - Continuous Support to Navo Sporting activity - Compile listing for food handler training - Misis Kolos Sewing Training for employees and SHA women + female spouses - Turtle bag donation to Kabaya Early Childhood and Lolobau school - Environment Day	May – June	Some activity already carried out										

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		<p>Grievances</p> <ul style="list-style-type: none"> <li>- Attend to grievance from Atata Plantation regarding local contractor engaged in FFB stealing in Atata.</li> <li>- Attend to grievance raised by Ibana Plantation regarding illegal expansion of Trade Store within Portion 624</li> </ul>	<p>May – June</p>	<p>All followed up</p>	
		<p>Community Assistance</p> <ul style="list-style-type: none"> <li>- Supply Ulamona Health Center with water</li> <li>- Supply fuel drum based on engagement and participatory request: East Nakanai LLG, Police, Provincial Government, Civil Registry, NGO and other stakeholders</li> <li>- Registration of Business and Companies with IPA</li> <li>- Financial Literacy Training</li> <li>- School and Church support to Urumaili community</li> <li>- Cleaning and grass slashing of Bialla Police Station</li> <li>- Repair of Police Vehicle and Maintenance of Police Staton cell at Navo and Bialla</li> <li>- New Britain Highway road rehabilitation program</li> <li>- Restoration of wash out bridges – support with Provincial Works Department</li> <li>- Livelihood Training Programs (WASH) in Bialla Region</li> </ul>	<p>May – June</p>	<p>Some already completed</p>	

		<p>Plantation</p> <ul style="list-style-type: none"> <li>- Assisting Ibana Plantation Team in engaging Navo Youth and Ulamona Youth</li> <li>- Assist Remailing Independent Estate water supply project</li> </ul>	<p>June</p>	<p>On progress</p>	
		<p>Education</p> <ul style="list-style-type: none"> <li>- Donation of library book to Navo Primary School and Elementary School</li> <li>- Donation of material for the construction of teacher houses in Bialla Primary School</li> <li>- Donation of water bottlers to various school in Bialla/Navo</li> <li>- Grass slashing of schools fields to various school in Bialla/Navo</li> <li>- Construction of Navo Mill and Atata Compound Elementary School</li> <li>- Vehicle to assist Navo Primary School to move desks</li> <li>- Electrician to install light bulbs and starters in Navo Primary School</li> <li>- Construction to clean tanks for teacher houses at Navo Primary School</li> </ul>	<p>ongoing</p>	<p>Provided from donor agency</p>	
		<p>Health</p> <ul style="list-style-type: none"> <li>- Procurement of ambulance services to assist growers and citizen of Bialla</li> <li>- Bialla Maternity Ward – for women</li> </ul>	<p>On going</p>	<p>Support from SIPEF</p>	

		<ul style="list-style-type: none"> <li>- Hargy Oil Palms Limited and Turtle Bag Foundation made donation outreach activities on 30 May – 1 June 2022 and 7-8 June 2022.</li> <li>- Upskilling in Seeing Class to a group of female fols within Hargy Oil Palms Limited and smallholder blocks dated 13-20 May 2022.</li> <li>- In January 2022, provided assistance to Kevin Tirupia Family at Soi.</li> <li>- In February 2022, provided allowance to Police.</li> <li>- In March 2022, provided Builder mix for Late John Osa Haus Krai.</li> <li>- In April 2022, hire slashers for school fields.</li> </ul>	
<p><b>Criterion 4.4:</b> Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent.</p>			
<p>4.4.1</p>	<p><b>(C)</b> Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed Consent (FPIC) process where such documents have been issued by the appropriate Government agency. For Customary land where such documents are not available, evidence of ownership will be demonstrated as follows:</p> <ul style="list-style-type: none"> <li>- Critical (Major) compliance -</li> </ul>	<p>Hargy Oil Palms Limited demonstrated the legal ownership of the land for its estates, mills, offices, workshops, housing/camp and wharf.</p> <ul style="list-style-type: none"> <li>- Hargy Mill/Workshop, Portion 15 &amp; Portion 633: Agricultural Lease under Section 56, to Hargy Oil Palms Limited, dated 2 February 1978 for 99 years, Portion 633 &amp; 1044 consolidated, Milinch Ulawun, Fourmil Talasea, area of 16.99 Ha, West New Britain Province. Land title completed with map scale 1:7500 Survey Plan Catalogue No.15/282 &amp; 15/341.</li> <li>- Hargy Estate, Portion 2046; State Lease Hargy Oil Palms Limited Portion 2046, Milinch Ulawun, Fourmil Talasea, West New Britain Province for area 321.67 Ha, Survey Plan Catalogue 15/805; dated 5 April 2007 for 99 years.</li> <li>- Hargy Effluent – Mill, Portion 14: Lease</li> <li>- Hargy Estate, Portion 9: Agricultural Lease under Section 56, to Hargy Oil Palms Limited, dated 25 March 1977 for 95 years, Portion 9, Milinch Ulawun, Fourmil Talasea, area of 2,967 Ha, West New Britain Province. Land title completed with map scale 1:50,000 Survey Plan Catalogue No.15/289.</li> <li>- Hargy Beach Front, Portion 1045: State Lease Hargy Oil Palms Limited Portion 1045, Milinch Ulawun, Fourmil Talasea, West New Britain Province</li> </ul>	<p>Complied</p>

		<p>for area 0.72 Ha, Survey Plan Catalogue 17/140; dated 5 April 2007 for 99 years.</p> <ul style="list-style-type: none"> <li>- Hargy Beach Front, Portion 1046: State Lease Hargy Oil Palms Limited Portion 1046, Milinch Ulawun, Fourmil Talasea, West New Britain Province for area 0.24 Ha, Survey Plan Catalogue 17/150; dated 5 April 2007 for 99 years.</li> <li>- Hargy Beach Front, Portion 1047: State Lease Hargy Oil Palms Limited Portion 1047, Milinch Ulawun, Fourmil Talasea, West New Britain Province for area 0.50 Ha, Survey Plan Catalogue 17/144; dated 5 April 2007 for 99 years.</li> <li>- Hargy Beach Front, Portion 1048: State Lease Hargy Oil Palms Limited Portion 1048, Milinch Ulawun, Fourmil Talasea, West New Britain Province for area 0.426 Ha, Survey Plan Catalogue 17/147; dated 5 April 2007 for 99 years.</li> <li>- Hargy Beach Front, Portion 1049: State Lease Hargy Oil Palms Limited Portion 1049, Milinch Ulawun, Fourmil Talasea, West New Britain Province for area 0.56 Ha, Survey Plan Catalogue 17/143; dated 5 April 2007 for 99 years.</li> <li>- Hargy Beach Front, Portion 1050: State Lease Hargy Oil Palms Limited Portion 1050, Milinch Ulawun, Fourmil Talasea, West New Britain Province for area 0.42 Ha, Survey Plan Catalogue 17/148; dated 5 April 2007 for 99 years.</li> <li>- Hargy Beach Front, Portion 1051: State Lease Hargy Oil Palms Limited Portion 1051, Milinch Ulawun, Fourmil Talasea, West New Britain Province for area 0.1 Ha, Survey Plan Catalogue 17/145; dated 5 April 2007 for 99 years.</li> <li>- Hargy Beach Front, Portion 1052: State Lease Hargy Oil Palms Limited Portion 1052, Milinch Ulawun, Fourmil Talasea, West New Britain Province for area 0.1 Ha, Survey Plan Catalogue 17/145; dated 5 April 2007 for 99 years.</li> </ul>	
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		<ul style="list-style-type: none"> <li>- Hargy Beach Front, Portion 1053: State Lease Hargy Oil Palms Limited Portion 1053, Milinch Ulawun, Fourmil Talasea, West New Britain Province for area 0.1 Ha, Survey Plan Catalogue 17/141; dated 5 April 2007 for 99 years.</li> <li>- Hargy Beach Front, Portion 1054: State Lease Hargy Oil Palms Limited Portion 1054, Milinch Ulawun, Fourmil Talasea, West New Britain Province for area 0.1 Ha, Survey Plan Catalogue 17/146; dated 5 April 2007 for 99 years.</li> <li>- Hargy Beach Front, Portion 1055: State Lease Hargy Oil Palms Limited Portion 1055, Milinch Ulawun, Fourmil Talasea, West New Britain Province for area 0.1 Ha, Survey Plan Catalogue 17/149; dated 5 April 2007 for 99 years.</li> <li>- Wharf and Under Water, Portion 1494: Lease for Papua New Guinea Harbours Board, Portion 1494, Milinch Ulawun, Fourmil Talasea, West New Britain Province; dated 27 October 1991 for 99 years.</li> <li>- Adjacent Area 6, Portion 2045: State Lease Hargy Oil Palms Limited Portion 2045, Milinch Ulawun, Fourmil Talasea, West New Britain Province for area 364 Ha, Survey Plan Catalogue 15/811; dated 20 June 2014 for 99 years.</li> <li>- Bush Camp, Portion 2044: State Lease Hargy Oil Palms Limited Portion 2044, Milinch Ulawun, Fourmil Talasea, West New Britain Province for area 18.372 Ha, Survey Plan Catalogue 15/811; dated 20 June 2014 for 99 years.</li> <li>- Barema Estate, Portion 2038: State Lease Hargy Oil Palms Limited Portion 2038, Milinch Ulawun, Fourmil Talasea, West New Britain Province for area 2,900 Ha, Survey Plan Catalogue 15/773; dated 1 August 2002 for 99 years.</li> <li>- Barema, Portion 1431: State Lease Yanaiwi Managu Portion 1431, Milinch Ulawun, Fourmil Talasea, West New Britain Province for area 5.79 Ha, Survey Plan Catalogue 15/540; dated 23 October 1980 for 99 years.</li> </ul>	
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		<p>For Hargy Estate, audit team reviewed that Hargy was still having the hectares for Ivule Estate which has been taken back by owners thus hectares have returned under smallholder area. In addition, there is 2 Ha difference at Hargy due to area not being replanted due to area being too steep.</p> <ul style="list-style-type: none"> <li>- Navo Estate, Portion 624: Agricultural Lease under Section 56, to Hargy Oil Palms Limited, dated 7 July 1983 valid for 99 years, Portion 624, Milinch Ulawun, Fourmil Talasea, area of 6,460 Ha, West New Britain Province. Land title completed with map scale 1:60,000 Survey Plan Catalogue No.15/147.</li> <li>- Navo Estate: Agricultural Lease under Section 56, to Hargy Oil Palms Limited, dated 17 February 2005 for 25 years, Portion 2040, Milinch Ulawun, Fourmil Talasea, area of 26 Ha, West New Britain Province. Land title completed with map scale 1:60,000 Survey Plan Catalogue No.15/932.</li> <li>- Pandi Estate: State Lease Sulvuse Estates Limited, Portion 1; Milinch Ulawun, Fourmil Talasea, East New Britain; Survey Plan Catalogue No. 25/181; for 383 Ha; date 21 February 2018 valid 99 years.</li> <li>- Pandi Estate, Portion 3: State Lease Hargy Oil Palms Limited Portion 3, Milinch Ulawun, Fourmil Talasea, East New Britain Province for area 146 Ha, Survey Plan Catalogue 15/946; dated 21 February 2018 for 99 years.</li> <li>- Sabalbala 2, Portion 6: State Lease Hargy Oil Palms Limited Portion 6, Milinch Ulawun, Fourmil Talasea, East New Britain Province for area 35 Ha, Survey Plan Catalogue 15/936; dated 21 February 2018 for 99 years.</li> <li>- Pandi, Portion 7: State Lease Hargy Oil Palms Limited Portion 7, Milinch Ulawun, Fourmil Talasea, East New Britain Province for area 65 Ha, Survey Plan Catalogue 15/935; dated 21 February 2018 for 99 years.</li> <li>- Pandi Estate: State Lease Gamupa Oil Palm Development, Portion 4; Milinch Ulawun, Fourmil Talasea, East New Britain; Survey Plan Catalogue No. 25/183; for 27.89 Ha; dated 21 February 2018 valid 99 years.</li> </ul>	
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		<ul style="list-style-type: none"> <li>- Pandi Estate: State Lease Gamupa Oil Palm Development, Portion 5; Milinch Ulawun, Fourmil Talasea, East New Britain; Survey Plan Catalogue No. 25/184; for 186.59 Ha; dated 21 February 2018 valid 99 years.</li> <li>- Pandi Estate: State Lease Gamupa Oil Palm Development, Portion 9; Milinch Ulawun, Fourmil Talasea, East New Britain; Survey Plan Catalogue No. 25/187; for 20.90 Ha; dated 21 February 2018 valid 99 years.</li> <li>- Pandi Estate: State Lease Gamupa Oil Palm Development, Portion 10; Milinch Ulawun, Fourmil Talasea, East New Britain; Survey Plan Catalogue No. 25/188; for 92.91 Ha; dated 21 February 2018 valid 99 years.</li> <li>- Pandi Estate: State Lease Gamupa Oil Palm Development, Portion 11; Milinch Ulawun, Fourmil Talasea, East New Britain; Survey Plan Catalogue No. 25/189; for 20.70 Ha; dated 21 February 2018 valid 99 years.</li> <li>- Pandi Estate: State Lease Gamupa Oil Palm Development, Portion 12; Milinch Ulawun, Fourmil Talasea, East New Britain; Survey Plan Catalogue No. 25/190; for 27.15 Ha; dated 21 February 2018 valid 99 years.</li> <li>- Pandi Estate: State Lease Gamupa Oil Palm Development, Portion 13; Milinch Ulawun, Fourmil Talasea, East New Britain; Survey Plan Catalogue No. 25/191; for 614 Ha; dated 21 February 2018 valid 99 years.</li> <li>- Portion 2071 Magalona: Located on state land. State Lease Title currently in the process of Registration and Issuance by the Lands Department. Sighted Notice of Acceptance of a Lease by a Successful Applicant for Portion 2071 Milinch Ulawun, Fourmil Talasea, West New Britain Province, 1 June 2021.</li> <li>- Pandi Estate: Certificate of Title Abunava Incorporated Land Group, Portion 2108C, Milinch Ulawun, Fourmil Talasea, West New Briatin; Survey plan catalogue No.15/1051; for 318 Ha Land name Sena, East Nakanai Local Level Government; dated 30 October 2017.</li> <li>- Portion 2077 Ibana: Certificate of Recognition of Incorporated Land Group Abunava Land Group Incorporated on 21 April 2016 for Portion 2077 based on Survey Plan Map Catalogue No.15/952. Currently In progress of meeting</li> </ul>	
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		<p>the requirements to apply for the registration and issuance of customary land title over Portion 2077 to Abunava ILG.</p> <ul style="list-style-type: none"> <li>- Pandi Estate: Special Agricultural and Business Lease for Vamukuma Land Group Inc., Portion 2062C, Milinch Ulawun, Fourmil Talasea, East New Britain; Survey Plan Catalogue No. 15/910; for 731 Ha; dated 13 August 2010 - valid 99 years.</li> <li>- Pandi Estate: State Lease Alaba Development Corporation Limited, Portion 2061; Milinch Ulawun, Fourmil Talasea, West New Britain; Survey Plan Catalogue No. 15/866; for 1,906.40 Ha; dated 13 November 2008 valid 99 years.</li> <li>- Portion 2091C Remaling: Certificate of Recognition of Incorporated Land Group Remailing Land Group Incorporated on 14 July 2017 for Portion 2091C based on Survey Plan Map Catalogue No.15/1008. Currently In progress of meeting the requirements to apply for the registration and issuance of customary land title over Portion 2091C to Remaling ILG.</li> </ul> <p>Sample of Smallholder’s Legal Ownership of the Land: Smallholder No.040618 Densuit Kebuliu</p> <ul style="list-style-type: none"> <li>- Application for a Replacement Title, for Portion 618, Banga, Fourmil Talasea, name Densuit Kebuliu. Circumstances of loss: Title was destroyed/misplaced by the decease owner himself. Declared in Bialla on 11 October 2021.</li> <li>- Transmission application (Death) for portion 618, Banga, Fourmil Talasea, West New Britain Province, by Transferee Joe Kembu, dated 3 July 2022. Completed with Statutory Declaration signed by Joe Kembu on 11 October 2021.</li> <li>- Statutory Declaration for portion 618, Banga, Fourmil Talasea, West New Britain Province by Applicant on behalf of Joe Kembu, dated 11 October 2021. The applicant stated that owners copy of land title was misplaced by decease holder and the applicant is the biological son of decease owner.</li> </ul>	
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		<ul style="list-style-type: none"> <li>- Land lease rental fee receipt No. R00001310395 on behalf of Joe Kembu (Portion 618, Banga, Fourmil Talasea, West New Britain Province) date 10 June 2021 with total payment PGK 100.</li> </ul> <p>Smallholder No.041184 Ephraim Saibubu</p> <ul style="list-style-type: none"> <li>- Land Application for Portion 1184 Sale Malasi Subdivision, Milinch/Banga, Fourmil Talasea – West New Britain Province from Division of Lands and Physical Planning of West New Britain Province on 1 September 2016.</li> <li>- Application or Tender Form to Department of Lands and Physical Planning. Advertisement Number N/A (Notice Under Sec.69 (2) 01) Land Act 1996). Application on Behalf of Ephraim Saibubu; Occupation Subsistence Farmer; Address C/I BOPGA PO BOX 344; Type of Lease applied Agricultural Lease; Proposed Purpose: already developed 4 hectares of the land with 960 oil palms. Description of Land Portion 1184 Sale Malasi Subdivision, Milinch/Banga, Fourmil Talasea – West New Britain Province.</li> <li>- Official receipt of land application fee from provincial treasury office – Kimbe on behalf of Ephraim Saibubu. Total payment PGK 50.00. Receipt Number C02-0521116 on 15 August 2016.</li> </ul> <p>Smallholder No.041186 Ephraim Suluvi</p> <ul style="list-style-type: none"> <li>- Land Application for Portion 1186 Sale Malasi Subdivision, Milinch/Banga, Fourmil Talasea – West New Britain Province from Division of Lands and Physical Planning of West New Britain Province on 15 August 2016.</li> <li>- Application or Tender Form to Department of Lands and Physical Planning. Advertisement Number N/A (Notice Under Sec.69 (2) 01) Land Act 1996). Application on Behalf of Ephraim Suluvi; Occupation Subsistence Farmer; Address C/I BOPGA PO BOX 344; Type of Lease applied Agricultural Lease; Proposed Purpose: already developed 3 hectares of the land with 720 oil</li> </ul>	
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		<p>palms. Description of Land Portion 1186 Sale Malasi Subdivision, Milinch/Banga, Fourmil Talasea – West New Britain Province.</p> <ul style="list-style-type: none"> <li>- Official receipt of land application fee from provincial treasury office – Kimbe on behalf of Ephraim Suluvi. Total payment PGK 50.00. Receipt Number C02-052069 on 12 August 2016.</li> </ul> <p>Smallholder No.050178 Tovole Lopi</p> <ul style="list-style-type: none"> <li>- Agricultural Lease under Section 56, to Lava Mioge, dated 29 July 1965, Portion 178, Banga, Fourmil Talasea, area of 17 Acres, West New Britain Province. Land title completed with map.</li> <li>- Transmission application (Death) for Portion 178, Banga, Fourmil Talasea, West New Britain Province, by Transferee Tovole Lopi, dated 4 June 2022. Completed with Statutory Declaration signed by Tovole Lopi on 4 June 2022.</li> <li>- Statutory Declaration for portion 178, Banga, Fourmil Talasea, West New Britain Province by Applicant on behalf of Tovole Lopi, dated 4 June 2022. The applicant stated that he is the first biological son and the eldest son of late decease holder and the applicants will all of his siblings have agreed and consented for Tovole Lopi to as next kin.</li> <li>- Land Lease rental receipt No. G677186 on 3 May 2022 for payment of land Portion 178, Banga, Fourmil Talasea, West New Britain Province. Total payment PGK 1,700.00.</li> </ul> <p>Smallholder No.020949 Gabriel Banban</p> <p>Agricultural Lease under Section 56, to Gabriel Banban, dated 20 September 1979, Portion 949, Milinch Ulawan, Fourmil Talasea, area of 6.73 Ha, West New Britain Province. Land title completed with map.</p> <p>Smallholder No.0021078 Bernard Saisum</p>	
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		<ul style="list-style-type: none"> <li>- Agricultural Lease under Section 56, to Tumbe Anime, dated 24 November 1978, Portion 1078, Milinch Ulawan, Fourmil Talasea, area of 6.53 Ha, West New Britain Province. Land title completed with map.</li> <li>- Land Transfer Journal issued by Division of Lands on 15 May 2013 for land transferred (Portion 1078, Milinch Ulawan, Fourmil Talasea, West New Britain Province) on behalf of seller Alphonse Kokia to buyer Bernard Saisum.</li> <li>- Statutory Declaration for Portion 1078, Milinch Ulawan, Fourmil Talasea, West New Britain Province by applicant on behalf of Alphonse Kokia, dated 3 May 2013. The applicant stated that he willing to sell the block at the price 85,000 Kina to purchaser on behalf Bernard Saisum.</li> <li>- Contract of Sales the Land that issued by Department of Agriculture and Livestock on 15 May 2013 between vendor Alphonse Kokia to purchaser Bernard Saisum over Portion 1078, Milinch Ulawan, Fourmil Talasea, West New Britain Province.</li> <li>- Lease Ownership Change - Portion 1078, Milinch Ulawan, Fourmil Talasea, West New Britain Province issued by Oil Palm Industry Corporation on 11 July 2013.</li> </ul> <p>Smallholders 350061 Parfrey Peni, CLUA on state land 2Ha. Now applying for land title.</p> <ul style="list-style-type: none"> <li>- East Nakanai Local Level Government issued letter with subject: Authorization for Temporary Use of Government Land for VOP Oil Palm Plantings – Portion 11 &amp; Lot 21 Section 29 (Town of Bialla), Milinch of Ulawun, Forumil Talasea, West New Britain – dated 14 May 2021. “As stipulated under Section 4 of Lands Act 1996, the East Nakanai Local Level Government as a lower arm of the state government is the custodian over the portion of land Portion 11 &amp; Lot 21 Section 29 (Town of Bialla), Milinch Ulawun, Fourmil Talasea covering a total area of 23.09 Ha and 21.96 Ha respectively on which the nine (9) VOP have been established. We therefore give temporary Authorization to Use The Land for the sole intended purpose</li> </ul>	
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		<p>agricultural activities until such time in future whereby the land will be recalled and reallocated for development purposes". Letter signed by East Nakanai LLG Manager and President.</p> <ul style="list-style-type: none"> <li>- West New Britain Province Physical Planning Board issued Notification of Determination of an Application for Planning Permission Decision Note Application No.PPN19-024/2021; Subject: Application of Non-Conforming Use of Vacant Government Land Portion 11, Bialla Town. The board considered and determined the application be: Approved with an extension of 5-10 years period depending also on the development of the town, dated 3 December 2021.</li> </ul> <p>No dispute during cultivation, no dispute currently.</p> <p>Smallholders 010188 Kangi Waguo, LSS 7.5Ha (planted oil palm 6Ha). Land title available for 99 years.</p> <ul style="list-style-type: none"> <li>- Agricultural Lease under Section 56, to Kangi Waguo, dated 17 November 1977, Portion 188, Milinch Nakanai, Fourmil Talasea, area of 7.5 Ha, West New Britain Province. Land title completed with map.</li> <li>- Transmission Application (Death) for portion 188, Milinch Nakanai, Fourmil Talasea, West New Britain Province, by Decease proprietor Kangi Waguo to Applicant Anton Kangi, dated 9 January 2020. Completed with Statutory Declaration; Statutory Declaration to transfer the land title from Kangi Waguo to his eldest son Anto Kangi on 9 January 2020.</li> </ul> <p>Smallholders 010272 Suarua Elias, LSS 6 Ha.</p> <ul style="list-style-type: none"> <li>- Survey Plan Portion 272-278, Catalogue 15/307.</li> <li>- Application for Replacement Title Portion 272, Milinch Nakanai, Fourmil Talasea, West New Britain Province, Name Owner Binadik Suarua – Statutory Declaration Title lost/misplaced by the deceased owner. Submitted by Elias Suarua on 4 July 2022.</li> </ul>	
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		<p>Smallholders 010220 Justina Pali, LSS 7.15Ha (planted 6Ha). Land title available for 99 years.</p> <ul style="list-style-type: none"> <li>- Agricultural Lease under Section 56, to Salkut Guvira, dated 18 January 1984, Portion 220, Milinch Nakanai, Fourmil Talasea, area of 7.15 Ha, West New Britain Province. Land title completed with map. Recorded transfer to Justina Palin on 25 August 2010.</li> </ul> <p>Smallholders 331994 Uma Tasim, LSS 7Ha. Land title available for 99 years.</p> <ul style="list-style-type: none"> <li>- Agricultural Lease under Section 49, to Uma Tasim, dated 25 March 1993, Portion 1994, Milinch Ulawun, Fourmil Talasea, area of 7 Ha, West New Britain Province. Land title completed with map. No dispute during cultivation, no dispute currently.</li> </ul> <p>Smallholders 331982 Henry Marita, LSS 7Ha.</p> <ul style="list-style-type: none"> <li>- Inspection Report for Portion 1982, Milinch of Ulawun, Fourmil of Talasea, West New Britain Province, applicant Henry Marita, for land area 7 Ha as delineated on the survey plan catalogue No.15/630, location of subject property is located at Kabaiya LSS subdivision. Phase 1 – 200 palm trees covering 2 Ha planted in year 1998; Phase 2 – 200 palm trees covering 2 Ha planted in year 2006.</li> <li>- Survey Plan Portion 1982, Catalogue 15/630.</li> <li>- Application or Tender Form, applicant Henry Marita, submitted in 4 July 2022.</li> </ul> <p>Ela Lumkere Enterprise as landowner holding land title and sub lease to smallholder:</p> <ul style="list-style-type: none"> <li>- Ela Lumkere has incorporated their business: Certificate of Registration Business Name under Ela Lumkere Enterprise No.6-18707 daetd 15</li> </ul>	
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		<p>September 1994; Certificate of Incorporation Ela Lumkeere Enterprise No.1-128091 dated 21 September 2020.</p> <ul style="list-style-type: none"> <li>- Ela Lumkere has State Lease Title: State Lease Volume 16 Folio 91 for Portion 2039, Milinch Ulawun, Fourmil Talasea, West New Britain Province containing area of 351 Ha, from Survey Plan No.15/Catalogue 789. State lease for 99 years since 17 February 2005.</li> <li>- Ela Lumkere has agreement/sub lease with 39 smallholders to work on the said land parcels, sampled agreement: Memorandum of Agreement between Ela Lumkere Enterprise with James Koldup on 10 August 2019 – valid for 9 years. From this agreement, the sold FFB, the smallholder gets 70% and the landlord gets 30% (mobile card) from farmgate price.</li> </ul>	
	<p>4.4.1(a) For PNG, there are no written laws on customary land, but decisions are guided by customs of the landowning group or clan and documented in a CLUA (Customary Land Use Agreement) which is valid for one planting cycle only. Decisions on land use and distribution are normally done conventionally at the level of the clan and may vary from clan to clan. Individuals only have exclusive rights to use and occupy land based on verbal and mutual agreement, whilst undisputed outright ownership status of customary land is vested in the clan. Traditionally, clans decide on occupancy and user rights. One has to be a member of a land-owning group through custom in order to have access to land.</p>	<p>Sample of CLUA sighted and verified:</p> <ul style="list-style-type: none"> <li>- 101039 Ephraim Vorit: Clan Land Use Agreement No.101039 for Ephraim Vorit, to use the land known as Bubu and which allocated 2 Ha as the VOP Block of Matauru VOP area from representative of Uge Uge Clan; dated 9 May 2016 and period 12 years.</li> <li>- 380086 James Paulu: Clan Use Agreement No. 380086 on behalf of James Paulu from Nagoa Clan for 2 Ha land located in Tianepou. The agreement signed on 15 November 2016 for 12 years</li> <li>- 101080 Michael Rakua: Clan Land Use Agreement No.101080 for Michael Rakua, to use the land known as Maulili and which allocated 2 Ha as the VOP Block of Mataururu VOP area from representative of Uge Uge Clan; dated 13 May 2016 and period 13 years.</li> <li>- 101082 Michael Palia: Clan Land Use Agreement No.101082 for Michael Palia, to use the land known as Mailili and which allocated 2 Ha as the VOP Block of Mataururu</li> </ul>	

		<p>VOP area from representative of Uge Uge Clan; dated 13 May 2016 and period 12 years.</p> <ul style="list-style-type: none"> <li>- 350044 Jack Amos: Clan Land Use Agreement No.350044 for Jack Amos, to use the land known as Isoo Settlement and which allocated 2 Ha as the VOP Block of Ewase VOP area from representative of Uge Uge Clan; dated 5 August 2015 and period 14 years.</li> <li>- 101017 Mataururu United Church: Clan Land Use Agreement No.101017 for Mataururu United Church, to use the land known as Tarobi and which allocated 2 Ha as the VOP Block of Mataururu VOP area from representative of Uge Uge Clan; dated 9 May 2016 and period 10 years.</li> <li>- 111132 Robert Teia: Clan Land Use Agreement No.111132 for Robert Teia, to use the land known as Mamata and which allocated 2 Ha as the VOP Block of Kiava VOP area from representative of Kabulubulu Clan; dated 6 May 2016 and period 13 years.</li> <li>- 380042 Peter Bai: Clan Use Agreement No. 380042 on behalf of Peter Bai from Nagoa Clan for 2 Ha land located in Tianepou. The agreement signed on 15 November 2016 for 12 years</li> <li>- 111164 Ume Lowa: Clan Land Use Agreement No.111164 for Ume Lowa, to use the land known as Umu Umu and which allocated 2 Ha as the VOP Block of Kiava VOP area from representative of Kabulubulu Clan; dated 6 May 2016 and period 12 years.</li> <li>- 171737 Willy Mulai: Clan Land Use Agreement No.171737 for Willy Mulai, to use the land known as Halolo and which allocated 2 Ha as the VOP Block of Matililiu VOP area</li> </ul>	
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		<p>from representative of Uge Uge Clan; dated 18 October 2016 and period 5 years.</p> <ul style="list-style-type: none"> <li>- 380034 Thomas Toululu: Clan Use Agreement No. 380034 on behalf of Thomas Toululu from Nagoa Clan for 2 Ha land located in Tianepou. The agreement signed on 15 November 2016 for 12 years.</li> <li>- 171738 Paul Seria: Clan Land Use Agreement No.171738 for Paul Seria, to use the land known as Magege and which allocated 2 Ha as the VOP Block of Matililiu VOP area from representative of Babeka Clan; dated 27 October 2016 and period 7 years.</li> <li>- 120119 Kunai Gaa: Clan Land Use Agreement No.120119 for Joan Kunei Lolo, to use the land known as Urumaili and which allocated 2 Ha as the VOP Block of Gomu/Urumaili VOP area from representative of Kabulubulu Clan; dated 3 January 2021 and period 5 years.</li> <li>- Isidorah Paulo – 410034 Clan Use Agreement No. 410034 on behalf of Isidorah Paulo from Buali Clan for 2 Ha land located in Mauba. The agreement signed on 11 November 2016 for 12 years.</li> <li>- 121260 Rupen Balele: Clan Land Use Agreement No.121260 for Rupen Balele, to use the land known as Gacebu and which allocated 2 Ha as the VOP Block of Gomu VOP area from representative of Kabuliala Clan; dated 29 January 2020 and period 14 years.</li> <li>- 121203 Palibutu Tika: Clan Land Use Agreement No.121203 for Palibutu Tika, to use the land known as Sabekaka and which allocated 2 Ha as the VOP Block of Gomu VOP</li> </ul>	
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		<p>area from representative of Kabuliala Clan; dated 29 August 2016 and period 12 years.</p> <ul style="list-style-type: none"> <li>- 121218 Kit Walo: Clan Land Use Agreement No.121218 for Kit Walo, to use the land known as Urumaili and which allocated 2 Ha as the VOP Block of Urumaili VOP area from representative of Uge uge Clan; dated 14 May 2017 and period 25 years.</li> <li>- 121265 Moses Peni: Clan Land Use Agreement No.121265 for Moses Peni, to use the land known as Urumaili and which allocated 2 Ha as the VOP Block of Urumaili VOP area from representative of Kabulubulu Bulea Clan; dated 14 May 2017 and period 25 years.</li> <li>- Francis Patu Hilele – 380068 Clan Use Agreement No. 380068 on behalf of Francis Patu Hilele from Nagoa Clan for 2 Ha land located in Tianepou. The agreement signed on 15 November 2016 for 12 years.</li> <li>- 120112 Kiolly Delford: Clan Land Use Agreement No.120112 for Kiolly Delford, to use the land known as Kekeme and which allocated 2 Ha as the VOP Block of Gomu VOP area from representative of Kabulialala Clan; dated 29 August 2016 and period 22 years.</li> <li>- 121266 Kevin Gaa: Clan Land Use Agreement No.121266 for Kevin Gaa, to use the land known as Urumaili and which allocated 2 Ha as the VOP Block of Urumaili VOP area from representative of Kabulubulu Bulea Clan; dated 14 May 2017 and period 25 years.</li> <li>- 171738 Paul Seria: Clan Land Use Agreement No.171738 for Paul Seria, to use the land known as Magege and which allocated 2 Ha as the VOP Block of Matililiu VOP area</li> </ul>	
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		<p>from representative of Babeka Clan; dated 27 October 2016 and period 7 years.</p> <ul style="list-style-type: none"> <li>- 181845: Clan Land Use Agreement No.181845 for Rachael Kipoel, to use the land known as Gavaiva Land and which allocated 4 Ha as the VOP Block of Bubu VOP area from representative of Rosa rosa Clan; dated 27 October 2016 and period 7 years.</li> <li>- Muumata Independent Estate Clan Use Agreement No. 8800B for Muumata Oil Palm Estate to use the land known as La La Tasa which allocated 29 Ha as the Independent Estate area from representative of Abilimosi Muu Clan; dated 3 August 2020 and period 25 years.</li> </ul>	
	<p>4.4.1(b) For Solomon Islands, Customary Land may be recorded in accordance with the Customary Lands Record Act 1994 (as amended). This act provides for the Recording officer appointed by the National Records to determine the Customary Owners, the survey the land with maps to be held at the Central and other Land Record offices. Other mechanisms to manage Customary Land may be applied.</p> <p>Companies must be able to demonstrate that where they have leased customary land, they have negotiated with the recognised owners of the land or their authorised representatives and have observed full FPIC requirements in those negotiations with all required details being appropriately documented.</p>	<p>N/A</p>	
<p>4.4.2</p>	<p>Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:</p>	<p>According to interview with sample of smallholders, explained that for VOP smallholders the land status owned by Customary Land. Copies of documents evidencing that smallholders able to cultivate the land namely Clan Land Use Agreement (CLUA). From the sample of VOP smallholders visited, their</p>	<p>Complied</p>

		<p>acknowledge that CLUA was lease from customary land for various period, but mostly one period of oil palm cycle (25 years).</p> <p>FPIC process was informed at the time of signing CLUA between Customary Head and smallholder.</p> <p>Agreement making process for use of Incorporated Land Group/ILG as part of lease-lease back process. Communication to landlord:</p> <ul style="list-style-type: none"> <li>- Hargy Oil Palms Limited demonstrated stakeholder communication record to Abulbai (Alangily) Land Group, Andrew Niu, Paul Galia on 10 June 2015. Discussion related to land group capacity, land group spinoff business, awarding of local contract.</li> <li>- Hargy Oil Palms Limited demonstrated stakeholder communication record to Abulbai (Alangily) Land Group, Theodore Paulus, Andrew Niu, Cosmas Gabu on 16 February 2016. Discussion related to machinery contract and delay in Land Lease Title for Alangily Estate.</li> </ul> <p>Sub-lease agreement:</p> <ul style="list-style-type: none"> <li>- Agriculture Sub-Lease between Sulvuse Estate Limited, and Hargy Oil Palms Limited to sub-lease the land for oil palm development and pay rental fee to the Landlord. The landlord will sublease Portion 01, Milinch Ulawun, Fourmil Talasea containing 383 hectares of which 291 hectares have been planted with oil palm and remaining 92 hectares is reserved as buffer zone area. The tenant to develop the land at its cost and pay annual rent of K75 per hectare per annum of plantable land, K20 per hectare on reserved land. Term of rental is 25 years since 26 January 2011. In addition, an addition to 10% royalty for the FFB harvested each month is due on 27<sup>th</sup> day of the following month. Signed by both parties 5 February 2019.</li> <li>- Hargy Oil Palms Limited demonstrate payment of Land Rental from Hargy Oil Palms Limited – period 2022 to Sulvuse Estate Limited of PGK 23,665. Payment made 3 January 2022.</li> </ul>	
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		- Bank transaction sighted through BSP from Hargy Oil Palms Limited to Sulvuse Estate of PGK 23,665.	
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 -	According to interview with sample of smallholders (LSS and VOP) and interview with landlords, explained that no unresolved issues/grievance arise related use of the land for oil palm crops within past 12 months. The company carry out field days in periodic time to gathering information from smallholders and villager. This is part of FPIC process that implement by the company. Communication to landlord: - Hargy Oil Palms Limited demonstrated stakeholder communication record to Abulbai (Alangily) Land Group, Andrew Niu, Paul Galia on 10 June 2015. Discussion related to land group capacity, land group spinoff business, awarding of local contract. - Hargy Oil Palms Limited demonstrated stakeholder communication record to Abulbai (Alangily) Land Group, Theodore Paulus, Andrew Niu, Cosmas Gabu on 16 February 2016. Discussion related to machinery contract and delay in Land Lease Title for Alangily Estate.	Complied
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 -	Hargy Oil Palms Limited made consultations and meeting with the Incorporated Land Groups and its member to discuss the terms for land's sublease agreement. Communication to landlord: - Hargy Oil Palms Limited demonstrated stakeholder communication record to Abulbai (Alangily) Land Group, Andrew Niu, Paul Galia on 10 June 2015. Discussion related to land group capacity, land group spinoff business, awarding of local contract. - Hargy Oil Palms Limited demonstrated stakeholder communication record to Abulbai (Alangily) Land Group, Theodore Paulus, Andrew Niu, Cosmas Gabu on 16 February 2016. Discussion related to machinery contract and delay in Land Lease Title for Alangily Estate.	Complied
4.4.2c	Evidence that the legal, economic, environmental and social implications of permitting operations on their land have been	HOPL has fully developed the leasehold land transferred from predecessors or through purchase and transfer of title. There will be no further own land	Complied

	<p>understood and accepted by affected communities, including the implications for the legal status of their land at the expiry of the unit of certification's title, concession or lease on the land.</p> <p>- Minor compliance -</p>	<p>expansion from HOPL. The development of the Bialla project inclusive of smallholders and sub-leasing from customary land (through the Leased Lease Back program with Incorporated Land Grouping (customary land) and incorporated companies (state lease)). The LLBs are land belongs to the clan. Therefore, in order to maintain the "FPIC" requirements, HOPL has developed the Land Negotiation Procedure to manage clan lands registration. The procedures provide guidance to the clan and the clan members shall discuss their user rights and interest of communal benefits and come to the consensus to incorporate land grouping (ILG).</p> <p>The land titles for lands that was developed by HOPL are available and kept onsite. Communication to landlord:</p> <ul style="list-style-type: none"> <li>- Hargy Oil Palms Limited demonstrated stakeholder communication record to Abulbai (Alangily) Land Group, Andrew Niu, Paul Galia on 10 June 2015. Discussion related to land group capacity, land group spinoff business, awarding of local contract.</li> <li>- Hargy Oil Palms Limited demonstrated stakeholder communication record to Abulbai (Alangily) Land Group, Theodore Paulus, Andrew Niu, Cosmas Gabu on 16 February 2016. Discussion related to machinery contract and delay in Land Lease Title for Alangily Estate.</li> </ul> <p>Sub-lease agreement:</p> <ul style="list-style-type: none"> <li>- Agriculture Sub-Lease between Sulvuse Estate Limited, and Hargy Oil Palms Limited to sub-lease the land for oil palm development and pay rental fee to the Landlord. The landlord will sublease Portion 01, Milinch Ulawun, Fourmil Talasea containing 383 hectares of which 291 hectares have been planted with oil palm and remaining 92 hectares is reserved as buffer zone area. The tenant to develop the land at its cost and pay annual rent of K75 per hectare per annum of plantable land, K20 per hectare on reserved land. Term of rental is 25 years since 26 January 2011. In addition, an addition to 10% royalty for the FFB harvested each month is due on 27<sup>th</sup> day of the following month. Signed by both parties 5 February 2019.</li> </ul>	
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		<ul style="list-style-type: none"> <li>- Hargy Oil Palms Limited demonstrate payment of Land Rental from Hargy Oil Palms Limited – period 2022 to Sulvuse Estate Limited of PGK 23,665. Payment made 3 January 2022.</li> <li>- Bank transaction sighted through BSP from Hargy Oil Palms Limited to Sulvuse Estate of PGK23,665.</li> </ul>	
4.4.3	<p><b>(C)</b> Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities).</p> <p>- Critical (Major) compliance -</p>	<p>Unit of Certification HOPL is maintaining maps of the Customary lands that are being lease leased back from the clan owners for Plantations.</p> <ul style="list-style-type: none"> <li>- Map of Bakada Plantation (Pandi Estate), Scale 1:15,000</li> <li>- Map of Atata Plantation (Navo Estate), Scale 1 : 17,000</li> <li>- Map of Barema Plantation (Hargy Estate), Scale 1 : 18,000</li> <li>- Map of Bialla Project, Scale 1 : 115,000.</li> </ul> <p>The overall map covering the entire Lands that are leased by HOPL is available and HOPL maintained its’ own GIS team to managed the mapping. The assessment team had verified the availability of the maps.</p>	Complied
4.4.4	<p>All relevant information is available in appropriate forms and the English language, including assessments of impacts, proposed benefit sharing, and legal arrangements. Explanatory documentation may be provided in Tok Pisin in PNG or Solomon Pijin in the Solomon Islands and verbal presentation may be made in those languages.</p> <p>- Minor compliance -</p>	<p>Policies and other relevant information is provide in bilingual (English and Tok Pisin). All documented relevant information and records are disseminated on notice board at each operation unit (Mill and Estates).</p>	Complied
4.4.5	<p><b>(C)</b> Evidence is available to show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose.</p> <p>- Critical (Major) compliance -</p>	<p>According to interview with sample of smallholders (LSS and VOP), explained that communities are represented by community leader for any issues raise or they can choose freely to select legal counsel. However, based on stakeholder consultation there is no unresolved issues/grievance arise within past 12 months.</p>	Complied
4.4.6	<p>There is evidence that implementation of agreements negotiated through FPIC is reviewed in consultation with affected parties</p>	<p>HOPL has fully developed the leasehold land transferred from predecessors or through purchase, through sub-lease agreement and transfer of title. There will</p>	Complied

	<p>midway through the term of the agreement however regular communication between the parties is encouraged through the duration of the agreement.</p> <p>- Minor compliance -</p>	<p>be no further own land expansion from HOPL. The development of the Bialla project inclusive of smallholders and sub-leasing from customary land (through the Leased Lease Back program with Incorporated Land Grouping (customary land) and incorporated companies (state lease Therefore, in order to maintain the "FPIC" requirements, HOPL has developed the Land Negotiation</p> <p>Communication to landlord:</p> <ul style="list-style-type: none"> <li>- Hargy Oil Palms Limited demonstrated stakeholder communication record to Abulbai (Alangily) Land Group, Andrew Niu, Paul Galia on 10 June 2015. Discussion related to land group capacity, land group spinoff business, awarding of local contract.</li> <li>- Hargy Oil Palms Limited demonstrated stakeholder communication record to Abulbai (Alangily) Land Group, Theodore Paulus, Andrew Niu, Cosmas Gabu on 16 February 2016. Discussion related to machinery contract and delay in Land Lease Title for Alangily Estate.</li> </ul> <p>Sub-lease agreement:</p> <ul style="list-style-type: none"> <li>- Agriculture Sub-Lease between Sulvuse Estate Limited, and Hargy Oil Palms Limited to sub-lease the land for oil palm development and pay rental fee to the Landlord. The landlord will sublease Portion 01, Milinch Ulawun, Fourmil Talasea containing 383 hectares of which 291 hectares have been planted with oil palm and remaining 92 hectares is reserved as buffer zone area. The tenant to develop the land at its cost and pay annual rent of K75 per hectare per annum of plantable land, K20 per hectare on reserved land. Term of rental is 25 years since 26 January 2011. In addition, an addition to 10% royalty for the FFB harvested each month is due on 27<sup>th</sup> day of the following month. Signed by both parties 5 February 2019.</li> </ul>	
<p><b>Criterion 4.5:</b> No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.</p>			
4.5.1	<p><b>(C)</b> Documents showing identification and assessment of demonstrable legal, customary and user rights are available.</p>	<p>HOPL has fully developed the leasehold land transferred from predecessors, through sub-lease agreement or through purchase and transfer of title. There</p>	<p>Not Applicable</p>

	- Critical (Major) compliance -	<p>will be no further own land expansion from HOPL. The development of the Bialla project inclusive of smallholders and sub-leasing from customary land (through the Leased Lease Back program with Incorporated Land Grouping (customary land) and incorporated companies (state lease)). Therefore, in order to maintain the "FPIC" requirements, HOPL has developed the Land Negotiation Procedure to manage clan lands registration. The procedures provide guidance to the clan and the clan members shall discuss their user rights and interest of communal benefits and come to the consensus to incorporate land grouping (ILG).</p> <p>The land titles for lands that was developed by HOPL are available and kept onsite.</p> <p>No new planting was developed by unit of certification within last 12 months.</p>	
4.5.2	<p><b>(C)</b> FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions, with all the relevant information and documents made available, with option of resourced access to independent advice through a documented, long-term and two-way process of consultation and negotiation.</p> <p>- Critical (Major) compliance -</p>	<p>HOPL has fully developed the leasehold land transferred from predecessors, through sub-lease agreement or through purchase and transfer of title. There will be no further own land expansion from HOPL. The development of the Bialla project inclusive of smallholders and sub-leasing from customary land (through the Leased Lease Back program with Incorporated Land Grouping (customary land) and incorporated companies (state lease)). Therefore, in order to maintain the "FPIC" requirements, HOPL has developed the Land Negotiation Procedure to manage clan lands registration. The procedures provide guidance to the clan and the clan members shall discuss their user rights and interest of communal benefits and come to the consensus to incorporate land grouping (ILG).</p> <p>The land titles for lands that was developed by HOPL are available and kept onsite.</p> <p>No new planting was developed by unit of certification within last 12 months.</p>	Not Applicable
4.5.3	Evidence is available that affected local peoples understand they have the right to say 'no' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up	<p>According to interview with sample of smallholders (LSS: 031472, 311507, 031306, 050178, 050204, 041184, 041186, 010188 and VOP: 350061, 101080, 171738, 181845, 121266, 171737, 101039), explained that the company conduct initial discussion prior to develop their land. The discussion is aim to</p>	Not Applicable

	<p>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>information gathering and associated consultations. Transparency is implemented during this session and no forced action are taken.</p> <p>At the time, no new development after 15 November 2018 in scope of certificate holder.</p>	
4.5.4	<p>To ensure local food and water security, as part of the FPIC process, participatory SEIA and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of the land allocation process.</p> <p>- Minor compliance -</p>	<p>According to interview with sample of smallholders (LSS: 031472, 311507, 031306, 050178, 050204, 041184, 041186, 010188 and VOP: 350061, 101080, 171738, 181845, 121266, 171737, 101039), explained that the company conduct initial discussion prior to develop their land. The discussion is aim to information gathering and associated consultations. Transparency is implemented during this session and no forced action are taken.</p> <p>At the time, no new development after 15 November 2018 in scope of certificate holder.</p>	Not Applicable
4.5.5	<p>Evidence is available that the affected communities and rights holders have had the option to access to information and advice that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands.</p> <p>- Minor compliance -</p>	<p>Communication to landlord:</p> <ul style="list-style-type: none"> <li>- Hargy Oil Palms Limited demonstrated stakeholder communication record to Abulbai (Alangily) Land Group, Andrew Niu, Paul Galia on 10 June 2015. Discussion related to land group capacity, land group spinoff business, awarding of local contract.</li> <li>- Hargy Oil Palms Limited demonstrated stakeholder communication record to Abulbai (Alangily) Land Group, Theodore Paulus, Andrew Niu, Cosmas Gabu on 16 February 2016. Discussion related to machinery contract and delay in Land Lease Title for Alangily Estate.</li> </ul>	Not Applicable
4.5.6	<p>Evidence is available that the communities (or their representatives) gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator</p> <p>- Minor compliance -</p>	<p>Communication to landlord:</p> <ul style="list-style-type: none"> <li>- Hargy Oil Palms Limited demonstrated stakeholder communication record to Abulbai (Alangily) Land Group, Andrew Niu, Paul Galia on 10 June 2015. Discussion related to land group capacity, land group spinoff business, awarding of local contract.</li> <li>- Hargy Oil Palms Limited demonstrated stakeholder communication record to Abulbai (Alangily) Land Group, Theodore Paulus, Andrew Niu, Cosmas Gabu</li> </ul>	Not Applicable

		on 16 February 2016. Discussion related to machinery contract and delay in Land Lease Title for Alangily Estate.	
4.5.7	New lands will not be acquired for plantations and mills after 15 November 2018 as a result of recent (2005 or later) expropriations in the national interest without consent (eminent domain), except in cases of smallholders benefitting from agrarian reform or anti-drug programmes. - Minor compliance -	No new development as a result of expropriations in the national interest after 15 November 2018 in scope of certificate holder. Not applicable.	Not Applicable
4.5.8	<b>(C)</b> New lands are not acquired in areas inhabited by communities in voluntary isolation unless a full FPIC process has been undertaken with recognised community representatives and their right to use the land is verified in accordance with 4.4.1. - Critical (Major) compliance -	No new development after 15 November 2018 in scope of certificate holder.	Not Applicable
<b>Criterion 4.6:</b> Any negotiations Concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.			
4.6.1	<b>(C)</b> A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place. - Critical (Major) compliance -	HOPL demonstrates Land Negotiation Procedure: A Guide to Acquiring Land for Oil Palm Development was established with flow charts have been prepared for awareness session among stakeholders'/land owners concerning the process for establishing new blocks respectively in accordance with the lease-lease back and alienated land approaches.  - Hargy Oil Palms Limited demonstrated stakeholder communication record to Abulbai (Alangily) Land Group, Andrew Niu, Paul Galia on 10 June 2015. Discussion related to land group capacity, land group spinoff business, awarding of local contract.  - Hargy Oil Palms Limited demonstrated stakeholder communication record to Abulbai (Alangily) Land Group, Theodore Paulus, Andrew Niu, Cosmas Gabu on 16 February 2016. Discussion related to machinery contract and delay in Land Lease Title for Alangily Estate.	Complied

		<p>- Hargy Oil Palms Limited demonstrated letter on 11 October 2018, subject Agricultural Sublease Agreement for Execution: Sulvuse Oil Palm Plantation. HOPL has been utilize land owned by Sulvuse Estate Limited since 2011, however has not been formalised through an Agricultural Sublease Agreement due to lack of proper State Lease Title over Portion 1.</p>	
<p>4.6.2</p>	<p><b>(C)</b> A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. Distribution of monies within families is determined by the families.</p> <p><b>Guidance:</b> Where possible, Companies shall set up banking arrangements with the ILGs to provide for monies to be paid directly into members’ bank accounts at the agreed percentages to avoid the possibility of theft or diversion of funds.</p> <p>- Critical (Major) compliance -</p>	<p>The terms and condition for the agriculture leased lease back approached was established since 1996 by palm oil industry in PNG involving the Palm Oil Producer Association.</p> <p>The royalties’ percentage and PGK50 land rental for per hectare for production land was agreed by the industry. The land rental had increased over the years from PGK50 to PGK75 per Ha for production land and additional PGK20 per Ha is paid for buffer land.</p> <p>HOPL has developed the Land Negotiation Procedure: A Guide to Acquiring Land for Oil Palm Development that documented the Industry acceptance of the method to determine the leasing payment.</p> <p>Communication to landlord:</p> <ul style="list-style-type: none"> <li>- Hargy Oil Palms Limited demonstrated stakeholder communication record to Abulbai (Alangily) Land Group, Andrew Niu, Paul Galia on 10 June 2015. Discussion related to land group capacity, land group spinoff business, awarding of local contract.</li> <li>- Hargy Oil Palms Limited demonstrated stakeholder communication record to Abulbai (Alangily) Land Group, Theodore Paulus, Andrew Niu, Cosmas Gabu on 16 February 2016. Discussion related to machinery contract and delay in Land Lease Title for Alangily Estate.</li> </ul> <p>Sub-lease agreement:</p> <ul style="list-style-type: none"> <li>- Agriculture Sub-Lease between Sulvuse Estate Limited, and Hargy Oil Palms Limited to sub-lease the land for oil palm development and pay rental fee to the Landlord. The landlord will sublease Portion 01, Milinch Ulawun, Fourmil Talasea containing 383 hectares of which 291 hectares have been planted</li> </ul>	<p>Complied</p>

		with oil palm and remaining 92 hectares is reserved as buffer zone area. The tenant to develop the land at its cost and pay annual rent of K75 per hectare per annum of plantable land, K20 per hectare on reserved land. Term of rental is 25 years since 26 January 2011. In addition, an addition to 10% royalty for the FFB harvested each month is due on 27 <sup>th</sup> day of the following month. Signed by both parties 5 February 2019.	
4.6.3	Evidence is available that equal opportunities are provided to both men and women to hold land titles for small holdings in accordance with National law. - Minor compliance -	Equal opportunities are provided to men and women to hold land titles for smallholdings. Audit team made onsite interview with female smallholders. Ex: - Clan Land Use Agreement No.181845 for Rachael Kipoel, to use the land known as Gavaiva Land and which allocated 4 Ha as the VOP Block of Bubu VOP area from representative of Rosa rosa Clan; dated 27 October 2016 and period 7 years. - Smallholders 010220 Justina Pali, LSS 7.15Ha (planted 6Ha). Land title available for 99 years, as in Agricultural Lease under Section 56, to Salkut Guvira, dated 18 January 1984, Portion 220, Milinch Nakanai, Fourmil Talasea, area of 7.15 Ha, West New Britain Province. Land title completed with map. Recorded transfer to Justina Palin on 25 August 2010.	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 provided that the right to privacy and confidentiality is respected.. - Minor compliance -	Negotiation evidences has been verified. Samples of the execution on the payments as per the agreement were verified to be accordance to the MoUs signed between HOPL and land owners (ILGs, or incorporated companies). Agreement with consent from the lease-lease back program are available. Sample of the agreement verified including for: - Hargy Oil Palms Limited demonstrated letter on 11 October 2018, subject Agricultural Sublease Agreement for Execution: Sulvuse Oil Palm Plantation. HOPL has been utilize land owned by Sulvuse Estate Limited since 2011, however has not been formalised through an Agricultural Sublease Agreement due to lacn of proper State Lease Title over Portion 1.	Complied

		<ul style="list-style-type: none"> <li>- Hargy Oil Palms Limited demonstrated letter from East New Britain Provincial Administration Division of Lands &amp; Physical Planning, Subject Land Investigation Trip Report – Bakada Land Purchase dated 26 September 2013. Check on Alangili Portion 1, Milinch Ulawun, Fourmil Talasea, previously known as being Portion 2069 having a total land area of 385 Ha – both State Leases are vacant. Recent and registered Survey Plan Catalogue 15/935.</li> <li>- The lease holder/landlord demonstrate State Lease for Portion 1 Milinch Ulawun, Fourmil Talasea, in East New Britain Province of 383 Ha for catalogue 15/Folio 979 – granted to Sulvuse Estate Limited for 99 years since 21 February 2018.</li> <li>- Sulvuse Estate Limited demonstrated Certificate of Incorporation No.1-108306 dated 19 August 2022.</li> <li>- Agriculture Sub-Lease between Sulvuse Estate Limited, and Hargy Oil Palms Limited to sub-lease the land for oil palm development and pay rental fee to the Landlord. The landlord will sublease Portion 01, Milinch Ulawun, Fourmil Talasea containing 383 hectares of which 291 hectares have been planted with oil palm and remaining 92 hectares is reserved as buffer zone area. Signed by both parties 5 February 2019.</li> <li>- Hargy Oil Palms Limited demonstrated application fee to Internal Revenue Commission on 4 October 2019 of PGK 5,933.85.</li> <li>- Hargy Oil Palms Limited demonstrate payment of Land Rental from Hargy Oil Palms Limited – period 2022 to Sulvuse Estate Limited of PGK 23,665. Payment made 3 January 2022.</li> <li>- Bank transaction sighted through BSP from Hargy Oil Palms Limited to Sulvuse Estate of PGK23,665.</li> </ul>	
<p><b>Criterion 4.7:</b> Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.</p>			
4.7.1	<p><b>(C)</b> A mutually agreed procedure for identifying people entitled to compensation is in place.</p>	<p>There is a process for identifying those people entitled to compensation when customary land is involved, in line with Social and Environmental Impact</p>	<p>Complied</p>

	- Critical (Major) compliance -	Assessment. This system for determining compensation is defined in the PNG Lands Act. This development came about via the requests of the local people.	
4.7.2	<p><b>(C)</b> A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is in place and documented and made available to affected parties.</p> <p>- Critical (Major) compliance -</p>	<p>HOPL has procedure "Land Negotiation Procedure: A Guide to Acquiring Land for Oil Palm Development", issue #2 dated 25 March 2021.</p> <p>The procedure explaining type of land acquisition:</p> <ul style="list-style-type: none"> <li>- Alienated land</li> <li>- Customary land</li> <li>- Incorporated land groups</li> </ul> <p>A mutually agreed procedure for calculating and distributing fair compensation are describes within the procedure.</p>	Complied
4.7.3	<p>Communities that have lost access and rights to land for plantation expansion are given opportunities including employment and supply contracts to benefit from plantation development.</p> <p>- Minor compliance -</p>	<p>The compensation offered, based on the New Britain Palm Oil model, PGK20 hectare for vacant land (i.e. buffer zones/areas too steep to plant) and PGK75 hectare for planted areas. Additionally, there is a PGK15/hectare payment upon the signing of a sub-lease agreement. Added to this there is a royalty payment on the fruit which is 10% of the smallholder FFB price paid monthly. Furthermore, indirect compensation as people benefit from the new development via improved economy, paid employment, improved education facilities, housing, medical facilities, and better infrastructure as a result.</p>	Complied
<p><b>Criterion 4.8:</b> The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrate that they have legal, customary, or user rights.</p>			
4.8.1	<p>Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed compensation has been made to all people who held legal, customary, or user rights at the time of acquisition is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC.</p> <p><b>Guidance:</b> In some circumstances where FPIC was conducted many years ago, documented evidence of the process may not be</p>	<p>Based on interview with stakeholders and document review, there was no land acquisition by HOPL since the last assessment.</p>	Complied

	<p>available. In these cases, evidence of continuing agreement of all parties shall be regarded as evidence of resolution.</p> <p>- Minor compliance -</p>		
4.8.2	<p><b>(C)</b> Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms.</p> <p>- Critical (Major) compliance -</p>	<p>HOPL has established Grievance Mechanism (Doc. No.: PRO-COM-GEN- 001-06, Issue No.: 6 dated 25/03/2021), it was developed to provide a way to reduce risks from external stakeholders an effective channel for expressing concerns achieving remedies and promote a mutually constructive relationship with all relevant stakeholders and the company. Community Affairs Manager will be the primary interface between HOPL and any external stakeholders intending to raise their grievance. Business Development Officer form a centralized reporting, Grievance Tracking Database and will ensure all grievances are channeled to relevant departments. The target to response and provides feedback to 100% of grievances within 7 days dealing directly with the person raising the grievance.</p> <p>Based on interview with stakeholders, there is no land conflict present in area of HOPL.</p>	Complied
4.8.3	<p>Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use rights, these claims will be settled using the relevant requirements (Indicators 4.4.2, 4.4.3 and 4.4.4)</p> <p>- Minor compliance -</p>	<p>Based on interview with stakeholders and document review, there was no land acquisition by HOPL since the last assessment.</p>	Complied
4.8.4	<p>For any conflict or dispute over the land, the extent of the disputed area is mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable).</p> <p>- Minor compliance -</p>	<p>Based on interview with stakeholders and document review, there was no land acquisition by HOPL since the last assessment.</p>	Complied
<p><b>Principle 5: Support smallholder inclusion</b></p>			

<b>Criterion 5.1:</b> The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.					
5.1.1	Current and previous period prices paid for FFB are publicly available and accessible by smallholders. - Minor compliance -	Price sets together with OPIC on behalf of government. The price calculation carried out with consideration of the international palm product value price of CPO CIF Rotterdam price – See 5.1.3.  The FFB price are publicly available and accessible by smallholders in notice boards of HOPL smallholder offices, Village’s notice board, etc.  - Sighted FFB price for Mumata Independent Estate for period 13-16 July 2022 farm gate price at PGK 743.91/ton.	Complied		
5.1.2	<b>(C)</b> Evidence is available that the unit of certification explains the FFB pricing to smallholders on request from individual smallholders. - Critical (Major) compliance -	Hargy Oil Palms Limited established document FFB Price Calculation Mechanism – Communication, dated 14 May 2021. The document lines out the FFB price factors comprise of world price of oil, FOB factor, extraction ratio, exchange rate, 57% payout ratio (determined by national government through Palm Oil Board), levies, transport cost and sample of FFB price calculation. Hargy Oil Palms Limited made the document in Tok Pisin.  The company has made trainings/dissemination to smallholders with topic FFB price calculation. For instance, for Block 35 - 0065 has been conducted on 17 November 2021, and for Block 10 – 1081 (Mataururu Village) has been conducted 22 March 2022.  Based on interview with smallholders, they have understood the pricing mechanism and keep the records of FFB weighing and fortnightly payslips. For instance, based on the smallholder payslips (Godfrey Mainga No. 031303P) on 30 July 2022, has shown that the FFB were bought with price rate PGK 692.33/ton in farmgate. Smallholder said that there is no transparency issues related to the payment documentation.	Complied		
5.1.3	<b>(C)</b> Fair pricing, calculated as a portion of the international CPO price less costs is provided to smallholders in the supply base and documented. Premium pricing, when achieved for RSPO certified sustainable palm oil is also shared with Smallholders.	Hargy Oil Palms Limited provided evidence of monthly Smallholders FFB Price Calculations. For instance, the calculation for July 2022: <table border="1" data-bbox="1025 1302 1731 1353" style="margin-left: 20px;"> <tr> <td style="padding: 5px;">Variable</td> <td style="padding: 5px;">July 2022</td> </tr> </table>	Variable	July 2022	Complied
Variable	July 2022				

	<p>- Critical (Major) compliance -</p>	<table border="1"> <tr> <td>US\$ Price CPO Rotterdam</td> <td>USD 1,632.77</td> </tr> <tr> <td>US\$ Price for PKO Rotterdam</td> <td>USD 1,608.77</td> </tr> <tr> <td>Average extraction rate for CPO</td> <td>24.19%</td> </tr> <tr> <td>Average extraction rate for PKO</td> <td>1.98%</td> </tr> <tr> <td>Palm product value of 1MT of FFB US\$ to Kina (PGK)</td> <td>PGK 1,308.00</td> </tr> <tr> <td>Farmer pay out ratio at 57%</td> <td>PGK 745.56</td> </tr> <tr> <td>Add 1% VAT</td> <td>PGK 7.42</td> </tr> <tr> <td>Less OPRA Levy</td> <td>PGK -2.20</td> </tr> <tr> <td>Less Sexava Levy</td> <td>PGK -2.50</td> </tr> <tr> <td>Less OPIC Levy</td> <td>PGK -4.00</td> </tr> <tr> <td>Less VAT 10% OPIC Levy</td> <td>PGK -0.40</td> </tr> <tr> <td>Mill Gate Price</td> <td>PGK 743.91</td> </tr> <tr> <td>Less FFB transport cost</td> <td>PGK -51.58</td> </tr> <tr> <td>Farm Gate Price</td> <td>PGK 692.33</td> </tr> </table>	US\$ Price CPO Rotterdam	USD 1,632.77	US\$ Price for PKO Rotterdam	USD 1,608.77	Average extraction rate for CPO	24.19%	Average extraction rate for PKO	1.98%	Palm product value of 1MT of FFB US\$ to Kina (PGK)	PGK 1,308.00	Farmer pay out ratio at 57%	PGK 745.56	Add 1% VAT	PGK 7.42	Less OPRA Levy	PGK -2.20	Less Sexava Levy	PGK -2.50	Less OPIC Levy	PGK -4.00	Less VAT 10% OPIC Levy	PGK -0.40	Mill Gate Price	PGK 743.91	Less FFB transport cost	PGK -51.58	Farm Gate Price	PGK 692.33		
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<p>5.1.4</p>	<p><b>(C)</b> Evidence is available that all parties within the Unit of Certification, including women and independent representative organisations assisting smallholders where requested, are involved in decision-making processes and understand the basis on which their fruit is sold to the Companies. These include those involving finance, loans/credits, and repayments through FFB price reductions for replanting and or other support mechanisms where</p>	<p>Hargy has involved all parties including women in decision-making process. For instance, based on field observation and interview with Gomu Women Representative and female smallholders (Isidorah Paulo, Block Code 410034, Division 3 Mauba Area), it is known that she has been involved in decision making. The dissemination has been provided comprising FFB pricing and the calculation, payment terms including deduction.</p> <p>Other than that, the company's policy to strengthen the women involvement is to provide 'Mama Card' (wife's bank account and ATM card). In this Mama Card,</p>	<p>Complied</p>																													

	<p>applicable. To assist this, Companies include financial literacy information in their extension activities.</p> <p>- Critical (Major) compliance -</p>	<p>if the smallholder’s wife works as a loose fruit collector, the loose fruits will be weighed separately from the FFB. Then, the loose fruits payment will be sent to Mama Card account.</p> <p>In addition, HOPL support women in the community by providing financial literacy training, sewing training, etc.</p>	
5.1.5	<p>Contracts are fair, legal and transparent and have an agreed timeframe.</p> <p><b>Smallholder requirements:</b>            Smallholders must be able to verbally explain that they understand and observe their obligations and the obligations of the Company to whom they are selling their fruit.</p> <p>- Minor compliance -</p>	<p>There is no specific contract between smallholder and the company. Based on interview with sample of smallholders, as well as document review of weighing slips and payments slips, it can be concluded that Hargy Oil Palms Limited’s and OPIC extension officers has provided explanation on the FFB quality, FFB price and the calculation, payment terms including deduction.</p> <p>For instance, the smallholders can explain the items in payment slips, such as tonnage, levies (OPRA, OPIC, sexava/pest), farmgate price (if the company collect the FFB in farm), mill gate prices (if the smallholder brings the FFB to the Mill), loans, and net pay. They also have understood that the FFB shall be sold only to Hargy’s Mills, not to other unrecognize Mill or FFB transporter. The smallholder said that the documentation system is good in terms of transparency and details.</p> <p>For other local business such as loose fruit transporter named Earthworks Mowing Services (contract No. HOPL2022-12 dated 31 January 2022) also payment slips from Hargy, it can be concluded that the contract has been fairly made, legal, and transparent. The payments are conducted fortnightly in accordance with the contract.</p>	Complied
5.1.6	<p><b>(C)</b> Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given.</p> <p><b>Guidance:</b> Weight of FFB may be determined by weighing at the point of pick-up or by calculation of average bunch weight when weighed at the verified mill weighbridge. The organization managing the smallholders should determine the data used for payment and communicated to all smallholders.</p>	<p>The agreed payment time is fortnightly, and the receipts have specified variables of tonnage, levies (OPRA, OPIC, sexava/pest), farmgate price (if the company collect the FFB in farm), mill gate prices (if the smallholder brings the FFB to the Mill), loans, and net pay. They also have understood that the FFB shall be sold only to Hargy’s Mills, not to other unrecognize Mill or FFB</p>	Complied

	<p>- Critical (Major) compliance -</p>	<p>transporter. The smallholder said that the documentation system is good in terms of transparency and details, the payments are also on time fortnightly. For instance, based on the smallholder payslips (</p> <ul style="list-style-type: none"> <li>- Block No.0310303 Godfrey Mainga on 30 July 2022, has shown that the FFB were bought with price rate PGK 692.33/ton in farmgate (comply with July price).</li> <li>- Block 880013E – Mumata Independent Estate. FFB collected on 13-16 July 2022 of 19.94 MT; Paid PGK 14,833.56 from price PGK 743.91/MT FFB (farmgate price) x 19.94 MT and total deduction of PGK 51.58 (transport charge); payment made 17 July 2022.</li> </ul>	
<p>5.1.7</p>	<p>Weighbridges used for determining payment to smallholders are verified by an independent third party on a regular basis (this can be government). Other weighing equipment used may be calibrated using weights that are verified on the weighbridges. Records are maintained to provide an audit trail.</p> <p>- Minor compliance -</p>	<p>Weighbridges used for determining payment to smallholders are verified by Independent Consumer Competition Commission, that are:</p> <ul style="list-style-type: none"> <li>- For Hargy POM, the Independent Consumer Competition Commission – Certificate of Inspection No. ICC2278 dated 14 May 2022 for weighbridge model JAC 320 NUWEIGH capacity 60 tonnes. Next inspection date 14 May 2023.</li> <li>- For Barema POM, the Independent Consumer Competition Commission – Certificate of Inspection No. ICC2279 dated 14 May 2022 for weighbridge model R 420 RINSTRUM capacity 60 tonnes. Next inspection date 14 May 2023.</li> <li>- For Navo POM, the Independent Consumer Competition Commission – Certificate of Inspection No. ICC2280 dated 14 May 2022 for weighbridge model E1110 capacity 60 tonnes. Next inspection date 14 May 2023.</li> </ul> <p>All Hargy’s smallholder FFB trucks weighing scale have been calibrated regularly, for instance VC Truck Variance Form for Truck VC 20, dated 01 August 2022. High variance record (- 450 kg). The truck weigh checked and recalibrate faulty scale and tested OK.</p>	<p>Complied</p>

5.1.8	<p>The unit of certification supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material.</p> <p>- Minor compliance -</p>	<p>The smallholder in PNG is associated smallholder. There is no independent smallholder surrounding the company. The Internal Control System-function for associated smallholders was performed by HOPL in cooperation with OPIC.</p>	Complied
5.1.9	<p><b>(C)</b> The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner.</p> <p>- Critical (Major) compliance -</p>	<p>The company has implemented Procedure Grievance Mechanism No.PRO-SAD-GEN-001-06 dated 25 March 2021. Section 5 Performance Indicator stipulate that Response: the target is to provide a feedback to 100% of grievances within 7 days, dealing directly with the person raising the grievance. The company has maintained Grievances Logbook.</p> <p>There was a grievance from smallholder in 2021 regarding the FFB was not collected by the company. This grievance has been described refers to indicator 4.2.3.</p>	Complied
<p><b>Criterion 5.2:</b> The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.</p>			
5.2.1	<p>The Company consults with interested smallholders (irrespective of type) within the Unit of Certification, including women or other partners in their supply base, to assess their needs for support to improve their livelihoods and their interest in RSPO certification.</p> <p>- Minor compliance -</p>	<p>HOPL made regular consultation and communication meeting with interested smallholders within the unit of certification, including women. Consultation and communication performed in field day, where HOPL representative visit the village or smallholder area to assess their needs for support to improve their livelihoods and their interest in RSPO certification.</p> <p>Available records of field day such as attendance record and meeting agenda, facilitated by HOPL – PNGOPRA as follows:</p> <ol style="list-style-type: none"> <li>1. Malasi Area: Mini Field Day on 8 August 2021, facilitate by OPIC, PNG-OPRA, HOPL-SHAAS &amp; LANDS. Attended by 70 participants. The topic of the field day was related to: <ul style="list-style-type: none"> <li>➤ Production and Best Management Practices,</li> <li>➤ RSPO Principles &amp; Criteria,</li> <li>➤ Fertilizer, Pest and Disease</li> </ul> </li> </ol>	Complied

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		<ul style="list-style-type: none"> <li>➤ Land ownership requirements</li> <li>2. Malasi Area: Mini Field Day on 23 March 2022, facilitate by HOPL-SHAAS (Karen S. Rickian, Cleophas Gavuli and Paul Asei). Attended by 35 participants. The topic of the field day was related to:             <ul style="list-style-type: none"> <li>➤ FFB Price Calculation,</li> <li>➤ Best Management Practices,</li> <li>➤ Fertilizer and Mama Loose Fruit</li> </ul> </li> <li>3. Barema Section 2: RSPO Awareness and Block Inspection Report Training on 13 October 2021, facilitate by HOPL-SHAAS and Sustainability Department (Gabriel Peka, Stephanie Silik and Fidelis Hiamangi). Attended by 25 participants. The topic of the meeting was related to RSPO requirement (legal requirement, chemical usage, waste management, fire use, child labour, ethical conduct policy, buffer zone, RTE species) and Block Inspection Report awareness (block upkeep, fertilizer application, harvesting and road access).</li> <li>4. Barema Section 5 &amp; 6: RSPO Awareness and Block Inspection Report Training on 10 November 2021, facilitate by HOPL-SHAAS extension officer (Gabriel Peka). Attended by 24 participants. The topic of the meeting was related to RSPO requirement (legal requirement, chemical usage, waste management, fire use, child labour, ethical conduct policy, buffer zone, RTE species) and Block Inspection Report awareness (block upkeep, fertilizer application, harvesting and road access).</li> <li>5. Barema Section 9: Awareness Training of Production on 9 May 2022, facilitate by HOPL-SHAAS extension officer (Gabriel Peka). Attended by 24 participants. The topic of the meeting was related to Best Management Practices (harvesting, fertilizer application, tool &amp; chemical glyphosate and replanting).</li> <li>6. Sovula VOP: Awareness Training of Best Management Practices on 13 July 2021, facilitate by HOPL-SHAAS extension officer (Gabriel Peka). Attended</li> </ul>	
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		<p>by 24 participants. The topic of the meeting was related to Best Management Practices (fertilizer application, depletion and restoracion).</p> <p>7. Sovula VOP – Main Village Ground: RSPO Awareness and Block Inspection Report Training on 10 October 2021, facilitate by HOPL-SHAAS extension officer (Gabriel Peka). Attended by 37 participants. The topic of the meeting was related to RSPO requirement (legal requirement, chemical usage, waste management, fire use, child labour, ethical conduct policy, buffer zone, RTE species) and Block Inspection Report awareness (block upkeep, fertilizer application, harvesting and road access).</p> <p>8. Ole Village: RSPO Awareness and Best Management Practices Training on 18 July 2022, facilitate by HOPL-SHAAS extension officer (Michael Tony and Jude Vitikut). Attended by 22 participants. The topic of the meeting was related to RSPO requirement (ethical conduct, child labour, bell hevi/grievance procedure, fire watch, environmental protection, and chemical usage) and best management practices (block upkeep, fertilizer application, harvesting and replanting).</p> <p>9. Wilelo Section 12: Mini field day on 26 October 2021, facilitate by HOPL-SHAAS &amp; PMB - Kimbe. Attended by 31 participants. The topic of the field day was related to:</p> <ul style="list-style-type: none"> <li>➤ Chemical issuance and usage</li> <li>➤ Production</li> <li>➤ Health and safety</li> <li>➤ Fertilizer application</li> <li>➤ Pest and disease</li> </ul> <p>10. Wilelo LSS: RSPO Awareness Training on 12 July 2022, facilitate by HOPL-SHAAS extension officer (Alphonse Olemba) and HOPL-SHAAS manager (Morgane Commans). Attended by 18 participants. The topic of the meeting was related to RSPO Smallholders (ethical conduct policy, child</p>	
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		<p>labour, chemical usage, waste management, buffer zone, RTE species, new planting and replanting area and grievance procedure).</p> <ol style="list-style-type: none"> <li>11. Wilelo Community Hall: FFB Price Calculation Awareness Training on 13 December 2021, facilitate by HOPL-SHAAS (Karen S. Rickian, Cleophas Gavuli and Paul Asei) and HOPL-SHAAS extension officer (Alphonse Olemba). Attended by 48 participants. The topic of the field day was related to: FFB price calculation and grievance procedure.</li> <li>12. Gamupa VOP: RSPO Awareness Training on 5 June 2022, facilitate by HOPL-SHAAS extension officer and Sustainability Department Officer (Billy Werake and Fidelis Hiamangi). Attended by 48 participants. The topic of the meeting was related to RSPO Smallholders (ethical conduct policy, child labour, chemical usage, waste management, buffer zone, RTE species, new planting and replanting area and grievance procedure).</li> <li>13. Nantabu VOP: RSPO Awareness Training on 31 July 2022, facilitate by HOPL-SHAAS extension officer (Billy Werake). Attended by 24 participants. The topic of the meeting was related to RSPO Smallholders (ethical conduct policy, child labour, chemical usage, waste management, buffer zone, RTE species, new planting and replanting area and grievance procedure).</li> <li>14. Apupul Community Hall: FFB Price Calculation Awareness Training on 16 December 2021, facilitate by HOPL-SHAAS extension officer (John Ken) and HOPL-SHAAS Manager (Morgane Commans). Attended by 41 participants. The topic of the meeting was related to: FFB price calculation and grievance procedure.</li> <li>15. Urumaili Village: RSPO Awareness and Best Management Practices Training on 18 July 2022, facilitate by HOPL-SHAAS extension officer (Karen Rickian). Attended by 24 participants. The topic of the meeting was related to RSPO requirement (ethical conduct, child labour, bell hevi/grievance procedure, fire watch, environmental protection, and chemical usage) and best management practices (block upkeep, fertilizer application, harvesting and replanting).</li> </ol>	
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		<p>16. Sege Village: Awareness on New and Additional Plantings on 20 September 2021, facilitate by HOPL-SHAAS extension officer (Michael Tony). Attended by 33 participants.</p> <p>17. Soi Section 3 &amp; 4: Awareness Training of Crop Quality and Best Management Practices on 3 July 2022, facilitate by HOPL-SHAAS extension officer (Manuel Vikun and Joseph Meleskit) and HOPL-SHAAS Manager (Morgane Commans). Attended by 56 participants. The topic of the meeting was related to crop quality and Best Management Practices (path and circle weeding, pruning, frond stacking, cover crop planting).</p> <p>18. Soi Section 9: Awareness Training of Crop Quality and Best Management Practices on 26 June 2022, facilitate by HOPL-SHAAS extension officer (Manuel Vikun) and PNG-OPRA Officer (Charles Baleko). Attended by 32 participants. The topic of the meeting was related to fertilizer application.</p> <p>19. Soi Community: Awareness Training of Crop Quality and Best Management Practices on 5 January 2022, facilitate by HOPL-SHAAS extension officer (Manuel Vikun, Karen S. Rickian, Cleophas Gavuli and Gideon) and HOPL-SHAAS Manager (Morgane Commans). Attended by 36 participants. The topic of the meeting was related to RSPO Awareness and.</p> <p>20. Soi Section 6: Awareness Training on Best Management Practices on 15 June 2022, facilitate by HOPL-SHAAS extension officer (Manuel Vikun). Attended by 21 participants. The topic of the meeting was related to block upkeep (path and circle weeding, pruning, frond stacking, cover crop planting).</p> <p>21. Kabaya Section 2: RSPO Awareness and Best Management Practices Training on 27 October 2021, facilitate by HOPL-SHAAS extension officer (Andy Samuel and Temah Ima). Attended by 24 participants. The topic of the meeting was related to RSPO requirement (ethical conduct, child labour, bell hevi/grievance procedure, fire watch, environmental protection, and chemical usage) and best management practices (block upkeep, fertilizer application, harvesting and replanting).</p>	
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		<p>22. Muumata – Independent Estate: RSPO Policies and Best Management Practices Training on 3 August 2022, facilitate by HOPL-SHAAS extension officer (Billy Werake). Attended by 10 participants. The topic of the meeting was related to RSPO requirement (ethical conduct, child labour, bell hevi/grievance procedure, fire watch, environmental protection, and chemical usage) and best management practices (block upkeep, fertilizer application, harvesting and replanting).</p>	
<p>5.2.2</p>	<p>The Company and Government Extension Service provide extension services to support the development and implementation of livelihood improvement programmes, including capacity building to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Independent Smallholder Standard.</p> <p><b>PROCEDURAL NOTE:</b> The RSPO is currently developing a separate standard for Independent Smallholders to be referred to as the "RSPO Independent Smallholder Standard". A National Interpretation for PNG&amp;SI will be developed after the standard is ratified.</p> <p>- Minor compliance -</p>	<p>HOPL and OPIC provide extension services through SHAAS (Smallholder Agricultural Advisory Services) to support the development and implementation of livelihood improvement programmes, including capacity building. This SHAAS through Extension Officer provided smallholder growers with knowledge regarding best agricultural practices to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification. SHAAS Extension Officers are in charge of providing all necessary documentations and do the physical checks during the process.</p> <p>Sighted the record of SHAAS extension officers training as follows:</p> <p>Integrated Pest Management training on 31 March 2022 located in HOPL Training Room. Attended by 13 participants e.g Sustainability Department, Plantation Manager, HOPL-SHAAS Department, and OPRA Agronomist.</p> <p>Integrated Pest Meeting – TTI application on 19 July 2022 located in HOPL Board Room. Attended by 13 participants e.g General Manager, Head of Department Plantation, Sustainability Department, Plantation Manager, HOPL-SHAAS Department and OPRA Agronomist.</p> <p>Integrated Pest Meeting on 15 September 2021 located in HOPL Board Room. Attended by 12 participants e.g Head of Department Plantation, Sustainability Department, Plantation Manager, HOPL-SHAAS Department and OPRA Agronomist.</p>	<p>Complied</p>

<p>5.2.3</p>	<p>Where applicable, the Company and Government Extension Service provide extension services to Smallholders to enhance their understanding of the legal requirements for FFB production to maintain RSPO certification.</p> <p>- Minor compliance -</p>	<p>HOPL and OPIC assist smallholder in obtaining legal ownership of the land. For example:</p> <p>Sample of Smallholder’s Legal Ownership of the Land:</p> <ul style="list-style-type: none"> <li>• <b>Densuit Kebuliu – Malasi 040618</b> <ol style="list-style-type: none"> <li>1. Application for a Replacement Title, for Portion 618, Banga, Fourmil Talasea, name Densuit Kebuliu. Circumstances of loss: Title was destroyed/misplaced by the decease owner himself. Declared in Bialla on 11 October 2021.</li> <li>2. Transmission application (Death) for portion 618, Banga, Fourmil Talasea, West New Britain Province, by Transferee Joe Kembu, dated 3 July 2022. Completed with Statutory Declaration signed by Joe Kembu on 11 October 2021.</li> <li>3. Statutory Declaration for portion 618, Banga, Fourmil Talasea, West New Britain Province by Applicant on behalf of Joe Kembu, dated 11 October 2021. The applicant stated that owners copy of land title was misplaced by decease holder and the applicant is the biological son of decease owner.</li> <li>4. Land lease rental fee receipt No. R00001310395 on behalf of Joe Kembu (Portion 618, Banga, Fourmil Talasea, West New Britain Province) date 10 June 2021 with total payment 100 Kina.</li> </ol> </li> <li>• <b>Ephraim Saibubu – Malasi 041184</b> <ol style="list-style-type: none"> <li>1. Land Application for Portion 1184 Sale Malasi Subdivision, Milinch/Banga, Fourmil Talasea – West New Britain Province from Division of Lands and Physical Planning of West New Britain Province on 1 September 2016.</li> <li>2. Application or Tender Form to Department of Lands and Physical Planning. Advertisement Number N/A (Notice Under Sec.69 (2) 01) Land Act 1996). Application on Behalf of Ephraim Saibubu; Occupation Subsistence Farmer; Address C/I BOPGA PO BOX 344; Type of Lease</li> </ol> </li> </ul>	<p>Complied</p>
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		<p>applied Agricultural Lease; Proposed Purpose: already developed 4 hectares of the land with 960 oil palms. Description of Land Portion 1184 Sale Malasi Subdivision, Milinch/Banga, Fourmil Talasea – West New Britain Province.</p> <p>3. Official receipt of land application fee from provincial treasury office – Kimbe on behalf of Ephraim Saibubu. Total payment 50.00 Kina. Receipt Number C02-0521116 on 15 August 2016.</p> <ul style="list-style-type: none"> <li>• <b>Ephraim Suluvi – Malasi 041186</b> <ol style="list-style-type: none"> <li>1. Land Application for Portion 1186 Sale Malasi Subdivision, Milinch/Banga, Fourmil Talasea – West New Britain Province from Division of Lands and Physical Planning of West New Britain Province on 15 August 2016.</li> <li>2. Application or Tender Form to Department of Lands and Physical Planning. Advertisement Number N/A (Notice Under Sec.69 (2) 01 Land Act 1996). Application on Behalf of Ephraim Suluvi; Occupation Subsistence Farmer; Address C/I BOPGA PO BOX 344; Type of Lease applied Agricultural Lease; Proposed Purpose: already developed 3 hectares of the land with 720 oil palms. Description of Land Portion 1186 Sale Malasi Subdivision, Milinch/Banga, Fourmil Talasea – West New Britain Province.</li> <li>3. Official receipt of land application fee from provincial treasury office – Kimbe on behalf of Ephraim Suluvi. Total payment 50.00 Kina. Receipt Number C02-052069 on 12 August 2016.</li> </ol> </li> </ul> <p>All of this process was assisted by HOPL and OPIC.</p>	
5.2.4	<p><b>(C)</b> Evidence exists that pesticide handling training is available from the Company and/or Government Extension Service for Smallholders within the Unit of Certification. This may be verified by interview with the Smallholders.</p> <p>- Critical (Major) compliance -</p>	<p>HOPL provides pesticide handling training for smallholders. Sampled smallholders has Certificate of Herbicide Training, e.g.:</p> <ul style="list-style-type: none"> <li>- Smallholder No.101080 Michael Rakua has Certificate of Attendance, for Training on Agricultural Safety and Crop Spraying Methods at Mataururu</li> </ul>	Complied

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		<p>Village Subdivision of Bialla District, West New Britain Province, on 8 November 2020; valid for 3 years.</p> <ul style="list-style-type: none"> <li>- Smallholder No.101082, Isidor Mou (Brother in Law of Michael Palia) has Certificate of Attendance, for Training on Agricultural Safety and Crop Spraying Methods at Mataururu Village Subdivision of Bialla District, West New Britain Province, on 8 November 2020; valid for 3 years.</li> <li>- Smallholder No.350044, Jack Amos has Certificate of Attendance, for Training on Agricultural Safety and Crop Spraying Methods at Ewasse Village Subdivision of Bialla District, West New Britain Province, on 31 August 2020; valid for 3 years.</li> <li>- Smallholder No.111132, Robert Teia has Certificate of Attendance, for Training on Agricultural Safety and Crop Spraying Methods at Kiava Subdivision of Bialla District, West New Britain Province, on 3 March 2020; valid for 3 years.</li> <li>- Smallholder No.010220, Gibson Pali (son of Justina Pali) has Certificate of Attendance, for Training on Agricultural Safety and Crop Spraying Methods at Tiauru LSS Subdivision of Bialla District, West New Britain Province, on 29 September 2020; valid for 3 years.</li> <li>- Smallholder No.121203, David Palibatu (son in law of Palibutu Tika) has Certificate of Attendance, for Training on Agricultural Safety and Crop Spraying Methods at Urumaili Village Subdivision of Bialla District, West New Britain Province, on 2 October 2021; valid for 3 years.</li> <li>- Smallholder No.121218, Kit Walo has Certificate of Attendance, for Training on Agricultural Safety and Crop Spraying Methods at Urumaili Subdivision of Bialla District, West New Britain Province, on 2 October 2021; valid for 3 years.</li> </ul>	
5.2.5	<p>The unit of certification regularly reviews and publicly reports on the progress of the Smallholder support programme.</p> <p>- Minor compliance -</p>	<p>The progress of smallholder support reviewed annually. The last meeting was held on 19 July 2022 in HOPL Board Room. The meeting attended by General Manager, Head of Department Plantation, Sustainability Department, Plantation Manager, HOPL-SHAAS Department, OPRA Agronomist and OPIC</p>	Complied

		representatives. The meeting agenda discussing: minutes of previous meeting; Inward and outward correspondences; Project financial and physical report; Update and current balance – Sexava fund; Proposal on Debt Recovery Scale based on FFB price levels; Update Mama Loose Fruit Program; Smallholder extension – field days; Smallholder fertilizer application issue.	
<b>Principle 6: Respect workers’ rights and conditions</b>			
<b>Criterion 6.1:</b> Any form of discrimination is prohibited.			
6.1.1	<p><b>(C)</b> A publicly available non-discrimination and equal opportunity policy is implemented in such a way to prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age.</p> <p>- Critical (Major) compliance -</p>	<p>Equal Employment Opportunity Policy (Doc. No.POL-HRD-GEN-008-06, Issue No.6 dated 6 June 2022) was available where the company is committed to a non-discriminatory workplace and will abide by the relevant Anti-discrimination and Equal Employment laws and regulations of the countries where it operates. HOPL does not discriminate against anyone during recruitment or in the performance of its business operations. Recruitment selection process is based on merit with desired qualification and experience will be considered for the open position. Promotion and sanctions are handled on the same basis of non-discrimination. Employment of employees are based on medical fit and all of them are paying salary as per the legal requirement. Promotion of the employees will be based on the performance.</p> <p>Based on audit in Hargy Estate-Barema Plantation, management provide company policies awareness: Against Forced or Trafficked Labor Policy, Child Labor Policy, Equal Employment Opportunity Policy to 22 loose fruit collectors dated 20 July 2022.</p> <p>Based on audit in Navo Estate-Ibana Plantation, management provide company policies awareness: Communication Policy, Protection of Reproductive Rights, Equal Opportunity Policy to 18 harvesters, 7 sprayers, 16 loose fruit collectors, 7 truck drivers, 7 FFB loader and crews, and 2 upkeep workers dated 14 July 2022.</p>	Complied

		In Navo POM, management provides company Anti Discrimination policy awareness for 12 mill workers (Admin operator, lab analyst, weighbridge clerk, lab samplers) on 6 August 2022.	
6.1.2	<p><b>(C)</b> Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against. Evidence includes migrant workers' non-payment of recruitment fees.</p> <p>- Critical (Major) compliance -</p>	<p>Based on information collected during interview with sample of workers, there was no migrant workers at HOPL operation. Discrimination to the workers related job assignment was also absence within unit of certification.</p> <p>Therefore, no evidence that discrimination is apply within this certificate holder operation.</p>	Complied
6.1.3	<p>The unit of certification demonstrates that recruitment selection, hiring, access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available.</p> <p>- Minor compliance -</p>	<p>HOPL has developed Human Resource Operations Manual (Doc. No.: MAN-HRD-GEN-001-01, Issue No.: 1 dated 10 January 2021) and Equal Employment Opportunity Policy (Doc. No.: POL-HRD-GEN-008-06, Issue No.: 6 dated 7 June 2021) where the policy clearly stated that Recruitment selection process is based on merit with desired qualification and experience will be considered for the open position. Promotion and sanctions are handled on the same basis of non-discrimination. Initial review and screening based on criteria will be conducted by HR Recruitment Officer.</p> <p>Sampled records of promotion such as Staff Order – General with the details of appointment/ transfer with new grade level and basic wages included.</p> <p>Besides, reviewed the Staff Employment Form for the sampled recruitment on last 12 months found that the employment was based on capabilities and qualification. Medical check will be done prior the employment to ensure medical fit.</p>	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>Pregnancy testing conducted without any discrimination and it is performed when requested by the female workers. The pregnancy testing usually conducted at the clinic which located in every compound.</p>	Complied

6.1.5	<p><b>(C)</b> A Social Issues Committee (SOC) is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.</p> <p>- Critical (Major) compliance -</p>	<p>Hargy Oil Palms Limited have appointed a person for Social Issue Committee, Mrs. Margueritte Tracey Masing.</p>	Complied
6.1.6	<p>There is evidence of equal pay for the same work scope.</p> <p>- Minor compliance -</p>	<p>Reviewed the payslips for both gender, male and female workers found that they are paying the minimum basic rate, K2.80/ hour. The rate will be adjusted to higher depends on the job scope and the position. There is no discrimination of pay based on gender.</p>	Complied
<p><b>Criterion 6.2:</b> Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).</p>			
6.2.1	<p><b>(C)</b> Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions are available to the workers in the English language and verbally explained to them in language they understand.</p> <p>- Critical (Major) compliance -</p>	<p>HOPL has implemented Employee Handbook revised January 2015 where summary of employment conditions was clearly stated in the handbook such as hours of work, overtime, annual leave, sick days, housing, electricity, water, promotion, loans and advances, probation notice and maternity leave. Reviewed payslips where all types of work done and the deduction made by the company have stated in the payslips.</p> <p>Based on interview with Worker Union Head, it is known that Employee Handbook has been disseminated to workers.</p>	Complied
6.2.2	<p><b>(C)</b> Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed, including work done by family members.</p> <p>Family members who work must be employed to ensure that they have access to those benefits. Notwithstanding that, young children may assist their parents on Smallholder blocks provided it does not interfere with their schooling, their physical and emotional</p>	<p>Based on document review, the employment contract has regulated the elements of employment. For instance, the employment contract of Silvanie Ragie (oil room attendant Navo Mill) dated 9 March 2022, it has described clauses of:</p>	Complied

	<p>development and they are under the direct supervision of their parents.</p> <p>- Critical (Major) compliance -</p>	<ul style="list-style-type: none"> <li>- Position</li> <li>- Grade/ Level</li> <li>- Remuneration</li> <li>- Designation/Start Dates</li> <li>- Place of Recruitment</li> <li>- Working Hours</li> <li>- Working Schedule</li> <li>- Overtime</li> <li>- Annual Leave</li> <li>- Superannuation</li> <li>- Probationary Period</li> <li>- Maternity Leave</li> <li>- Housing</li> <li>- Medical Treatment</li> <li>- Termination of the agreement</li> </ul> <p>Based on interview with the workers in Mills and Estates, they said that they have sign the employment contracts. Once the contract is signed the Company retains a copy on file in the HR Office which is accessible to the employee should they request a copy at any time. Given the large number of employees, the lack of secure facilities within their housing compounds, the requirement for confidentiality and the high level of turnover experienced, especially in the lower grade levels this is process is far more practical and addressed the above risks.</p>	
6.2.3	<p><b>(C)</b> There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity</p>	<p>The legal compliance of employment regulations have been verified based on document review of payment slips, interview with workers, Worker Union, and Governmental Agencies. Based on verification, the working hours, overtime,</p>	Complied

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	<p>leave, reasons for dismissal, period of notice and other legal labour requirements.</p> <p>- Critical (Major) compliance -</p>	<p>rate per hour, are have adhered the regulation or employee handbook.</p> <p>For instance, in the payment slips of Michael Naure (Barema POM, ID 03053) and John Jefferey (Hargy POM, ID 01103), have describes the payment rate, normal work day, holiday work day, public holy day, overtime (x 1.5), overtime (x 2.0) shift allowance, taxes, employment superannuation insurance (Nasfund), and housing loan.</p> <p>Based on interview with workers in Mill and Estate/Plantation, it can be concluded that there is no issue related to the payments.</p>	
<p>6.2.4</p>	<p><b>(C)</b> The Company provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. National laws, or in their absence the ILO Guidance on Workers’ Housing Recommendation No. 115, are used. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5years) is allowed to upgrade the infrastructure. Smallholders may live in houses of traditional materials or other accommodation of their choosing.</p> <p>- Critical (Major) compliance -</p>	<p>Based on field observation to Hargy Estate – Barema Plantation, Navo Estate – Ibana Plantation, Pandi Estate – Bakada Plantation, Muumata Independent Estate (IE), it is known that the company and IE have provided housing, with sitation facilities, water supply, electricity (from solar cell in IE), gardening area to plant staple foods, clinics, and sport court. The educational amenities are using public/government schools located surrounding the plantations.</p> <p>The auditors found that the housing number in Hargy Estate – Barema Plantation, Navo Estate – Ibana Plantation, Pandi Estate – Bakada Plantation are not sufficient to cover the number of workers. For instance, there are some housed that are supposed to be occupied by 2 families in maximum but factually occupied by 3 until 4 families.</p> <p>The company has shown justifications, such as Housing Census in every plantation/mill, stated that the management has known that the housing number is not sufficient. Moreover, there are CAPEX (Capital Expenditure) program of 2022 to build new housing in Atata Compound, Navo Mill Compound. The housing CAPEX for other plantations will be programmed in 2023 and onward. This is because Hargy only have one Construction Division that do the project consecutively.</p> <p><b>Opportunity for Improvement (OFI)</b></p> <p>The company has provided educational facilities such as supporting teachers salary in public schools. Moreover, in some plantations, have been provided by school transports. However, the company has an opportunity for improvement</p>	<p>Complied</p>

		to provide more school transport for students, in particular, considering the grievance from parents in Navo region (dated 17 February 2022), requested for student transportation to Bialla Secondary School.																			
6.2.5	The unit of certification being the mill and Company operated plantations makes efforts to improve workers' access to adequate, sufficient and affordable food. - Minor compliance -	The company provides canteen in each compound as part of business of opportunities to the local community. The canteen management is by rental system to the local communities with the agreement. Based on interview and field observation, crops gardening field also allocated by the company in every housing/compound.	Complied																		
6.2.6	A DLW is paid to all workers, including piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours. <b>PROCEDURAL NOTE:</b> Where a GLWC living wage standard (benchmark), or one that fulfills the basic requirements of the RSPO-endorsed living wage methodology, has been established in the country or region of operation, the same should be used as benchmarks. In the absence of such benchmarks, the RSPO will collaborate with the GLWC and/or local experts on developing oil palm industry benchmarks <sup>1</sup> . These benchmarks will be developed in collaboration and consultation with relevant stakeholders such as palm oil industry members, workers' union, authorities and/or relevant organisations. For countries where no living wage standard is established, until such time that an RSPO endorsed benchmark for the country is in place, national minimum wages shall be paid to all workers. In addition to the payment of minimum wages, the Unit of Certification (UoC) shall conduct an assessment of the prevailing wages and in-kind benefits provided to workers in the Unit of Certification aligned with the RSPO Guidance for Implementing a Decent Living Wage.	HOPL has established the annual prevailing wage calculation to include all the in-kind benefits provided to the workers. The in-kind benefits for local workers are such as housing, electricity & water, education, healthcare, transport, food and sport & recreation facilities.  The recent prevailing wage calculation has been set on 21 July 2022, as follows:	Complied																		
		<table border="1"> <thead> <tr> <th>In kind benefits</th> <th>Local Worker (PGK)</th> </tr> </thead> <tbody> <tr> <td>Housing</td> <td>660.55</td> </tr> <tr> <td>Electricity and water</td> <td>75.15</td> </tr> <tr> <td>Education</td> <td>12.00</td> </tr> <tr> <td>Creche facilities</td> <td>0.00</td> </tr> <tr> <td>Health care</td> <td>73.02</td> </tr> <tr> <td>Transport</td> <td>11.90</td> </tr> <tr> <td>Food</td> <td>0.00</td> </tr> <tr> <td>Sport and recreation facilities</td> <td>21.33</td> </tr> </tbody> </table>	In kind benefits	Local Worker (PGK)	Housing	660.55	Electricity and water	75.15	Education	12.00	Creche facilities	0.00	Health care	73.02	Transport	11.90	Food	0.00	Sport and recreation facilities	21.33	
In kind benefits	Local Worker (PGK)																				
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Sport and recreation facilities	21.33																				

	<p>Once the benchmarks are available, this procedural note is no longer applicable. UoC shall have an implementation plan towards the payment of a DLW with specific targets, and a phased implementation process including:</p> <ul style="list-style-type: none"> <li>• Updated assessment on prevailing wages and in-kind benefits</li> <li>• There is annual progress on the implementation of living wages</li> <li>• 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</li> <li>• The UoC may to choose to implement the living wage payment in specific section as a pilot project; the pilot will then be evaluated and adapted before eventual scale up of the living wage implementation.</li> </ul> <p>- Minor compliance -</p>	<table border="1"> <tr> <td data-bbox="1025 362 1697 411">Total cost of in-kind benefit</td> <td data-bbox="1697 362 1957 411">853.95</td> </tr> <tr> <td data-bbox="1025 411 1697 461">Average monthly take home salary per worker</td> <td data-bbox="1697 411 1957 461">675.35</td> </tr> <tr> <td data-bbox="1025 461 1697 544">Total monthly remuneration (included benefits) per month</td> <td data-bbox="1697 461 1957 544">1,529.29</td> </tr> <tr> <td data-bbox="1025 544 1697 627">Total monthly remuneration (included benefits) per hour</td> <td data-bbox="1697 544 1957 627">8.02</td> </tr> </table>	Total cost of in-kind benefit	853.95	Average monthly take home salary per worker	675.35	Total monthly remuneration (included benefits) per month	1,529.29	Total monthly remuneration (included benefits) per hour	8.02	
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6.2.7	<p>Permanent, full-time employment is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal.</p> <p>- Minor compliance -</p>	<p>Based on document review, field observation, and interview in the Mills and Estates/Plantations, it is known that all core work such as harvester and main station workers are using full time workers. Temporary workers are limited to jobs that are temporary or seasonal, and there is no casual worker in the Mills and Estates.</p> <p>For smallholders, most of smallholders are cultivate their blocks by themselves and their families. For smallholders that employed harvester, it is considered temporary job, because the harvesting is conducted only two times in a months. Moreover, some harvesting time also can be conducted by smallholders/family member.</p>	Complied								
<p><b>Criterion 6.3:</b> The unit of Certification respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.</p>											

6.3.1	<p><b>(C)</b> A published statement recognising freedom of association and right to collective bargaining in national languages is available and is explained to all workers in languages that they understand and is demonstrably implemented.</p> <p>- Critical (Major) compliance -</p>	<p>Freedom of Association Policy No.POL-HRD-GEN-009-04, issued on 7 June 2021, issue No. 4. Bilingual: English and Tok Pisin language, that the company recognize the freedom of association and right to collective bargaining.</p> <p>The dissemination of the policy has been conducted through pamphlet in notification board located in housing complex, Estate/Plantation Office, and workplaces. Moreover, the dissemination has been conducted through annual dissemination/training. Based on the interview to workers in Mills and Estates/Plantations, as well as smallholders, it can be concluded that the company has disseminated regularly the policy of freedom association and the right to collective bargain. For instance, the recent dissemination related to freedom association conducted on:</p> <ul style="list-style-type: none"> <li>- Hargy Estate on 13 July 2022.</li> <li>- Pandi Estate – Bakada Plantation on 21 July 2022.</li> </ul> <p>Based on interview with workers in Mills and Estates, they have understood the company’s policy related to freedom of association and right to collective bargaining.</p> <p>Based on audit in Hargy Estate-Barema Plantation, management provide company policies awareness: Freedom of Association Policy, Protection of Reproductive Rights Policy, Sexual Harassment Policy to 18 harvesters and 11 female loose fruit collectors dated 14 July 2022.</p>	Complied
6.3.2	<p>Minutes of meetings between the unit of certification with trade unions or workers representatives, who are freely elected, are documented in national languages and made available upon request.</p> <p>- Minor compliance -</p>	<p>Based on interview with representative of Human Resource and Worker Union Head, the last meeting was conducted on 27 July 2021. For current period, there is no meeting yet due to the Worker Union is still manage to consolidate internal organization. There is no evidence that the company’s management interfere the Worker Union. Moreover, there is no regulation that the meeting should be conducted regularly, such as in a monthly basis.</p>	Complied
6.3.3	<p>Management does not interfere with the formation or operation of registered unions/ labour organisations or associations, or other</p>	<p>According to information from HR Department, the company gives freedom for association to all workers for joining any trade/worker union. Audit team received comment from Worker Union Head, he confuse on K2.00 deduction</p>	Complied

	<p>freely elected representatives for all workers including migrant and contract workers.</p> <p>- Minor compliance -</p>	<p>on his member’s payslip, which is for union levy. But some workers said that they felt disappointed because no actual program for union to support the worker, therefore, they resigned from the union.</p> <p>Audit team seeks confirmation from Hargy Oil Palms Limited. The response: The K2.00 Union fee is only deducted from the employee’s salary if the employee gives his/her authority by completing and signing the relevant Union Membership form provided by the Company Union Representative. The company facilitates on a fortnightly basis the payment of the fees to the Union bank account. As per the earlier statement, HOPL Management do not interfere with Union matters or influence an employee’s choices when it comes to their Freedom of Association.</p> <p>Based on field verification, it can be seen that the dissemination of the policy has been conducted through pamphlet in notification board located in housing complex, Estate/Plantation Office, and workplaces. Moreover, the dissemination has been conducted through annual dissemination/training. Based on the interview to workers in Mills and Estates/Plantations, as well as smallholders, it can be concluded that the company has disseminated regularly the policy of freedom association and the right to collective bargain.</p>	
<p><b>Criterion 6.4: Children are not employed or exploited.</b></p>			
<p>6.4.1</p>	<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>Organization has established and documented policy or the protection of children, including prohibition of child labour Policy on Child Labour (Doc. No. POL-HRD-GEN-007-06, Issue No.6 dated 7 June 2021).</p> <p>The company also has developed Human Resource Operations Manual (Doc. No. MAN-HRD-GEN-001-01, Issue No.1 dated 10 January 2021) where age verification will be the part of the process of recruitment. The age verification will be done as per the company’s Child Labour Policy. For instance, based on Staff Employment Form found that method of age verification is recorded such as through birth certificate, clinic book, national identity card or others such as best facial judgement or professional curriculum vitae.</p>	<p>Complied</p>

		In the service contract with Earthworks Mowing Services No. HOPL2022-12 dated 31 January 2022, has been stated that the contractor must adhere the employment legal requirement, including not employ the child labour. Based on interview with the contractors, he has understood the company's policy to not employ children.	
6.4.2	<p><b>(C)</b> There is evidence that minimum age requirements are met. Personnel files show that all workers are above the national minimum age or above company policy minimum age, whichever is higher. There is a documented age screening verification procedure which must be carried out by clinic or supervisory staff to be applied where other documentary evidence of date of birth is not available.</p> <p>- Critical (Major) compliance -</p>	<p>The HR Department has shown list of workers in Mills and Estates/Plantation that shows the date of birth and date of joining the company, therefore, it can be shown that there is no workers under 18 years old (minimum age in accordance to government regulation) when they join the company.</p> <p>For the one who the date of birth is can not be identified, the Officer in charge will use her/ his best judgement if there are no official documents for age verification. Employment could be refused in case of doubt during verification. Contractors, smallholders and other parties performing work for the company are to be informed on the policy. Reviewed the Services Agreement/ Contract for the contractors that provided services to the company confirmed that the employees must be 18 years or over. Based on field observation, it was not found a child labor in the field.</p>	Complied
6.4.3	<p><b>(C)</b> Young persons may be employed only for non- hazardous work, with protective restrictions in place for that work. Normally the minimum age for employment by the Company is 18 year however in certain circumstances such as school work experience, persons as young as 16 years may be employed. These persons are classified as Young Persons.</p> <p>- Critical (Major) compliance -</p>	<p>According to interview with sample of workers at Mill and Estates workers, the company following their policy that disallowing child labour (under 18 years old) employed in Hargy Oil Palm Limited.</p> <p>Dissemination information of this policy and employment requirement are through notification board and frequent awareness at the site by each supervisor. Based on field observation, it was not found a child labor in the field.</p>	Complied
6.4.4	<p>The Company demonstrates communication about its "no child labour" policy and the negative effects of child labour through notices at workers' housing compounds and Smallholder field days. It promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live.</p>	<p>The dissemination of no child labour policy has been conducted through pamphlet in notification board located in housing complex, Estate/Plantation Office, workplaces, and in Muumata Independent Estate Office. Moreover, the dissemination has been conducted through annual dissemination/training. Based on the interview to workers in Mills and Estates/Plantations, as well as smallholders, it can be concluded that the company has disseminated regularly</p>	Complied

	<p>- Minor compliance -</p>	<p>the policy of freedom association and the right to collective bargain. For instance, the recent dissemination related to no child labour conducted on:</p> <ul style="list-style-type: none"> <li>- Hargy Estate on 13 July 2022.</li> <li>- Pandi Estate – Bakada Plantation on 21 July 2022.</li> </ul> <p>Based on audit in Hargy Estate-Barema Plantation, management provide company policies awareness: Against Forced or Trafficked Labor Policy, Child Labor Policy, Equal Employment Opportunity Policy to 22 loose fruit collectors dated 20 July 2022.</p>	
<p><b>Criterion 6.5:</b> There is no harassment or abuse in the workplace, and reproductive rights are protected.</p>			
<p>6.5.1</p>	<p><b>(C)</b> A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce.</p> <p><b>Smallholder requirements:</b>          Smallholders must be able to verbally explain that they understand and observe this requirement.</p> <p>- Critical (Major) compliance -</p>	<p>Sexual Harassment Policy (Doc. No.POL-HRD-GEN-011-08, Issue No.8 dated 6 June 2022) was available where the company is committed to ensure a harmonious and productive work environment for its employees. Sexual harassment may include physical contact, verbal comments, jokes, propositions, display of offensive material or other behaviours. This commitment recognized that the workplace should be free from sexual harassment. Sexual harassment applies equally to all genders. The policy is communicated to the workers and seen the briefing records:</p> <ul style="list-style-type: none"> <li>- Based on audit in Hargy Estate-Barema Plantation, management provide company policies awareness: Freedom of Association Policy, Protection of Reproductive Rights Policy, Sexual Harassment Policy to 18 harvesters dated 14 July 2022.</li> <li>- In Barema POM, management provide company policies awareness: Freedom of Association Policy, Protection of Reproductive Rights Policy, Sexual Harassment Policy to 3 female admins and 10 mill operators dated 13 July 2022 and to 20 mill operators, clerks and assistant on 14 July 2022.</li> <li>- In Pandi Estate-Bakada Plantation, management provided company policies awareness Reproductive rights, breastfeeding time, maternal leave, prohibit sexual harassment to 1 male field supervisor, 1 male overseer, 3</li> </ul>	<p>Complied</p>

		<p>male fertilizer distributors and 14 female fertilizer applicators, dated 21 July 2022.</p> <ul style="list-style-type: none"> <li>- Based on audit in Navo Estate-Ibana Plantation, management provide company policies awareness Sexual Harassment Policy to 16 female loose fruit collectors dated 14 March 2022. Awareness on Sexual Harassment Policy to 5 tractor drivers, 3 FFB loaders, 7 upkeep workers, 1 compound upkeep dated 20 August 2021.</li> <li>- In Navo POM, management provides company policies awareness on prohibit sexual harassment for 12 mill workers (admin operator, lab analyst, weighbridge clerk, lab samplers) on 27 July 2022.</li> </ul> <p>Hargy Oil Palms Limited and the Security Department handles all sexual harassment report. Audit team verified sampled sexual harassment report logged on 2021. Action taken by Social Officer on 5 July 2021. The complainant brought the case to police station and the perpetrator dealt with police (closed) as they preferred on this choice and company respect the complainant choice.</p>	
6.5.2	<p><b>(C)</b> A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce.</p> <p><b>Smallholder requirements:</b>          Smallholders must be able to verbally explain that they understand and observe this requirement.          - Critical (Major) compliance -</p>	<p>Hargy Oil Palms Limited has established Policy on the Protection of Reproductive Rights (Doc. No.POL-HRD-GEN-014-04, Issue No.4 dated 6 June 2022) to protect the reproductive rights of its employees and to provide medical services associated with reproductive health. The couples or individuals can freely decide when and how many children they want.</p> <p>Based on audit in Hargy Estate-Barema Plantation, management provide company policies awareness: Freedom of Association Policy, Protection of Reproductive Rights Policy, Sexual Harassment Policy to 18 harvesters dated 14 July 2022.</p> <ul style="list-style-type: none"> <li>- In Barema POM, management provide company policies awareness: Freedom of Association Policy, Protection of Reproductive Rights Policy, Sexual Harassment Policy to 3 female admins and 10 mill operators dated 13 July 2022 and to 20 mill operators, clerks and assistant on 14 July 2022.</li> <li>- Based on audit in Navo Estate-Ibana Plantation, management provide company policies awareness: Communication Policy, Protection of</li> </ul>	Complied

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		<p>Reproductive Rights, Equal Opportunity Policy to 18 harvesters, 7 sprayers, 16 loose fruit collectors, 7 truck drivers, 7 FFB loader and crews, and 2 upkeep workers dated 14 July 2022.</p> <ul style="list-style-type: none"> <li>- In Navo POM, management provides company policies awareness on reproductive rights protection for 12 mill workers (demin operator, lab analyst, weighbridge clerk, lab samplers) on 4 August 2022.</li> <li>- In Pandi Estate-Bakada Plantation, management provided company policies awareness Reproductive rights, breastfeeding time, maternal leave, prohibit sexual harassment, RTE protection to 5 male compound upkeep and 9 female compound upkeep workers, dated 15 July 2022.</li> </ul>	
<p>6.5.3</p>	<p>Management has assessed the needs of new mothers, in consultation with the new mothers, and a procedure has been determined that identifies actions are taken to address the needs of them and their babies.</p> <ul style="list-style-type: none"> <li>- Minor compliance -</li> </ul>	<p>Hargy Oil Palms Limited has demonstrated assessment and consultation of new mother.</p> <p>Interview with housewife in Hargy Estate-Barema Plantation, with Mrs. Ellie Isaac and Mrs. Lucy Tavayam stated the need for infant such as medical clinic access, vaccination program, is in place.</p> <p>Verification:</p> <p>Audit team verified through interview with female worker, housewives and company’s medical team, and confirmed Hargy Oil Palms Limited has identified the need from the new mothers. Information gathered through mother/patient visit to prenatal and antenatal clinic. Up to August 2022, the need identified related to pregnancy test, pregnancy check, delivery/labor ward, baby check and immunization. HOPL prepared Maternity and Child Health Management Process comprise of:</p> <ul style="list-style-type: none"> <li>- Treatment for pregnant mother at nearest plantation clinic by plantation clinic nurse, including pregnancy test for confirmation of pregnancy.</li> <li>- Registering the pregnant mother to Antenatal Register. Following that regular checks are continued until delivery. All checks are conducted based on PNG Standard for Antenatal Checks.</li> </ul>	<p>Complied</p>

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		<ul style="list-style-type: none"> <li>- During the antenatal checks and if issues are encountered, the clinic nurse then refers the mother to HEO or doctors in Navo/Hargy for further review and management.</li> <li>- After delivery, mothers are expected to bring their babies or children &lt;5 years old to clinic during Maternity and Child Health Clinics for routine baby checks, baby immunizations, discussion on breastfeeding and child nutrition, and Family Planning for the mothers.</li> </ul> <p>Record and implementation sighted:</p> <ul style="list-style-type: none"> <li>- Hargy Oil Palms Limited and SIPEF supports the maternity ward, operating since 2020 for women.</li> <li>- Weekly Child Health Program – 2022: Tuesday – Family planning, Wednesday – well baby clinic, Thursday – Antenatal clinic;</li> <li>- Company medical team has a Antenatal Register Book, sampled from Hargy Estate-Barema Plantation, reported 9 mothers being checked in 2022.</li> <li>- Company medical team has a Antenatal Register Book, sampled from Barema POM clinic, reported 9 mothers being checked in 2022.</li> <li>- Company medical team has a program for family planning. Medical team shows register book “Family planning attendance register book”. Up to August 2022, medical team recorded a presence of 28 mother attended for family planning session.</li> </ul> <p>NC Minor closed out.</p>	
6.5.4	<p>A grievance mechanism, which respects anonymity and protects complainants where requested, is established, implemented and communicated to all levels of the workforce.</p> <p>- Minor compliance -</p>	<p>Based on Management Review Meeting, in 2021 there were 72 grievances raised from both internal and external. Out of the 72 grievances, all closed out as of June 2022.</p> <p>Based on Grievance Summary, in 2022 (up to 20 August 2022) there were 45 complaints/grievances raised from both internal and external. Out of the 45 grievances, 33 closed out and 13 still open as of August 2022.</p>	Complied

		Based on audit in Navo Estate-Ibana Plantation, management provide communication of grievance procedure to 36 harvesters, 5 wheelers dated 21 July 2022; to 9 loose fruit collectors on 22 March 2022.	
<b>Criterion 6.6:</b> No forms of forced or trafficked labour are used.			
6.6.1	<p><b>(C)</b> All work is voluntary and following are prohibited:</p> <ul style="list-style-type: none"> <li>• Retention of identity documents or passports</li> <li>• Payment of recruitment fees</li> <li>• Contract substitution</li> <li>• Involuntary overtime</li> <li>• Lack of freedom of workers to resign</li> <li>• Penalty for termination of employment</li> <li>• Debt bondage</li> <li>• Withholding of wages</li> </ul> <p>Note: where a Company has advanced money to an employee as a loan, this is to be regarded as a debt to the Company by the employee and a documented arrangement for repayment is to be established that is acceptable to both parties.</p> <p><b>Smallholder requirements:</b>            Smallholders must be able to verbally explain that they understand and observe this requirement.            - Critical (Major) compliance -</p>	<p>Based on review of Employee Handbook, company’s policy regarding anti forced labour, and interview with workers and stakeholder (PNG Department of Labour and Industrial Relation), it can be concluded that the company has upheld its policy of anti-forced labour. All work is voluntary and bounded in employment contracts. Both party signed the contracts and workers keep the copy.</p> <p>There is no incident of written in the company’s procedure or contracts that imply retention of identity documents, recruitment fees, contracts substitution, involuntary overtime, penalty for termination, or debt bondage.</p> <p>Based on audit in Hargy Estate-Barema Plantation, management provide company policies awareness: Against Forced or Trafficked Labor Policy, Child Labor Policy, Equal Employment Opportunity Policy to 22 loose fruit collectors dated 20 July 2022.</p>	Complied
6.6.2	<p><b>(C)</b> Where temporary or migrant workers are employed for seasonal or activity related periods of high demand, these are regarded as “casual” workers. A specific labour policy and procedures for casual workers are established and implemented.</p>	<p>Based on field observation and interview in Mills and Estates, as well as HR Department, it can be concluded that there is no temporary or migrant workers employed for activity related periods of high demand.</p> <p>Other than that, Hargy Oil Palms Limited has developed Employee Handbook revised on January 2015 where company is committed to a non-discriminatory</p>	Complied

	<p>- Critical (Major) compliance -</p>	<p>workplace, provided housing to the employees, trainings will be provided and HOPL is followed the directives of PNG Employment Act 1978 where contract is a legally binding agreement between company and employee. The contract cannot be altered without consent of both parties. All employees will be issued with a contract of employment before commencement of work.</p>	
<p><b>Criterion 6.7:</b> The unit of certification ensures that the working environment under its control is safe and without undue risk to health.</p>			
<p>6.7.1</p>	<p><b>(C)</b> The responsible person(s) for H&amp;S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.</p> <p>- Critical (Major) compliance -</p>	<p>Unit of Certification has appointed responsible person for H&amp;S at each unit. There are:</p> <ul style="list-style-type: none"> <li>- H&amp;S Officer in Barema Palm Oil Mill: Thomas Tade.</li> <li>- H&amp;S Officer in Hargy Palm Oil Mill: Wayne Sareo.</li> <li>- H&amp;S Officer in Navo Palm Oil Mill: David Tautele.</li> <li>- H&amp;S Officer in Hargy Plantation: Kuborum Gobul</li> <li>- H&amp;S Officer in Barema Plantation: Paul Maron.</li> <li>- H&amp;S Officer in Ibana Plantation: David Waim</li> <li>- H&amp;S Officer in Pandi Estate: Michael Silpaga</li> <li>- H&amp;S Officer in Kiba Plantation: Clement Duhaut</li> <li>- H&amp;S Officer in Atata Plantation: Theresa Kaoka</li> </ul> <p>The main duties &amp; responsibilities of H&amp;S officer are:</p> <ul style="list-style-type: none"> <li>- Ensuring compliance to RSPO (including OHS) and EMS at specific site's operations. Including compounds.</li> <li>- Ensure safety, social and environmental issues are documented, investigated and mitigated.</li> <li>- Coordinate the timely response of non-conformances, corrective &amp; preventive actions and other inspection outcomes for the site.</li> <li>- Ensure RSPO meeting/training or RSPO related activities are carried out as required.</li> <li>- Conduct site induction for new employees.</li> </ul>	<p>Complied</p>

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		<p>H&amp;S meeting conducted in regular basis at each unit to review the input of previous meeting, and to discuss current issue. Several records that have been observed among others:</p> <ul style="list-style-type: none"> <li>- Hargy Palm Oil Mill, recently has been conducted on 31 July 2022 by Wayne Sarero.</li> <li>- Barema POM, recently has been conducted on 22 July 2022 by Paul Maron.</li> <li>- Navo POM, recently has been conducted on 09 August 2022 by David Tautele.</li> <li>- Hargy Estate - Barema Plantation, recently has been conducted on 22 July 2022 by Paul Maron.</li> <li>- Pandi Estate – Bakada Plantation has been conducted on 13 July 2022 by Michael Silpaga.</li> <li>- Navo Estate – Ibana Plantation, recently has been conducted on 27 July 2022 by David Waim.</li> </ul>	
6.7.2	<p>Accident and emergency procedures are in place and instructions are clearly understood by all workers. Accident procedures are available in the appropriate language of the workforce. Assigned operatives trained in first aid are present in both field and other operations, and first aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.</p> <p>- Minor compliance -</p>	<p>Accident and emergency procedures namely Emergency Response Procedures No.ERP-ESD-GEN-001-08, dated 22 June 2021. Evacuation Response Plan are available for each emergency stations, for examples</p> <ul style="list-style-type: none"> <li>- No.ERP-ESD-GEN-001-09 for Volcano Eruption;</li> <li>- No.ERP-ESD-GEN-002-09 for Flooding Rivers Evacuation ERP;</li> <li>- No.ERP-ESD-GEN-003-09 for Mill Factories Fires Evacuation;</li> <li>- No.ERP-ESD-GEN-004-09 for Bialla Tank Farm and Tanker Terminal Fire;</li> <li>- No.ERP-ESD-GEN-005-09 Bialla Tangker Terminal Oil Spill;</li> <li>- No.ERP-ESD-GEN-008-09 for Motor Vehicle Accident;</li> <li>- No.ERP-ESD-GEN-009-09 for Fire Emergency Response.</li> <li>- No.ERP-ESD-GEN-007-09 for Medical Emergency</li> <li>- No.ERP-ESD-GEN-010-09 for Search and Rescue Response.</li> </ul>	Complied

		<p>The plans have been communicated to employees, contractors and visitors. The procedure was available in English and Tok Pisin language.</p> <p>During pandemic, HOPL had specific COVID-19 mechanism which consist of:</p> <ul style="list-style-type: none"> <li>- HOPL Statement from CEO regards to Covid19, dated 23 March 2021.</li> <li>- SOP Infection Prevention Control Guideline for COVID-19 Treatment/Isolation Centre (Area 8), dated 13 April 2021.</li> <li>- COVID-19 Awareness Template in English and Tok Pidgin languages. The awareness containing Preventive Measures for The Spread of Covid-19 Viruses.</li> <li>- COVID-19 Screening Form</li> <li>- Hargy COVID-19 Surveillance Plan Flowchart</li> </ul> <p>Assigned trained in first aid are present in Mills and Estates/Plantations, moreover, first aid kits are available at worksites. Fist Aider trainings and certificates were issued by Papua New Guinea Red Cross Society. Records of all accidents are kept as states in indicator 6.7.5.</p> <p><b>Fatality Accident</b></p> <p>On 8 January 2022, there was a fatality accident occurred to Bobby Dangah who felt from trailer in Berema Plantation – Hargy Estate. The company has conducted investigation of this incident. The documentation including:</p> <ul style="list-style-type: none"> <li>- Safety event register</li> <li>- Accident investigation report, including root cause analysis and corrective action plan</li> </ul> <p>The root cause analysis result is because Bobby Dangah was sitting on the trailer. It is supposed to be that he sat inside the trailer.</p> <p>The corrective action that has been planned and conducted were:</p> <ul style="list-style-type: none"> <li>- Driver to be disciplined appropriately for unsafe driving into worker’s housing.</li> <li>- Reinforce the safety instruction like: all workers must sit inside the trailer.</li> </ul>	
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		<ul style="list-style-type: none"> <li>- Non-workers are not allowed to be engaged in tractors/trailer activities.</li> <li>- All harvesting tools to be kept in a central location and not in the housing area.</li> <li>- Supervisor to uphold and increased the supervision level.</li> <li>- Reinforce the instruction of no tractors or trucks in housing area.</li> <li>- Continuous awareness on 'do not sit on the trailer' and safe driving.</li> <li>- Build speed bump in every housing complex/compound.</li> </ul> <p>All documentation of each corrective action has been verified. For instance, minutes of dissemination of safety driving on 12 January 2022 in Berema Plantation. Based on field observation in every plantation, it can be seen the speed bumps have been build in housing complex. The residents also said that no more tractors and trucks pass the housing area.</p>	
6.7.3	<p><b>(C)</b> Workers use appropriate personal protective equipment (PPE) as specified in Company procedures, which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.</p> <p>- Critical (Major) compliance -</p>	<p>PPE provided to the workers without any charge based on HIRAC and Personal Protective Equipment (PPE) SOP (No. PRO-SUS-OHS-003-06, issue No. 6 dated 23 November 2021) including PPE Matrix attachment. It has been shown evidences of regular PPE provision especially for high risk workplace such as chemical storage, pesticide application, mill's machineries, harvesting, etc.</p> <p>Based on field observation in the high risk workplace in the Mill and Estate, known that the workers provided proper PPE in accordance with the HIRAC and/or MSDS. For instance:</p> <ul style="list-style-type: none"> <li>- Checmical storage operator: has been provided rubber gloves, mask, apron, boots.</li> <li>- Checmical sp: has been provided rubber gloves, mask, apron, boots.</li> <li>- Genset/engine room, boiler operator: has been provided mask and ear muff/ear plug.</li> </ul> <p>Sanitation facilities and PPE storage for pesticide/fertilizer applicator provided in the Plantation. Therefore, the PPE and working tools are washed and stored in the specific place and prohibited to be placed in worker's houses.</p>	Complied

		Based on interview with the workers, the PPE has been provided, exchanged regularly or anytime if broken without any charge.	
6.7.4	<p>All workers are provided with medical care and covered by accident insurance. Costs incurred from work-related incidents leading to injury or sickness are covered in accordance with national law or by the unit of certification where national law does not offer protection.</p> <p>- Minor compliance -</p>	<p>Medical care is provided to all the employees. Each mills and plantation have clinic for handling health and accident. If unit's clinic cannot handle the incident, then patient will be referred to central clinic at Hargy POM. All the workers are local and they are covered under Workers Compensation Act 1978. There are company doctor in each site, e.g. for Navo POM and Estate, the clinic and the doctor located at Atata Plantation Compound. For Pandi Estate, company clinic located at Bakada Plantation office complex. HOPL also has three ambulances, located in area of Hargi Estate, Pandi Estate, and Navo Estate.</p> <p>During the assessment HOPL still have contract of medical, health and worker compensation for staffs with MARSH &amp; McLENNAN COMPANIES as agent. The monthly premium payment has been seen.</p> <p>Detail of insurance are as follows:</p> <p>Workers Compensation Excluding Worker's Emergency Transportation and Hospitalisation Abroad (WETHA) Extension; policy number W0015566. Insurer: QBE Insurance (PNG) Ltd – 100%; covering insured's legal liability to workers under the Workers Compensation Act 1978 (as amended).</p> <p>National Managers Medical (Marsh Medicare); policy number HOPL 31121617. Insurer: Capital Life Insurance Company Limited – 100%. Scope (1) Medical &amp; Hospital benefits, covering eligible reimbursement of medical expenses following sickness or hospitalization of nominated employee and his/or declared dependants on application including natural parents. (2) Persona; Accident (Death by Accident), covering loss of life (Death) resulting from accidental causes (as defined) 24 hours, 7 days a week.</p>	Complied

		<p>It has been observed occupational illness medical illness, in the form of 'HOPL Medical Treatment Request Form' in the name of Johny John (boiler attendant) in 5 July 2022 and Jimmy Jack (maintenance) in 6 August 2022, has been followed up with medical treatment in clinic. Moreover, they have been given sick leave 1 day and 3 days for Johny and Jimmy respectively. For Johny Joh, the sick leave has been paid also.</p> <p><b>Fatality insurance claim</b></p> <p>For the case of fatality incident of Bobby Dangah on 8 January 2022 (as stated in indicator 6.7.2), the company has shown the evidence (email) that the insurance claim is currently still under process. The latest correspondence was on 9 August 2022 from Office of Workers Compensation - Department of Labour and Industrial Relation (government agency).</p> <p>Based on historical of the emails, it is known that the payment is hampered due to verification process of the beneficiary. The deceased Bobby Dangah was single when he died, and he has a son but still under 10 years old, which is still prohibited to received the payment according to the regulation. Therefore, the recognized beneficiary is Bobby's parent, but they live in Lae City – Morobe Province (main island). Therefore, it is still in discussion where the third party meeting (Hargy, Office of Workers Compensation, and beneficiary) will be conducted. The latest suggestion is Hargy to arrange the verification meeting in Lae City – Morobe Province.</p> <p>The process of this insurance claim and payment to beneficiary will be observed in the next audit.</p>																	
6.7.5	<p>Occupational injuries are recorded using Lost Time Accident (LTA) metrics.</p> <p>- Minor compliance -</p>	<p>The company is able to demonstrate Incident/Accident Report 2022 (up to July). From the summary of January – June 2022 OHS Monthly KPI Rates, the summary as follow:</p> <table border="1" data-bbox="1025 1300 1937 1391"> <thead> <tr> <th></th> <th>Jan</th> <th>Feb</th> <th>Mar</th> <th>Apr</th> <th>May</th> <th>Jun</th> <th>YTD</th> </tr> </thead> <tbody> <tr> <td>LTI case</td> <td>21</td> <td>15</td> <td>24</td> <td>12</td> <td>16</td> <td>14</td> <td>102</td> </tr> </tbody> </table>		Jan	Feb	Mar	Apr	May	Jun	YTD	LTI case	21	15	24	12	16	14	102	Complied
	Jan	Feb	Mar	Apr	May	Jun	YTD												
LTI case	21	15	24	12	16	14	102												

		<table border="1"> <tr> <td>No. workers</td> <td>4,594</td> <td>4,594</td> <td>4,696</td> <td>4,770</td> <td>4,902</td> <td>4,651</td> <td>4,701</td> </tr> <tr> <td>Workday lost</td> <td>45</td> <td>35</td> <td>51</td> <td>76</td> <td>39</td> <td>33</td> <td>279</td> </tr> </table>	No. workers	4,594	4,594	4,696	4,770	4,902	4,651	4,701	Workday lost	45	35	51	76	39	33	279	
No. workers	4,594	4,594	4,696	4,770	4,902	4,651	4,701												
Workday lost	45	35	51	76	39	33	279												
<p>Samples of injuries/incident records have been verified. Or instance, incident of Jimmy Jack on 6 August 2022 in Berema POM, has got injuries on his upper right side thumb. Days off given (paid rest) is 3 days.</p>																			
<p><b>Principle 7: Protect, conserve and enhance ecosystems and the environment</b></p>																			
<p><b>Criterion 7.1:</b> Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.</p>																			
<p>7.1.1</p>	<p><b>(C)</b> IPM plans are implemented and monitored to ensure effective pest control.</p> <p><b>Smallholder requirements:</b>          Organization managing the smallholders to manage IPM program for smallholders.          - Critical (Major) compliance -</p>	<p>HOPL Integrated Pest Management Plan is available in document No.PLN-SUS-SUS-001-06 dated 23 June 2021, therein includes: Methods of Reducing Pesticides use, justification of agrochemical use, integrated pest management plan safety with chemicals, describes:</p> <ol style="list-style-type: none"> <li>1. Pest survey &amp; monitoring;</li> <li>2. Safety and effective use of pesticides;</li> <li>3. Insect control;</li> <li>4. Weed control;</li> <li>5. Disease control.</li> </ol> <p>Methods of reducing pesticides usage: More prudent use of pesticides, key components:</p> <ul style="list-style-type: none"> <li>- Applying pesticides as needed, rather than on a fixed schedule.</li> <li>- Avoidance of persistent pesticides and those that bio-accumulate.</li> <li>- Decreased use of chemical spraying and increased efficiency of spray equipment.</li> <li>- Use of buffers near waterways to reduce possible contamination of non-target sectors of the ecosystem.</li> <li>- Sparing use.</li> </ul>	<p>Complied</p>																

		<p>- Use of pesticides in combination with other control methods namely mechanical, biological and cultural controls.</p> <p>Judicious use of pesticides, HOPL uses only chemical approved under national regulation and the environmentally compatible chemical are chosen for use in the plantation. Less toxic pesticides and specific target pesticides are preferred over broad spectrum ones to avoid killing predators and parasites. Chemicals for pest and disease control should be judiciously applied when outbreak reach economic injury level. In the first instance biological control is considered ahead of chemical control. Host plants of natural enemy of pests are encouraged and conserved to build up their populations.</p> <p>Officer/Staff who detect pest report to Entomology (PNG-OPRA), as recorded in "Pest Infestation Request (PestReq)".</p> <p>Some training related to the IPM has been held. For example:</p> <ol style="list-style-type: none"> <li>1. Integrated Pest Management training on 31 March 2022 located in HOPL Training Room. Attended by 13 participants e.g Sustainability Department, Plantation Manager, HOPL-SHAAS Department, and OPRA Agronomist.</li> <li>2. Integrated Pest Meeting – TTI application on 19 July 2022 located in HOPL Board Room. Attended by 13 participants e.g General Manager, Head of Department Plantation, Sustainability Department, Plantation Manager, HOPL-SHAAS Department and OPRA Agronomist.</li> <li>3. Integrated Pest Meeting on 15 September 2021 located in HOPL Board Room. Attended by 12 participants e.g Head of Department Plantation, Sustainability Department, Plantation Manager, HOPL-SHAAS Department and OPRA Agronomist.</li> </ol> <p>Training discussed about safety, awareness, overall pest and disease situation, matter arise from meeting, pest survey and monitoring, update on monitoring and treatment/control.</p> <p><b>Smallholder:</b></p>	
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		<p>IPM program in smallholder area are guided by HOPL, OPIC and PNG-OPRA through SHAAS Extension officers. For example:</p> <ol style="list-style-type: none"> <li>1. TTI Training on 11 August 2021 located in HOPL Training Room. Attended by 21 participants e.g OPRA officer, TTI applicator team, HOPL-SHAAS extension officer. Facilitated by Dr. Katayo Sagata, Thom Thaddy Batari and Simon Makai.</li> <li>2. Herbicide Usage and Safety Training on 2 May 2022 located in Soi Section 3. Attended by 43 smallholders member. Facilitated by HOPL-SHAAS Extension officer.</li> <li>3. Herbicide Usage and Safety Training on 11 May 2022 located in Soi Section 6. Attended by 51 smallholders member. Facilitated by HOPL-SHAAS Extension officer.</li> <li>4. Herbicide Usage Training on 30 March 2022 located in Soi Section 8. Attended by 60 smallholders member. Facilitated by HOPL-SHAAS Extension officer.</li> <li>5. Herbicide Usage Training on 31 August 2021 located in Nantabu Village. Attended by 25 smallholders member. Facilitated by HOPL-SHAAS Extension officer.</li> <li>6. Pesticide Usage Training on 22 March 2022 located in Ewasse. Attended by 50 smallholders member. Facilitated by HOPL-SHAAS Extension officer.</li> </ol>	
7.1.2	<p>Species referenced in the Global Invasive Species Database and CABI.org are not to be used in managed areas, unless plans to prevent and monitor their spread are implemented. Any imported species must first be approved in PNG by National Agriculture Quarantine and Inspection Authority (NAQIA) and in the Solomon Islands by Biosecurity Solomon Islands (BSI).</p> <p>- Minor compliance -</p>	<p>Based on HOPL Integrated Pest Management Plan (PLN-SUS-SUS-001-06) Issue No.6 dated 23 June 2021 stated that resident pests and possible invasive introduced species (if any) are effectively managed using appropriate IPM techniques. Routine patrols are conducted to detect pest infestations and implement an effective control strategy promptly before large-scale control measures are required. Procedure consist of pest identification, understanding the biology and ecology of pest, monitoring of pest populations and related activities, determine action threshold – economic injury level, choosing appropriate combination of management controls, prevention and intervention.</p>	Complied

7.1.3	<p>There is no use of fire for pest control unless in exceptional circumstances such as plantation sanitation, i.e. where no other effective methods exist, and with prior approval of government authorities.</p> <p>- Minor compliance -</p>	<p>Based on interview with workers and smallholder, there is no use of fire for pest control.</p>	Complied
<b>Criterion 7.2:</b> Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.			
7.2.1	<p><b>(C)</b> Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised.</p> <p>- Critical (Major) compliance -</p>	<p>Documented justification of all agrochemical use is available under Approved Product List for use in industrial and agricultural application, informing the product name, type of pesticide, active ingredients, LD50, approved agricultural use. The guidelines were used for company-owned plantation and smallholder blocks.</p> <p>Justification came from the government agency as well named "Environment Permit" issued by Conservation and Environment Protection Authority. Environment Permit is issued based on Section 65 of the Environment Act 2000. Sample evident for Dimehypo (Bisultap) under permit number P-144, dated of issue 4 July 2021, valid until 3 July 2026.</p> <p>Based on field visit to spraying activity – circle and path at Barema Plantation, Ibana Plantation and Bakada Plantation obtained information that worker can demonstrated that spraying only applied to the specific area and weeds. There are no uses of Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat. Workers are using PPE such as overall, head cover, hand gloves and gum boots. Medical surveillance is regularly conducted, and evidence can be shown by the company. In the field there is no worker under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions.</p>	Complied

		<p><b>Smallholders:</b>          No pesticide was issued to the smallholders. The smallholders would only use herbicide. In case of chemical control of pest such as Saxava, it was done by HOPL – under supervision of PNG OPRA.</p>	
7.2.2	<p><b>(C)</b> Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) are provided.</p> <p><b>Smallholder requirements:</b>          Organization managing the smallholders to maintain records of herbicide issue to smallholders.          - Critical (Major) compliance -</p>	<p>Hargy Oil Palms maintained the record of pesticide use, active ingredient, LD50 and hectare of area treated – for each estate/division in document “Toxicity Analysis by Division”. For example, there is an application of Phosphatidycholine in 2021 for total 3,685.3 Ha area of Alangily Plantation with total active ingredients 3.46 kg.</p> <p><b>Smallholders:</b>          Records of pesticide use in smallholders available in Smallholder Pesticides 2022. It mentioned that smallholder only use Glyphosate as herbicide for controlling weed. Data period January to December 2022 described that Glyphosate used in Wilelo is 713 L. No other agrochemical used in smallholders.</p>	Complied
7.2.3	<p><b>(C)</b> Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.</p> <p><b>Smallholder requirements:</b>          Organization managing the smallholders to manage IPM for smallholders.          - Critical (Major) compliance -</p>	<p>The use of pesticide is minimized as part of Continuous Improvement Plan. Integrated Pest Management Plan is to manage oil palm pests and the pesticides used for their treatment and control in order to alleviate pest problems with the least possible hazard to people, property, and the environment. In plantations and nursery, insecticides are not use in prophylactic treatment but only when insect outbreak is identified and suspected to provoke major damages.</p> <ul style="list-style-type: none"> <li>• 0-12 months after planting; No herbicide is to be applied. Allow only hand weeding to promote young palm and LCP growth.</li> <li>• 1-2 Years; Apply pre-mixed herbicide around the palm base to 3m wide whilst lifting up the fronds as illustrated.</li> <li>• 2-4 Years; Apply pre-mixed herbicide around the edge of the frond drips to prevent creepers growing onto the palm as illustrated.</li> <li>• &gt; 4 YAP; The circle must be sprayed using double circuit method. In this method, the sprayer sprays to the palm circle in the direction of his left</li> </ul>	Complied

		<p>hand towards the palm base. Once he completes the first loop, he turns back to the direction of the spray, steps about half a metre away and continue spraying until he completes the second loop as illustrated.</p> <p><b>Smallholders:</b></p> <p>OPIC provide herbicide to smallholder who want to do spraying circle and path. Education has been provided to smallholders regarding IPM. IPM program in smallholder area are guided by HOPL and PNGOPRA through SHAAS Extension officers. Available records of training and field day facilitated by HOPL – PNGOPRA, e.g.</p> <ol style="list-style-type: none"> <li>1. TTI Training on 11 August 2021 located in HOPL Training Room. Attended by 21 participants e.g OPRA officer, TTI applicator team, HOPL-SHAAS extension officer. Facilitated by Dr. Katayo Sagata, Thom Thaddy Batari and Simon Makai.</li> <li>2. Herbicide Usage and Safety Training on 2 May 2022 located in Soi Section 3. Attended by 43 smallholders member. Facilitated by HOPL-SHAAS Extension officer.</li> <li>3. Herbicide Usage and Safety Training on 11 May 2022 located in Soi Section 6. Attended by 51 smallholders member. Facilitated by HOPL-SHAAS Extension officer.</li> <li>4. Herbicide Usage Training on 30 March 2022 located in Soi Section 8. Attended by 60 smallholders member. Facilitated by HOPL-SHAAS Extension officer.</li> <li>5. Herbicide Usage Training on 31 August 2021 located in Nantabu Village. Attended by 25 smallholders member. Facilitated by HOPL-SHAAS Extension officer.</li> </ol> <p>Pesticide Usage Training on 22 March 2022 located in Ewasse. Attended by 50 smallholders member. Facilitated by HOPL-SHAAS Extension officer.</p>	
7.2.4	There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines.	Based on interview with workers and smallholders, there is no prophylactic use of pesticides in whole are of Hargy Oil Palms Limited. The use of pesticide is	Complied

	<p>- Minor compliance -</p>	<p>minimized as part of Continuous Improvement Plan. Integrated Pest Management Plan is to manage oil palm pests and the pesticides used for their treatment and control to alleviate pest problems with the least possible hazard to people, property, and the environment. In plantations and nursery, insecticides are not use in prophylactic treatment but only when insect outbreak is identified and suspected to provoke major damages.</p>	
<p>7.2.5</p>	<p>Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, are not used, unless in exceptional circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks.</p> <p>The due diligence refers to:</p> <ul style="list-style-type: none"> <li>7.2.5a Judgment of the threat and verify why this is a major threat</li> <li>7.2.5b Why there is no other alternative which can be used</li> <li>7.2.5c Which process was applied to verify why there is no other less hazardous alternative</li> <li>7.2.5d What is the process to limit the negative impacts of the application</li> <li>7.2.5e Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.</li> </ul> <p><b>Smallholder requirements:</b></p> <p>Smallholders not using pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat. Smallholders to follow the policies of the organization managing the smallholders</p>	<p>Based on the record of pesticide in chemical store and type of pesticide usage during the field visit obtained information that there is no pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat used in whole area of HOPL including in smallholders area.</p>	<p>Complied</p>

	- Minor compliance -		
7.2.6	<p><b>(C)</b> Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criteria 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they carry out.</p> <p><b>Smallholder requirements:</b>          Smallholders using and/or storing pesticides must demonstrate knowledge of the correct handling, storage, application and disposal requirements.</p> <p>- Critical (Major) compliance -</p>	<p>Training of pesticide handling and application are routinely conducted, e.g.</p> <ol style="list-style-type: none"> <li>1. Integrated Pest Management training on 31 March 2022 located in HOPL Training Room. Attended by 13 participants e.g Sustainability Department, Plantation Manager, HOPL-SHAAS Department, and OPRA Agronomist.</li> <li>2. Integrated Pest Meeting – TTI application on 19 July 2022 located in HOPL Board Room. Attended by 13 participants e.g General Manager, Head of Department Plantation, Sustainability Department, Plantation Manager, HOPL-SHAAS Department and OPRA Agronomist.</li> <li>3. Integrated Pest Meeting on 15 September 2021 located in HOPL Board Room. Attended by 12 participants e.g Head of Department Plantation, Sustainability Department, Plantation Manager, HOPL-SHAAS Department and OPRA Agronomist.</li> </ol> <p><b>Smallholder:</b>          Smallholder generally performs slashing to control weeds. However, for associated smallholder who performed spraying, it was done by trained smallholder – issued with certificate. HOPL and OPIC conducted special training for Agricultural Safety and Crop Spraying. The auditor team has verified the sample of certificate as follows:          Sampel of pesticide applicator license (Green Card) seen:</p> <ul style="list-style-type: none"> <li>• Paissi Joe Yoruku – Smallholder Block Number 021206              Has attended training on agricultural safety and crop spraying method at Wilelo Community Hall Subdivision of Bialla District, West New Britain Province on 10 July 2020; valid for 3 years.</li> <li>• Aisach Banban – Son of Gabriel Banban Smallholder Block Number 020949              Has attended training on agricultural safety and crop spraying method at Wilelo Community Hall Subdivision of Bialla District, West New Britain Province on 10 July 2020; valid for 3 years.</li> </ul>	Complied

		<ul style="list-style-type: none"> <li>Ludwig Masnamta – Smallholder Block Number 021451            Has attended training on agricultural safety and crop spraying method at Wilelo LSS Subdivision of Bialla District, West New Britain Province on 11 August 2020; valid for 3 years.</li> </ul> <p>Smallholder training:</p> <ol style="list-style-type: none"> <li>TTI Training on 11 August 2021 located in HOPL Training Room. Attended by 21 participants e.g OPRA officer, TTI applicator team, HOPL-SHAAS extension officer. Facilitated by Dr. Katayo Sagata, Thom Thaddy Batari and Simon Makai.</li> <li>Herbicide Usage and Safety Training on 2 May 2022 located in Soi Section 3. Attended by 43 smallholders member. Facilitated by HOPL-SHAAS Extension officer.</li> <li>Herbicide Usage and Safety Training on 11 May 2022 located in Soi Section 6. Attended by 51 smallholders member. Facilitated by HOPL-SHAAS Extension officer.</li> <li>Herbicide Usage Training on 30 March 2022 located in Soi Section 8. Attended by 60 smallholders member. Facilitated by HOPL-SHAAS Extension officer.</li> <li>Herbicide Usage Training on 31 August 2021 located in Nantabu Village. Attended by 25 smallholders member. Facilitated by HOPL-SHAAS Extension officer.</li> <li>Pesticide Usage Training on 22 March 2022 located in Ewasse. Attended by 50 smallholders member. Facilitated by HOPL-SHAAS Extension officer.</li> </ol>	
7.2.7	<p><b>(C)</b> Storage of all pesticides is in accordance with recognised best practices.</p> <p><b>Smallholder requirements:</b></p>	<p>Based on site visit and interview, storage of all pesticides in HOPL found to be consistent with the Material Safety Data Sheet and Best Agricultural Practice.</p>	Complied

	<p>The requirements fully applicable to smallholders.          - Critical (Major) compliance -</p>	<p>The guidelines of pesticide storage are available under the procedure of Plantation Management Practice – Pesticide Practices.          Each estate has chemical shed to store the herbicide and pesticide. Agrochemical is stored and segregated based on type. The chemical shed has mixing bay and washing basin. All chemical are pre-mixed and no pure chemical brought to field. All work uniform, PPE and spraying tools are washed and stored in locked room. The estates disposed of the empty herbicide container into landfill.  <b>Smallholder:</b>          Smallholder generally performs slashing to control weeds. However, for associated smallholder who performed spraying, it was done by trained smallholder – issued with certificate. Based on the field visit especially to the smallholders that used pesticide, the storage of pesticides is away from housing. Chemical shed is locked when not in used. There is also chemical pit to dispose all chemical waste/contaminated waste.</p>	
7.2.8	<p>All pesticide containers are triple rinsed and punctured before being disposed of and/or handled responsibly if used for other purposes. Empty pesticide containers may be used for pre-mixing spray solution before transport to the plantation for use by sprayers. In this case they must have visual identification such as painted lines around them.  <b>Smallholder requirements:</b>          The requirements fully applicable to smallholders.          - Minor compliance -</p>	<p>The empty container is triple rinsed and cut into small pieces for ease of transport. The company inventory of chemical and their container that is used and kept on site. The chemical container is stored and re-use for mixed of pesticides/herbicides. The record for ex container recycling was sighted, titled Chemical Container Recycling Record, No.FOR-ESD-UPK-012-02, The record for ex container disposal was sighted, titled Chemical Container Disposal Record, No.FOR-ESD-EMS-012-03.  <b>Smallholder:</b>          Smallholder generally performs slashing to control weeds. However, for associated smallholder who performed spraying, the chemical container is stored and re-use for mixed of pesticides/herbicides. Based on the field visit especially to the smallholders that used pesticide, the storage of pesticides is away from housing. Chemical shed is locked when not in used. There is also chemical pit to dispose all chemical waste/contaminated waste.</p>	Complied

		NC Minor closed out.	
7.2.9	<p><b>(C)</b> Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying.</p> <p><b>Smallholder requirements:</b>  The requirements fully applicable to smallholders.  - Critical (Major) compliance -</p>	There was no pesticides applied aurally in whole area of HOPL including in Smallholders area.	Complied
7.2.10	<p><b>(C)</b> Specific bi-annual medical surveillance for pesticide operators handling organophosphate insecticides, and documented action to treat related health conditions, is demonstrated.</p> <p><b>Smallholder requirements:</b>  The requirements fully applicable to smallholders.  - Critical (Major) compliance -</p>	<p>Specific annual medical surveillance for pesticides operator has been done by HOPL, and it was carried out on regular basis. Record regarding health condition of the pesticides operators are under "Baseline Surveillance for Sprayers", that contains demographic data, occupational history, medical history, basic examination (eyes, nose, throat, respiratory, skin, rash, bones) to prepare conclusion on status to working with agrochemical. Records of medical check on 18 January 2022 were sight for interviewed sprayer for Barema Plantation, e.g. Joe Phillip, Kenneth Michael, Johnson Hilson Nelson and Paskalis Palat fitness classification are fit to work.</p> <p>Another record sighted as follows:</p> <ul style="list-style-type: none"> <li>• Navo Estate – Ibana Plantation on 30 March 2022 for 19 pesticide workers (all fit to work) including some pesticide applicator interviewed during the audit namely Oswald Dumu, Francis Liliura, Jerry Wai, Alfred Andra and John Morris.</li> <li>• Pandi Estate – Bakada Plantation on 14 June 2022 for 7 pesticide workers (all fit to work) including some pesticide applicator interviewed during the audit namely Nathan Samean, Walter Job, August Jason, Richard Papi, Paul Joe, Japhet Kolou and Leonard Kekea.</li> </ul>	Complied

		<ul style="list-style-type: none"> <li>Hargy Estate – Barema Plantation on 18 January 2022 for 9 pesticide workers (all fit to work) including some pesticide applicator interviewed during the audit namely Edon Thomas, Henry Bidik, Ben Nick, Isaac Irenuma, Joe Phillip, Kenneth Michael, Hilson Nelson, Paskalis Palat and Peter Ato.</li> </ul> <p><b>Smallholders:</b>  Sexava Exposure Biological Monitoring Report facilitate by Dr. James Deboy for Trunk Injection on 21 March 2022 on behalf 16 smallholder’s applicator. All normal.</p>	
7.2.11	<p><b>(C)</b> No work with pesticides is undertaken by persons under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions and they are offered alternative equivalent work.</p> <p><b>Smallholder requirements:</b>  The requirements fully applicable to smallholders.  - Critical (Major) compliance -</p>	<p>Based on field visit and interview, there are no worker under 18 years old. Review to employee record concluded that no recruitment being made to under 18 years old worker. All herbicide sprayer and trunk injector are male workers. However, based on interview during field visit these male workers understood company policy regarding no work with pesticide shall be undertaken by pregnant or breastfeeding women. Pesticide training has been done to all worker interview at the field.</p> <p><b>Smallholders:</b>  At the smallholder blocks, pesticides are only applied by those that have attend the Agriculture Safety and Crop Spraying conducted by OPIC and HOPL. Targeted Trunk Injection (TTI) is only applied by HOPL employees. There was no evidence observed that spraying was conducted by other parties, such as women or children.</p> <p>Sampel of pesticide applicator license (Green Card) seen:</p> <ul style="list-style-type: none"> <li>Paissi Joe Yoruku – Smallholder Block Number 021206  Has attended training on agricultural safety and crop spraying method at Wilelo Community Hall Subdivision of Bialla District, West New Britain Province on 10 July 2020; valid for 3 years.</li> <li>Aisach Banban – Son of Gabriel Banban Smallholder Block Number 020949</li> </ul>	Complied

		<p>Has attended training on agricultural safety and crop spraying method at Wilelo Community Hall Subdivision of Bialla District, West New Britain Province on 10 July 2020; valid for 3 years.</p> <ul style="list-style-type: none"> <li>Ludwig Masnamta – Smallholder Block Number 021451</li> </ul> <p>Has attended training on agricultural safety and crop spraying method at Wilelo LSS Subdivision of Bialla District, West New Britain Province on 11 August 2020; valid for 3 years.</p>	
<p><b>Criterion 7.3:</b> Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.</p>			
7.3.1	<p>A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.</p> <p><b>Smallholder requirements:</b>          Smallholders must demonstrate planned waste management and disposal by disposing of waste products in a designated waste pit.          - Minor compliance -</p>	<p>Hargy Oil Palms Limited established a Waste Management Plan No.PLN-SUS-EMS-001-14 dated 29 June 2022. The generation and management of wastes within Hargy Oil Palms Ltd project sites would be in accordance with the waste minimization and cleaner production principles (waste-avoidance, reduction, segregation, reuse, recycling, treatment and disposal), as well as relevant PNG Industry Environmental Code Of practices, guidelines, and other best environmental management practices &amp; procedures applicable to the industry. Hargy Oil Palms Limited have identified source of waste activities:</p> <ul style="list-style-type: none"> <li>- Land Clearing &amp; Preparation (vegetation clearing, exposed topsoil);</li> <li>- Road Construction (exposed topsoil hydrocarbon related product);</li> <li>- Plantation Establishment, Maintenance and Harvesting (polybags, fertilizer bags, empty pesticide containers, hydrocarbon related products, unserviceable equipment, palm fronds);</li> <li>- Residential Compounds and Office Establishments (exposed top soil, gravel extraction, domestic waste, waste water, toilet/septic waste, pesticide containers, storm water runoff, offensive odor, litter, medical waste, construction waste, landfill construction);</li> <li>- Maintenance workshop, gensets, storage sheds, housing construction and maintenance (runoff water, waste oil, used batteries, used tyres, oil/fuel spills, used filters, packaging material, litter, hydrocarbon storage drums);</li> </ul>	Complied

		<ul style="list-style-type: none"> <li>- Medical Wastes</li> <li>- Field equipment servicing (waste oil, oil/fuel spillages, used filters, litter);</li> <li>- Vehicle Workshop (waste oil, oil/fuel spillages, used filters, litter, hydrocarbon storage drum, used batteries, used tyres);</li> <li>- Palm Oil Mills (POME, EFB, expeller, sterilizer condensate, smoke from boiler, boiler ash, used hydrocarbons, waste water from mill cleaning, used hydrocarbons, fuels and lubricants, used lead acid batteries, empty chemical containers, machinery parts, FFB cages, packaging material, domestic wastes, used rope from cages).</li> <li>- Mill equipment servicing (waste oil, oil/fuel spillages, used filters, litter);</li> <li>- Office wastes (waste/used papers, empty boxes/packaging material, old equipment, air conditioning system).</li> <li>- CPO and PKO Bulk Storage Tanks</li> </ul> <p>Hargy Vehicle Workshop:</p> <ul style="list-style-type: none"> <li>- Waste oil and battery issuance register Hargy Vehicle Workshop Year 2022 N70 quantity 31 units, N50 quantity 2 units, N120 quantity 11 units, N150 quantity 36 units, N200 quantity 1 unit, motorbike quantity 1 unit – status still in the shed.</li> </ul> <p>For battery disposal, Hargy Oil Palms Limited is currently discussing alternatives to sent used motor vehicle battery to recycle company, Dunlop PNG.</p> <p>Barema POM Chemical Container Recycling Record:</p> <ul style="list-style-type: none"> <li>- Period January 2021-January 2022 Barema POM recorded the production of empty chemical container: 2 Sulphuric Acid containers, 3 Potassium Hydrochloride containers, 1 Hydrochloric acid container, 2 Nitrification inhibitor containers, 2 Sodium sulphate containers, 3 detergent containers – all stored in Storage near biogas plant.</li> </ul>	
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		<ul style="list-style-type: none"> <li>- Vehicle TJ76 disposed of 1 load of fertilizer bag and plastic waste from Atata plantation to plastic waste pit dated 1 August 2022.</li> <li>- Vehicle TE27 disposed of 1 load of hydrocarbon waste from Navo POM to hydrocarbon waste pit dated 3 August 2022.</li> </ul> <p>Landfill record Pandi Estate-Bakada Plantation (center landfill receiving waste from Abulmosi, Alaba, Alangily, Gamupa, Magalona Division):</p> <ul style="list-style-type: none"> <li>- Vehicle LI19 disposed of 1 load of fertilizer bag and 1 load of empty chemical container from Bakada Plantation dated 12 August 2022-disposed to chemical waste pit.</li> <li>- Vehicle LI19 disposed of 1 load of contaminated hose/pipe waste from Bakada Plantation to hydrocarbon waste pit dated 12 August 2022 – disposed to industrial waste pit.</li> <li>- Vehicle LI136 disposed of 2 loads of domestic waste from Bakada Plantation compound to domestic waste pit dated 15 August 2022.</li> </ul>	
7.3.2	<p>Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated. Medical waste must be disposed of in purpose- built incinerators.</p> <p><b>Guidance:</b> With minimal opportunity for recycling in PNG and Solomon Islands, waste disposal is by landfill. Segregation of waste shall be into Hydrocarbon contaminated waste, putrescible waste and hard waste and compostable waste. Company procedures must state how these waste streams are managed.</p> <p><b>Smallholder requirements:</b>  The requirements fully applicable to smallholders.  - Minor compliance -</p>	<p>Navo Estate Medical Waste Disposal Records 2022</p> <ul style="list-style-type: none"> <li>- On 30 July 2022, vehicle C165 pick up and disposed of 4 biobags x 25 boxes from Atata clinic; 2 biobags from Ibana clinic; 1 biobag from Kiba clinic; 1 biobag from Navo POM clinic; 1 biobag and 1 sharp box medical waste from Sabalbala clinic – incinerated on the same day.</li> <li>- On 16 July 2022, vehicle C191 pick up and disposed of 3 biobags and 3 sharp boxes medical waste from Atata clinic; 1 biobag and 1 box expired drug from Kiba clinic; 1 biobag from Sabalbala clinic – incinerated on same day.</li> </ul> <p>Based on visit to Hargy Estate-Barema Plantation landfill area, audit team found that the segregation of waste implemented consistently: hydrocarbon waste, domestic waste, plastic waste, and septic waste.</p> <p>Based on visit to Navo Estate-Ibana Plantation landfill area, audit team found that the waste segregation implemented consistently: domestic waste pit for tin, plastic, bottles, food wrap, cans, boxes; plastic pit for rinsed plastic chemical, mill boiler chemical container, rinsed fertilizer bag, polybags; septic</p>	Non-compliance

		<p>pit for septic tank sludge. Training provided for Ibana landfill attendant, Bonney Yambe: types of rubbish, rubbish segregation, landfill record, landfill upkeep work, no scavenger policy – on 8 August 2022.</p> <p>Plantation EHS Monthly Inspection Checklist for Ibana Plantation dated 16 May 2022 by John Peter. The checklist covers all aspect such as genset condition, fuel storage and issue, office area, car park, first aid kit, PPE provision, pesticide use, spraying, fertilizer store, landfill condition (including segregation) and housing condition. Result no finding.</p> <p>Plantation EHS Monthly Inspection Checklist for Pandi Estate-Bakada Plantation dated 29 July 2022 by Michael Silpaga. The checklist covers all aspect including landfill condition (including segregation). Result no finding.</p> <p>Mill EHS Monthly Inspection Checklist for Navo POM dated 3 August 2022 by David Tautele. The checklist covers all aspect such as general plant condition, first aid, walkways, contractor safety, mill housekeeping, boiler emission, diesel fuel storage, CPO tank, genset condition, water treatment plant and laboratory, workshop, carpark, working at height, effluent ponds, documentation, compound. Result no finding.</p> <p>Training provided for Navo Estate-Atata landfill attendant, Martin Ai: types of rubbish, rubbish segregation, landfill record – on 7 July 2022.</p> <p>Training provided for Pandi Estate-Gamupa landfill attendant, Jonah Pansop: types of rubbish, rubbish segregation, disposal timing, landfill record – on 23 March 2022.</p>	
7.3.3	<p>Open fire is not used for waste disposal by the Unit of Certification.</p> <p><b>Smallholder requirements:</b></p>	<p>During site visit assisted by audit facilitators, audit team did not find use of fire for waste disposal in company-owned plantation and/or smallholder’s block.</p>	Complied

	<p>Smallholders must be able to verbally explain that they understand and observe this requirement.</p> <p>- Minor compliance -</p>		
<p><b>Criterion 7.4:</b> Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.</p>			
<p>7.4.1</p>	<p>Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts.</p> <p><b>Smallholder requirements:</b>          Smallholders to implement good agriculture practices as communicated through extension services delivered by organization that is managing the smallholders.</p> <p>- Minor compliance -</p>	<p>Each estate has conducted the fertilizer application to maintain soil fertility. Based on document verification, there is a record of the application in each estate year 2021 as follows:</p> <ul style="list-style-type: none"> <li>• Pandi Estate – Bakada Plantation:             <ol style="list-style-type: none"> <li>1. DAP: 179.05 Ton (100% completed)</li> <li>2. Fertibor: 85.05 ton (100% completed)</li> <li>3. Kieserite: 37 Ton (100% completed)</li> <li>4. MOP: 219.65 Ton (100% completed)</li> <li>5. Urea: 690.55 Ton (100% completed)</li> </ol> </li> <li>• Record of fertilizer documented in Fertilizer Application Progress. Sample taken: Barema Plantation 2021:             <ol style="list-style-type: none"> <li>1. Barema 1: Fertibor (544 bag; 101% completed), Kieserite (304 bag; 101% completed), Urea (4,956 bag; 97% completed)</li> <li>2. Barema 2: DAP (1,086 bag; 116% completed), Fertibor (431 bag; 101% completed), Kieserite (111 bag; 102% completed), MOP (329 bag; 103% completed), Urea (4,598 bag; 101% completed)</li> </ol> </li> </ul> <p>HOPL (Pandi Estate – Bakada Plantation) has conducted the fertilizer application in accordance with the annual recommendation.</p> <p>Smallholders are implementing good agricultural practices as communicated through extension services delivered by HOPL. Available attendance list and minutes of field day, e.g.</p>	<p>Complied</p>

		<ol style="list-style-type: none"> <li>1. Malasi Area: Mini Field Day on 8 August 2021, facilitate by OPIC, PNG-OPRA, HOPL-SHAAS &amp; LANDS. Attended by 70 participants. The topic of the field day was related to: <ul style="list-style-type: none"> <li>➤ Production and Best Management Practices,</li> <li>➤ RSPO Principles &amp; Criteria,</li> <li>➤ Fertilizer, Pest and Disease</li> <li>➤ Land ownership requirements</li> </ul> </li> <li>2. Wilelo Section 12: Mini field day on 26 October 2021, facilitate by HOPL-SHAAS &amp; PMB - Kimbe. Attended by 31 participants. The topic of the field day was related to: <ul style="list-style-type: none"> <li>➤ Chemical issuance and usage</li> <li>➤ Production</li> <li>➤ Health and safety</li> <li>➤ Fertilizer application</li> <li>➤ Pest and disease</li> </ul> </li> <li>3. Muumata – Independent Estate: RSPO Policies and Best Management Practices Training on 3 August 2022, facilitate by HOPL-SHAAS extension officer (Billy Werake). Attended by 10 participants. The topic of the meeting was related to RSPO requirement (ethical conduct, child labour, bell hevi/grievance procedure, fire watch, environmental protection, and chemical usage) and best management practices (block upkeep, fertilizer application, harvesting and replanting).</li> </ol> <p>Smallholder fertilizer recommendation on 2021 was UREA 2,590 Ton. Actual only 1,175 Ha.</p>	
7.4.2	<p>Periodic tissue and soil sampling is carried out by Companies to monitor and manage changes in soil fertility and plant health. Tissue testing is conducted annually to determine fertiliser requirements for the following year. Soil testing is carried out at replant.</p>	<p>HOPL practices periodic tissue and soil analysis. The periodic tissue and soil sampling carried out by Applied Agricultural Resources Sdn. Bhd during March – June 2021 (216 sample taken from entire estate). Tissue sampling is taken on annual basis prior to the manuring program being established. Guidelines</p>	Complied

	<p><b>Guidance:</b> Smallholders are provided with access to test results applicable to the Company Management Unit closes to their block.</p> <p><b>Smallholder requirements:</b>          Organization that is managing the smallholders to take tissue samples from representative Smallholders annually.          - Minor compliance -</p>	<p>are available in the "GUIDELINE FOR OIL PALM TISSUE SAMPLING IN HOPL PLANTATIONS". Therein is shown:</p> <ul style="list-style-type: none"> <li>• Introduction/Background;</li> <li>• Identifying a frond to sample/identifying each leaf;</li> <li>• Leaf sampling/sampling methodology/leaf sampling density;</li> <li>• Leaf sample processing;</li> <li>• Frequency &amp; timing;</li> <li>• Deficiency symptoms.</li> </ul> <p>Document seen: Foliar Analysis Result by Applied Agricultural Resources Sdn. Bhd. dated 12 August 2021, Lab reference PC20/PNGHOPL 1 to 216. Major element checked (% on DM) are Ash, N, P, K, Ca, Mg. Minor element checked are Cl (%), S (%) and B (ppm).</p> <p>HOPL conducted soil testing as well. The sampling conducted between on 2019 by Hill Laboratories. Sighted the document of Soil Analysis Result by Hill Laboratories, dated 4 July 2019; Quote No.97058; sample type is Soil Oil Palm (S73); comprise of 27 samples; analysis type: pH, Olsen Phosphorus, Anion Storage Capacity, Potassium, Magnesium, Sodium, CEC, Total Base Saturation, Volume Weight, Organic matter, total carbon, total nitrogen, C/N ration, total saturation and MAF units.</p> <p><b>Smallholder:</b>          Tissue sampling analysis in smallholder are performed by PNG-OPRA. Available PNG-OPRA letter dated 30 August 2021 regarding advice from PNGOPRA on Bialla Smallholders leaf sampling and subsequent laboratory analysis for 2020 and 2021 that smallholder leaf sampling for 2021 and 2022 has been conducted respectively, however there will be a delay in getting the laboratory result.</p>	
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7.4.3	<p>A nutrient recycling strategy is in place, which includes the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers.</p> <p>- Minor compliance -</p>	<p>During this field visit, only Hargy Estate – Barema Plantation that conduct EFB application. Based on interview with the division manager obtained information that the EFB application using dosage 40 ton/Ha/year and placed in interrow with U-shape.</p>	Complied
7.4.4	<p>Records of fertiliser inputs are maintained.</p> <p><b>Smallholder requirements:</b>          Organization that is managing the smallholders to maintain records of fertiliser distribution.</p> <p>- Minor compliance -</p>	<p>Records for fertilizer application are available and maintained under Fertilizer Booklet and OMP (Oil Palm Management Practice) Report. During this annual surveillance assessment, the following fertilizer input was captured and verified.</p> <ul style="list-style-type: none"> <li>• Pandi Estate – Bakada Plantation:             <ol style="list-style-type: none"> <li>1. DAP: 179.05 Ton (100% completed)</li> <li>2. Fertibor: 85.05 ton (100% completed)</li> <li>3. Kieserite: 37 Ton (100% completed)</li> <li>4. MOP: 219.65 Ton (100% completed)</li> <li>5. Urea: 690.55 Ton (100% completed)</li> </ol> </li> <li>• Record of fertilizer documented in Fertilizer Application Progress. Sample taken Barema Plantation 2021:             <ol style="list-style-type: none"> <li>1. Barema 1: Fertibor (544 bag; 101% completed), Kieserite (304 bag; 101% completed), Urea (4,956 bag; 97% completed)</li> <li>2. Barema 2: DAP (1,086 bag; 116% completed), Fertibor (431 bag; 101% completed), Kieserite (111 bag; 102% completed), MOP (329 bag; 103% completed), Urea (4,598 bag; 101% completed)</li> </ol> </li> </ul> <p><b>Smallholder:</b>          Records of fertilizer input in smallholder are available, e.g. Smallholder Smallholder fertilizer recommendation on 2021 was UREA 2,590 Ton. Actual only 1,175 Ha.</p> <p>Records of fertilizer input in smallholder are available, e.g.</p>	Complied

		<ul style="list-style-type: none"> <li>- Smallholder No.101082 – Michael Palia; Outgrowers Department Goods &amp; Services Delivery Docket; dated 20 May 2021; Fertilizer Urea; quantity 8 bags; unit price K100; total cost K800.</li> <li>- Smallholder No.101039 – Ephraim Vorit; Outgrowers Department Goods &amp; Services Delivery Docket; dated 20 May 2021; Fertilizer Urea; quantity 4 bags; unit price K100; total cost K400.</li> <li>- Smallholder No.880013E – Mumata Independent Estate; Outgrowers Department Goods &amp; Services Delivery Docket, Division III; dated 25 September 2021; Fertilizer Urea; quantity 157 bags; unit price K100; total cost K15,700.</li> </ul>	
<b>Criterion 7.5:</b> Practices minimise and control erosion and degradation of soils.			
7.5.1	<p><b>(C)</b> Maps identifying marginal and fragile soils, including steep terrain, are available.</p> <p>- Critical (Major) compliance -</p>	<p>Soil map of Bialla Project 2020, scale 1:84,000, dated February 2020 is available. The map consist of soil type and topography of Hargy Plantation, Barema Plantation, Karla Plantation, Ibana Plantation, Bakada Plantation, all smallholders and all Mills. Based on the soil map, soils in HOPL are Loam to sandy loam; heavy loam to sandy clay loam; organic loams, silty loam; sand to loamy sand; clay loam to silty clay loam, loamy sand/gravel.</p> <p>Based on Soil analysis issued by Hill Laboratories dated 10 April 2006, Hargy Pit 1 Soil description was as follows:</p> <ul style="list-style-type: none"> <li>• Parent material: Volcanic alluvial materials;</li> <li>• Landform: Alluvial plain on foot slope;</li> <li>• Slope: Flat;</li> <li>• Previous land use: Logged forest;</li> <li>• Vegetation: Logged secondary forest;</li> <li>• Surface features: Thick litter layer and no outcrops, deep water trench common feature;</li> <li>• Ground cover: good ground cover with forest under growth;</li> <li>• Soil drainage: well drained;</li> </ul>	Complied

		<p>Comments: there were no stones and gravel found throughout the profile, there were orange inclusions at 150-200 cm depth;</p> <p>Description: Brown (10YR 4/3); sandy clay loam; friable; weakly developed fine-medium sub angular blocky structure; slightly sticky; plastic; many fine pores; rapid porosity; many fine and medium and few coarse roots, diffuse boundary to.</p> <p>Below is detail of soil type in HOPL:</p> <ul style="list-style-type: none"> <li>• Yanaswali Plantation – Vamakuma Soils. Mengen Bakada Soils (HOPL expansion 2014), Scale 1:16,950. ± 90% is Sandy clay loam; 10 % is River gravel.</li> <li>• Yanaswali Plantation – Sena Soils. Mengen Bakada Soils (HOPL expansion 2014), Scale 1:17,200. 100 % is loamy sand/gravel.</li> <li>• Bakada Plantation – Magalona Soils. Mengen Bakada Soils (HOPL expansion 2014), Scale 1:20,230. ± 65% is loamy sand/gravel; ± 35 % is loamy sand.</li> <li>• Karla Plantation Soils. Scale 1:40,200. Surface soil texture: ± 70% is sand to loamy sand, ± 20% is loam to sandy loam, 10% is heavy loam to sand clay loam.</li> <li>• Ibana Plantation Soils, Scale 1:37,440. Surface soil texture: 100% is sand to loamy sand.</li> <li>• Hargy Plantation Soils. Surface soil texture: sand to loamy sand (15%), heavy loam to sand clay loam (68%), clay loam to silty clay loam (5%), No data (10%), organic loam to sandy clay loam (2%).</li> <li>• Barema Plantation Soils. Surface soil texture: silty clay (70%), organic loam to sand clay loam (15%), clay loam to silty clay loam (15%).</li> <li>• Bakada Plantation - Alangily Soils, scale 1:26,590. Surface soil texture: sandy loam (90%), loamy sand (10%).</li> </ul>	
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7.5.2	<p>There is no extensive replanting of oil palm on steep terrain.</p> <p><b>Smallholder requirements:</b>          Smallholders do not plant on unsuitable slopes. Organization managing the smallholders to advise on slope suitability after consideration of gradient, soil type, harvesting safety and other relevant issue.</p> <p>- Minor compliance -</p>	<p>Based on field observation in Barema, Ibane and Bakada Plantation obtained information that there is no extensive replanting of oil palm on steep terrain in HOPL area including in smallholders.</p>	Complied
7.5.3	<p>There is no new planting of oil palm on steep terrain.</p> <p>- Minor compliance -</p>	<p>Based on field observation and interview, there is no new planting activity in HOPL area including in smallholders.</p>	Complied
<p><b>Criterion 7.6:</b> Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.</p>			
7.6.1	<p><b>(C)</b> To demonstrate the long-term suitability of land for palm oil cultivation, soil maps or soil surveys identifying marginal and fragile soils, including steep terrain, are taken into account in plans and operations.</p> <p>- Critical (Major) compliance -</p>	<p>Soil map of Bialla Project 2020, scale 1:84,000, dated February 2020 is available. The map consists of soil type and topography of Hargy Plantation, Barema Plantation, Karla Plantation, Ibane Plantation, Bakada Plantation, all smallholders and all Mills. Based on the soil map, soils in HOPL are Loam to sandy loam; heavy loam to sandy clay loam; organic loams, silty loam; sand to loamy sand; clay loam to silty clay loam, loamy sand/gravel.</p> <p>The certificate holder has had management strategy for fragile and problem soils and it is stated in the SOP for New Development No.PRO-ESD-GEN-001-11, issue No.11, dated 12 May 2021. It was stipulated in page 3: Consideration for New Planting Procedures Soil Surveys &amp; Topographic Information. Extensive planting on steep terrain, and/or on marginal soils, is avoided. The requirements are:</p>	Complied

		Where limited planting on fragile and marginal soils is proposed, plans (including maps) shall be developed and implemented to protect soils thus minimising adverse environmental and social impacts; Avoid planting on slope in excess of 25° slope; Avoid planting on contiguous areas of peat soils >3m deep and >150 Ha in extent.	
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 -	Based on field observation and interview, there is no extensive planting on marginal and fragile soils. Whole plantation located in mineral soil.	Complied
7.6.3	Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure. - Minor compliance -	Available Soil analysis issued by Hill Laboratories dated 10 April 2006 and HOPL Soil Map Bialla Project 2020. Soil surveys and topography information are used for site planning the establishment of new plantings, and the results are incorporated into plans and operations. Soil suitability map as result of soil surveys is adequate to establish the long-term suitability of land for oil palm cultivation. Available topographic information that guide the planning of drainage and irrigation systems, roads, and other infrastructure.	Complied
<b>Criterion 7.7:</b> No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.			
7.7.1	<b>(C)</b> There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas. - Critical (Major) compliance -	Based on Soil analysis issued by Hill Laboratories dated 10 April 2006 and HOPL Soil Map Bialla Project 2020, there is no peat in whole HOPL Plantations including in Smallholders area. This indicator is not applicable.	Not Applicable
7.7.2	Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat. <b>PROCEDURAL NOTE:</b> Maps and other documentation of peat soils are provided, prepared and shared in line with RSPO Peatland Working Group (PLWG) audit guidance (see Procedural Note for 7.7.5 below).	Based on Soil analysis issued by Hill Laboratories dated 10 April 2006 and HOPL Soil Map Bialla Project 2020, there is no peat in whole HOPL Plantations including in Smallholders area. This indicator is not applicable.	Not Applicable

	- Minor compliance -		
7.7.3	<p><b>(C)</b> Subsidence of peat is monitored, documented and minimised.</p> <p>- Critical (Major) compliance -</p>	<p>Based on Soil analysis issued by Hill Laboratories dated 10 April 2006 and HOPL Soil Map Bialla Project 2020, there is no peat in whole HOPL Plantations including in Smallholders area.</p> <p>This indicator is not applicable.</p>	Not Applicable
7.7.4	<p><b>(C)</b> A documented water and ground cover management programme is in place.</p> <p>- Critical (Major) compliance -</p>	<p>Based on Soil analysis issued by Hill Laboratories dated 10 April 2006 and HOPL Soil Map Bialla Project 2020, there is no peat in whole HOPL Plantations including in Smallholders area.</p> <p>This indicator is not applicable.</p>	Not Applicable
7.7.5	<p><b>(C)</b> For plantations planted on peat, drainability assessments are conducted following the RSPO Drainability Assessment Procedure, or other RSPO recognised methods, at least five years prior to replanting. The assessment result is used to set the timeframe for future replanting, as well as for phasing out of oil palm cultivation at least 40 years, or two cycles, whichever is greater, before reaching the natural gravity drainability limit for peat. When oil palm is phased out, it is replaced with crops suitable for a higher water table (paludiculture) or rehabilitated with natural vegetation.</p> <p><b>PROCEDURAL NOTE:</b> Full details of the RSPO Drainability Assessment Guidelines and related concepts and detailed actions are in the manual currently being fine-tuned/tested by PLWG. A final version should be approved by PLWG in January 2019 and will include additional guidance on the steps to be followed after the decision not to replant as well as implications for other stakeholders, smallholders, local communities and the unit of certification. It is recommended that a further twelve-month methodology trial period is proposed for all related management units (i.e. those with plantations on peat) to utilise the methodology and provide feedback to the PLWG to enable further refinement of procedure as</p>	<p>Based on Soil analysis issued by Hill Laboratories dated 10 April 2006 and HOPL Soil Map Bialla Project 2020, there is no peat in whole HOPL Plantations including in Smallholders area.</p> <p>This indicator is not applicable.</p>	Not Applicable

	<p>appropriate before January 2020. Units of certification have the option to defer replanting till after the availability of the revised guidelines. Additional guidance on alternative crops and rehabilitation of natural vegetation will be provided by PLWG.</p> <p><b>PROCEDURAL NOTE:</b> PLWG and the Smallholder Interim Group (SHIG) will collaboratively develop guidance for Independent Smallholders [cross links to SHIG and GHG issues]</p> <p>- Critical (Major) compliance -</p>		
7.7.6	<p><b>(C)</b> All existing plantings on peat are managed according to the 'RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat', version 2 (2018) and associated audit guidance.</p> <p>- Critical (Major) compliance -</p>	<p>Based on Soil analysis issued by Hill Laboratories dated 10 April 2006, there is no peat in whole HOPL Plantations including in Smallholders area.</p> <p>This indicator is not applicable.</p>	Not Applicable
7.7.7	<p><b>(C)</b> All areas of unplanted and set-aside peatlands in the managed area (regardless of depth) are protected as "peatland conservation areas"; new drainage, road building and power lines by the unit of certification on peat soils is prohibited; peatlands are managed in accordance with the 'RSPO BMPs for Management and Rehabilitation of Natural Vegetation Associated with Oil Palm Cultivation on Peat', version 2 (2018) and associated audit guidance</p> <p>- Critical (Major) compliance -</p>	<p>Based on Soil analysis issued by Hill Laboratories dated 10 April 2006, there is no peat in whole HOPL Plantations including in Smallholders area.</p> <p>This indicator is not applicable.</p>	Not Applicable
<p><b>Criterion 7.8:</b> Practices maintain the quality and availability of surface and groundwater.</p>			
7.8.1	<p>A water management plan is in place and implemented to promote more efficient use and continued availability of water sources and to avoid negative impacts on other users in the catchment. The plan addresses the following:</p>	<p>Hargy Oil Palms Limited submitted application for Environmental Permit Amalgamation to cover the Extraction and Discharge Points from all Hargy Estate area. The water extraction points consist of: 3 boreholes in Hargy POM for industrial use, 2 boreholes in Hargy POM compound for domestic use, 6 boreholes in Hargy Estate for domestic use, 3 boreholes in Barema POM for industrial and domestic use, 1 borehole in Barema Plantation for domestic use, 1 borehole and 3 surface water sources in Navo Estate for industrial and</p>	Complied

	<p>7.8.1a The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities.</p> <p>7.8.1b Workers have adequate access to clean water.</p> <p>- Minor compliance -</p>	<p>domestic use, 1 borehole in Navo POM for industrial use, 2 surface water sources in Pandi Estate for domestic use.</p> <p>Hargy POM and Hargy Estate: Hargy Oil Palms Limited has permit for waste water discharge points based on Environment Permit No.WD-L2(56) dated 13 October 1993, date of amendment 16 May 2005 and 26 May 2006, date of expiry 31 December 2028 – for Hargy Oil Palms Limited to carry out works at portions 9, 14, 15, 1081, 1492, 1494 at Bialla District of West New Britain Province; to discharge waste into environment from its premises while carrying out a level 2.</p> <table border="1" data-bbox="1025 710 1942 1361"> <thead> <tr> <th>Discharge point</th> <th>Location of wastewater discharge; Annual discharge volume</th> <th>Discharge point</th> <th>Location of wastewater discharge; Annual discharge volume</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Urumaili Division 2. 8,640 m<sup>3</sup>/year</td> <td>7</td> <td>Hargy POM and office building. 4,320 m<sup>3</sup>/year</td> </tr> <tr> <td>2</td> <td>Residential premise Urumaili Division 2. 4,320 m<sup>3</sup>/year</td> <td>8</td> <td>Managers Residential Premise. 8,640 m<sup>3</sup>/year</td> </tr> <tr> <td>3</td> <td>Kerakera Area 12, Division 3. 8,640 m<sup>3</sup>/year</td> <td>9</td> <td>Oil-water separator from Fuel Storage Hargy POM. 1,920 m<sup>3</sup>/year</td> </tr> <tr> <td>4</td> <td>Kerakera Area 12, Division 3. 4,320 m<sup>3</sup>/year</td> <td>10</td> <td>Vehicle workshop at Hargy POM to Solomon sea. 960 m<sup>3</sup>/year</td> </tr> <tr> <td>5</td> <td>Kerakera Area 12, Division 3. 8,640 m<sup>3</sup>/year</td> <td>11</td> <td>Treated mill POME from Hargy POM. 259,200 m<sup>3</sup>/year</td> </tr> </tbody> </table>	Discharge point	Location of wastewater discharge; Annual discharge volume	Discharge point	Location of wastewater discharge; Annual discharge volume	1	Urumaili Division 2. 8,640 m <sup>3</sup> /year	7	Hargy POM and office building. 4,320 m <sup>3</sup> /year	2	Residential premise Urumaili Division 2. 4,320 m <sup>3</sup> /year	8	Managers Residential Premise. 8,640 m <sup>3</sup> /year	3	Kerakera Area 12, Division 3. 8,640 m <sup>3</sup> /year	9	Oil-water separator from Fuel Storage Hargy POM. 1,920 m <sup>3</sup> /year	4	Kerakera Area 12, Division 3. 4,320 m <sup>3</sup> /year	10	Vehicle workshop at Hargy POM to Solomon sea. 960 m <sup>3</sup> /year	5	Kerakera Area 12, Division 3. 8,640 m <sup>3</sup> /year	11	Treated mill POME from Hargy POM. 259,200 m <sup>3</sup> /year	
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4	Kerakera Area 12, Division 3. 4,320 m <sup>3</sup> /year	10	Vehicle workshop at Hargy POM to Solomon sea. 960 m <sup>3</sup> /year																								
5	Kerakera Area 12, Division 3. 8,640 m <sup>3</sup> /year	11	Treated mill POME from Hargy POM. 259,200 m <sup>3</sup> /year																								

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		6	Kerakera Division 3. 4,320 m <sup>3</sup> /year											
<p>Barema POM: Environment Permit No.WE-L2B(209) date of issue 9 December 2010, date of commencement 7 January 2010, date of expiry 7 January 2035 – for Hargy Oil Palms Limited to carry out works within portions 2038, Milinch Ulawun, Fourmil Talasea West New Britain Province; while carrying out a level 2B (sub-category 9.5) activities for water total annual volume 280,806 m<sup>3</sup>/year.</p>														
<table border="1"> <thead> <tr> <th data-bbox="1010 655 1211 703">Extraction point</th> <th data-bbox="1211 655 1957 703">Extraction rate/Annual extraction volume</th> </tr> </thead> <tbody> <tr> <td data-bbox="1010 703 1211 751">1</td> <td data-bbox="1211 703 1957 751">8,915 liters/hour; 55,629.60 m<sup>3</sup>/year</td> </tr> <tr> <td data-bbox="1010 751 1211 799">2</td> <td data-bbox="1211 751 1957 799">19,103 liters/hour; 119,202.70 m<sup>3</sup>/year</td> </tr> <tr> <td data-bbox="1010 799 1211 863">3</td> <td data-bbox="1211 799 1957 863">16,983 liters/hour; 105,973.90 m<sup>3</sup>/year</td> </tr> </tbody> </table>							Extraction point	Extraction rate/Annual extraction volume	1	8,915 liters/hour; 55,629.60 m <sup>3</sup> /year	2	19,103 liters/hour; 119,202.70 m <sup>3</sup> /year	3	16,983 liters/hour; 105,973.90 m <sup>3</sup> /year
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<p>Navo POM: Environment Permit No. WD-L2B (104) to Hargy Oil Palms Limited, date of issue 11 January 2001, amendment 16 June 2006, expiry on 31 December 2053. The permit to carry out works at Ibana Oil Palm Plantation and Navo Palm Oil Mill within Portion 624, Biiala, West New Britain Province; to discharge waste into environment carrying out level 2 activities associated with agricultural cultivation and palm oil extraction.</p>														
<table border="1"> <thead> <tr> <th data-bbox="1010 1102 1167 1214">Discharge point</th> <th data-bbox="1167 1102 1489 1214">Location of wastewater discharge; Annual discharge volume</th> <th data-bbox="1489 1102 1621 1214">Discharge point</th> <th data-bbox="1621 1102 1957 1214">Location of wastewater discharge; Annual discharge volume</th> </tr> </thead> <tbody> <tr> <td data-bbox="1010 1214 1167 1343">1</td> <td data-bbox="1167 1214 1489 1343">Executive compound Karla Plantation. 3,646 m<sup>3</sup>/year</td> <td data-bbox="1489 1214 1621 1343">7</td> <td data-bbox="1621 1214 1957 1343">Oil-water separator from Fuel Storage Karla Plantation. 900 m<sup>3</sup>/year</td> </tr> </tbody> </table>							Discharge point	Location of wastewater discharge; Annual discharge volume	Discharge point	Location of wastewater discharge; Annual discharge volume	1	Executive compound Karla Plantation. 3,646 m <sup>3</sup> /year	7	Oil-water separator from Fuel Storage Karla Plantation. 900 m <sup>3</sup> /year
Discharge point	Location of wastewater discharge; Annual discharge volume	Discharge point	Location of wastewater discharge; Annual discharge volume											
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		2	Worker compound Karla Plantation. 10,947 m <sup>3</sup> /year	8	Navo POM and Office building. 10,947 m <sup>3</sup> /year						
		3	Mill compound Karla Plantation, Division 3. 12,951 m <sup>3</sup> /year	9	Oil-water separator from Fuel Storage Navo POM. 900 m <sup>3</sup> /year						
		4	Kiba Division, Karla Plantation. 10,947 m <sup>3</sup> /year	10	Grease trap from Navo POM. 1,440 m <sup>3</sup> /year						
		5	Oil-water separator from Fuel Storage Karla Plantation. 900 m <sup>3</sup> /year	11	Grease trap from Navo POM. 1,440 m <sup>3</sup> /year						
		6	Oil-water separator from Fuel Storage Karla Plantation workshop. 900 m <sup>3</sup> /year	12	POM effluent Navo POM to land surface. 155,330 m <sup>3</sup> /year						
		<p>Water extraction permit in Navo POM and Navo Estate, Environment Permit No.WE-L2B(60) date of issue 11 January 2001, date of amendment 16 June 2006, date of expiry 31 December 2053 – for Hargy Oil Palms Limited to extract water from Ibana River within Portion 624, West New Britain Province.</p> <table border="1"> <thead> <tr> <th>Extraction point</th> <th>Location of extraction point; Annual extraction volume</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Ibana Plantation Compound and Navo POM. Volume 180,000 m<sup>3</sup>/year</td> </tr> <tr> <td>2</td> <td>Ibana Oil Palm Plantation. Volume 47,520 m<sup>3</sup>/year</td> </tr> </tbody> </table>						Extraction point	Location of extraction point; Annual extraction volume	1	Ibana Plantation Compound and Navo POM. Volume 180,000 m <sup>3</sup> /year
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2	Ibana Oil Palm Plantation. Volume 47,520 m <sup>3</sup> /year										

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

Extraction point	Location of extraction point; Annual extraction volume
1	Borehole from an underground spring water within Portion 733. Volume 34,560 m <sup>3</sup> /year.

Hargy Oil Palms Limited provides clean water to the workers. Water quality testing performed on quarterly basis. Test result from New Britain Laboratory, Mosa.

Pandi Estate, Bakada Plantation – Sabalbala compound

Parameter	2021	2022		
	Oct	Jan	Apr	Jul
Total coliforms <i>Max. level &lt;3 per 100 ml</i>	8	0	0	1
Colour, apparent <i>Max. level 50</i>	3	13	5	<1
E. coli (colonies/100ml) <i>Max. level none</i>	3	0	0	0
Total Solids (mg/L) <i>Max. level 1500 mg/L</i>	230	210	240	220
Turbidity (NTU) <i>Max. level 25 NTU</i>	5.6	5.2	6.2	10.7

Navo Estate – Ibane compound

Parameter	2021	2022		
	Oct	Jan	Apr	Jul
Total coliforms <i>Max. level &lt;3 per 100 ml</i>	98	27	1	TNTC
Colour, apparent <i>Max. level 50</i>	2	29	4	<1
E. coli (colonies/100ml) <i>Max. level none</i>	21	9	1	19
Total Solids (mg/L) <i>Max. level 1500 mg/L</i>	200	190	200	200
Turbidity (NTU) <i>Max. level 25 NTU</i>	5.9	4	7.7	11.9

Water quality testing in Navo Mill compound

Parameter	2021	2022		
	Oct	Jan	Apr	Jul
Total coliforms <i>Max. level &lt;3 per 100 ml</i>	TNTC	6	55	8
Colour, apparent <i>Max. level 50</i>	9	13	10	<1

		<table border="1"> <tr> <td>E. coli (colonies/100ml) <i>Max. level none</i></td> <td>3</td> <td>0</td> <td>50</td> <td>4</td> </tr> <tr> <td>Total Solids (mg/L) <i>Max. level 1500 mg/L</i></td> <td>280</td> <td>260</td> <td>260</td> <td>210</td> </tr> <tr> <td>Turbidity (NTU) <i>Max. level 25 NTU</i></td> <td>6.2</td> <td>5.5</td> <td>7.4</td> <td>10.7</td> </tr> </table> <p>Hargy Oil Palms Limited is still trying to apply for water extraction permit for Hargy Estate. Hargy in the email stated on letter 2 March 2018, an application was lodged on 19 December 2016 and company has not yet received any feedback on the status.</p>	E. coli (colonies/100ml) <i>Max. level none</i>	3	0	50	4	Total Solids (mg/L) <i>Max. level 1500 mg/L</i>	280	260	260	210	Turbidity (NTU) <i>Max. level 25 NTU</i>	6.2	5.5	7.4	10.7	
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Turbidity (NTU) <i>Max. level 25 NTU</i>	6.2	5.5	7.4	10.7														
7.8.2	<p><b>(C)</b> Water courses and wetlands are protected, including maintaining and restoring appropriate riparian and other buffer zones in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017) 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><b>Smallholder requirements:</b>          Smallholders must protect water courses and wetlands by not polluting with rubbish or other waste.          - Critical (Major) compliance -</p>	<p>HOPL has protected water course and wetlands, including maintaining and restoring appropriate riparian and other buffer zones in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017). Waste water from Hargy Mill are discharge to ocean. Based on field observation, the wastewater from effluent pond is discharge straight to the Bismarck ocean/Kimbe bay.</p> <p>In smallholder, smallholder with the water courses at the back of their block maintain the natural vegetation.</p>	Complied															
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>Hargy POM have POME treatment ponds, using anaerobic treatment, before final discharge to sea. The capacity of the POME ponds:</p>	Complied															

<p>- Minor compliance -</p>	<ul style="list-style-type: none"> <li>- Pond 1: 30 x 17.5 x 1.8 m = 945 m<sup>3</sup> (cooling)</li> <li>- Pond 2: 30 x 16.5 x 1.2 m = 594 m<sup>3</sup> (cooling)</li> <li>- Anaerobic Pond 3: 124.5 x 29 x 4 m = 14,442 m<sup>3</sup> (retention 13 days)</li> <li>- Anaerobic Pond 4: 3 x (102.2 x 20 x 4 m) = 24,528 m<sup>3</sup> (retention 22 days)</li> <li>- Anaerobic Pond 5: 2 x (102.2 x 20 x 4 m) = 16,352 m<sup>3</sup> (retention 15 days)</li> <li>- Anaerobic Pond 6: 136 x 32.5 x 4 m = 17,680 m<sup>3</sup> (retention 16 days)</li> <li>- The POME quality was monitored on monthly basis from National Analytical &amp; Testing Services Ltd., Lae, Morobe Province in PNG.</li> </ul> <p>Hargy POM's POME quality</p> <table border="1" data-bbox="1032 759 1944 1359"> <thead> <tr> <th>Month</th> <th>BOD External Analysis (mg/L)</th> <th>BOD Internal Analysis (mg/L)</th> <th>pH</th> <th>TSS External Analysis (mg/L)</th> </tr> </thead> <tbody> <tr> <td>Jul 2021</td> <td>51</td> <td>111</td> <td>8.1</td> <td>220</td> </tr> <tr> <td>Aug 2021</td> <td>62</td> <td>39</td> <td>7.6</td> <td>80</td> </tr> <tr> <td>Sep 2021</td> <td>401</td> <td>81</td> <td>8.2</td> <td>690</td> </tr> <tr> <td colspan="5"><i>(Delay in desilting program)</i></td> </tr> <tr> <td>Oct 2021</td> <td>260</td> <td>96</td> <td>8.4</td> <td>480</td> </tr> <tr> <td colspan="5"><i>(Hargy POM final discharge in week 43 to install flowmeter, desilting of final pond to be arranged, geotube test done)</i></td> </tr> <tr> <td>Nov 2021</td> <td>90</td> <td>271</td> <td>8.0</td> <td>1,520</td> </tr> <tr> <td colspan="5"><i>(Work in progress on the flowmeter installation, desilting delayed due to wet weather, geotube in use to reduce TSS – still in trial, driver recruit in progress for full time de-silting)</i></td> </tr> </tbody> </table>	Month	BOD External Analysis (mg/L)	BOD Internal Analysis (mg/L)	pH	TSS External Analysis (mg/L)	Jul 2021	51	111	8.1	220	Aug 2021	62	39	7.6	80	Sep 2021	401	81	8.2	690	<i>(Delay in desilting program)</i>					Oct 2021	260	96	8.4	480	<i>(Hargy POM final discharge in week 43 to install flowmeter, desilting of final pond to be arranged, geotube test done)</i>					Nov 2021	90	271	8.0	1,520	<i>(Work in progress on the flowmeter installation, desilting delayed due to wet weather, geotube in use to reduce TSS – still in trial, driver recruit in progress for full time de-silting)</i>					
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Dec 2021	48	419	8.4	250
Jan 2022	99	100	8.0	340
Feb 2022	504	52	7.9	2,200
<i>(Recirculation pump breakdown causing slow down of bacterial activity, desilting delay due to wet weather, try to fix pump, desilting commenced once weather improved)</i>				
Mar 2022	283	99	8.6	510
<i>(Desilting delay due to wet weather)</i>				
Apr 2022	208		8.1	220
<i>(Geotubes all full)</i>				
May 2022	357	77	7.7	19,000
<i>(Due to sample collected during desilting and not allowing sufficient settling prior to sample collection)</i>				
Jun 2022	83	80	8.0	340
Jul 2022	42	212	8.2	690
<i>(Recirculation pump breakdown causing slow down of bacterial activity, try to fix pump, temporarily use geotube cutter while awaiting pump fix)</i>				
*) Parameter limit is 100 mg/L for discharge to surface water				
<p>Navo POM have POME treatment ponds, using anaerobic treatment, before final discharge to plantation irrigation trenches as land application. The capacity of the POME ponds:</p> <ul style="list-style-type: none"> <li>- Pond 1: 20,000 m<sup>3</sup> (cooling)</li> </ul>				

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- Pond 2: 16,000 m<sup>3</sup> (anaerobic)
- Pond 3: 16,000 m<sup>3</sup> (anaerobic)
- Pond 4: 40,000 m<sup>3</sup> (aerobic)
- Pond 5: 20,000 m<sup>3</sup> (aerobic – final discharge)

The POME quality was monitored on monthly basis from New Britain Laboratories Services in Mosa, WNBP, Papua New Guinea. Navo POM's POME quality from pond 4

Month	BOD Internal Analysis (mg/L)	BOD External Analysis (mg/L)	pH	TSS External Analysis (mg/L)
Jul 2021	33	263	7.7	7000
Aug 2021	41	103	7.7	190
Sep 2021	116	565	7.8	5600
Oct 2021	207	298	7.9	790
Nov 2021	20	51	8.0	580
Dec 2021	138	85	8.1	340
Jan 2022	120	154	8.0	440
Feb 2022	144	164	6.7	320
Mar 2022	168	97	7.9	190
Apr 2022	168	747	7.9	440
May 2022	159	61	7.8	810
Jun 2022	220	91	7.5	330
Jul 2022	50	52	7.9	190

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

Barema POM have POME treatment ponds after the biogas plant, before final discharge to POME land application in Barema Plantation. The capacity of the POME ponds:

- Pond 1: 8,428 m<sup>3</sup>
- Pond 2: 51,480 m<sup>3</sup>
- Pond 3: 14,437 m<sup>3</sup>
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Barema POM's POME quality

Month	BOD External Analysis (mg/L)	BOD Internal Analysis (mg/L)	pH	TSS Internal Analysis (mg/L)
Jul 2021	51	299	7.4	20,220
Aug 2021	383	224	8.5	850
Sep 2021	230	220	8.1	720
Oct 2021	182	299	8.1	570
Nov 2021	81	326	8.1	840
Dec 2021	152	121	8.2	450
Jan 2022	102	431	8.1	650
Feb 2022	60	120	8.0	510
Mar 2022	70	100	8.2	110
Apr 2022	56	108	8.2	1,050

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		<table border="1"> <tr> <td>May 2022</td> <td>113</td> <td>125</td> <td>8.1</td> <td>510</td> </tr> <tr> <td>Jun 2022</td> <td>27</td> <td>176</td> <td>8.1</td> <td>190</td> </tr> <tr> <td>Jul 2022</td> <td>42</td> <td>253</td> <td>8.0</td> <td>4820</td> </tr> </table> <p>*) BOD parameter limit is 4000 mg/L for discharge to land application</p>	May 2022	113	125	8.1	510	Jun 2022	27	176	8.1	190	Jul 2022	42	253	8.0	4820																																						
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7.8.4	<p>Mill water use per tonne of FFB is monitored and recorded.                      - Minor compliance -</p>	<p>Hargy Oil Palms Limited monitors and recorded mill water use per tonne FFB processed.                      Hargy POM process water use</p> <table border="1"> <thead> <tr> <th>Month</th> <th>FFB processed (tons)</th> <th>Process water</th> <th>Process water/ton FFB</th> </tr> </thead> <tbody> <tr> <td>Jul 2021</td> <td>14,102</td> <td>1,891*</td> <td>0,13</td> </tr> <tr> <td>Aug 2021</td> <td>12,339</td> <td>5,137*</td> <td>0,42</td> </tr> <tr> <td>Sep 2021</td> <td>13,136</td> <td>916*</td> <td>0,07</td> </tr> <tr> <td>Oct 2021</td> <td>13,963</td> <td>12,228</td> <td>0,88</td> </tr> <tr> <td>Nov 2021</td> <td>15,170</td> <td>20,126</td> <td>1,33</td> </tr> <tr> <td>Dec 2021</td> <td>16,103</td> <td>27,316</td> <td>1,70</td> </tr> <tr> <td>Jan 2022</td> <td>13,445</td> <td>21,300</td> <td>1,58</td> </tr> <tr> <td>Feb 2022</td> <td>11,263</td> <td>11,300</td> <td>1,00</td> </tr> <tr> <td>Mar 2022</td> <td>13,877</td> <td>29,850</td> <td>2,15</td> </tr> <tr> <td>Apr 2022</td> <td>13,045</td> <td>16,950</td> <td>1,30</td> </tr> <tr> <td>May 2022</td> <td>16,040</td> <td>29,440</td> <td>1,84</td> </tr> <tr> <td>Jun 2022</td> <td>14,936</td> <td>13,170</td> <td>0,88</td> </tr> </tbody> </table>	Month	FFB processed (tons)	Process water	Process water/ton FFB	Jul 2021	14,102	1,891*	0,13	Aug 2021	12,339	5,137*	0,42	Sep 2021	13,136	916*	0,07	Oct 2021	13,963	12,228	0,88	Nov 2021	15,170	20,126	1,33	Dec 2021	16,103	27,316	1,70	Jan 2022	13,445	21,300	1,58	Feb 2022	11,263	11,300	1,00	Mar 2022	13,877	29,850	2,15	Apr 2022	13,045	16,950	1,30	May 2022	16,040	29,440	1,84	Jun 2022	14,936	13,170	0,88	Complied
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*\*) water flowmeter was error, and replaced in September 2021*

Barema POM process water use

Month	FFB processed (tons)	Process water	Process water/ton FFB
Jul 2021	16,081.94	4,746	0.30
Aug 2021	15,439.98	4,084	0.26
Sep 2021	18,053.60	4,484	0.25
Oct 2021	13,773.44	4,529	0.33
Nov 2021	16,957.12	6,581	0.39
Dec 2021	18,027.72	5,114	0.28
Jan 2022	17,897.86	6,363	0.36
Feb 2022	11,959.18	4,618	0.39
Mar 2022	18,687.40	6,470	0.35
Apr 2022	17,035.32	5,072	0.30
May 2022	19,480.58	6,336	0.33
Jun 2022	19,968.32	6,191	0.31

Navo POM process water use

Month	FFB processed (tons)	Process water/ton FFB milled	Process water
Jul 2021	18,827	0.73	13,756

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		<table border="1"> <tr><td>Aug 2021</td><td>17,346</td><td>0.66</td><td>11,363</td></tr> <tr><td>Sep 2021</td><td>14,733</td><td>0.62</td><td>9,134</td></tr> <tr><td>Oct 2021</td><td>19,917</td><td>0.69</td><td>13,683</td></tr> <tr><td>Nov 2021</td><td>22,163</td><td>0.71</td><td>15,629</td></tr> <tr><td>Dec 2021</td><td>20,232</td><td>0.75</td><td>15,090</td></tr> <tr><td>Jan 2022</td><td>22,046</td><td>0.67</td><td>14,718</td></tr> <tr><td>Feb 2022</td><td>17,194</td><td>0.88</td><td>15,171</td></tr> <tr><td>Mar 2022</td><td>22,110</td><td>0.59</td><td>12,997</td></tr> <tr><td>Apr 2022</td><td>20,134</td><td>0.57</td><td>11,733</td></tr> <tr><td>May 2022</td><td>23,412</td><td>0.71</td><td>16,543</td></tr> <tr><td>Jun 2022</td><td>21,963</td><td>0.69</td><td>15,073</td></tr> </table> <p>In Navo POM, HOPL found faulty water meter. After faulty water meter was replaced in April 2021, water metered increased. Water meter repositioned for full flow metering on 22 August 2021.</p>	Aug 2021	17,346	0.66	11,363	Sep 2021	14,733	0.62	9,134	Oct 2021	19,917	0.69	13,683	Nov 2021	22,163	0.71	15,629	Dec 2021	20,232	0.75	15,090	Jan 2022	22,046	0.67	14,718	Feb 2022	17,194	0.88	15,171	Mar 2022	22,110	0.59	12,997	Apr 2022	20,134	0.57	11,733	May 2022	23,412	0.71	16,543	Jun 2022	21,963	0.69	15,073	
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<b>Criterion 7.9:</b> Efficiency of fossil fuel use and the use of renewable energy is optimised																																															
7.9.1	A plan for improving efficiency of the use of fossil fuels and to optimise renewable energy is in place, monitored and reported. - Minor compliance -	<p>Hargy Oil Palms Limited made Electrical Weekly Service Schedule as controls to minimise mileage and fuel usage by servicing the genset. Hargy POM's diesel usage</p> <table border="1"> <thead> <tr> <th>Month</th> <th>FFB processed (tons)</th> <th>Diesel (liters)</th> </tr> </thead> <tbody> <tr> <td>Jul 2021</td> <td>14,102</td> <td>54,000</td> </tr> <tr> <td>Aug 2021</td> <td>12,339</td> <td>56,100</td> </tr> </tbody> </table>	Month	FFB processed (tons)	Diesel (liters)	Jul 2021	14,102	54,000	Aug 2021	12,339	56,100	Complied																																			
Month	FFB processed (tons)	Diesel (liters)																																													
Jul 2021	14,102	54,000																																													
Aug 2021	12,339	56,100																																													

Sep 2021	13,136	51,500
Oct 2021	13,963	53,600
Nov 2021	15,170	49,800
Dec 2021	16,103	56,000
Jan 2022	13,445	56,100
Feb 2022	11,263	47,200
Mar 2022	13,877	55,900
Apr 2022	13,045	52,600
May 2022	16,040	55,100
June 2022	14,936	37,700

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

Month	Fiber (MT)	Palm Kernel Shell (MT)
Jul 2021	2,265.29	1,128.15
Aug 2021	1,974.23	987.11
Sep 2021	2,101.82	1,050.91
Oct 2021	2,234.15	1,117.08
Nov 2021	2,427.21	1,213.61
Dec 2021	2,576.44	1,288.22
Jan 2021	2,151.17	1,075.59
Feb 2021	1,802.00	901.00

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Mar 2021	2,220.28	1,110.14
Apr 2021	2,087.22	1,043.61
May 2021	2,566.47	1,283.24
Jun 2021	2,389.83	1,194.92

Barema POM's diesel usage

Month	FFB processed (tons)	Diesel (liters)
Jul 2021	16,081.94	37,500
Aug 2021	15,439.98	38,800
Sep 2021	18,053.60	26,500
Oct 2021	13,773.44	38,700
Nov 2021	16,957.12	34,900
Dec 2021	18,027.72	31,680
Jan 2022	17,897.86	42,900
Feb 2022	11,959.18	49,100
Mar 2022	18,687.40	37,350
Apr 2022	17,035.32	28,900
May 2022	19,480.58	26,200
June 2022	19,968.32	29,333

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

Month	Fiber (MT)	Palm Kernel Shell (MT)
Jul 2021	2,573.11	1,286.56
Aug 2021	2,456.00	1,228.00
Sep 2021	2,888.58	1,444.29
Oct 2021	2,203.75	1,101.08
Nov 2021	2,713.14	1,356.57
Dec 2021	2,884.44	1,442.22
Jan 2022	2,863.66	1,431.83
Feb 2022	1,913.47	956.73
Mar 2022	2,989.98	1,494.99
Apr 2022	2,725.65	1,362.83
May 2022	3,116.89	1,558.45
Jun 2022	3,194.93	1,597.47

Navo POM's diesel usage

Month	FFB processed (tons)	Diesel (liters)
Jul 2021	18,827	69,461
Aug 2021	17,346	78539
Sep 2021	14,733	63,743
Oct 2021	19,917	69,564
Nov 2021	22,163	65,728

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Dec 2021	20,232	59,479
Jan 2022	22,046	67,700
Feb 2022	17,194	59,200
Mar 2022	22,110	62,000
Apr 2022	20,134	57,253
May 2022	23,412	58,111
June 2022	21,963	63,428

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

Month	Fiber (MT)	Palm Kernel Shell (MT)
Jul 2021	3,012.39	1,506.19
Aug 2021	2,775.41	1,387.70
Sep 2021	2,357.34	1,178.67
Oct 2021	3,186.67	1,593.33
Nov 2021	3,546.04	1,773.02
Dec 2021	3,237.08	1,618.54
Jan 2022	3,527.34	1,763.67
Feb 2022	2,751.01	1,375.51
Mar 2022	3,537.61	1,768.80
Apr 2022	3,285.46	1,642.73

		May 2022	3,745.99	1,872.99	
		Jun 2022	3,514.10	1,757.05	
<b>Criterion 7.10:</b> Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.					
7.10.1	<p><b>(C)</b> GHG emissions are identified and assessed for the unit of certification. Plans to reduce or minimise them are implemented, monitored through the Palm GHG calculator and publicly reported.</p> <p>- Critical (Major) compliance -</p>	<p>The parameter are Significant Aspect, Objective, Requirement, Resource, Timeframe, and Basis of Evaluation. Significant pollutants and GHG emissions from any sources is identify, including the plan to reducing it. For example: to reduce the GHG, Barema POM already has Methane Gas Capture from Mill effluent prior discharge to the plantation as Land Application.</p> <p>Company has prepared the PalmGHG calculator, based on database period July 2021 – June 2022.</p>			Complied
7.10.2	<p><b>(C)</b> Starting 2014, the carbon stock of the proposed development area and major potential sources of emissions that may result directly from the development are estimated and a plan to minimise them prepared and implemented (following the RSPO GHG Assessment Procedure for New Development).</p> <p>- Critical (Major) compliance -</p>	<p>There is no new development, no new planting. This is explained to smallholders.</p>			Complied
7.10.3	<p><b>(C)</b> Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored</p> <p>- Critical (Major) compliance -</p>	<p>The company has prepared a strategy in effort to reduce and mitigate pollution and emission. Monitoring of pollution and emission quality for plantation has been planned and implemented. Smoke emission trend based on Ringelmann chart being monitored since 2016.</p> <p>The parameter are Significant Aspect, Objective, Requirement, Resource, Timeframe, and Basis of Evaluation. Significant pollutants and GHG emissions from any sources is identify, including the plan to reducing it. For example: to reduce the GHG, Barema POM already has Methane Gas Capture from Mill effluent prior discharge to the plantation as Land Application.</p>			Complied

In Barema POM, biogas plant received 400 m<sup>3</sup>/hour, coming into buffer tank, into reactor tank to produce biogas.

Monitoring and reporting of the significant pollutants to water, gaseous emissions to air and contamination on land are in place. Tools and systems used include the water quality at discharge points. Water samples taken every month, tested by mill environment officer in charge, and analysed to ensure compliance to Conservation Protection Authority (CEPA) requirements at final discharge points. The water samples were sent to National Analysis Laboratory for analysis. Records are maintained and verified on-site to have met the permissible regulatory limits.

Barema POM's biogas plant production:

Month	Nm <sup>3</sup>
Feb 2022	68,700
Mar 2022	216,630
Apr 2022	128,340
May 2022	108,360
Jun 2022	120,900
Jul 2022	81,990

Hargy POM's smoke emission monitoring record, target 40% opacity from Ringelmann chart

Month	Emission (%)	Month	Emission (%)
Jul 2021	1.8	Feb 2022	3.7
Aug 2021	2.8	Mar 2022	0.0

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Sep 2021	7.8	Apr 2022	2.6
Oct 2021	3.0	May 2022	0.4
Nov 2021	3.0	Jun 2022	0.0
Dec 2021	1.5	Jul 2022	1.2
Jan 2022	1.0		

Barema POM's smoke emission monitoring record

Month	Emission (%)	Month	Emission (%)
Jul 2021	15.7	Feb 2022	11.9
Aug 2021	12.8	Mar 2022	14.8
Sep 2021	15.5	Apr 2022	20.6
Oct 2021	21.1	May 2022	14.6
Nov 2021	24.7	Jun 2022	14.8
Dec 2021	15.4	Jul 2022	16.8
Jan 2022	14.3		

Navo POM's smoke emission monitoring record

Month	Emission (%)	Month	Emission (%)
Jul 2021	22.31	Feb 2022	13.48
Aug 2021	18.14	Mar 2022	14.23
Sep 2021	13.40	Apr 2022	16.19

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		<table border="1"> <tr> <td>Oct 2021</td> <td>24.16</td> <td>May 2022</td> <td>33.17</td> </tr> <tr> <td>Nov 2021</td> <td>29.73</td> <td>Jun 2022</td> <td>26.09</td> </tr> <tr> <td>Dec 2021</td> <td>10.66</td> <td>Jul 2022</td> <td>16.13</td> </tr> <tr> <td>Jan 2022</td> <td>14.82</td> <td></td> <td></td> </tr> </table>	Oct 2021	24.16	May 2022	33.17	Nov 2021	29.73	Jun 2022	26.09	Dec 2021	10.66	Jul 2022	16.13	Jan 2022	14.82			
Oct 2021	24.16	May 2022	33.17																
Nov 2021	29.73	Jun 2022	26.09																
Dec 2021	10.66	Jul 2022	16.13																
Jan 2022	14.82																		
<b>Criterion 7.11: Fire is not used for preparing land and is prevented in the managed area</b>																			
7.11.1	<b>(C)</b> Land for new planting or replanting is not prepared by burning. - Critical (Major) compliance -	Based on field visit, document review and interview, there is no new planting or replanting preparation carried out by burning in HOPL area.	Complied																
7.11.2	The unit of certification establishes fire prevention and control measures for the areas directly managed by the unit of certification. - Minor compliance -	Based on field visit, document review and interview, there is no new planting or replanting preparation carried out by burning in HOPL area.  Fire prevention and control as in Zero burning policy already stated within Hargy Oil Palms Limited prepared Environmental Aspects Impacts Master Register No.REG-SUS-EMS-001-19, latest review 30 April 2021 and Waste Management Plan (PLN-SUS-EMS-001-11, Issue No: 11, Issued dated: 21 April 2021).	Complied																
7.11.3	The unit of certification engages with adjacent stakeholders on fire prevention and control measures. - Minor compliance -	Fire prevention and control as in Zero burning policy already stated within Hargy Oil Palms Limited prepared Environmental Aspects Impacts Master Register No.REG-SUS-EMS-001-19, latest review 30 April 2021 and Waste Management Plan (PLN-SUS-EMS-001-11, Issue No: 11, Issued dated: 21 April 2021).  HOPL regularly conducted communication to adjacent stakeholder regarding fire prevention and control measures in coordination with OPIC and PNG OPRA. Several records seen related to the fire awareness training as follows:  1. Barema Section 2: RSPO Awareness and Block Inspection Report Training on 13 October 2021, facilitate by HOPL-SHAAS and Sustainability Department (Gabriel Peka, Stephanie Silik and Fidelis Hiamangi). Attended	Complied																

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		<p>by 25 participants. The topic of the meeting was related to RSPO requirement (legal requirement, chemical usage, waste management, fire use, child labour, ethical conduct policy, buffer zone, RTE species) and Block Inspection Report awareness (block upkeep, fertilizer application, harvesting and road access).</p> <ol style="list-style-type: none"> <li>2. Barema Section 5 &amp; 6: RSPO Awareness and Block Inspection Report Training on 10 November 2021, facilitate by HOPL-SHAAS extension officer (Gabriel Peka). Attended by 24 participants. The topic of the meeting was related to RSPO requirement (legal requirement, chemical usage, waste management, fire use, child labour, ethical conduct policy, buffer zone, RTE species) and Block Inspection Report awareness (block upkeep, fertilizer application, harvesting and road access).</li> <li>3. Sovula VOP – Main Village Ground: RSPO Awareness and Block Inspection Report Training on 10 October 2021, facilitate by HOPL-SHAAS extension officer (Gabriel Peka). Attended by 37 participants. The topic of the meeting was related to RSPO requirement (legal requirement, chemical usage, waste management, fire use, child labour, ethical conduct policy, buffer zone, RTE species) and Block Inspection Report awareness (block upkeep, fertilizer application, harvesting and road access).</li> <li>4. Ole Village: RSPO Awareness and Best Management Practices Training on 18 July 2022, facilitate by HOPL-SHAAS extension officer (Michael Tony and Jude Vitikut). Attended by 22 participants. The topic of the meeting was related to RSPO requirement (ethical conduct, child labour, bell hevi/grievance procedure, fire watch, environmental protection, and chemical usage) and best management practices (block upkeep, fertilizer application, harvesting and replanting).</li> <li>5. Urumaili Village: RSPO Awareness and Best Management Practices Training on 18 July 2022, facilitate by HOPL-SHAAS extension officer (Karen Rickian). Attended by 24 participants. The topic of the meeting was related to RSPO requirement (ethical conduct, child labour, bell hevi/grievance procedure, fire watch, environmental protection, and</li> </ol>	
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		<p>chemical usage) and best management practices (block upkeep, fertilizer application, harvesting and replanting).</p> <p>6. Kabaya Section 2: RSPO Awareness and Best Management Practices Training on 27 October 2021, facilitate by HOPL-SHAAS extension officer (Andy Samuel and Temah Ima). Attended by 24 participants. The topic of the meeting was related to RSPO requirement (ethical conduct, child labour, bell hevi/grievance procedure, fire watch, environmental protection, and chemical usage) and best management practices (block upkeep, fertilizer application, harvesting and replanting).</p> <p>Muumata – Independent Estate: RSPO Policies and Best Management Practices Training on 3 August 2022, facilitate by HOPL-SHAAS extension officer (Billy Werake). Attended by 10 participants. The topic of the meeting was related to RSPO requirement (ethical conduct, child labour, bell hevi/grievance procedure, fire watch, environmental protection, and chemical usage) and best management practices (block upkeep, fertilizer application, harvesting and replanting).</p>	
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**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.

**PROCEDURAL NOTE for 7.12**

The 2018 RSPO P&C include new requirements to ensure the effective contribution of RSPO to halting deforestation. This will be achieved by incorporating the High Carbon Stock Approach (HCSA) Toolkit in the revised standard.

The RSPO ToC also commits RSPO to balancing sustainable livelihoods and poverty reduction with the need to conserve, protect and enhance ecosystems.

High Forest Cover Countries (HFCCs) urgently require economic opportunities that enable communities to choose their own development path, while providing socio-economic benefits and safeguards. Adapted procedures will be developed to support the sustainable development of palm oil by indigenous peoples and local communities with legal or customary rights. These will apply in specific HFCCs, and within those, in High Forest Cover Landscapes (HFCLs).

The development of these procedures will be guided by a No Deforestation Joint Steering Group (NDJSG) of RSPO and HCSA members. In HFCCs, RSPO will work through national and local participatory processes with governments, communities and other stakeholders to develop these procedures. A timeframe for these activities is stipulated in the Terms of Reference for the NDJSG and publicly available.

<p>7.12.1</p>	<p><b>(C)</b> Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCVs or HCS forests.</p> <p>A historic Land Use Change Analysis (LUCA) is conducted prior to any new land clearing, in accordance with the RSPO LUCA guidance document</p> <p>- Critical (Major) compliance -</p>	<p>The HCV study conducted by Douglas Environmental Services in February 2009. According to the HCV assessment that within Alangily, Gamupa and Alaba area, there is no HCV are present. There is no new planting have replaced primary forest for extension area. Land Use Change Analysis (LUCA) is not yet required for the certificate holder due to NPP submitted to RSPO.</p> <p>Based on site visit, document review and interview with plantation managers and smallholders; there is no land clearing for new planting since 15 November 2018. Hargy Oil Palms Limited is implementing no new planting policy, including for smallholders.</p> <p>Data Hargy Oil Palms Limited 5 Years Development &amp; Replant 2022 stated no new planting, only replanting of oil palm.</p> <table border="1" data-bbox="1032 751 1946 1377"> <thead> <tr> <th></th> <th>YOP</th> <th>2023 (Ha)</th> <th>2024 (Ha)</th> <th>2025 (Ha)</th> <th>2026 (Ha)</th> <th>2027 (Ha)</th> </tr> </thead> <tbody> <tr> <td rowspan="4">Hargy Estate</td> <td>2002</td> <td></td> <td>235.19</td> <td></td> <td></td> <td></td> </tr> <tr> <td>2006</td> <td></td> <td></td> <td></td> <td></td> <td>231.39</td> </tr> <tr> <td>2007</td> <td></td> <td></td> <td></td> <td></td> <td>155.85</td> </tr> <tr> <td>2007</td> <td></td> <td></td> <td></td> <td></td> <td>136.69</td> </tr> <tr> <td rowspan="7">Navo Estate</td> <td>2001</td> <td>286.42</td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>2001</td> <td>137.16</td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>2002</td> <td>94.64</td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>2003</td> <td>16.41</td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>2003</td> <td></td> <td>131.33</td> <td></td> <td></td> <td></td> </tr> <tr> <td>2003</td> <td></td> <td>159.08</td> <td></td> <td></td> <td></td> </tr> <tr> <td>2005</td> <td></td> <td></td> <td></td> <td>172.10</td> <td></td> </tr> </tbody> </table>		YOP	2023 (Ha)	2024 (Ha)	2025 (Ha)	2026 (Ha)	2027 (Ha)	Hargy Estate	2002		235.19				2006					231.39	2007					155.85	2007					136.69	Navo Estate	2001	286.42					2001	137.16					2002	94.64					2003	16.41					2003		131.33				2003		159.08				2005				172.10		<p>Complied</p>
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		2006			201.89		
		2006			192.86		
		2006				211.49	
		2007				184.32	
		2007				206.67	
7.12.2	<p><b>(C)</b> HCVs, HCS forests and other conservation areas are identified as follows:</p> <p>7.12.2a For existing plantations with an HCV assessment conducted by an RSPO-approved assessor and no new land clearing after 15 November 2018, the current HCV assessment of those plantations remains valid.</p> <p>7.12.2b Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the HCSA Toolkit and the HCV-HCSA Assessment Manual. This will include stakeholder consultation and take into account wider landscape-level considerations.</p> <p><b>PROCEDURAL NOTE:</b> For details of transitional measures, refer to Annex 5: RSPO transition from HCV assessments to HCV-HCSA assessments.</p> <p>- Critical (Major) compliance -</p>	<p>The HCV study conducted by Douglas Environmental Services in February 2009. According to the HCV assessment that within Alangily, Gamupa and Alaba area, there is no HCV are present. There is no new planting have replaced primary forest for extension area.</p>					Complied
7.12.3	<p><b>(C)</b> In High Forest Cover Landscapes (HFCLs) within HFCCs, a specific procedure will apply for legacy cases and development by indigenous peoples and local communities with legal or customary rights, taking into consideration regional and national multi-</p>	<p>No new development after 15 November 2018 in scope of certificate holder. The HCV study conducted by Douglas Environmental Services in February 2009. According to the HCV assessment that within Alangily, Gamupa and</p>					Complied

	<p>stakeholder processes. Until this procedure is developed and endorsed, 7.12.2 applies.</p> <p><b>PROCEDURAL NOTE:</b> There shall be demonstrable benefits to the local community; clear recognition of legal and customary lands based on participatory land use planning; development shall be proportional to the needs of the local community; with a balance between conservation and development. This procedure will also cover planting on previous or abandoned agricultural land/ plantations. All other P&amp;C requirements apply, including FPIC and HCV requirements.</p> <p>- Critical (Major) compliance -</p>	<p>Alaba area, there is no HCV are present. There is no new planting have replaced primary forest for extension area.</p>	
7.12.4	<p><b>(C)</b> Where HCVs, HCS forests after 15 November 2018, peat land and other conservation areas within Company managed land have been identified, they are protected and/or enhanced. An integrated management plan to protect and/or enhance HCVs, HCS forests, peatland and other conservation areas is developed, implemented and adapted where necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan is developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified) that may result from the actions of the Unit of Certification.</p> <p>- Critical (Major) compliance -</p>	<p>Based on site visit, document review and interview with plantation managers and smallholders; there was no land clearing for new planting since 15 November 2018. Hargy Oil Palms Limited is implementing no new planting policy, including for smallholders.</p> <ul style="list-style-type: none"> <li>- The HCV study conducted by Douglas Environmental Services in February 2009. According to the HCV assessment that within Alangily, Gamupa and Alaba area, there is no HCV are present. There is no new planting have replaced primary forest for extension area.</li> <li>- Based on Soil analysis issued by Hill Laboratories dated 10 April 2006, there was no peat in whole HOPL Plantations including in Smallholders area.</li> </ul> <p>Hargy Oil Palms Limited prepared HCV/HCS, Peatlands and Conservation Area Management Plan, dated 30 March 2021. The management plan presents a summary of findings and recommendations from HCV assessments for Hargy Oil Palms Limited. The generic recommendations for conservation areas within all the plantations and smallholders are: Demarcate boundaries of HCV/HCS, other conservation areas and peatlands; Collaborate with the smallholder growers to create a simple management plan for each area; Collaborate with local communities to establish and maintain appropriate riparian buffers; Maintain or improve water quality in all rivers in the area of operations.</p>	Complied

		HCV 1, HCV 2 and HCV 3		
		Threat	Conversion of forest areas to agriculture; Conversion of forest areas to fuelwood plantation area; Extraction of logs to meet demand for customary purposes; Routine plantation works; Unplanned fire events; Invasive species	
		Management Recommendation	<ul style="list-style-type: none"> <li>- Paying a lease on the conservation areas. Stop paying lease if evidence of subsequent clearing is observed.</li> <li>- Having a conservation area manager that socializes the purpose of conservation and gets conservation area projects running.</li> <li>- Agreement on forest boundaries with relevant communities and demarcation of all HCV areas.</li> <li>- Use of information signage that delineates HCV areas and details allowed usage.</li> <li>- Agreement on use of forest areas by tribe / clans (e.g. no clearing for agriculture, limited firewood extraction, but no tree felling allowed)</li> <li>- Communication and awareness on the importance of maintaining HCVs.</li> <li>- Demarcation.</li> <li>- Refer to relevant HOPL / SIPEF SOP's for routine works.</li> <li>- Develop a fire management plan for El Nino events. Develop and implement an estate-wide integrated pest and weed management plan.</li> </ul>	
		Monitoring Recommendation	- Initial quarterly surveys of all HCVs to check for incursions of gardening or logging. Reducing	

		<p>frequency once incursions lessen.</p> <ul style="list-style-type: none"> <li>- Surveys include mapping of any further clearing and restoration activities within HCVMA. This should include Landsat image interpretation as well as infield GPS of boundaries.</li> <li>- Use of Monitoring Results to adapt management recommendations in the future</li> <li>- Use of information signage that delineates HCV areas</li> </ul>	
	Responsibility	GIS/Sustainability Dept /Plantation Management/CA-Lands	
	Status	Ongoing	
	HCV 1 RTE Species Flora and Fauna		
	Threat	<ul style="list-style-type: none"> <li>- Harvesting of these species, affecting already restricted geographic extent of populations</li> <li>- Exploitation of Flora and Fauna spp by HOPL management / HOPL plantation workers / adjacent community members and squatters</li> </ul>	
	Management Recommendation	- Develop a conservation area management plan that specifically addresses the management requirements of ALL RTE species identified during this assessment	
	Monitoring Recommendation	- Develop a conservation area management plan that specifically addresses the monitoring requirements of ALL RTE species identified during this assessment	
	Responsibility	GIS/Sustainability Dept /Plantation Management/CA-Lands	
	Status	Ongoing	

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

			<ul style="list-style-type: none"> <li>- Maintain and establish riparian buffers – this involves:               <ul style="list-style-type: none"> <li>- Planting appropriate vegetation to stabilize the riparian areas;</li> <li>- Ensuring vegetation cover is maintained;</li> </ul> </li> <li>- Agreeing with the community on allowable use of vegetation in riparian areas.</li> </ul>	
		Monitoring Recommendation	<ul style="list-style-type: none"> <li>- Quarterly monitoring of riparian buffer condition. Use of adaptive management to evaluate and adjust management and monitoring activities as necessary</li> <li>- Extend current water quality monitoring program to include HCV 4 areas identified during this assessment, aiming to measure change in quality from where rivers enter and exit the estate.</li> <li>- Document all stabilisation works and monitor the effectiveness.</li> </ul>	
		Responsibility	GIS/Sustainability Dept /Plantation Management/CA-Lands	
		Status	Ongoing	
		HCV 5		
		Threat	<ul style="list-style-type: none"> <li>- Site preparation and installation of infrastructure in readiness for oil palm cultivation.</li> <li>- Oil palm cultivation with application of agrichemicals.</li> </ul>	
		Management Recommendation	<ul style="list-style-type: none"> <li>- Allocate at least 20m buffer protection for the sago swamps and limestone waterholes and enhance vegetation density with local species.</li> <li>- Install sediment and silt control structures at strategic</li> </ul>	

			<p>locations.</p> <ul style="list-style-type: none"> <li>- Repair or upgrade sediment and silt control structures as required.</li> <li>- Develop and implement an estate wide integrated pest and weed management plan</li> <li>- Enrich buffer zone vegetation with native species.</li> <li>- Strictly regulate dosage of agrichemicals.</li> <li>- Adjust agrichemical dosage if PNG Drinking Water Quality Standards are exceeded.</li> <li>- Provide alternative community water supply if contamination level remains high.</li> </ul>	
		Monitoring Recommendation	<ul style="list-style-type: none"> <li>- Monitor buffer zone integrity regularly.</li> <li>- Carry out water quality monitoring within the area before site preparation and infrastructure installation starts.</li> <li>- Check sediment and silt control structures regularly.</li> <li>- Monitor buffer zone integrity regularly.</li> <li>- Monitor water quality every three months (quarterly intervals).</li> </ul>	
		Responsibility	Lands/Plantation Management/GIS/Sustainability	
		Status	Ongoing	
		HCV 6		
		Threat	<ul style="list-style-type: none"> <li>- Areas identified are disturbed or destroyed during site preparation</li> <li>- HOPL facilitating expeditions to Lake Lamo auro (Hargy) for research and recreational purposes.</li> </ul>	

		<p>Management Recommendation</p>	<ul style="list-style-type: none"> <li>- Establish appropriate buffers around HCV 6 areas identified, or exclude from development area.</li> <li>- Develop an MOU that formalises access arrangements to Traditional Owners</li> </ul>	
		<p>Monitoring Recommendation</p>	<ul style="list-style-type: none"> <li>- Monitor HCV 6 area quarterly to ensure integrity.</li> <li>- Review MOU annually to ensure it's working.</li> </ul>	
		<p>Responsibility</p>	<p>Plantation Management/ CA-Lands/Sustainability</p>	
		<p>Status</p>	<ul style="list-style-type: none"> <li>- Ongoing</li> <li>- Pending</li> </ul>	
		<p>Other Conservation Area</p>		
		<p>Threat</p>	<ul style="list-style-type: none"> <li>- Destruction of forested areas by locals and smallholder growers</li> <li>- Destruction to breeding sites of animals (crocodiles)</li> <li>- Use of fire for replanting is avoided</li> <li>- Degradation of marines' ecosystem and reduction in biodiversity</li> </ul>	
		<p>Management Recommendation</p>	<ul style="list-style-type: none"> <li>- Conduct regular awareness to smallholder growers on importance of HCVs and conservation areas.</li> <li>- Install sign boards along buffer zones and coastlines at potential breeding sites for crocodile.</li> <li>- Awareness to smallholder growers not to burn vegetation and poisoned palm trees.</li> <li>- Establish and maintain appropriate buffer zones along shoreline.</li> <li>- Work with local stakeholders and NGO on marine</li> </ul>	

		<table border="1"> <tr> <td data-bbox="1016 363 1263 405"></td> <td data-bbox="1263 363 1953 405">conservation projects.</td> </tr> <tr> <td data-bbox="1016 405 1263 970">Monitoring Recommendation</td> <td data-bbox="1263 405 1953 970"> <ul style="list-style-type: none"> <li>- Regular awareness through field days and visits on HCS/HCS areas to smallholder growers</li> <li>- Conduct regular monitoring of potential breeding sites within HOP plantation buffer zones</li> <li>- Awareness to growers and workers</li> <li>- Regular monitoring of replant blocks for signs/evidences of burning;</li> <li>- Regular monitoring of degraded areas for species regenerations;</li> <li>- Buffer zone established and maintained;</li> <li>- Survey and monitoring of shoreline buffer zones; Species regeneration and regrowth to resemble nearby forest types.</li> <li>- Ongoing monitoring of conservation sites for species regeneration</li> </ul> </td> </tr> <tr> <td data-bbox="1016 970 1263 1018">Responsibility</td> <td data-bbox="1263 970 1953 1018">Plantation Management/Sustainability Dept/SHASS</td> </tr> <tr> <td data-bbox="1016 1018 1263 1070">Status</td> <td data-bbox="1263 1018 1953 1070">Ongoing</td> </tr> </table>		conservation projects.	Monitoring Recommendation	<ul style="list-style-type: none"> <li>- Regular awareness through field days and visits on HCS/HCS areas to smallholder growers</li> <li>- Conduct regular monitoring of potential breeding sites within HOP plantation buffer zones</li> <li>- Awareness to growers and workers</li> <li>- Regular monitoring of replant blocks for signs/evidences of burning;</li> <li>- Regular monitoring of degraded areas for species regenerations;</li> <li>- Buffer zone established and maintained;</li> <li>- Survey and monitoring of shoreline buffer zones; Species regeneration and regrowth to resemble nearby forest types.</li> <li>- Ongoing monitoring of conservation sites for species regeneration</li> </ul>	Responsibility	Plantation Management/Sustainability Dept/SHASS	Status	Ongoing	
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Responsibility	Plantation Management/Sustainability Dept/SHASS										
Status	Ongoing										
		<p>OFI: Pandi Estate found Magalona Reserve Buffer Zone was not equipped with Signage.</p> <p>Hargy Oil Palms Limited prepared a company-wide buffer sign board implementation plan year 2022. For Hargy Estate-Barema Plantation, planned to establish 13 new sign boards and replace 5 old sign boards. In Hargy Estate-Hargy Plantation, planned to establish 5 new sign boards.</p> <p>In Navo Estate-Atata Plantation planned to repaint 4 buffer sign boards, establish 6 new sign boards and establish 2 new sign boards in buffer zone</p>									

		<p>near replanting area. In Navo Estate-Ibana Plantation planned to establish 17 new buffer zone sign boards, and to replace 3 old buffer zone sign boards. In Navo Estate-Kiba Plantation planned to establish 3 new sign boards and replace 1 old sign board.</p> <p>In Pandi Estate-Bakada Plantation planned to establish 5 new buffer sign boards in new location and replace 1 buffer sign board from existing buffer zone.</p>	
<p>7.12.5</p>	<p>Where rights of local communities have been identified in HCV areas, HCS forest after 15 November 2018, peat land and other conservation areas, there is no reduction of these rights without evidence of a negotiated agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas.</p> <p>- Minor compliance -</p>	<p>The HCV study conducted by Douglas Environmental Services in February 2009. According to the HCV assessment that within Alangily, Gamupa and Alaba area, there is no HCV are present. No new development after 15 November 2018 in scope of certificate holder.</p> <ul style="list-style-type: none"> <li>- Hargy Oil Palms Limited carried out RSPO Awareness in Kiava community, dated 25 February 2022 – attended by 28 VOP smallholders. Meeting Minutes deforestation for palm oil new planting is not allowed; all new plantings must be assessed by special assessors; Fire cannot be used for land preparation;</li> <li>- Hargy Oil Palms Limited carried out RSPO Awareness in Tiauru section 2 and 3 Junction, dated 24 February 2022 – attended by 50 smallholders. Meeting Minutes: All RSPO criteria to smallholder discussed, no new planting on marginal land area, buffer zone; protection of rare-threatened-endangered species.</li> <li>- Hargy Oil Palms Limited carried out RSPO Awareness in Mataururu Village, dated 12 July 2022 – attended by 30 smallholders. Meeting Minutes: Buffer zone maintained, prohibit hunting and harming RTE species, no new planting should be done unless assessed and certified – at the moment it is on hold. No primary forest should be cleared for planting of palms – only replants are allowed, no additional planting.</li> <li>- Based on interview with Baikakea community, HOPL supports the conservation of Lake Hargy.</li> </ul>	<p>Complied</p>

<p>7.12.6</p>	<p>All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species.</p> <p><b>Smallholder requirements:</b>          Organization managing the smallholders to educate and support Smallholders through field days and visits to Smallholder blocks as part of their routine extension activities.</p> <p>- Minor compliance -</p>	<p>The HCV study conducted by Douglas Environmental Services in February 2009. According to the HCV assessment that within Alangily, Gamupa and Alaba area, there is no HCV present.</p> <p>Hargy Oil Palms Limited prepared Annual Field Training Schedule 2022:</p> <ul style="list-style-type: none"> <li>- In Pandi Estate-Bakada Plantation, management provided company policies awareness related to RTE protection to 5 male compound upkeep and 9 female compound upkeep workers, dated 15 July 2022.</li> <li>- Hargy Estate-Barema Plantation made RTE Protection Training. Meeting Minutes and attendance dated 23 March 2022 – attended by 13 sprayers, 2 driver upkeep and 1 overseer. The explanation on RTE species to protect: Muruk (Dwarf Cassowary - <i>Casuarius bennetti</i>), Balus (Red knobbed Imperial Pigeon - <i>Ducula rubricera</i>), Balus (Finsch’s Imperial Pigeon - <i>Ducula finschii</i>), Balus (Yellow legged Pigeon - <i>Columba pallidiceps</i>), Torosel (Green Turtle - <i>Chelonia mydas</i>), Kalangar (Eclectus parrot - <i>Eclectus roratus</i>), Batafly (Priamus Birdwing Butterfly - <i>Ornithoptera priamus</i>), Kokomo (Blyth’s Hornbill - <i>Rhyticeros plicatus</i>), Koki (Blue-eyed Cockatoo - <i>Cacatua ophthalmica</i>), Tarangau (New Britain Buzzard - <i>Henicopernis infuscatus</i>), Owl (New Britain Boobok - <i>Ninox odiosa</i>).</li> <li>- HOPL carried out RTE policy awareness to Navo Estate-Ibana Plantation worker, dated 15 July 2022 to 12 harvesters and 13 cutters; dated 21 July 2022 to 5 upkeep workers and 16 loose fruit collectors. The explanation related to endangered species policy. The explanation on RTE species to protect: Muruk (Dwarf Cassowary - <i>Casuarius bennetti</i>), Balus (Red knobbed Imperial Pigeon - <i>Ducula rubricera</i>), Balus (Finsch’s Imperial Pigeon - <i>Ducula finschii</i>), Balus (Yellow legged Pigeon - <i>Columba pallidiceps</i>), Torosel (Green Turtle - <i>Chelonia mydas</i>), Kalangar (Eclectus parrot - <i>Eclectus roratus</i>), Batafly (Priamus Birdwing Butterfly - <i>Ornithoptera priamus</i>), Kokomo (Blyth’s Hornbill - <i>Rhyticeros plicatus</i>), Koki (Blue-eyed Cockatoo - <i>Cacatua</i></li> </ul>	<p>Complied</p>
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		<p><i>ophthalmica</i>), Tarangau (New Britain Buzzard - <i>Henicopernis infuscatus</i>), Owl (New Britain Boobok - <i>Ninox odiosa</i>).</p> <ul style="list-style-type: none"> <li>- In Pandi Estate-Bakada Plantation, management provided company policies awareness Reproductive rights, breastfeeding time, maternal leave, prohibit sexual harassment, RTE protection to 5 male compound upkeep and 9 female compound upkeep workers, dated 15 July 2022.</li> <li>- Hargy Oil Palms Limited carried out RSPO Awareness in Kiava community, dated 25 February 2022 – attended by 28 VOP smallholders. Meeting Minutes deforestation for palm oil new planting is not allowed; all new plantings must be assessed by special assessors; Fire cannot be used for land preparation;</li> </ul> <p>Hargy Oil Palms Limited planted 120 mangrove seedling on Navo Estate-Kiba Plantation in August 2021.</p>	
7.12.7	<p>The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan.</p> <p>- Minor compliance -</p>	<p>Based on site visit, document review and interview with plantation managers and smallholders; there is no land clearing for new planting since 15 November 2018. Hargy Oil Palms Limited is implementing no new planting policy, including for smallholders.</p> <ul style="list-style-type: none"> <li>- The HCV study conducted by Douglas Environmental Services in February 2009. According to the HCV assessment that within Alangily, Gamupa and Alaba area, there is no HCV are present. There is no new planting have replaced primary forest for extension area.</li> <li>- Based on Soil analysis issued by Hill Laboratories dated 10 April 2006, there is no peat in whole HOPL Plantations including in Smallholders area.</li> <li>- Hargy Oil Palms Limited performed and recorded HCV/Buffer Zone Inspection Form Barema Plantation-Hargy Estate, period 13 December 2021. The checklist review any sign of encroachment – yes; gardening</li> </ul>	Complied

		<p>activity – yes on 09B15, 09C16, 07E27; sign of cutting trees/illegal logging – no; evidence of fire burning-no; animal sighted Blythe hornbill.</p> <ul style="list-style-type: none"> <li>- Hargy Oil Palms Limited performed and recorded HCV/Buffer Zone Inspection Form Barema Plantation-Hargy Estate, period 2 August 2022. The checklist review any sign of encroachment – no; gardening activity – yes; sign of cutting trees/illegal logging – no; evidence of fire burning-yes cover crop burned at 07D17, 07E16 buffer; animal sighted during the inspection hornbill, cockatoo, parrot.</li> <li>- Hargy Oil Palms Limited performed Buffer Zone Inspection to Pandi Estate, sample record dated 30 July 2022. Inspection result: no new development areas. RTE observed such as Kalangar (Eclectus parrot - <i>Eclectus roratus</i>), Kokomo (Blyth’s Hornbill - <i>Rhyticeros plicatus</i>), Koki (Blue-eyed Cockatoo - <i>Cacatua ophthalmica</i>).</li> <li>- Hargy Oil Palms Limited performed and recorded HCV/Buffer Zone Inspection Form Navo Estate-Ibana Plantation, period 16 May 2022. The checklist review any sign of encroachment – no; gardening activity – no; sign of cutting trees/illegal logging – no; evidence of fire burning-no; animal sighted Blythe hornbill, Parrot.</li> <li>- Hargy Oil Palms Limited performed and recorded HCV/Buffer Zone Inspection Form Navo Estate-Ibana Plantation, period 13 November 2021. The checklist review any sign of encroachment – no; gardening activity – no; sign of cutting trees/illegal logging – no; evidence of fire burning-no; animal sighted during the inspection hornbill, cockatoo, parrot.</li> </ul> <p>Based on field visit to buffer zone areas:</p> <ul style="list-style-type: none"> <li>- Hargy Estate-Barema Plantation, buffer zone to Barema beach near block 07E34 distance 400 meters the natural vegetation is good.</li> <li>- Navo Estate-Ibana Plantation, buffer zone near block 07O01 distance varies, the condition vegetation is good, timber trees are sighted, the area was designated as buffer zone because steep area.</li> </ul>	
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		<p>Continued inspection to monitor smallholder understanding and RTE protection:</p> <ul style="list-style-type: none"> <li>- Block inspection report for Michael Palia No.101082, understand HCV and RTE species protection.</li> <li>- Block inspection report for Mataururu United Church No.101017, understand HCV and RTE species protection.</li> <li>- Block inspection report for Michael Rakua No.101080, understand HCV and RTE species protection.</li> <li>- Block inspection report for John Kuvi No.353540 dated 11 July 2022, understand buffer zone maintenance and protect RTE species.</li> </ul>	
7.12.8	<p><b>(C)</b> Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018, the Remediation and Compensation Procedure (RaCP) applies.</p> <p>- Critical (Major) compliance -</p>	<p>The HCV study conducted by Douglas Environmental Services in February 2009. According to the HCV assessment that within Alangily, Gamupa and Alaba area, there is no HCV are present. There is no new planting have replaced primary forest for extension area. Land Use Change Analysis (LUCA) is not yet required for the certificate holder due to NPP submitted to RSPO.</p> <p>Hargy Oil Palms Limited demonstrated the explanation given to smallholder to prevent new land clearing without prior HCV-HCSA assessment.</p> <ul style="list-style-type: none"> <li>- Hargy Oil Palms Limited carried out RSPO Awareness in Tiauru section 2 and 3 Junction, dated 24 February 2022 – attended by 50 smallholders. Meeting Minutes: All RSPO criteria to smallholder discussed, no new planting on marginal land area, buffer zone; protection of rare-threatened-endangered species.</li> <li>- Hargy Oil Palms Limited carried out RSPO Awareness in Kiava community, dated 25 February 2022 – attended by 28 VOP smallholders. Meeting Minutes deforestation for palm oil new planting is not allowed; all new</li> </ul>	Complied

		<p>plantings must be assessed by special assessors; Fire cannot be used for land preparation;</p> <ul style="list-style-type: none"> <li>- Hargy Oil Palms Limited carried out RSPO Awareness in Matururu Village, dated 12 July 2022 – attended by 30 smallholders. Meeting Minutes: Buffer zone maintained, prohibit hunting and harming RTE species, no new planting should be done unless assessed and certified – at the moment it is on hold. No primary forest should be cleared for planting of palms – only replants are allowed, no additional planting.</li> </ul>	
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**Appendix B: GHG Reporting Executive Summary**

The GHG emissions that were produced in 2021 for Hargy POM, Barema POM and Navo POM and supply base was calculated using the PalmGHG Calculator version 4. The assessment team had verified the data input in the PalmGHG Calculator against operations records. PalmGHG Calculation Options selected 'Full version' and 'Exclude LUC Emission' calculation option is not applied. The records verified includes:

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

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

Emission per product	tCO <sub>2</sub> e/tProduct
CPO	1.09
PKO	1.27

Extraction	%
OER	24.83
KER	5.15

Production	t/yr
FFB Process	167,518.24
CPO Produced	41600,77
PKO Produced	8635,18

Land Use	Ha
OP Planted Area	16024.41
OP Planted on peat	0.00
Conservation (forested)	0.00
Conservation (non-forested)	0.00
<b>Total</b>	<b>16024.41</b>

**Summary of Field Emission and Sink**

	Own Crop*		Group		3 <sup>rd</sup> Party		Total	
	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB
<b>Emission</b>								
Land Conversion	26382.68	0.36	0.00	0.00	50464.25	0.00	76846.93	0.46
CO <sub>2</sub> Emission from fertilizer	1494.06	0.02	0.00	0.00	2017.59	0.00	3511.65	0.02
NO <sub>2</sub> Emission	1827.81	0.02	0.00	0.00	2601.97	0.00	4429.78	0.03
Fuel Consumption	1586.88	0.02	0.00	0.00	779.08	0.00	2365.96	0.01
Peat Oxidation	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<b>Sink</b>								
Crop Sequestration	-25007.29	-0.34	0.00	0.00	-43204.95	0.00	-68212.24	-0.41
Conservation Sequestration	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<b>Total</b>	<b>6284.15</b>	<b>0.09</b>	0.00	0.00	<b>12657.94</b>	<b>0.00</b>	<b>18942.09</b>	<b>0.11</b>

*\*Note: Includes both estates and smallholders*

**Summary of Mill Emission and Credit**

	tCO <sub>2</sub> e	tCO <sub>2</sub> e/tFFB
<b>Emission</b>		
POME	32836.41	0.20
Fuel Consumption	2836.07	0.02
Grid Electricity Utilization	0.00	0.00
<b>Credit</b>		
Export of Grid Electricity	0.00	0.00
Sales of PKS	0.00	0.00
Sales of EFB	0.00	0.00
<b>Total</b>	<b>35672.48</b>	<b>0.21</b>

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

Emissions	tCO <sub>2</sub> e
PK from own mill	9565.52
PK from other source	0.00
Fuel Consumptions	0.00
<b>Total Crusher emissions</b>	<b>9565.52</b>

\*This mill has no kernel crusher operation.

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

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

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

Emission per product	tCO <sub>2</sub> e/tProduct
CPO	0.64
PKO	1.43

Extraction	%
OER	25.74
KER	5.10

Production	t/yr
FFB Process	203,407.24
CPO Produced	52366,596
PK Produced	10369,99

Land Use	Ha
OP Planted Area	28409.24
OP Planted on peat	0.00
Conservation (forested)	0.00
Conservation (non-forested)	0.00
<b>Total</b>	<b>28409.24</b>

**Summary of Field Emission and Sink**

	Own Crop*		Group		3 <sup>rd</sup> Party		Total	
	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB
<b>Emission</b>								
Land Conversion	35021.70	0.33	0.00	0.00	43355.86	0.00	78377.55	0.39
CO <sub>2</sub> Emission from fertilizer	1548.29	0.01	0.00	0.00	431.81	0.00	1980.10	0.01
N <sub>2</sub> O Emission	1948.15	0.02	0.00	0.00	556.88	0.00	2505.03	0.01
Fuel Consumption	1747.06	0.02	0.00	0.00	548.81	0.00	2295.87	0.01
Peat Oxidation	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<b>Sink</b>								
Crop Sequestration	-33195.91	-0.31	0.00	0.00	-36806.01	0.00	-70002.52	-0.34
Conservation Sequestration	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<b>Total</b>	<b>7069.29</b>	<b>0.07</b>	<b>0.00</b>	<b>0.00</b>	<b>8086.74</b>	<b>0.00</b>	<b>15156.03</b>	<b>0.07</b>

\*Note: Includes both estates and smallholders

**Summary of Mill Emission and Credit**

	tCO <sub>2</sub> e	tCO <sub>2</sub> e/tFFB
<b>Emission</b>		
POME	23703.47	0.12
Fuel Consumption	1469.12	0.01
Grid Electricity Utilization	0.00	0.00
<b>Credit</b>		
Export of Grid Electricity	0.00	0.00

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Sales of PKS	0.00	0.00
Sales of EFB	0.00	0.00
<b>Total</b>	<b>25172.58</b>	<b>0.12</b>

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

<b>Emissions</b>	<b>tCO<sub>2</sub>e</b>
PK from own mill	14023.42
PK from other source	0.00
Fuel Consumptions	0.00
<b>Total Crusher emissions</b>	<b>14023.42</b>

\*This mill has no kernel crusher operation.

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

<b>POME Diverted to Anaerobic Digestion:</b>	
Divert to anaerobic pond (%)	50
Divert to methane captured (flaring) (%)	50
Divert to methane captured (energy generation) (%)	0

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

Emission per product	tCO <sub>2</sub> e/tProduct
CPO	0.33
PKO	0.00

Extraction	%
OER	25.91
KER	5.06

Production	t/yr
FFB Process	240,867.90
CPO Produced	62,398.64
PK Produced	12,179.14

Land Use	Ha
OP Planted Area	20,197.99
OP Planted on peat	0.00
Conservation (forested)	0.00
Conservation (non-forested)	0.00
<b>Total</b>	<b>20,197.99</b>

**Summary of Field Emission and Sink**

	Own Crop*		Group		3 <sup>rd</sup> Party		Total	
	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB
<b>Emission</b>								
Land Conversion	72,923.96	0.36	0.00	0.00	31,604.48	0.82	104,528.45	0.43
CO <sub>2</sub> Emission from fertilizer	3,743.51	0.02	0.00	0.00	325.38	0.01	4,068.89	0.02
N <sub>2</sub> O Emission	4,645.66	0.03	0.00	0.00	319.63	0.01	5,065.29	0.02
Fuel Consumption	4,536.69	0.02	0.00	0.00	391.39	0.01	4,928.19	0.02
Peat Oxidation	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<b>Sink</b>								
Crop Sequestration	-69,122.22	-0.34	0.00	0.00	-27,812.06	-0.72	104,528.45	0.43
Conservation Sequestration	0.00	0.00	0.00	0.00	0.00	0.00	4,068.89	0.02
<b>Total</b>	<b>16,727.59</b>	<b>0.08</b>	0.00	0.00	<b>4,928.93</b>	<b>0.13</b>	5,065.29	<b>0.02</b>

\*Note: Includes both estates and smallholders

**Summary of Mill Emission and Credit**

	tCO <sub>2</sub> e	tCO <sub>2</sub> e/tFFB
<b>Emission</b>		
POME	0.00	0.00
Fuel Consumption	2656.66	0.01
Grid Electricity Utilization	0.00	0.00
<b>Credit</b>		
Export of Grid Electricity	0.00	0.00

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Sales of PKS	0.00	0.00
Sales of EFB	0.00	0.00
<b>Total</b>	<b>2,656.66</b>	<b>0.01</b>

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

<b>Emissions</b>	<b>tCO<sub>2</sub>e</b>
PK from own mill	0.00
PK from other source	0.00
Fuel Consumptions	0.00
<b>Total Crusher emissions</b>	<b>0.00</b>

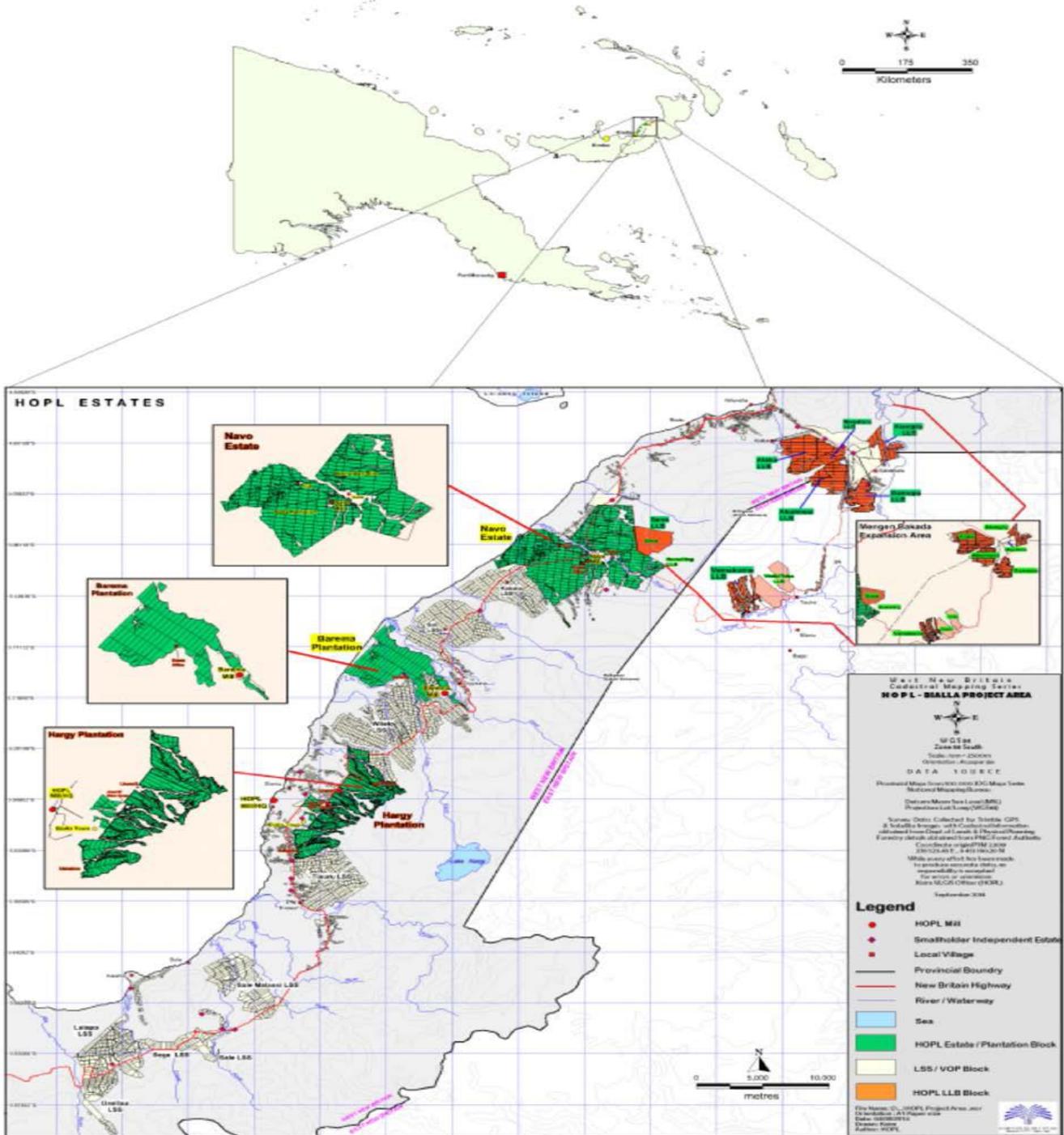
\*This mill has no kernel crusher operation.

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

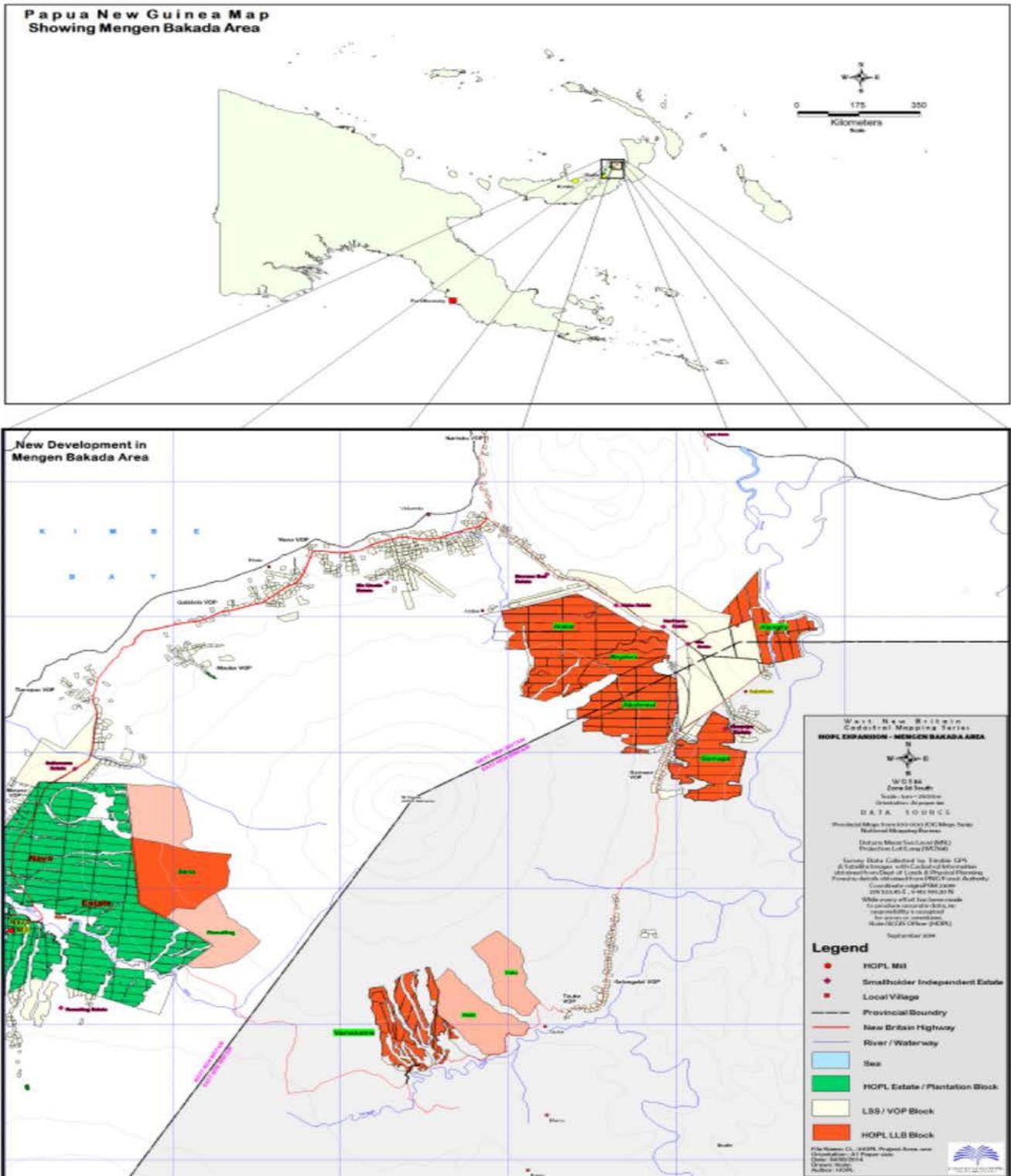
<b>POME Diverted to Anaerobic Digestion:</b>	
Divert to anaerobic pond (%)	100
Divert to methane captured (flaring) (%)	0
Divert to methane captured (energy generation) (%)	0

**Appendix C: Location Map of Certification Unit and Supply bases**

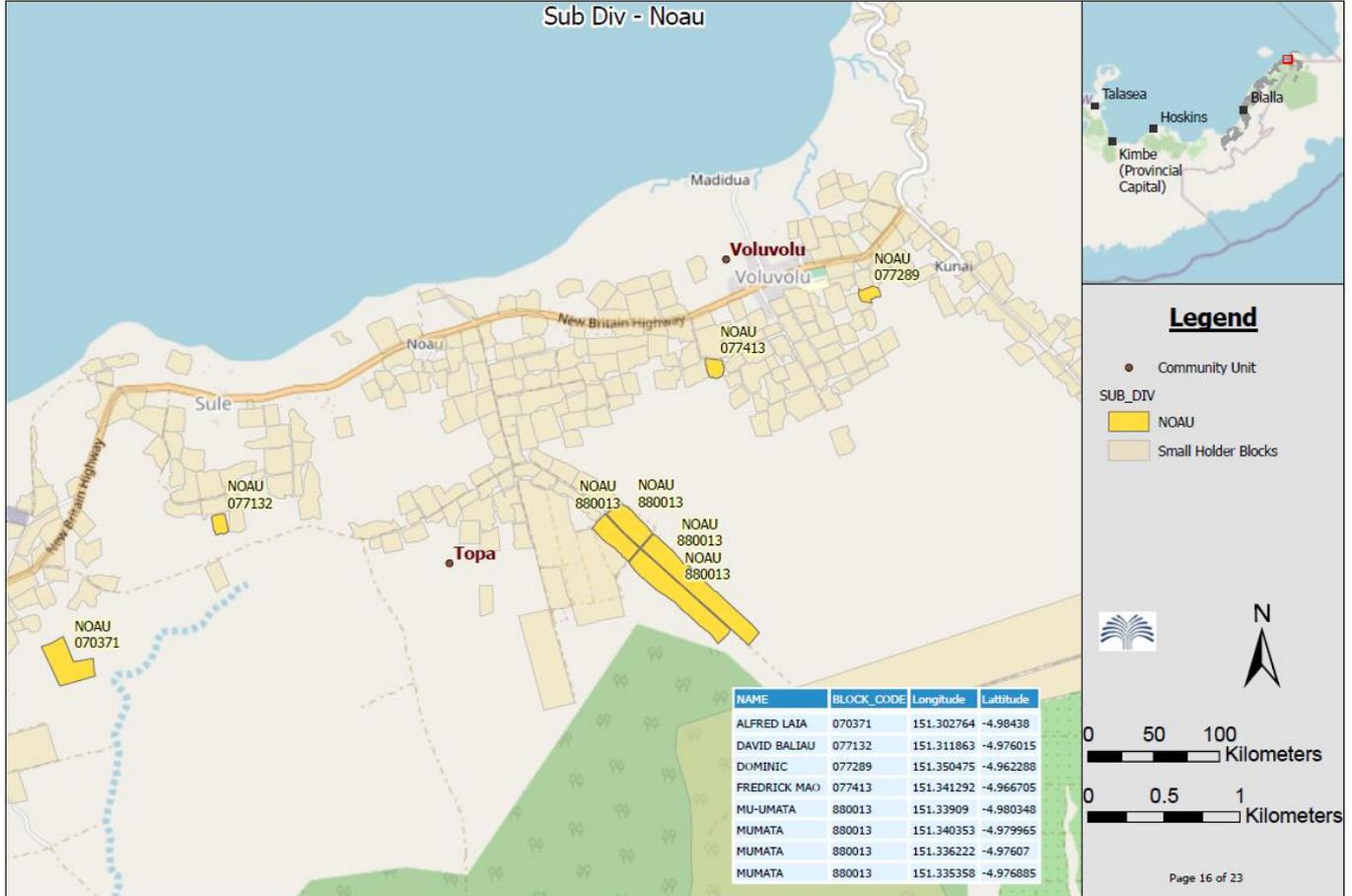
**PNG Map Showing HOPL Estates**



**Appendix D: Estate Field Map**



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**Appendix E: List of Smallholder Registered and/or sampled**

No	Name of farmer	Location	GPS Reference		Area Summary (Ha)		Forecasted annual FFB Production (MT)	Date of joining	Smallholder ID
			Latitude (N/S)	Longitude (E)	Total Certified Area	Planted Area			
1	MU-UMATA	Noau	4° 58' 29.33" S	151° 20' 7.84" E	29	29	447.34	2004	880013
2	PARFREY PENI	Ewasse	5° 19' 41.19" S	151° 1' 41.05" E	0.8	0.8	14.10	2005	350061
3	MICHAEL RAKUA	Mataururu	5° 22' 45.60" S	151° 1' 50.28" E	1.71	1.71	36.22	2004	101080
4	TOVOLE LOPI	Uasilau	5° 32' 48.14" S	150° 53' 32.85" E	4.85	4.85	58.51	1998	050178
5	VILEA KANAPANA	Uasilau	5° 33' 5.60" S	150° 53' 8.00" E	4	4	53.91	1998	050204
6	EPHRAIM SAEBUBU	Malasi	5° 27' 26.51" S	150° 58' 52.13" E	3.84	3.84	32.84	1997	041184
7	TELONU PENIAS	Uasilau	5° 32' 15.61" S	150° 52' 36.86" E	8	8	89.00	2000	050274
8	PAUL SERIA	Matililiu	5° 21' 13.17" S	151° 1' 22.94" E	2	2	33.53	1998	171738
9	EPHRAIM SULUVI	Malasi	5° 27' 30.74" S	150° 58' 54.73" E	1.98	1.98	35.63	1997	041186
10	KANGI WAUGU	Tiauru	5° 21' 18.86" S	151° 3' 7.18" E	4	4	119.36	1995	010188
11	RACHAEL KIPOEL	Bubu	5° 14' 36.04" S	151° 3' 7.26" E	4	4	43.43	2002	181845
12	KEVIN GAA	Gomu Urumaili	5° 17' 46.69" S	151° 2' 8.36" E	1.65	1.65	132.45	2004	121266
13	WILLY MULAI	Matililiu	5° 21' 36.98" S	151° 1' 10.13" E	2	2	20.37	1996	171737
14	EPHRAIM VORIT	Mataururu	5° 22' 48.12" S	151° 1' 34.88" E	2	2	46.05	2003	101039
15	ROBERT ISSAC	Malasi	5° 30' 16.69" S	150° 59' 13.49" E	1.83	1.83	24.28	2004	040079
16	KIOLLY DELFORD	Gomu Urumaili	5° 17' 21.27" S	151° 1' 41.05" E	2	2	24.61	2013	120112
17	SUARUA ELIAS	Tiauru	5° 22' 13.10" S	151° 3' 2.68" E	6	6	102.30	1996	010272
18	SAVOLE KASILA	Sege	5° 31' 35.60" S	150° 56' 23.90" E	1.2	1.2	18.93	1999	260003
19	PETER KARU	Lalopo	5° 30' 47.10" S	150° 54' 17.50" E	5	5	72.00	1995	321147
20	MOSES PENI	Gomu Urumaili	5° 18' 1.43" S	151° 2' 37.72" E	2	2	37.58	2004	121265
21	MICHAEL PALIA	Mataururu	5° 22' 55.98" S	151° 1' 52.04" E	3.96	3.96	60.48	2003	101082
22	JACK AMOS	Ewasse	5° 19' 53.61" S	151° 1' 28.18" E	1.91	1.91	86.24	2004	350044
23	JUSTINA PALI	Tiauru	5° 21' 32.42" S	151° 2' 50.48" E	6	6	44.19	1997	010220
24	RUPEN BALELE	Gomu Urumaili	5° 17' 50.45" S	151° 1' 15.40" E	1.83	1.83	55.98	2009	121260
25	UME LOWA	Kiava	5° 24' 43.07" S	151° 3' 1.05" E	2	2	38.02	2003	111164
26	KUNEI GAA	Gomu Urumaili	5° 17' 57.40" S	151° 2' 22.28" E	2	2	88.30	2013	120119
27	MING KOMPOT TOVOLE	Matililiu	5° 19' 58.03" S	151° 1' 14.43" E	2	2	0.00	1986	171701
28	PALIBUTU TIKA	Gomu Urumaili	5° 17' 16.65" S	151° 1' 24.03" E	2	2	103.37	2003	121203
29	MATAURURU UNITED CHU	Mataururu	5° 22' 57.90" S	151° 1' 29.13" E	2	2	28.14	2001	101017
30	VEIMULI MAGE	Uasilau	5° 32' 26.70" S	150° 52' 44.00" E	6	6	37.63	2000	050273
31	DENSIUT KEMBU	Malasi	5° 27' 59.55" S	150° 58' 20.12" E	4	4	45.09	2005	040618
32	ROBERT TEIA	Kiava	5° 25' 13.48" S	151° 3' 10.74" E	1	1	90.02	1996	111132
33	KIT WALO	Gomu Urumaili	5° 17' 55.56" S	151° 2' 31.65" E	4	4	40.59	1995	121218
34	WAIMAL KEPO	Barema	5° 12' 46.80" S	151° 6' 57.00" E	1.99	1.99	12.22	2021	031472
35	LEO GANAPI	Barema	5°13' 54.41" S	151° 6' 3.25" E	6.83	6.83	147.58	2006	031242
36	PAULUS PERARING	Soi	5° 9' 52.38" S	151° 7' 25.69" E	5.44	5.44	161.96	2001	311507
37	ROBERT LANGBUNG	Barema	5° 12' 22.40" S	151° 6' 12.20" E	6	6	59.73	1995	031306
38	JOHN GOGI	Gigipuna	5° 10' 54.27" S	151° 8' 1.27" E	1.71	1.71	80.54	2011	060617
39	JOEL WAI	Barema	5° 14' 22.53" S	151° 6' 20.72" E	6.57	6.57	115.25	2001	031239
40	MAULA NAGAWA	Barema	5° 14' 12.47" S	151° 7' 4.86" E	4.22	4.22	65.01	1995	031352
41	GABRIEL BANBAN	Wilelo	5° 15' 3.51" S	151° 6' 21.40" E	6.41	6.41	130.56	2006	020949
42	BERNARD SAISUM	Wilelo	5° 16' 3.89" S	151° 5' 0.22" E	5	5	74.34	1992	021078
43	RUSIAT WAURIA	Soi	5° 8' 49.70" S	151° 9' 2.97" E	5.1	5.1	94.80	1992	311578
44	UMA TASIM	Kabaiya	5° 7' 9.32" S	151° 9' 1.52" E	3.78	3.78	79.49	1994	331994
45	HENRY MARITA	Kabaiya	5° 7' 0.29" S	151° 8' 53.41" E	4	4	54.10	1998	331982
46	ISSAC AUNIGIL	Barema	5° 13' 41.40" S	151° 6' 40.20" E	6	6	117.90	2000	031331
47	MANUEL KUNUWE	Soi	5° 7' 55.74" S	151° 7' 31.53" E	4.6	4.6	72.34	2000	311734
48	TILU TALIS	Barema	5° 13' 13.82" S	151° 6' 43.66" E	6	6	117.35	2003	031337
49	MANA METE	Soi	5° 9' 2.97" S	151° 6' 58.95" E	4.9	4.9	84.26	1996	311793
50	DAVID AEN	Wilelo	5° 14' 54.07" S	151° 5' 13.78" E	4	4	61.00	1979	021136
51	GODFREY MAINGA	Barema	5° 12' 5.05" S	151° 6' 13.37" E	4	4	151.65	2000	031303

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			Latitude (N/S)	Longitude (E)	Total Certified Area	Planted Area			
52	RONDAL GEORGE	Barema	5° 14' 19.17" S	151° 6' 47.90" E	5.16	5.16	92.93	1998	031466
53	ROBERT VAGELO	Soi	5° 9' 39.03" S	151° 8' 43.04" E	3.77	3.77	102.38	1992	311619
54	PAISSI JOE YORUKU	Wilelo	5° 14' 11.53" S	151° 5' 55.78" E	6	6	142.01	2001	021206
55	LUDWIG MASNAMTA	Wilelo	5° 16' 1.46" S	151° 6' 9.78" E	6	6	92.41	1995	021451
56	AUGUSTINE KAPI	Soi	5° 8' 58.86" S	151° 8' 25.63" E	6	6	61.55	1993	311629
57	JERRY JOPO MICHAEL	Soi	5° 10' 19.67" S	151° 7' 8.55" E	8	8	253.72	1992	311562
58	ROBERT KUTBUL	Barema	5° 12' 39.22" S	151° 7' 9.11" E	6	6	144.64	1996	031419
59	LAWRENCE KENNY	Wilelo	5° 13' 24.64" S	151° 5' 4.71" E	6	6	119.85	1996	021154
60	JAMES PAULU	Tianepou	5° 1' 7.29" S	151° 14' 49.77" E	0.71	0.71	0.83	2005	380086
61	ALFRED LAIA	Noau	5° 0' 21.00" S	151° 16' 31.50" E	2	2	20.06	2003	410026
62	ISIDORAH PAULO	Mauba	5° 0' 26.10" S	151° 16' 34.65" E	3.0	3.0	68.82	2000	070371
63	PHILIP KOSAI	Gamupa	5° 2' 15.86" S	151° 24' 3.38" E	2	2	4.64	2004	410034
64	DUMOI TOLISI	Tauke	5° 5' 48.79" S	151° 23' 6.45" E	0.97	0.97	23.08	2004	390069
65	PETER BAI	Tianepou	5° 1' 50.76" S	151° 14' 51.00" E	2	2	27.99	2004	420024
66	MATIAS GAVULI	Nantabu	4° 55' 14.04" S	151° 21' 28.89" E	2.49	2.49	22.58	2003	380042
67	GERVINA TUO	Galelolo	4° 59' 7.60" S	151° 17' 3.40" E	2	2	19.29	2013	440064
68	DAVID BALIAU	Noau	4° 58' 33.69" S	151° 18' 42.71" E	2	2	2.69	2014	370076
69	DOMINIC DAVID	Noau	4° 57' 44.32" S	151° 21' 1.79" E	2	2	0.00	2003	077132
70	FRANCIS PATU HILELE	Tianepou	5° 2' 17.61" S	151° 15' 1.96" E	2	2	1.01	2004	077289
71	THOMAS TOULULU	Tianepou	5° 2' 16.19" S	151° 14' 56.84" E	1.63	1.63	0.85	2003	380068
72	FREDRICK MAO	Noau	4° 58' 0.22" S	151° 20' 28.65" E	1.98	1.98	19.44	2004	380034

## Appendix F: List of Abbreviations

a.i	Active Ingredient
BOD	Biochemical Oxygen Demand
BOGA	Biall Oil Palm Growers Associations
CB	Certification Bodies
CHRA	Chemical Health Risk Assessment
COD	Chemical Oxygen Demand
CPO	Crude Palm Oil
CSPO	Certified Sustainable Palm Oil
CSPKO	Certified Sustainable Palm Kernel Oil
EFB	Empty Fruit Bunch
EHS	Environmental, Health and Safety
EIA	Environmental Impact Assessment
EMS	Environmental Management System
FFB	Fresh Fruit Bunch
FPIC	Free, Prior, Informed and Consent
GAP	Good Agricultural Practice
GHG	Greenhouse Gas
GMP	Good Manufacturing Practice
GPS	Global Positioning System
HCV	High Conservation Value
HOPL	Hargy Oil Palms Limited
IPM	Integrated Pest Management
IP	Identity Preserved
ISCC	International Sustainable Carbon Certification
ISS	Independent Smallholder Standard
LD50	Lethal Dose for 50 sample
LSS	Land Settlement Scheme
MB	Mass Balance
MSDS	Material Safety Data Sheet
MT	Metric Tonnes
OER	Oil Extraction Rate
OPIC	Oil Palm Industry Corporation
OSH	Occupational Safety and Health
PK	Palm Kernel
PKO	Palm Kernel Oil
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
TTI	Targeted Trunk Injection
VOP	Village Oil Palms