

...making excellence a habit.™

RSPO PUBLIC SUMMARY REPORT

INDEPENDENT SMALLHOLDER INITIAL CERTIFICATION ASSESSMENT

ASOSIASI PETANI SAWIT SWADAYA AMANAH Ukui – Pelalawan District, Riau Province Indonesia

Report Author:

Aryo Gustomo – prepared April 2013

		age №
	MARY	
	eviations Used	
	COPE OF CERTIFICATION ASSESSMENT	
	lational Interpretation and Assessment Document Used	
	Certification ScopeScope	
	ocation and Maps	
	Description of the Independent Smallholder as a FFB Producer	
	rea of Plantation	
	Pate of Planting and Age profile	
	Approximate Tonnages Certified	
	ime Bound Plan	
	Pate of Certificate Issued and Scope of the Certificate	
	Other Certification Held	
	Organisational Information / Contact Person	
	SSESSMENT PROCESS	
	Pertification Body	
	Qualifications of the Lead Assessor and Assessment Team	
	ssessment Methodology, Programme, Site Visits	
	takeholder Consultation and List of Stakeholders Contacted	
	Pate of Next Surveillance Assessment Visit	
	SSESSMENT FINDINGS	
	ummary of Findings – Assessment against RSPO Standard for Group Certification	
	ummary of Findings – Assessment against RSPO P&C (INA-SWG) for Independent Smallholder	
	Detailed Identified Nonconformities, Corrective Actions and Auditor Conclusion	
	loteworthy Positive Components	
	ssues Raised by Stakeholders and Findings with Respect to Each Issue	
3.6 A	scknowledgement of Internal Responsibility and Formal Sign-off Assessment Findings	21
LIST	of TABLES	
1	GPS Location of the Group Office	
2a	Total Smallholder Members and Total Planted Area for each Subgroup	1
2b	Actual FFB Production for 2012 and Estimated FFB Production for 2013	3
3	Total mature and Immature Area	3
4	Age Profile of the Palms	3
5a	Approximate FFB and CPO Tonnages Produced in 2012 and Budgeted for 2013	4
5b	Approximate PK Tonnages Produced in 2012 and Budgeted for 2013	4
5c	Approximate PKO Tonnages Produced in 2012 and Budgeted for 2013	4
5d	Approximate PKE Tonnages Produced in 2012 and Budgeted for 2013	4
LIST	of FIGURES	
1	Location Maps of Asosiasi Petani Sawit Swadaya Amanah, Riau Province - Indonesia	2

List of Appendices

- A RSPO Certificate Details Asosiasi Petani Sawit Swadaya Amanah
- B Assessment Programme
- C List of Stakeholders Contacted
- D Supply Chain Assessment for the FFB Sales

SUMMARY

BSi has conducted initial certification assessment of Asosiasi Petani Sawit Swadaya Amanah operations comprising group of Independent Smallholder members, Group Management/Group Manager, FFB supply chain, support services and infrastructure. This group meets the requirement for the group certification based on the RSPO definition whereby this group members growing oil palm, where the family provides labour, the farm provides the principle source of income and the planted area of oil palm is below 50 hectare in size. The initial certification assessment was conducted on 11 – 14 February 2013.

BSi recommends that Asosiasi Petani Sawit Swadaya Amanah be approved as a producer of RSPO certified sustainable Fresh Fruit Bunches.

ABBREVIATIONS USED OBTAIN

BPN	Badan Pertanahan Nasional/National Land Agency
CPO	Crude Palm Oil
EFB	Empty Fruit Bunch
FFB	Fresh Fruit Bunch
GPS	Global Positioning System
HCV	High Conservation Value
ICS	Internal Control System
INA-NIWG	Indonesian National Interpretation Working Group
INA-SWG	Indonesia Smallholders Working Group
IPM	Integrated Pest Management
KER	Kernel Extraction Rate
KT	Kelompok Tani/Farmer sub-group
NGO	Non Government Organisation
OER	Oil Extraction rate
OHS	Occupational Health and Safety
P&C	Principle & Criteria
PK	Palm Kernel
PKE	Palm Kernel Expeller
PKO	Palm Kernel Oil
PPE	Personal Protective Equipment
PT IIS	PT Inti Indosawit Subur
R&D	Research and Development
RSPO	Roundtable on Sustainable Palm Oil
SEIA	Social & Environmental Impact Assessment
SOP	Standard Operation Procedure
TUS	Tim Unit Semprot/Spraying Unit Team
WWF	World Wildlife Fund

1.0 SCOPE OF CERTIFICATION ASSESSMENT

1.1 National Interpretation and Assessment Document Used

The operations of the independent smallholder group, group management, Group Manager, Group Members and their supply bases of FFB were assessed against the following documents as a reference:

RSPO Group Certification Standard, July 2010; Indonesian National Interpretation of RSPO P&C for Independent Smallholders (INA-SWG: July 2010); and RSPO Supply Chain Certification Systems: November 2011.

1.2 Certification Scope

The scope of Certification covers Asosiasi Petani Sawit Swadaya Amanah, its 10 famer Sub-Groups, Group Manager, and the Group Members who have been formally accepted to join the group and comply with the

group rules, requirements of the RSPO Standard for Group certification and Sustainable palm oil production.

1.3 Location and Maps

Asosiasi Petani Sawit Swadaya Amanah is located in Ukui Sub District, Pelalawan District, Riau Province – Indonesia (Figure 1).

The GPS location of the group office is shown in Table 1.

Table 1: GPS Locations of the Group Office

Group	Longitude	Latitude
Asosiasi Petani Sawit Swadaya	102'06'09.46 E	0′09′36.85 S
Amanah		

1.4 Description of the Independent Smallholders as a FFB producer

Fresh Fruit Bunch is produced from farmer's plots owned and managed by group members. These FFB is sold mostly to nearby mill belongs to PT Inti Indosawit Subur (PT IIS) namely Ukui Palm Oil Mill, although in particular case they could sell freely to other neighbouring mills. However, this Smallholders group has good relationship with PT IIS due to PT IIS's contribution for local development of Plasma scheme Smallholder to communities since 1980s. The land of smallholder group members was originally obtained from government lease. All of land status is officially issued by National Land Agency in term of "Sertifikat Hak Milik" (Land Ownership Certificate). The smallholder group consists of ten (10) farmer subgroups where initially was proactive to be merged into an independent smallholder group.

The smallholder numbers and planted area, and Estimated FFB productions (certified) for the year 2013 are listed in Table 2a and 2b below.

Smallholder numbers and planted area is shown in Table 2a. The budgeted FFB productions (certified) for the year 2013 is listed in Table 2b below. As per RSPO requirement, the Independent Smallholders Group Management has collected actual FFB production data for the year 2012 as shown in Table 2b.

Table 2a: Total Smallholder Members and Total Planted Area for each Sub-Group

Farmer sub- group	Villages	Planting Year	Total Area (Ha)	Number of farmers
311	Trimulya Jaya	2000	53	25
312	Trimulya Jaya	2000	123	56
313	Trimulya Jaya	2000	83	39
314	Trimulya Jaya	2000	89	37
315	Trimulya Jaya	2000	84	36
316	Trimulya Jaya	2000	81	40
317	Bukit Jaya	2001	63	31
318	Bukit Jaya	2001	62	28
319	Air Mas	1997-98	62	29
320	Trimulya Jaya	2000	63	28
TOTAL			763	349

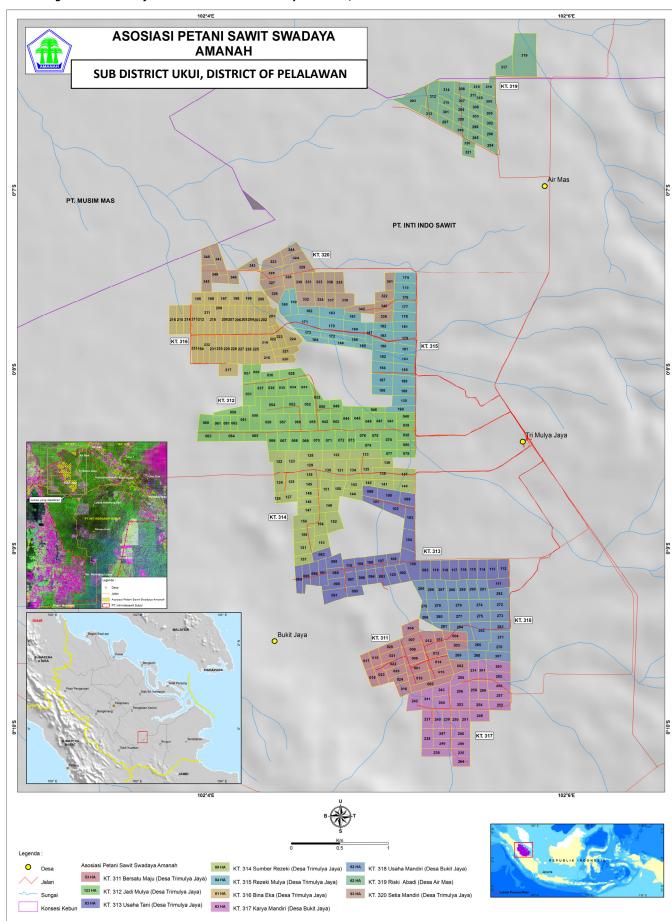


Figure 1: Location of Asosiasi Petani Sawit Swadaya Amanah, Riau Province - Indonesia

Table 2b. Actual FFB production for 2012 and Estimated FFB Production for 2013

Farmer sub- group	Planting Year	Total Area (Ha)	Actual FFB Production 2012	Estimation production for 2013 (tonnes)
311	2000	53	1,179.18	1,162.48
312	2000	123	1,851.22	2,716.78
313	2000	83	1,371.95	1,821.38
314	2000	89	1,304.93	1,956.68
315	2000	84	1,645.55	1,843.38
316	2000	81	1,482.11	1,778.04
317	2001	63	1,571.57	1,394.14
318	2001	62	1,384.54	1,359.82
319	1997-98	62	1,441.64	1,398.15
320	2000	63	996.89	1,376.54
TOTAL		763	14,229.58	16,807.39

Note: The average projected increase of 19 % is justifiable because majority of the planted area is coming into prime mature stage in 2012/2013. Furthermore the best oil palm management practise and techniques learned through the group training have improved the farmer overall management and productivity.

Asosiasi Petani Sawit Swadaya Amanah was developed as an Independent Smallholders farmers group through initiative from farmer member and supported by WWF Indonesia in which acted as consultant for implementation of the RSPO requirements for the Group Certification. This initiative was part of WWF Indonesia in close cooperation with Fondation Carrefour commitment to certify the Independent Smallholders towards RSPO certification.

Asosiasi Petani Sawit Swadaya Amanah comprise 10 farmer sub-groups and managed by a central committee (formally named as Internal Control system) which act as a group management led by Group Manager. Advice through training in best oil palm management practices was initiated by WWF Indonesia since 2011. There are 349 independent smallholder members in this group covering an area of 763 ha planted with oil palm. The independent smallholders are selling the FFB to specifically Ukui Palm Oil mill which is acting as a partnering mill although the independent smallholders do not have any obligation to sell the FFB to this mill. Ukui palm oil mill already developed traceability records for the FFB received from the Asosiasi Petani Sawit Swadaya Amanah.

Asosiasi Petani Sawit Swadaya Amanah group members are farmers who depend on the income from their farming work. The farming land was originally from the government or individual farmer and now have various types of ownership such land title, lease title, land use right and allowed to plant agriculture crops. The planting year and age profile is shown in Table 4. It is also noted that no planting was carried out after 2005. The audit team's inspection in the field, document verification, land history and interview with surrounding land owners and government officials confirm that this land was previously planted with other agriculture crops. There is no evidence of any replacement of primary forest or loss of HCV.

In order to bring the independent smallholders into compliance of RSPO certification requirement, group management was formed comprising smallholder members who were elected. This group management acted as group manager and started to communicate all the RSPO certification requirements to each of the members since 2011 to ensure the members can be included into the RSPO certification assessment.

BSI audit team visited a sample of the group members during the certification assessment and checked their status and compliance with RSPO group certification requirements and relevant standards. The methodology is explained in section 2.3 below.

1.5 Area of Plantation

The area of palms at the independent smallholders is listed in Table 3 below. All the area is in matured.

Table 3. Total Mature and Immature Area

Group	Mature (ha)	Immature (ha)	Total (ha)
Asosiasi Petani Sawit Swadaya Amanah	763	-	763
Total	763	-	763

1.6 Date of Plantings and age profile

Palms of the independent smallholder members in the Asosiasi Petani Sawit Swadaya Amanah were planted between 1997/1998 and 2000. All the palms are matured and still in the first planting cycle. Replanting cycle is 25 years. Since the oldest palm is 17 years old, there is no replanting program has been developed. The age profiles of the palms for each farmer sub-group are shown in Table 4.

Table 4. Age profile of the palms

Farmer sub- group	Planting Year	Total planted Area (Ha)	Age of the palm (years)	% of total Planted area
311	2000	53	13	6.9
312	2000	123	13	16.1
313	2000	83	13	10.8
314	2000	89	13	11.6
315	2000	84	13	11.0
316	2000	81	13	10.6
317	2001	63	12	8.2
318	2001	62	12	8.1
319	1997-98	62	16-17	8.1
320	2000	63	13	8.2
TOTAL		763	-	100.0

1.7 Approximate Tonnages Certified

The approximate tonnages of FFB certified reported during this certification assessment was based on the budget for the year 2013. As per the RSPO Standard for Group Certification and Indonesian National

Interpretation for Independent Smallholder requirement all the members have at least previous year's (2012) FFB production record. These records were checked and audited during the document audit. During this assessment, the approximate tonnage certified includes the production from each farmer sub-group. The group management control system is using the OER given by the partnering palm mill to make FFB conversion to CPO. The FFB production is converted to CPO based on the 19.73% Oil Extraction rate (OER) for CPO and 4.44% for PK (KER) given by the partnering palm oil mill. This OER and KER are calculated from laboratory analysis of sample smallholder's FFB by the mill in early 2013. This OER and KER figures was also confirmed to the Independent Smallholder members, Group Management and the representative from the palm oil mill. The OER and KER are based on the palm oil mill's grading procedure. While PKO and PKE are based on RSPO Standard for Group certification document of which 45% is counted as Certified Palm Kernel Oil and 55% as Certified Palm Kernel Expeller. The detail of the Certified FFB, CPO, PK, PKO and PKE production is shown in Table 5a, 5b, 5c and 5d below.

Table 5a: Approximate FFB and CPO Tonnages produced in 2012 and budgeted for 2013

Source	СРО	O tonnages (@ 19.73% OEI	R *
(farmer	2012	2012	2013	2013
subgroup)	Actual	Actual	Budget	Budget
	FFB	СРО	FFB	СРО
311	1,179.18	232.65	1,162.48	229.36
312	1,851.22	365.25	2,716.78	536.02
313	1,371.95	270.69	1,821.38	359.36
314	1,304.93	257.46	1,956.68	386.05
315	1,645.55	324.67	1,843.38	363.70
316	1,482.11	292.42	1,778.04	350.81
317	1,571.57	310.07	1,394.14	275.06
318	1,384.54	273.17	1,359.82	268.29
319	1,441.64	284.44	1,398.15	275.85
320	996.89	196.69	1,376.54	271.59
Total	14,229.58	2,807.50	16,807.39	3,316.10

^{*} This OER was given by the partnering mill.

Table 5b: Approximate PK Tonnages produced in 2012 and budgeted for 2013

Source	PK	tonnages@	4.44 % of KE	R*
(farmer	2012	2012	2013	2013
subgroup)	Actual	Actual	Budget	Budget
	FFB	PK	FFB	PK
311	1,179.18	52.36	1,162.48	51.61
312	1,851.22	82.19	2,716.78	120.63
313	1,371.95	60.91	1,821.38	80.87
314	1,304.93	57.94	1,956.68	86.88
315	1,645.55	73.06	1,843.38	81.85
316	1,482.11	65.81	1,778.04	78.94
317	1,571.57	69.78	1,394.14	61.90
318	1,384.54	61.47	1,359.82	60.38
319	1,441.64	64.01	1,398.15	62.08
320	996.89	44.26	1,376.54	61.12
Total	14,229.58	631.79	16,807.39	746.25

^{*} This KER was given by the partnering mill.

Table 5c: Approximate PKO Tonnages produced in 2012 and budgeted for 2013

Source	Р	KO tonnage	s@45% of F	PK
(farmer	2012	2012	2013	2013
subgroup)	Actual	Actual	Budget	Budget
	PK	PKO	PK	PKO
311	52.36	23.56	51.61	23.23
312	82.19	36.99	120.63	54.28
313	60.91	27.41	80.87	36.39
314	57.94	26.07	86.88	39.09
315	73.06	32.88	81.85	36.83
316	65.81	29.61	78.94	35.53
317	69.78	31.40	61.90	27.85
318	61.47	27.66	60.38	27.17
319	64.01	28.80	62.08	27.94
320	44.26	19.92	61.12	27.50
Total	631.79	284.307	746.25	335.81

Table 5d: Approximate PKE Tonnages produced in 2012 and budgeted for 2013

Source	P	KE tonnage	s@55% of F	PK
(farmer	2012	2012	2013	2013
subgroup)	Actual	Actual	Budget	Budget
	PK	PKE	PK	PKE
311	52.36	28.80	51.61	28.39
312	82.19	45.21	120.63	66.34
313	60.91	33.50	80.87	44.48
314	57.94	31.87	86.88	47.78
315	73.06	40.18	81.85	45.02
316	65.81	36.19	78.94	43.42
317	69.78	38.38	61.90	34.04
318	61.47	33.81	60.38	33.21
319	64.01	35.20	62.08	34.14
320	44.26	24.34	61.12	33.62
Total	631.79	347.49	746.25	410.44

1.8 Time Bound Plan

Asosiasi Petani Sawit Swadaya Amanah

is a member of RSPO since 5th October 2012. RSPO Membership No: 1-0133-12-000-00

There are total of 349 independent smallholders in this group All the members are formally joined this group and has individual agreement with the group management to comply with the RSPO certification requirements. All the formal members and their plots are included during this assessment. There are no members excluded from certification. Therefore there is no time bound plan required at this initial certification assessment.

1.9 Date of Certificate Issued and Scope of Certificate

The scope of the certificate includes the production of FFB from the Independent Smallholder Group: Asosiasi Petani Sawit Swadaya Amanah, group manager and group members. RSPO Certificate details are included as Appendix A. The certificate issue date will be the date of the RSPO approval of the Assessment Report.

1.10 Other Certifications Held

No other certification held by the group or the members. This is the first experience for the independent smallholder group and members to go through a certification process. They have shown the full commitment to implement and comply with the RSPO group certification requirements.

1.11 Organisational Information / Contact Person

The contact details as follows:

Asosiasi Petani Sawit Swadaya Amanah Desa Trimulya Jaya Kecamatan Ukui Kabupaten Pelalawan Provinsi Riau Indonesia

Contact Person: Mr. Sunarno Phone: +62 813 7165 6847

Fax: N/A

Email: hnarno@gmail.com

asosiasi.amanah@gmail.com

2.0 ASSESSMENT PROCESS

2.1 Certification Body

BSi Group Singapore Pte Ltd 3, Lim Teck Kim Road #10-02 Genting centre Singapore 088934

Phone: +65 6270 0777 Fax: +65 6270 2777

RSPO Scheme Manager: Mr Aryo Gustomo Email: aryo.Gustomo@bsigroup.com

BSi is a leading global provider of management systems assessment and certification, with more than 60,000 certified locations and clients in over 100 countries. BSi Standards is the UK's National Standards Body. BSi provides independent, third-party certification of management systems. BSi has a Regional Office in Singapore and an Office in Thailand, Kuala Lumpur and Jakarta.

2.2 Qualification of the Lead Assessor and Assessment Team

Aryo Gustomo – Lead Assessor

He holds degree in Agriculture science and graduated from Bogor Agriculture University. He is a specialist in oil palm plantation with Agronomy background. He had more than 5 (five) years working experienced related to oil palm industries i.e. as a Plant breeder/agronomist in the one of Malaysian oil palm seed producer, and as a field assistant in oil palm Plantation Company in Indonesia. Several relevant Training he has completed include ISO 9001 and 14001 Lead Auditor, RSPO Lead auditor endorsed courses which also covered RSPO SCCS, Social Report Assurance training, ISPO auditor training, and training on HCV identification and management. Currently he works for BSi Group based in Jakarta office as a RSPO scheme manager and one of the BSI qualified RSPO lead auditor. He had been involved in several RSPO certification audits including New Planting

Procedure assessment as a lead auditor/auditor with geographical audit experiences cover Indonesia, Malaysia, Thailand and Liberia - Africa. During this assessment, he mainly focused on the aspect of Group certification standard, legal, environment, smallholder best practices; working safety, and supply chain requirement.

Nanang Mualib - Assessor

He holds a Bachelor degree in Forestry Technology from Bogor Agriculture University, 1999. He has 4 years experience worked in the Forest plantation company in Indonesia, and has experiences involves in the several RSPO certification audits as team member. He has attended the 5 days RSPO P&C Certification System Assessment Training held by PT Mutuagung Lestari on 2009 as well as 5 days ISO 9001 auditor training on 2009. He has been approved as an HCV Assessor under RSPO Scheme. He has been involved in many assessment related to the Forestry and Sustainable oil palm certification in Indonesia. He has experienced involves in RSPO certification assessments more than 15 oil palm different organizations (including mills and estates) in Indonesia. He has an excellent command of Bahasa Indonesia and English in both writing and speaking. He is also familiar with RSPO P&C Certification assessment and qualified as audit team member. During this assessment, he assessed on the aspect of Legal, HCV identification and management, and also Social community engagement and stakeholders consultation.

Pratama Agung Sedayu - Assessor

He graduated from University of Jenderal Soedirman on 2008, majoring in Social Economic of Agriculture. He involved in RSPO certification since 2009 as a team member covering assessment with RSPO P&C in Indonesian and Malaysia. He completed the ISO 9001 and OHS 18001 Lead Auditor training, HCV identification and management, ISPO auditor training, and has planned to attend RSPO Lead auditor endorsed course in May 2013. He can communicate fluently in Bahasa Indonesia and English both oral and written. During this assessment, he assessed the smallholder best practices, environment, working safety, and emergency preparedness.

2.3 Assessment Methodology, Programme, Site Visits

The assessment was conducted to assess the compliance of the Independent Smallholder Group and its members against the RSPO requirement for Independent Smallholder Group certification. The assessment program is included in **Appendix B**.

This assessment was conducted using the documents as per in section 1.1 above as a reference during the assessment of the independent smallholder Group Manager, Group Members and Internal Control System. BSi Audit team conducted the certification assessment of the Independent Smallholders operation by conducting document review, field visit, and interview with Group Management Committee, Group Manager, ICS Staff, Group Members and stakeholders. During this

certification assessment sample of independent smallholder members and their plots were selected. The sampling was based on RSPO sampling formula.

Sampling formula and method of calculating the smallholder members to be assessed

BSI conducts the assessment based on sample in which regulated under RSPO Certification Requirement for Group Certification (2010). Under the requirement, size of samples was based on formula (0.8vy) x (z); where y is the total number of independent group member and z is the multiplier based on risk assessment.

For the purpose of sampling, risk assessment of group members and the group manager was carried out prior to the certification assessment through document review on the application details provided by the group manager. This includes details of members, size of the plot, management structure, sloping area, planting year, result of internal assessment, the geographical location, distance from the palm oil mill and information gathered from stakeholder. Based on the information gathered prior to the assessment, BSi audit team concluded that the risk is *medium* with 1.2 as multiplier coefficient.

During this assessment, Asosiasi Petani Sawit Swadaya Amanah, there were selected: $(0.8 \times \sqrt{349}) \times (1.2) = (0.8 \times 19) \times (1.2) = 18$ individual farmer plots. The detail selected farmers group member is described in Appendix C.

Plots of the members selected were visited and inspected followed by document assessment for each member's records and data relevant to group certification and RSPO P&C INA-SWG for Independent Smallholder. Interview was conducted at the field during the visit to the plot. Field operations such as harvesting, chemical spraying and FFB transportation were checked during the field visit. Checklist which was developed based on the RSPO Standard for Group certification and RSPO P&C INA-SWG for Independent Smallholders were used to guide the collection of information.

The assessment program includes assessment against all the applicable RSPO requirements for Independent Smallholder Group Certification. The methodology for collection of objective evidence includes physical inspection of the independent smallholders' facilities, members' plots, and interview with members, Group Manager, Group Management Committee, ICS Administrator, workers and review of documents. The field inspection was aligned with the field operation schedule in order to inspect the operation and interview the smallholder member and workers.

The assessment process was based on random sampling and therefore nonconformity may exist which have not been identified this time.

Mr. Senniah Appalasamy, who has been involved in BSi RSPO activities and one of the BSI internal reviewer, reviewed this report for conformance with BSi Procedure, RSPO Certification System and RSPO Procedure for Annual Surveillance Assessment. This

summary report was also submitted to RSPO Secretariat for further external peer reviewer process.

2.4 Stakeholder Consultation and List of Stakeholders Contacted

During the Independent Smallholder Assessment stakeholder consultation was conducted involving internal and external stakeholders. Prior to the assessment external stakeholders were notified by posting the Stakeholder Notification letter on the RSPO website and BSi website for 30 days. Since the independent smallholders group does not have their own website, the Stakeholder Notification was posted on the group's office notice board. During the stakeholder notification period, BSi did not receive any feedback from stakeholders during the 30 days notification period.

During the assessment meeting were held with internal and external stakeholder in the absent of the group members and group management to allow the stakeholders give their feedback freely.

During the meeting, the stakeholders were asked open end questions to seek feedback on the performance of the Independent Smallholder Group's performance with respect to RSPO requirements and aspects that they consider need improvements. Issues discussed were related to legal issues, land ownership issues, agriculture practices, environment and social performance. Stakeholders included are those immediately linked with the operation of the Independent Smallholder Group such as workers, group members, village head, government officials and representatives from the partnering mill. Stakeholder consultation took place in the form of meetings and interviews without the present of the group management members and interview with workers was without the present of the smallholder member.

It is noted that during the Independent Smallholder assessment there was no negative comments or complaints received. Issues raised and discussed are summarized in section 3.5. The list of stakeholders contacted is included as Appendix C.

2.5 Date of Next Surveillance Assessment Visit

The next surveillance assessment visit is planned before the first anniversary of the RSPO approval of the initial certification.

3.0 ASSESSMENT FINDINGS

The assessment findings are reported in Section 3.1 referring to the finding based on RSPO Standard for Group Certification: July 2010, and Section 3.2 is referring to the findings of the Independent Smallholder assessment based on RSPO P&C for Independent Smallholders, Indonesian National Interpretation: 2010.

During Initial Certification assessment, 2 (two) Major nonconformities against indicator 2.2.2 and 2.2.3 of

RSPO Group Certification Standard, and 2 (two) Minor nonconformities against indicator 4.3.3 and 4.6.4 of RSPO P&C for Independent Smallholders were identified. 7 (seven) Observation/Opportunity for improvements were also highlighted. The evidence for closing out the major nonconformities was verified during NCR Closure assessment. Asosiasi Petani Sawit Swadaya Amanah has also submitted Corrective Action Plan for Minor nonconformities and Observation/Opportunity for Improvement. BSI auditor has accepted the evidence of closing out Major nonconformities and concluded those were remained closed. BSI auditor has also accepted the Corrective Action Plan for minor nonconformities and will be further verified for effective implementation during subsequent surveillance visits. The detail of findings during initial certification assessment is explained in the summary of the findings below.

BSi recommends Asosiasi Petani Sawit Swadaya Amanah and its farmer sub-groups, Group Manager and Group Members complied with the RSPO requirements for the independent smallholder group certification; and recommends to be approved as a RSPO Certified FFB producer of Sustainable Palm Oil.

3.1 Summary of Findings

(Based on the RSPO Standard for Group certification: July 2010 reference to requirement for the Group Manager, Group members, Independent Smallholders group structure, Internal Control System and FFB Supply Chain Elements).

During the Independent Smallholder Assessment, the group manager and a sample of group members were assessed against the compliance to the requirement of RSPO Standard for Group Certification. Sampling of the member is explained in the section 2.3 above. It was assessed how the internal control system documentation and mechanism supports the group members, controls the group members' sustainable oil palm management, monitors the group members through internal assessment to ensure they meet the RSPO requirement for group certification and assessed the supply chain mechanism of the FFB produced and sold.

Requirement 1: Group requirements. Producers can form or join a group for group certification. The organization and its members shall demonstrate their ability to meet the RSPO Standard for Group Certification and the relevant RSPO Standard for Sustainable Palm Oil Production.

1.1. Group Elements

Asosiasi Petani Sawit Swadaya Amanah is an Independent Smallholder Group formed and trained to be certifiable standard with support from external consultants WWF Indonesia. The group is managed by a group manager who reports to internal group management committee consisted by selected group members. Organization chart for ICS (Internal Control System) has been developed consist of appointed

personal for each section, such as: Group Manager, Internal Approval Committee, Section for Registration and Counseling, Section of Internal Auditor, and Section for FFB Purchasing and Sales. Record of meeting minutes regarding establishment of appointed personal for ICS was done on 25 April 2012 (record number 001.06/DOK-AM/2.1/2012). The group manager ensures that the group members meet the requirement RSPO standard for Group Certification. (1.1.1)

Revision on previous procedure (Buku Pedoman ICS Petani Kelapa Sawit Swadaya, Periode July 2012 - July 2013, Section 5.1 Registration of farmer) of Member registration has been made. Some steps are changed to make known for new members. Flow chart of registration is now clearer starting from application form, pre-inspection and checking on appropriate documents of farmers, and internal approval. (Record: SOP No. 003/DOK/SOP/APSSA/2013). Procedure has stated Registration of each member shall be agreed during panel committee of internal approval. Once accepted to join the group, the members sign an agreement with the group manager to follow the group rules and meet the RSPO requirement for group certification. Review on record of farmer member of Asosiasi Petani Sawit Swadaya Amanah found that only formal group members are joined within the group. All 349 farmers are formally registered as group member

Group manager established a system to check membership status, production process, and RSPO requirements of principles and criteria for each farmer member (i.e. record of Checklist "Pemeriksaan Internal" Internal Inspection). Checklist consists of Land information and status, replanting area (if any), commitment to comply with RSPO requirements, and checklist of compliance with RSPO P&C. New procedure has also been established by group manager as guidance to monitor all individual group membership status and risk evaluation i.e. SOP No.011/DOK/SOP/APSSA/2013 ("Monitoring dan Pemantauan Kwalitas dan Profesionalisme Grup Sertifikasi"). (1.1.3)

Group manager specified maximum capacity of the prospective members that can be supported by management system and technical capacity is 500 individual famers. The maximum number is determined based on actual condition where potential farmer willing to join the group is only 151 individuals where current formal group member is 349 individuals. The relevant procedure provided by smallholder group is SOP No.003/DOK/SOP/APSSA/2013.

(1.1.4)

1.2. Compliance with Standard

Monitoring on formal group member under group certification is scheduled every 4 month. Latest records shown internal inspection for each individual formal member was done on January 2013. Group Manager has produced yearly programme to monitor all member within the group to comply with relevant RSPO Standard for Sustainable Oil Palm Production. (1.2.1)

Group manager plans a program to support formal group member and prospective members in achieving compliance with RSPO requirements. (Record: "Rencana Kerja Tahun 2013" Work Programme of 2013). Program covers identification of prospective member, training related to ICS, RSPO P&C requirements, gap assessment in compliance with RSPO requirements, regular internal inspection, registration of prospective member, internal assessment, internal approval committee meeting, formal agreement, and regular counselling on the field. Group Manager is aware that once the prospective members are in compliance with the RSPO standard through initial internal assessment before accepting into the group, they shall be formally included as a member of the group. Until RSPO compliance is achieved through an initial assessment by external certification body, the FFB production from prospective member sites is not included to the total certified production of the group. (1.2.2)

All the 349 formal group members have agreement with the Group Manager showing a commitment to achieve compliance to RSPO requirements for group certification. A copy of the agreement is kept at the ICS administrator and by the group members. Internal assessment is carried out to ensure that group members adhere to the internal requirement on group objective and policies. During this certification assessment there are no members excluded from the group. Review on record of agreement for each formal member from KT 311 (25 members), 318 (28 members), and 319 (29 members) are completed and up to date. Other samples taken i.e. KT 312 (56 members) and 313 (39 member) shows all formal agreement is available. (1.2.3)

Group Manger ensures that group members continuously committed to improve their compliance with relevant RSPO requirements by adhering to group rules and system. Interview with 18 farmers member sampled, admitted lack of understanding upon group internal requirement including ICS, policy and programme developed by Group Manager. Corrective action taken was to create socialization programme for understanding RSPO standard for each farmer member (Document: "Rencana Kerja Sosialisasi, SOP dan Surat Keputusan Perubahan Panduan Group Standard Sertifikasi Tahun 2013"). Progress evidence from this programme was socialization to 43 farmer member dated 13 February 2013. Group manager is committed to implement socialization of the programme consistently. Observation 01 raised with regards to consistency of the implementation of programme. (1.2.4)

Group manager shows improvement on the understanding of compliance to RSPO group certification standard including retention time of record keeping for each ICS document. Furthermore, eventhough routine internal inspection for each farmer plot has not been carried out; the group manager has provided a programme to going through. (1.2.5)

Group manager and its farmer members show effort to maintain compliance with RSPO standard continuously. 40 procedures related to Group Certification standard have been produced to support compliances with RSPO standard requirements including programme to conduct

routine inspection and corrective action against non-compliance. (1.2.6)

1.3. The Group Manager of the Group shall demonstrate its capacity for managing group certification and performance assessment against the RSPO Standard for Group Certification.

Group manager was appointed during member meeting on 25 April 2012; Minutes of meeting record is available. The appointed group manager is an individual acting as legal entity. The detail responsible for group manager is provided in SOP No.005/DOK/SOP/APSSA/2013 with regards to Appointment of Group Manager. The group manager and the group management committee are elected by members and have the capacity to manage the group certification through the formation of the group committee. Decision making is through meeting with members. (1.3.1; 1.3.2)

Group manager is local people and able to communicate fluently within members. During the audit, it is confirmed the group manager was able to communicate with the members in both spoken and written. (1.3.3)

The Group Manager and ICS personnel are able to demonstrate knowledge of the requirements of RSPO Standard for Sustainable Oil Palm Production, RSPO Standard for Group Certification, and internal group procedures and policies as stated in the sustainability manual. It is also noted that there is no conflict of interest in the group management structure and they are elected by the group members. – *in relevant to indicator 1.2.5 and 1.2.6 (1.3.4)*

SOP No.005/DOK/SOP/APSSA/2013 with regards to "Pengangkatan Grup Manager" (Appointment of Group Manager) stated competencies requirement to be appointed as group manager which include conflict of interest declaration. The Group is also provided evidence of competency analysis for recent appointed group manager where all requirements are met. (1.3.5)

During the audit, based on interview with group manager, field visit and observation to group office, audit team seen the sufficient resources in term of human capital, financial, buildings and other infrastructure such as agriculture tools, emergency response equipment, vehicles and office utensils. (1.3.6)

It is also noted during the audit, with interaction and interview with Group Manager, audit team convinced the appointed group manager is mentally and physically capable. The group manager is capable to control, monitor and evaluate all members pertaining to their compliance to the RSPO requirements including communicating with them and visiting them at the required frequencies. (1.3.7)

Group manager has set out mission, objective and group's policies. Not less than 40 procedures and policies have been produced covered all relevant activities to ICS, RSPO standard for group certification, and other RSPO requirements. (1.3.8)

There is a policy and procedure for communication i.e. SOP No.007/DOK/SOP/APSSA/2013 ("Komunikasi

Internal Grup Sertifikasi"). Policy has been communicated within group member. Interview with some sampled farmers show understanding of internal communication policy established by group manager. (1.3.9)

In relevant to indicator 1.2.2, Group manager has established a yearly program for prospective and formal members to develop strategic plan including the training need for its member. Record: Rencana Kerja Tahun 2013. (1.3.10)

Procedure for purchasing and selling within the group been established (Record: No.021/DOK/SOP/APSSA/2013 with regards to "Prosedur Penjualan Buah Kelapa Sawit"). The mechanism to ensure certified and non-certified products provided in SOP No.008/DOk/SOP/APSSA/2013 with regards to "Pemisahan TBS Tersertifikasi dengan TBS Non Sertifikasi". Both procedures are detailing the segregation mechanism for transport delivery of certified and non certified FFB. For example: utilisation of particular individual transport for certified FFB to send to the mill; to place particular stamp of certified product on delivery order document, etc. (1.3.11)

The Group Manager and ICS administrator aware that that the total of all sales and claims of RSPO certified FFB production from group members shall not exceed the total certified FFB production of the group in its entirety. This can be further verified during the surveillance assessment when the group already start producing certified FFB. Once certified the group will be producing segregated FFB and the group is aware that they will be able to trade through GreenPalm. The ICS documentation able to track the FFB production to the group members based on the information on the sales invoice and weighbridge document issues by the palm oil mill whereby the group member number is indicated on these documents by the mill. The group has past FFB production and sales record for the year 2012 which obtained from the palm oil mill and verified with the group members records. (1.3.12)

Requirement 2.0: Group Management Documentation Requirement

2.1. The Group Manager shall have its operational structure, policies and procedures, and basic information on individual group members documented. The system verifies whether operations within the group comply with the RSPO Standard for Group Certification Requirement and the relevant RSPO Standard for Sustainable Oil Palm Production.

The Group Manager has a Manual Book (i.e. Buku Panduan ICS) and procedures which contain operating structure, internal control system documents, decision making process and responsibility of the personnel involve in the group management. It is indicated in the manual and relevant procedure (SOP No.002/DOK/SOP/APSSA/2013) that all the group management documents/ICS documents are retained for at least for 5 years throughout the validity of the RSPO certificate. Interview with the Group manager and

ICS administrator reveal that they are aware of the document retention period. However, *Observation 02* raised against indicator 2.1.1 - it is consider to provide detail job description for sales and purchasing staff to running programme of Greenpalm. (2.1.1; 2.1.2)

The documented membership requirements for the participation of individual members in the group included in the Manual Book and procedures such as:

- Membership requirement and procedure to join the group SOP No.003/DOK/SOP/APSSA/2013 with regards to "Prosedur Penerimaan Anggota". Group manager stated that new procedure for member registration is also applicable for prospective member to join the group. (2.1.3.1)
- Procedure for leaving the group SOP No.010/DOK/SOP/APSSA/2013 with regards of "Keluar atau Mengundurkan Diri dari Keanggotaan" (2.1.3.2)
- Procedures for incorporating a remedial system for member non-compliance, stated in Manual Book (Guidance Book of Internal Control System, Asosiasi Petani Sawit Swadaya Amanah). Procedure covers requirement and penalty to group member whom are not complied with internal policies and procedures. (2.1.3.3)
- Procedure for expulsion from the group, stated in Legal Authority of Asosiasi Petani Sawit Swadaya Amanah, dated on 1st Aug 2012 issued by a law consultant Mr. Asri Thaher, S.H., M.Kn; and SOP No.026 / DOK/ SOP / APSSA /2013 "Pemecatan anggota grup sertifikasi". Member who are not followed and complied with internal procedures and policies of the group will be removed from the membership. (2.1.3.4)

(2.1.3)

There is also a group-level operation manual and procedures that includes the following:

- Procedure for internal assessment protocol and entry requirement stated in SOP No. 012/DOK/SOP/ APSSA/2013 with regards "Program Kerja Inspeksi Internal". For sampling method procedure is detailed in SOP No.014/DOK/SOP/APSSA/2013 with regards "Penentuan Sample Inspeksi Kebun Anggota Grup Sertifikasi" (2.1.4.1)
- Procedure for accepting / removing members see indicator 2.1.3 (2.1.4.2)
- Procedure for issuing Corrective Action Request (CAR) to members with non-compliance during internal assessment and external assessment including communicating CAR and timeline to respond to the CAR, stated in No.031/DOK/SOP/APSSA/2013 and No.033/DOK/SOP/APSSA /2013 (2.1.4.3; 2.1.4.4; and 2.1.4.5)
- Procedures for handling complaints, appeals, corrective action requests (CARs), and group member performance assessment, stated in 007/DOK/SOP/APSSA/2013 with regards to "Komunikasi Internal Group Sertifikasi" (2.1.4.6)
- Procedures for group monitoring and internal assessment, including carrying out and updating group risk assessment and annual surveillance of group members based on the RSPO sampling formula stated in SOP No.011/DOK/SOP/APSSA/2013 with

regards Monitoring dan Pemantauan kwalitas dan Profesionalisme Group Sertifikasi (2.1.4.7)

Group Manager established several new procedures for revision of current Manual (Buku Pedoman ICS). Decision Letter regarding revision of Manual Book stated in Letter ref No.010/DOK/SK.KPI/APSSA/2013. Group manager is also produced an update policy on time commencement of new SOPs and status of recent formal members prior to revision of procedures related to Group Certification standard including procedure to accept and expelled members. (Record: Decision letter of group manager No.025/DOK/SOP/APSSA/2013). (2.1.4)

Group Manager and ICS staff has developed a database of the group members in term of Database "Anggota Grup Sertifikasi", updated February 2013. This includes the information below as a minimum for each member:

A copy of each group member's application form include member information, membership number, address, contact details, application and agreement details, land ownership data and related documents, size of plots, map of the plot location, FFB production records (previous year and projected), fertilizer application and other details of farm management. Review on farmer member of KT 312, KT 318 and KT 319 confirmed those are completed. (2.1.5.1; 2.1.5.2)

Result of last internal assessment is available for each group member conducted on 2012. These are done during initial registration when the farmers joined the group. Sample record: "Checklist Pemeriksaan Internal" Checklist of Internal assessment. For routine inspection for 2013, a programme was provided. (2.1.5.3)

Date of acceptance of group member started on since the agreement letter between group manager and each group member was signed. The information is provided in Database Anggota Group Sertifikasi updated 2013. (2.1.5.4)

Maps of the farmer plot for each group member incorporated into farmer group maps are available. Records are kept in ICS documentation. Record provided in "Database Anggota Group Sertifikasi 2013" (2.1.5.5)

Summary of all the data on land use (in hectares) for each formal member is available in "Database Anggota Group Sertifikasi updated 2013" Database of Group Certification member 2013. The information cover location maps for each farmer plot, total area, total planted area, Total RSPO certified production area, and other related information. There is no other crop production and infrastructure areas within farmer plot. All farmer plot areas are planted with oil palm. Most of smallholders are living in the village nearby the plots area. (2.1.6.1 to 2.1.6.6)

2.2. Internal Assessment System

Group manager has established new procedure for member registration including recruitment of prospective members. Review on group documentation, all records related to member registration now is completed. There are complete sets of record of Internal assessment checklist for farmer members of KT 311 (25

farmers), 318 (28 farmers) and 319 (29 farmers). Further review of KT 312 (56 farmers), KT 313 (29 farmers), the record of Internal assessment checklist are fully completed. There are also complete sets of Internal approval committee letter for each farmer member of KT 318 (28 farmers), KT 319 (39 farmers), and KT 320 (28 farmers). (2.2.1)

During the assessment, Major nonconformity (reference

Number: A829199/11) raised against indicator 2.2.2 as follows: No evidence Managers Group has an internal audit program for its members on a regular basis. Internal audit program should cover requirements under RSPO group certification standard 2.2.2.1 - 2.2.2.8. Group Manager has prepared and submitted corrective action; and BSI auditor has accepted and closed out i.e. Internal assessment programme had just produced on February 2013 for implementation of 2013 - 2017. Developed procedure related to internal assessment place programme is also in (i.e. No.012/DOK/DOP/APSSA/2013 with regards "Penilaian Inspeksi internal" Internal Inspection; and SOP No. 029/DOK/SOP/APSSA/2013 with regards to Sampling size methodology). Asosiasi Petani Sawit Swadaya Amanah has provided the action plan for internal assessment. Program for regular internal assessment has been developed and first internal assessment as per program has been conducted. The internal assessment training conducted 16 February 2013. Risk factor, sample size, methodology and result evaluation has been determined and recorded. This was confirmed in line with Group Certification Standard and internal procedure. Asosiasi Petani Sawit Swadaya Amanah sent the corrective action records on 20 February 2013. Internal assessment started in 17-18 February 2013 with 18 samples from KT 311, 312, 313, 314, 315, 316, and 320. The result of internal assessment recorded under "form checklist pemeriksaan internal" Form of Internal Inspection Checklist and "Notulen Kegiatan Tim Penilai" Meeting Minutes of Internal Inspection Team. Nonconformity is considered closed 15 March 2013. However, **Observation 03** raised against this indicator: it could be advantage if the internal assessment team are adequately trained with audit techniques and writing non-conformance report to make accurate result in the

Similarly in relation to indicator 2.2.2, Major nonconformity (reference Number: A829199/12) is also raised against indicator 2.2.3, i.e. No evidence is available on the results of periodic internal audits to identify non-compliance and evidence of corrective action thereupon. Group Manager has prepared and submitted corrective action; and BSI auditor has accepted and closed out. Program for regular internal assessment has been developed and first internal assessment as per program has been conducted - see indicator 2.2.2. As a result from internal assessment, the internal assessment team of smallholder group raised non conformities and corrective action request. Group Manager is also issued guidance for management of waste management and peat management as corrective action to be taken by farmers. NC considers closed on 15 March 2013.

future. (2.2.2)

Requirement 3.0: Chain of Custody. The Group Manager shall have a system in place to enable the trading of RSPO certified Fresh Fruit Bunches (FFB) produced from the group

New procedure has been established SOP No.021/DOK/SOP/APSSA/2013 with regards "Prosedur Penjualan Buah kelapa Sawit Asosiasi Petani Sawit Swadaya Amanah" (Procedure of FFB sales and purchasing).

The Group Manager and ICS staff monitors and register the sales of FFB from the group members to the palm oil mill. The group manager receives the FFB sales summary from the group member as well as from the palm oil mill with the member number indicated in the related documents such as Delivery Note and weight bridge ticket. This facilitates is traceable by the Group Manager and to ensure that the total sales volume and claimed are from the certified group members. The Chain of Custody of the Independent Smallholder Group members stops at the palm oil mill and collection point. The palm oil mill takes over the chain of custody from the Independent Smallholders. All FFB sales and purchasing are recorded in "Buku Taksasi" Book of Duty and "Rekap Produksi" Production Recapitulation Book. (3.1; 3.2)

Appendix D shows the assessment against supply chain element. During this initial assessment there was no any FFB purchased by the group Manager or the Group members. Sales invoice indicated with group member's identification number, name of the group member, palm oil mill's name and address, date and quantity. Group manager established a procedure related segregation of certified products and non-certified i.e. No.008/DOK/SOP/APSSA/2013 with regards to "Pemisahan TBS Tersertifikasi Dengan TBS Non Sertifikasi" (Segregation on Certified and non-certified FFB). Procedure stated RSPO Segregation certified will be stamped in sales documentation once RSPO certificate is received. (3.3)

Smallholders Group is sending their FFB by own transportation (sub-contractor FFB transporter) to the mill. No intermediaries are employed. Most of FFB transporters are among smallholders member itself which has a truck to carry FFB to the mill. Contract for each transporter is available. (3.4)

All sales of FFB originating from the farmer plots are recorded under Delivery Order (weight bridge ticket) and FFB transport ticket (Surat Pengantar Buah) include invoice and receipt, transport information, farmer identification number (farmer sub-group), description of product, and product volume. (3.5)

The Group Manager maintain copies of all relevant documentation and records of group product transactions for a period of 5 years as stated in SOP No.002/DOK/SOP/APSSA/2013 with regards to Document Control. (3.6)

No intermediaries are existed. Smallholder group is using own transportation to carry FFB to the mill. – see indicator 3.4. *Not applicable (3.7)*

It is noted that the Group Manager is limited to access to the GreenPalm RSPO IT System due to the language constraints. He is only able to communicate in local language.

3.2 Summary of Findings

(Based on the RSPO Principles & Criteria for Independent Smallholders, Indonesian National Interpretation: 2010)

Principle 1: Commitment to transparency

Criteria 1.1: Oil palm growers and mills provide adequate information to other stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages & forms to allow for effective participation in decision making.

Organization made reference to "Mekanisme komunikasi dan konsultasi"/Mechanism on Communication and Consultation as guidance for communication and consultation including response upon any claim, issues receive, and complaint & grievance. As record keeping, organization provides Log Book "Petani Swadaya Kecamatan Ukui Kabupaten Pelalawan tahun 2012", the retention time of record determined for 3 years, the response time of any information or complaint receive maximum 14 working days. Example:

- Letter No.518/KUD-BUB/BJ/X/2012/03 dated 10
 October 2012 related to application of new farmer
 group; as a response Group Manager sent a letter
 No.18/Amanah/APM/X/2012 dated 15 October 2013.
- Letter No.1986/WWF-PKU/REDD/XI/2012 dated 2 November 2012 related to visit of WWF Networking to Asosiasi Amanah; as a response the visit was held on 10 November 2012.

(1.1.1)

Criterion 1.2: Management documents are publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes.

Organization determined the list of document accessible for public under "Daftar Dokumen yang dapat Diakses". The list dated 1 October 2012 and retention time determined for 5 years. Under the list, organization listed as follow:

- Legal: Notariat Act, Land title, and Yearly Plan for Independent Smallholder, Smallholder Group agreement;
- Environment: Simplified Environmental Impact Assessment, Identification of pollution and emision on farmer area HCV result, and other relevant best practice procedures:
- Social: Simplified Social Impact assessment; Social activity of smallholders; Document of local contribution.

There is also Publicly available documents such as location map and farm layout of the group members plots/blocks, application and agreement between the group manager and group members, internal audit documents, registration of the group with the local

authority, safety and health plan, details of complaints/grievances, group policies, copies of relevant government regulation, agriculture manual covering oil palm best practices, Guidance Book of ICS, farm operation and production records, training records, FFB sales records and continuous improvement plans. All these documents are in local language to allow the group members read and understand easily. All group members are given a copy of the relevant documents. (1.2.1)

Principle 2: Compliance with applicable laws and regulations

Criterion 2.1 – There is compliance with all applicable local, national and ratified international laws and regulations.

Smallholder group made available and up to date the legal documentation under "Dokumen Kepatuhan pada Peraturan dan Hukum yang berlaku" (Prinsip 2, Kriteria 1)/Document of Legal Compliance, consist of 8 acts, 3 government regulations and 2 ministerial regulations. For instance Act No. 25/1992 with regards to Cooperatives and communities, Act No. 12/1992 with regards to Plant Cultivation/best practices, Act No.13/2003 - Labour; including implementation of hazardous material regulation, such as: Government Regulation No.74/2001 with regards to Hazardous material handling, and Environmental Ministry Decree No. 03/2008 with regards to Mechanism on Labelling of Hazardous material. All of these documents recorded under Management System Document & Distribution List of Kebun Asosiasi Petani Sawit Swadaya Amanah Kecamatan Ukui, Kabupaten Pelalawan Tahun 2013 as "Legacy achieves of Legal Compliance (No. Dok. 008/Dok/2.1 Ma1/APSSA/13). (2.1.1)

Group manager and group members have adequate knowledge regarding legal requirements related to their operation. Implementation of the related legal requirements relevant to oil palm cultivation, including those related to the group activities are checked regularly by group manager and through the local district government agriculture extension officer. This was revealed by the agriculture officer during interview. Organization has conducted an analysis of compliance with laws and regulations include compliance discussion article by article. (2.1.2)

The group manager, group management and the partnering palm oil mill's officer regularly provide an upto-date list of applicable laws and regulation to ensure the group and members aware of the latest regulations. During this initial certification it is noted that external assistance and training was given by WWF Indonesia including preparing list of relevant documents to ensure the group management understand the requirement of this indicator. (2.1.3)

Criterion 2.2 – The right to use the land can be demonstrated and is not legitimately contested by local communities with demonstrable rights.

All farmers acquired land use rights from local Government in the form of "Surat Keterangan Tanah"/Letter of Land Status (Scheet-kaart Land) or Land Ownership Certificate, for example;

In KT 320, there are 28 farmer members hold land use rigths, for instance as Mr. Dinanik who have proof of land ownership in the form of Scheet-kaart Land plot Number 332 cover an area of 16,800m2 (1.6 ha) located in RT 03/04 Dusun Dua, Desa Pangkalan Lesung issued 15th October 2009. Land on behalf of Mr. Kalidi, Land Ownership Certificate issued by BPN Pelalawan No.01 referring to a Letter Decree of BPN Pelalawan No.643/520.1/ 09.70/2002 dated 20 December 2002. Map measurement refer to No.03/P.Lesung/2002 dated 18 December 2002 cover 19,708 m2 (1.9 ha).

All the group members have maps, farm layouts and evidence showing legal land ownership in the form of land title and land use right. There are various types of land ownership noted and each ownership comes with particular rights or term of use. Group members understand the terms of the ownership and able to explain the history of the land use prior to oil palm planting. These details are made available to the group manager prior to joining the group. (2.2.1)

Group manager ensure that group members lands are not claimed or contested by any third parties or local communities and there is no violation of customary rights. There is no dispute noted during this assessment and no issues were raised by the stakeholders during interview. Group manager have negotiation procedure to address any conflict if identified. Based on interview with group manager and with local government, found that there are no disputes between associations and other community members. (2.2.2)

Organization planned to monitor implementation of boundary concrete poles and maintenance under "Program pemasangan Patok Batas Kavling dan Realisasi Pemasangan Patok Batas tahun 2013". Based on the record there are 343 farmer plots are completely installed with boundary poles. Field inspection to sampled 18 farmer plots, found the boundary poles are visibly maintained. Furthermore, palm fronds stacking are also arranged along the boundary lines at several farmer plots. (2.2.3)

Criterion 2.3 – Use of the land for oil palm does not diminish the legal rights, or customary rights, of other users without their free, prior and informed consent.

It is noted that the land was initially developed as a forest production area taken over by government when the permit was ended since 1990s. Most of smallholder members were obtained a land use right from local government to cultivate those lands for oil palm planting since 1997; and now smallholder members are hold land title for those occupied land. There are various types of land ownership noted and each ownership comes with particular rights or term of use. Interview with head of

villages (Air Mas and Trimulya Jaya) confirmed there are no traditional rights or land dispute with any third party. (2.3.1)

Principle 3: Commitment to long-term economic and financial viability

Criterion 3.1. – There is an implemented management plan that aims to achieve long-term economic and financial viability

The group manager and the group management committee with participation from members developed operational work plan in term of "Rencana Kerja Kebun Sawit Swadaya 2012-2013"/Operational Plan for Independent Smallholders 2012-2013. Under the document, the target of projected FFB production for three years, production and maintenance cost, total income, and other related activities are provided such as training programme, manuring schedule, Internal inspection, weed control, boundary poles upkeep, prevention erosion and upkeep of land subsidence. Although it is simple calculation, it shows the income generated for the group through membership fee and FFB sales to the partnering mill. It is also noted simple calculation on certified FFB sales through Green Palm. The expenses include cost of training, internal and external audit. The projected FFB based on actual production record on the last 3 years (2009-2012). (3.1.1)

The replanting programme is available under "Dokumen Rencana Replanting"/Document of Replanting Programme in which the programme will commence in 2028 for all farmer plots. (3.1.2)

Principle 4: Use of appropriate best practices by growers and millers

Criterion 4.1: Operating procedures are appropriately documented and consistently implemented and monitored.

Smallholder group is referring to "Agricultural Policy Manual for Smallholders" No. AA-PLASMA-PP-KS-01. The manual explains the procedures for seedling preparation, pest and disease control, fertilizer application, harvesting. There are also reference documents issued by national government in relation to oil palm plantation such as "Buku Operasional Pengendalian Hama Terpadu Kelapa Sawit" Dirjen Perlindungan Perkebunan Departmen Pertanian 2007" (Book of Pest and Disease management, Directorate of Protection and Plantation, Agriculture Minister 2007); "Kumpulan Diskripsi Varietas Benih Bina Tanaman Tahunan", Dirjen Bun 2005 (Journal of Seedling Variety, Plantation Directorate General 2005), "Pedoman Pengamatan dan Pengendalian OPT Penting Kelapa Sawit", Direktorat Jenderal Perkebunan 2010 (Guidance on Monitoring and Management of Oil Palm Disorder, Plantation Directorate General 2010); and "Pedoman Teknis Pengembangan Kelapa Sawit Program Revitalisasi Pertanian", Direktorat Jenderal Perkebunan 2009 (Technical Guidance on Oil Palm Development of

Revitalisation Programme, Plantation Directorate General 2009). (4.1.1)

The independent smallholder group was given external support and assistance by WWF Indonesia and partnering Mill in implementation of agricultural practices. Review on document and field visit confirmed the smallholder group are implementing their own agriculture practice appropriately, for instance: Fertilizer application based on leaf sampling recommendation, U-shape frond stacking to reduce land erosion, Empty fruit bunch application, Pesticide application using spraying unit team, pest and disease census, and harvesting activity. Records of those activities are kept in group manager office. Group Manager and ICS staff ensures to regularly check on the smallholder activity through internal audit and monthly field inspection to the selected member plots. The group manager organises regular training for the group members in order to review and enhance their knowledge on good agriculture practices. (4.1.2)

Criterion 4.2: Practices maintain soil fertility at, or where possible improve soil fertility to a level that ensures optimal and sustained yield.

The fertilizer application recorded under "Daftar Jenis dan Volume Pupuk yang disalurkan Petani" (List of Fertilizer application for smallholder member) includes "Laporan Realisasi Pemupukan Tahun 2012" (report of Fertilizer application for 2012). Smallholder group was completed applying fertilizer to all member plots as per December 2012, such as ZA, MOP, Dolomite, and Rock Phosphate. There is also found 15 Tonnes of Empty Fruit Bunches (EFB) applied for 62Ha in farmer sub-group plot of KT 319. The EFB was supplied by partnering mill upon request from group manager. (4.2.1)

Organization recorded the productivity history and realization of year 2009–2012. The monthly record is also checked and verified by the Group Manager and ICS administrator and updated in the ICS documentation. (4.2.2)

Criterion 4.3: Practices minimise and control erosion and degradation of soils.

Most of smallholder group member are located on flat area. Nevertheless, smallholder group has implemented the frond stacking on letter "U" in particular slope area. Group manager planned to monitor implementation of frond stacking and drainage maintenance under document of "Monitoring pelepah letter U dan Perawatan parit" year 2013. Field visit and interview with 18 sampled farmer plots confirmed they are understand on the practice to minimise and control erosion. (4.3.1)

During the field visit it is noted that only selective and circle herbicide spraying carried out. Soft grass and soft weeds are maintained to minimize erosion during heavy rainfall. There is no immature area during the audits, the latest planting years was back in 2000. Group manager

and ICS staff ensure no blanket spraying applied by farmer member. (4.3.2)

During the audit, auditor found a number of farmer plots identified as peat soil for instance two farmer plots under farmer sub-group KT 312 and two farmer plots under KT 315. Group manager have not identified any peat soil under the scope at that time. However, subsequently the group manger prepared action plan and procedure of oil palm management in peat soil No. 034/DOK/SOP/APSSA/2013 dated 12 February 2013. Under the action plan and procedure, identification of peat on the field and identification of water inlet and outlet for water gate will be commenced on March 2013 onwards; Monitoring and evaluation planned every 3 months. Auditor concluded non compliance against indicator due to limited progress on peat soil management. Minor Nonconformity (reference number: A843471/1) against indicator 4.3.3: Peat soil identified during field visit and there is no sufficient evidence of water table management has been implemented. Organization just recently established procedure and action plan of peat soil management for its member on February 2013, and implementing for those members identified with peat soil commencing March 2013. These will be further verified during subsequent surveillance

Criterion 4.4: Practices maintain the quality and availability of surface and groundwater.

Smallholder group recorded the pesticide application under document of "Rekap Biaya Herbisida TUS" (Recapitulation of Herbicide cost through Spraying Unit Team) recording Pesticide used from May — November 2012. Fertilizer application recorded under "Daftar Jenis dan Volume Pupuk yang Disalurkan Petani" (List of Fertilizer Distribution Type and Volume to the farmers) in which the dosage were recorded "Dosis Rekomendasi Pemupukan tahun 2012" include the fertilizer recommendation per type of fertilizer: ZA, MOP, RP, Dolomite.

(4.4.1)

During field visit it is noted that most of the group members' plots are planted in flat area. Nevertheless, the smallholder group implements U-shape frond stacking in some particular slope area. For example farmer plot area of KT 311 and KT 319. Buffer zones are managed along the water stream. Inspection to the field confirmed, no chemical treatment carried out along the buffer area. Group members are provided with knowledge on maintaining the quality and availability of water resources such as maintaining buffer zones by avoiding spraying and maintaining natural vegetation. (4.4.2)

Criterion 4.5: Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.

IPM is documented in the Manual and procedures. This manual describes all the IPM techniques and methods to

be used by the group members in managing oil palm pest and disease. The techniques include prevention through planting beneficial plants such as *Tunera subulata*. Smallholder group monitors pest and diseases through census of bagworm, rat and Ganoderma under "Laporan Hasil Pengamatan dan Pengendalian Hama dan Penyakit" (Report of Monitoring and Control of Pest & Disease). Census is conducted on monthly basis. Smallholder group tries to control pests and diseases through plan for planting "bunga pukul delapan" (*Turnera subulata*) and barn owl box since January 2013. (4.5.1)

Group manager provides knowledge to group members to understand the IPM techniques such as biological control for pest. Initially the training was conducted by external resources from WWF Indonesia, extension officers from the district agriculture office and partnering mill. Manuals related to IPM practices kept in the group office and copy is distributed to group members. Group members aware how to identify pest attacks if any by conduction visual observation. Training of IPM conducted on 8 November 2012, attended by farmer representatives from KT 311-320. Based on interview to 18 sample farmers were able to demonstrate adequate knowledge on integrated pest management and the implementation. (4.5.2)

Criterion 4.6: Agrochemicals are used in a way that does not endanger health or the environment. There is no prophylactic use of pesticides, except in specific situations identified in national Best Practice guidelines. Where agrochemicals are used that are categorised as World Health Organisation Type 1A or 1B, or are listed by the Stockholm or Rotterdam Conventions, growers are actively seeking to identify alternatives and this is documented.

Group manager develops "Tim Unit Semprot/TUS" (Spraying Unit Team) to carry out chemical spraying activities on farmer plots within the group. Group manager ensures all of TUS operators are trained well before joining the spraying team. Record of training for each spraying operator is in place and kept in group office. For example: training on Limited pesticides "Pelatihan Pestisida Terbatas" dated 19 December 2012. The trainer was from Plantation Department of Riau province. Interview with TUS operators confirmed knowledge of spraying and chemical application. (4.6.1)

Organization listed all the agrochemical used in smallholder group. All agrochemical used listed under "Bukti Penggunaan Agrokimia Terdaftar" (Record of Registered Agrochemical used) referred to Agriculture Ministry office Book "Buku Pestisida Terbatas tahun 2011". Visit to agrochemical storage and crosscheck with the list, all agrochemical stored have valid registration license. (4.6.2)

Record of Agrochemical used for the targeted weeds with appropriate dosage as per the recommendation on the label is recorded in "Rencana kerja Harian" Book. Record shows date, type of herbicide used and quantity used. There is type 1A and 1B agrochemical used such as Paraquat. The group manager and its members are

aware of the requirement in RSPO related to use of *Paraquat* and considering alternative agrochemicals such as glyphosate. The progress will be checked during the surveillance assessment. No blanket spraying noted during the field visits to 18 sample farmer plots. (4.6.3)

PPE is implemented and given to spraying operator of TUS. However, based on Group Manual and procedure, PPE for TUS operator must be kept at PPE storage near to group office. While based on field visit it was found that Apron, working suit, rubber gloves, and rubber shoes were taken home by the operator. This may pose hazard to the operator back home. This also has been observed by auditor during pre-assessment and since no significant progress evidence, auditor raised into Minor NC (reference number: A843471/2). (4.6.4)

Agrochemicals are stored at the store near to group office separated from the housing area and stock records maintained by the group members who keep stock. MSDS is available in local language understood by group member. Group Manager collaborates with partnering mill is agreed to send the empty agrochemical container produced by smallholder group for disposal into licensed temporary hazardous waste storage located in PT IIS Ukui Mill area. Record observed by auditor was "Berita Acara Serah Terima Limbah B3" (Meeting Minutes of Hazardous Waste), dated 1 February 2013. (4.6.5)

Interview with group manager and group members reveal that there is no toxicity case. Smallholder group kept "Rekaman Pengobatan bagi Aplikator jika terjadi Kasus Keracunan" (Record of Medication for Chemical Operator in case of Toxicity); it shows no toxicity case occurred at current. Smallholder group monitors the health of chemical operator through routine medical check-up once a year. Example: Record of "Daftar Presensi Karyawan TUS yang mengikuti Medical Checkup dated 10 January 2013" (List of TUS Chemical operator involved in Medical checks), 11 TUS operator followed the medical check-up with 1 field supervision and 1 storekeeper. (4.6.6)

Criterion 4.7: An occupational health and safety plan is documented, effectively communicated and implemented.

Smallholder group established Health and safety policy under "Kebijakan Lingkungan, Sosial Kesehatan dan Keselamatan Kerja" (Policy of Environment, Social, Health and Safety); to establish measureable objective and target to prevent accident, ill health among member and employee towards continual improvement performance. Record of "Rencana Keselamatan Kerja" (Programme of Work Safety) February 2013 was also produced as guidance for health and safety implementation. The plan applied for training on work safety, prohibition of under-age worker and prohibition of sexual harassment and protects its reproductive right. Further the health and safety plan implemented in areas of harvesting, FFB transport, farmer plot maintenance and fertilizer application, office activities, fertilizer and agrochemical store. (4.7.1)

Guidelines on accident and emergency procedures are available and briefed to all group members. Standard form is prepared for recording any accident occurred. During assessment it is noted that there is no any major accident. This was confirmed by the stakeholders interviewed, surrounding farmers, group members and workers. Only common minor thorn pricks cases highlighted by workers. Safety measures explained to workers by group members and included in safety training. Interviews with workers confirmed knowledge of the plans and procedures for emergency. Record observed by auditor for example: Training on pesticide handling under "Notulensi Pelatihan Keselamatan Keria" dated 19 December 2012, attended by 50 farmer member from KT 311-KT 320. Training on PPE for harvester recorded under "Notulensi Pelatihan Alat Pelindung Diri" dated 13 October 2012, attended by 22 farmer member including harvester. Training on first aid recorded under "Notulensi Pelatihan Pertolongan Pertama Gawat Darurat" dated 24 October 2012, farmer attended 20 member. by

Smallholder group made available "Prosedur Kesehatan dan Keselamatan Kerja" (Procedure of Health and Safety) where include Risk analysis for each activities covered under smallholder group scope. Working activities cover such as Harvesting (frond cutting, FFB harvests, FFB transport, and frond stacking), Fertilizer application, Farmer plot upkeep (spraying, mixing of pesticide) and office activity. (4.7.3)

Criterion 4.8: All staff, workers, smallholders and contractors are appropriately trained.

Training programme and realization documented and recorded under "Rencana dan Realisasi Pelatihan Tahun 2013" (Training Programme and Realisation for 2013). Training programme for 2013 such as RSPO P&C training, Limited pesticide and handling of hazardous waste training, soil and water conservation training, OHSAS training, First aid training, IPM training, Land Fire Emergency training, HCV and social impact training, harvesting with PPE, and Balance fertilizer application training. Training record for year of 2012 is also in place. Most of Training record in 2012 was facilitated by WWF Indonesia. (4.8.1)

Principle 5: Environmental responsibility and conservation of natural resources and biodiversity

Criterion 5.1: Aspects of plantation and mill management, including replanting, that have environmental impacts are identified and plans to mitigate the negative impacts and promote the positive ones are made, implemented and monitored to demonstrate continuous improvement.

Assessment of environmental impacts has been identified all parameters to be monitored by the smallholder group includes management of biological, physical, and social Aspects. Record observed by auditor was document of Environmental Impact Management Effort" dated 4 February 2013. The document is also includes the efforts to control upon environmental

impacts from farm activities such as spraying, fertilizing and harvesting. The measurement described in Impact emitted, Control efforts, Time Target, and personal in charge. (5.1.1; 5.1.2).

However, **Observation 04 (5.1.2)** - Smallholder group has opportunity to improve the Environmental impact document for all operational activities within the group to include for example: land clearing, transport of FFB, etc.

Criterion 5.2: The status of rare, threatened or endangered species and high conservation value habitats if any, that exist in the plantation or that could be affected by plantation or mill management, shall be identified and their conservation taken into account in management plans and operations.

Smallholder group has made the identification of environmental impact on High Conservation Value (HCV) in oil palm plantation carried out on October 2012. The Group manager and group member have been monitored the flora and fauna within farmer member plots during the year 2012 and has compiled on a list of protected animal dated on 4 February 2013; there are 39 protected species are identified. The list is classifying protected species based on the status of protection and scarcity (e.g. legislation, IUCN and CITES) but need to be sufficiently updated in relevant with document reference – Observation 05. (5.2.1)

Group manager has produced a SOP for management of conflict with protected species. Document No. 015/doc/SOP/APSSA/2013 dated 27 January 2013 explaining the mechanism of handling conflicts with protected species but can be improved by adjusting the needs within the group area in relation to the current location of the Smallholder group area is relatively close with the existing Tesso Nilo National Park and should supported with the necessary steps to mitigate conflicts – Observation 06. (5.2.2)

The Smallholder group has appointed a dedicated officer within ICS staff to conduct management of HCV area as refer to Decision letter of Group Manager No. 01/Mandate/SK/X/2012. The appointed officers are Mr. Tugiono, Dadang and Muliadi. Training of HCV has been conducted for appointed officers on 12 October 2012. Record of training is available in term of Meeting minutes, training materials and a list of attendance, conducted by WWF Indonesia officer (Mr. Dani Rahardian). (5.2.3)

Criterion 5.3: Waste is reduced recycled, re-used and disposed of in an environmentally and socially responsible manner.

Agrochemical waste products have been identified and documented – see Criterion 4.6. Interview with 18 sampled smallholders confirmed understanding on disposal of empty agrochemical containers. Furthermore, Group manager has established mechanisms for waste management which include hazardous agrochemical waste such as Management of

agrochemical used containers by sending the waste store of PT IIS Ukui Mill. Document observed by auditor include a letter No. 10/Amanah/Adm/VI/2010 dated 7 June 2012 and the minutes of handover of hazardous waste dated 16 October 2012. Agrochemical waste management is handled by spraying unit team (TUS consists of 13 people) conducted by personnel who had received training. The empty agrochemical container is triple rinsed and punched at bottom before disposal. The remains of the agrochemical and contaminated water from the washing of used container are re-using for the next pre-mixing compound. (5.3.1; 5.3.2)

Based on interview with group manager admitted that there is no complaint from the stakeholder in relation to disposal of agrochemical waste container. Interviews with officials and local communities surrounding from Bukit Jaya, Air Emas and Tri Mulya Jaya villages confirmed there are no irresponsible hazardous waste disposal from smallholder group and no complaint from community at present. (5.3.3)

Criterion 5.4: Efficiency of energy use and use of renewable energy is maximised.

This criterion is not applicable to Independent Smallholders Group as stated in Indonesian National Interpretation of RSPO P&C for Independent Smallholder, July 2010.

Criterion 5.5: Use of fire for waste disposal and for preparing land for replanting is avoided except in specific situation, as identified in the ASEAN guidelines or other regional best practice.

Group manager and members are aware that they cannot use fire for land preparation during replanting from oil palm to oil palm or from any other crop. Zero burning techniques have been explained to group members through internal training by WWF Indonesia. During field visit there is no evidence of any kind of burning was noticed. Interview with stakeholders' i.e. government officers, village head and neighbouring farmers confirmed that fire is not used. During the interview, the group manager and group members highlighted that there are no pest and disease problem. So the use of fire during replanting is unlikely. However they are aware that fire is only permitted in special cases which involve elimination of pest and diseases where recommendation from relevant government agencies must be in place prior to use of fire. The smallholder group has developed replanting programme starting on 2028 and has referred to technical guidelines of "Pedoman Teknis Pembukaan Lahan Tanpa Bakar" (Land preparation with zero burning), published by the Ministry of Agriculture. (5.5.1)

Observation 07 (5.5.1) – Smallholder group has opportunity to increase those parameters in replanting plan adapted to the existing conditions in the area of group member work place of which, based on the results of the field verification, found some farmer plots are shallow peat.

The group manager has formed the "Masyarakat Peduli Api (MPA)" (Fire-burning anxiety community) within the group and has established the Emergency Response Organization Structure. This community is responsible for occurrence of land burning in the farmer plots. Group Manager has also established Land Fire Emergency Response Mechanism included in Health and Safety Plan. Interview with ICS staff and some farmer member confirmed understanding of emergency land burning procedure. (5.5.2)

Simple fire control equipments are available and kept in group office such as fire extinguisher equipment, hoes reel, axes, shovels, bamboo stick, plastic bucket, and water pump. (5.5.3)

Criterion 5.6: Plans to reduce pollution and emissions, including greenhouse gases are developed, implemented and monitored.

This criterion is not applicable to Independent Smallholders Group as stated in Indonesian National Interpretation of RSPO P&C for Independent Smallholder, July 2010.

Principle 6: Responsible consideration of employees and of individuals and communities affected by growers and mills

Criterion 6.1: Aspects of plantation and mill management, including replanting, that have social impacts are identified in a participatory way and plans to mitigate the negative impacts and promote the positive ones are made, implemented and monitored, to demonstrate continuous improvement.

The group manager and the group members are able to explain the social impacts of their operations. They have not received any complaints regarding their operation. The social impacts identification is documented – see Criterion 5.1. Most of social impacts identified within farmer member as well as efforts of smallholder operations including negative and positive impact. (6.1.1)

Criterion 6.2: There are open and transparent methods for communication and consultation between growers and/or millers, local communities and other affected or interested parties.

Record of open and transparent system of consultation and communication with local stakeholders and external stakeholders is available in term of Logbook information requests and responses, Logbook of complaint and response received, and Logbook of assistance requests and responses. Interview with community village heads of Bukit Jaya, Air Mas, and Trimulya confirmed they are aware of these mechanisms. (6.2.1)

Records of communications/consultations, request and action taken are recorded in Logbooks as above (indicator 6.2.1) and kept at the group office. Stakeholder lists are available and up dated. The group

manager communicates with the stakeholders internally and externally. For example: head of farmer sub-group KT 311 requested to the Group Manager on the awareness of cultivation system on palm oil; and subsequently group manager followed up in coordination with the partnering mill to conduct training. (6.2.2)

An identified line of communication is developed for the group whereas Internal Approval committee officers. The partnering mills' extension officer is also communicate with the smallholder group management and members in providing technical advice and ensures communication between the group members and the partnering mill is effective. (6.2.3)

Criterion 6.3: There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all parties.

Systems for complaints are in place at smallholders group office – see Criterion 6.2. Group manager and members are aware of the procedure as well as external Stakeholders. This was confirmed by stakeholders during interview. (6.3.1)

During the assessment it is noted that there are no complaints/grievances reported to the group management. Interview with local village heads (Trimulya Jaya and Air Mas) confirmed no complaints or grievances are taken place within smallholder group. (6.3.2; 6.3.3)

Criterion 6.4: Any negotiations concerning compensation for loss of legal or customary 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.

Similar to Criterion 2.3 – It is noted that the land was initially developed as a forest production area taken over by government when the permit was ended since 1990s. Most of smallholder members were obtained a land use right from local government to cultivate those lands for oil palm planting since 1997; and now smallholder members are hold land title for those occupied land. There are various types of land ownership noted and each ownership comes with particular rights or term of use. Interview with head of villages (Air Mas and Trimulya Jaya) confirmed there are no traditional rights or land dispute with any third party. There are no any issues related to loss of legal right to land because the group members are having their own land ownership documents. Stakeholders interviewed did not raised any issues related to compensation or lost of legal and customary rights. (6.4.1; 6.4.2; 6.4.3)

Criterion 6.5: Pay and conditions for employees and for employees of contractors always meet at least legal or industry minimum standards and are sufficient to provide decent living wages.

There are no permanent workers hired for oil palm operation. Temporary or seasonal workers are hired during harvesting maximum twice per month, and some for herbicide spraying through Spraying Unit Team (TUS). Contract between harvesting workers and group members are made verbally and accepted with transparently with freedom of choice by the workers. Contract for herbicide spraying workers are documented as ruled out in procedure No.002/PK/KUD.B/X/2012 Regulations/procedures of Work Order TUS. Group Manager and group members are make an effort to follow Industrial Minimum Wage regulation issued by District of Pelalawan, Riau Province for oil palm harvesting and chemical spraying operator. Wage payment is documented. Workers sign to acknowledge receiving their wage. Interview with workers reveal that they receive wages without any deduction. Workers are staying on their own housing. (6.5.1; 6.5.2)

Criterion 6.6: The employer respects the right 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.

This criterion is not applied for independent smallholders as stated in the Indonesian National Interpretation of RSPO P&C for Independent Smallholder, July 2010

Criterion 6.7: Child labour is not used. Work by children is acceptable on family farms, under adult supervision, and when not interfering with education programmes. Children are not exposed to hazardous working conditions

Group members are provided with training and briefing to understand the requirements of national labour law, and RSPO requirements related to child labour. Group manager and ICS staff ensure that group members are not employing any child labour by implementing their own policy of Prohibition of children working in any activity of Smallholder group (Policy of Environmental, Social, and Safety & Health, issued on January 2013). Interview with 4 (four) chemical sprayers indicated that the current workers have been recruited as aged over 18 years old. During field visit there are no group members children work on the field. The group members are aware that children's education is given priority. (6.7.1)

Criterion 6.8: The employer shall not engage in or support discrimination based on race, caste, national origin, religion, disability, gender, sexual orientation, union membership, political affiliation, or age.

There is a publicly available equal opportunities policy as stated in Policy of Environmental, Social, Health and safety issued January 2013 at Section 4 consists of Treat all members and employees fairly in admissions, assessment, conditions and working environment as well as representation regardless of caste, ethnicity, country of origin, religion/belief, disability, gender, sexual orientation and Union membership. No evidence of discrimination among workers. Workers are treated equally with regard to working opportunities. This was confirmed by workers interview (Spraying Unit Team) and feedback from stakeholder consultation (head of Village of Trimulya Jaya, Bukit jaya, and Air Mas).

Criterion 6.9: A policy to prevent sexual harassment and all other forms of violence against women and to protect their reproductive rights is developed and applied.

Policy on preventing sexual harassment and violence against women and protection is documented as one of the group Policy (Policy of Environmental, Social, Health and safety issued January 2013). The grievance mechanism to address sexual harassment issues is similar to the complaint procedure as highlighted in Criterion 6.3 above. Interview with workers and external stakeholder reveal that there is no any kind of harassment or violence took place. Group manager and ICS also ensure that women workers are able to claim pregnancy and menstruation rights according to existing national labour regulation (Permenaker 13/2003). (6.9.1)

Criterion 6.10: Growers and mills deal fairly and transparently with smallholders and other local businesses.

Group Manager has set up a policy of business collaboration with its members or other local party fairly and transparently as stated in Group Policy (Environment, Social, Health and Safety, issued January 2013). (6.10.1)

The pricing mechanism for FFB and other services provided by the partnering mill's officer to the group manager and this information is available to all members through phone SMS and Group notice board. This has also considered some major parameters within price calculation such as the price of FFB refers to regional district market price, and FFB size and weight. (6.10.2)

There is an agreement between independent smallholder group and partnering mill with regards to price determination (Record: Agreement letter No.01/PKDPS/VIII/2012 dated 31 August 2012 article 7 – Purchasing price of FFB. There is only one mill servicing this group at the moment i.e. Ukui Mill of PT IIS. The group is not purchasing any FFB from external source. There is also contract for FFB delivery to the mill between independent group and FFB transporter. For example: FFB transport contract No.003/NKB-KJA/B/X/2012 dated October 6, 2012. (6.10.3)

Monthly FFB sales full payment received from the mill to the group's bank account subsequently transferred to each farmer sub-group. The group members will receive their FFB sales payment from chief of farmer sub-group collectively. This method is common used and easier for farmers to received payment for FFB sales collectively. All calculation with regard to FFB sales are made publicly available within group member. The group members have evidence of receiving payment. These records are kept by ICS administrator for documentation. (6.10.4)

Criterion 6.11: Growers and millers contribute to local sustainable development wherever appropriate.

There is evidence of contribution to local development as the group members are agreed, for example: allocation of cash money for villages of Bukit Jaya: IDR 4/Kg FFB, Trimulya Jaya: IDR 5 Kg/FFB, and Air Emas: IDR 5/Kg FFB. Smallholder group is also actively donated to national holiday celebration on the villages such as Independent days, Muslim festival, etc. (6.11.1)

Principle 7: Responsible development of new plantings

During this assessment it is noted that No new planting after November 2005.

Principle 8: Commitment to continuous improvement in key areas of activity

Criterion 8.1: Group managers regularly monitor and review their activities and develop and implement action plans that allow demonstrable continuous improvement in key operations.

The continuous improvement plan includes training enhancement to the group members focusing on best agriculture management practices. The Group Manager in consultation with the group members developed improvement plan based on the social and environmental impacts and internal inspection. This includes maintaining the best oil palm practices through continuous training (such as harvesting, IPM, fertilizer, zero burning). Furthermore, improving group member farm records, minimise herbicide usage, and encourage new members to be part of the group. (8.1.1)

There is also evidence of training record for all group members received from WWF Indonesia and other party such as Biocert, RILO, and others. Most of training activities are relevant to RSPO P&C and RSPO Group certification standards. Records are held in group manager office. (8.1.2)

3.3 Detailed identified Nonconformities, Corrective Actions and Auditor Conclusions

Since pre-assessment until main assessment, Asosiasi Petani Sawit Swadaya Amanah has successfully closed out nonconformities except for two major nonconformities raised against indicator 2.2.2 and 2.2.2 of RSPO Group Certification Standard, and two Minor nonconformities against indicator 4.3.3 and 4.6.4 of Indonesian National Interpretation of RSPO P&C for Independent smallholder. The evidence for closing out the major nonconformities was verified during NCR Closure assessment. Group manager has also submitted a Corrective Action Plan for Minor nonconformities.

BSI auditor has accepted the evidence of closing out Major nonconformities and concluded those were remained close. BSI auditor has also accepted the Corrective Action Plan for minor nonconformities; these will be further verified for effective implementation during subsequent surveillance visits. The detail nonconformities are listed below:

MAJOR NONCONFORMITIES

CAR reference A829199/11

2.2.2 RSPO Group Certification Standard: a regular and ongoing internal assessment programme for all current Group members

No evidence that group manager has an internal audit program for its members on a regular basis. Internal audit program should cover requirements under RSPO group certification standard 2.2.2.1 - 2.2.2.8.

Corrective Action:

Internal assessment programme had just produced on February 2013 for implementation of 2013 - 2017. Procedure related internal assessment programme is also in place (i.e. SOP No.012/DOK/DOP/APSSA/2013 with regards "Penilaian Inspeksi internal"). Asosiasi Petani Sawit Swadaya Amanah has provided the action plan for internal assessment result. Program for regular internal assessment has been developed and first internal assessment as per program has been conducted. The internal assessment training for group member conducted 16 February 2013. Risk factor, sample size, methodology and result evaluation has been determined and recorded. This was confirmed in line with Group Certification Standard and internal procedure. Internal assessment started in 17-18 February 2013 with 18 samples from KT 311, 312, 313, 314, 315, 316, 320. The result of internal assessment recorded under "form checklist pemeriksaan internal" and "Notulen Kegiatan Tim Penilai". Nonconformity is considered closed on 15 March 2013.

CAR reference A829199/12

2.2.3 RSPO Group Certification Standard: Nonconformities identified by the Group Manager shall be resolved internally according to a documented system of applying corrective action requests (CARs).

No evidence is available on the results of periodic internal assessment/audits to identify non-compliance and evidence of corrective action thereupon.

Corrective Action:

Similar to corrective action for indicator 2.2.2 above, the smallholder group has implemented an internal assessment programme to their member. As a result from internal assessment, the internal assessment team of the group raised non conformities and corrective action request to the group member in term of Letter of Corrective Action request, for example Letter No. 033/AMANAH / ADM /II/2013 to farmer plot number 041/312. Nonconformity is considered closed on 15 March 2013.

MINOR NONCONFORMITIES

CAR reference A843471/1

4.3.3 RSPO P&C INA-SWG for Independent Smallholder: Peat soil management

Peat soil identified during field visit (two farmer plots under farmer sub-group KT 312 and two farmer plots under KT 315); and there is no sufficient evidence of water table management has been implemented. Organization just recently established procedure and action plan of peat soil management for its member on February 2013, and implementing for those members identified with peat soil commencing March 2013. These will be further verified during subsequent surveillance visit.

Corrective Action Plan:

Group Manager and ICS staff would implement programme to maintain water level in peat area commencing on March 2013 and actively socialization throughout the group members.

BSI auditor accepted the Corrective Action Plan and will follow up during subsequent surveillance visits.

CAR reference A843471/2:

4.6.4 RSPO P&C INA-SWG for Independent Smallholder: Safe agrochemical application

Based on Group Manual and procedure, PPE for TUS operator must be kept at PPE storage near to group office. While based on field visit it was found that Apron, working suit, rubber gloves, and rubber shoes were taken home by the operator. This may pose hazard to the operator back home. This also has been observed by auditor during pre-assessment and since no significant progress evidence, auditor raised into nonconformity.

Corrective Action Plan:

Group Manager will issue a letter for all spraying unit team (TUS) operators to remind them once again regarding keeping PPE in the storage instead to bring along back home.

BSI auditor accepted the Corrective Action Plan and will follow up during subsequent surveillance visits.

OBSERVATION/OPPORTUNITY FOR IMPROVEMENT

There are 7 (seven) Observation/Opportunity for improvement highlighted during this assessment. The progress will be checked during subsequent surveillance assessment. Details are in the section below:

OBS 1 (1.2.4 RSPO Group Certification Standard):

Group manager is to be consistently implementing awareness programme in relation to Group Certification Standard for all group members sufficiently.

OBS 2 (2.1.1 RSPO Group Certification Standard):

It is consider providing detail job description for sales and purchasing staff to running Green Palm programme.

OBS 3 (2.2.2 RSPO Group Certification Standard):

It could be advantage if the internal assessment team are adequately trained with audit techniques and writing non-conformance report to make accurate result in the future.

OBS 4 (5.1.2 RSPO P&C INA-SWG for Independent Smallholder):

Smallholder group has opportunity to improve the Environmental impact document for all operational activities within the group to include for example: land clearing, transport of FFB, etc.

OBS 5 (5.2.1 RSPO P&C INA-SWG for Independent Smallholder):

The list of protected animal is classifying protected species based on the status of protection and scarcity (e.g. legislation, IUCN and CITES) but need to be sufficiently updated in relevant with document reference.

OBS 6 (5.2.2 RSPO P&C INA-SWG for Independent Smallholder):

Group manager has produced a SOP for management of conflict with protected species. Document No. 015/doc/SOP/APSSA/2013 dated 27 January 2013 explaining the mechanism of handling conflicts with protected species but can be improved by adjusting the needs within the group area in relation to the current location of the Smallholder group area is relatively close with the existing Tesso Nilo National Park and should supported with the necessary steps to mitigate conflicts

OBS 7 (5.5.1 RSPO P&C INA-SWG for Independent Smallholder):

Smallholder group has opportunity to increase those parameters in replanting plan adapted to the existing conditions in the area of group member work place of which, based on the results of the field verification, found some farmer plots are shallow peat.

3.4 Noteworthy Positive Components

It is noted that the Independent Smallholder Group members including Group manager are mostly have had experience in the scheme smallholder cooperatives management; in which could be enhanced their willingness to maintain compliance to RSPO standard requirements. The group manager can demonstrate his capability in the group management due to his background experience in scheme smallholder cooperative. The scheme smallholder (namely KUD Bakti) has already been RSPO certified under PT Inti Indosawit Ukui Group.

The Group Manager have future plans to make the group management stronger financially by producing good quality FFB and selling certified FFB for higher price.

Generally the group members have enhanced their knowledge on good agriculture practices, OSH, environment protection, legal requirement and engagement with stakeholders through much training which was new for them. The group sees introduction of RSPO requirement as a positive way to move forward to increase the family income through producing sustainable palm oil.

The palm oil mill or partnering mill purchasing the FFB from the group members supports the group through its extension officer who consults with the group members regularly and assists in training and field practices.

During this assessment there was no any kind of dispute highlighted. Interview with local community and government department officials further confirm that they are supporting Asosiasi Petani Sawit Swadaya Amanah to be the first RSPO certified independent smallholder group in Indonesia.

3.5 Issues Raised by Stakeholders and Findings with Respect to Each Issue

During the Independent Smallholder group Notification on the RSPO, Company and BSI websites, there was no comments or feedback received in writing

Appendix C contains list of stakeholders contacted. Methodology used was group discussion and interview on their premises by the audit team member with social auditing background. Stakeholders interviewed include participants from community representatives, Scheme smallholder manager from partnering mill, group members, and government officials from Agriculture Office.

Stakeholders' interview had positive comments about the Independent Smallholder Group's practices. There were no issues related to legal or land disputes highlighted.

Some of the details comment received are listed below:

Comment: Scheme smallholder manager from partnering mill is glad to have good relationship with Asosiasi Petani Sawit Swadaya Amanah since few years ago. Even now the smallholder group is trying to achieve RSPO certification; it would be good for them as value added significantly not only for group manager but also for all group members. The partnering mill extended a dedicated staff to consult and assist the smallholder regularly.

Group Manager: It is honour to know that partnering mill is supporting independent smallholder group.

Auditor response: this is positive issue.

Comment: Bukit Jaya, Air Mas, and Trimulya Jaya Village Heads mention there are many advantages for communities whom joined the smallholder group which for example: pricing better than selling through middleman, improving field practices and social activities, routine income every month, and can have access into soft loan through smallholder group. Amanah is also donated some money for local contribution of village.

Group manager: This is positive comment and will strive to maintain properly.

Auditor response: positive comment; can be considered for whole certification audit process.

3.6 Acknowledgement of Internal Responsibility and Formal Sign-off Assessment Findings

Signed for on behalf of

Asosiasi Petani Sawit Swadaya Amanah

Mr. H. Sunarno Group Manager

Signed for on behalf of BSi Group Singapore

Åryo Gustomo Lead Assessor

Appendix A: RSPO Certificate Details

Group Name: Asosiasi Petani Sawit Swadaya Amanah

Certificate Number: SPO 594864

Initial Certificate Issued Date: (RSPO Approval of Summary Report)

Standard: RSPO Group Certification Standard Guidance, July 2010; Indonesian National Interpretation of RSPO P&C for Independent Smallholders (INA-SWG: July 2010); and RSPO Supply Chain Certification Systems: 2011.

Details of Asosiasi Petani Sawit Swadaya Amanah.			
Location Address	Trimulya Jaya, Bukit Jaya, and Air Mas Villages, Ukui Sub District, Pelalawan District, Riau Province – Indonesia.		
GPS Location	102'06'09.46 BT 0'09'36.85 LS		
Total Planted Area (ha)	763		
Total Number of Members	349		
Projected FFB Tonnage for the year 2013	16,807.39		
Projected CPO Tonnage Total* (Certified)	3,316.10		
Projected PK Tonnage Total* (Certified)	746.25		
Projected PKO Tonnage Total** (Certified)	335.81		
Projected PKE Tonnage Total** (Certified)	410.44		

^{*} This OER (19.73%) and KER (4.44%) were given by the partnering mill. This OER and KER are calculated from laboratory analysis of sample smallholder's FFB by the mill in early 2013.

^{**} PKO and PKE are based on RSPO Standard for Group certification document of which 45% is counted as Certified Palm Kernel Oil and 55% as Certified Palm Kernel Expeller

Farmer sub- group	Villages	Planting Year	Total Area (Ha)	Number of farmers	Projected production for 2013 (tonnes)
311	Trimulya Jaya	2000	53	25	1,162.48
312	Trimulya Jaya	2000	123	56	2,716.78
313	Trimulya Jaya	2000	83	39	1,821.38
314	Trimulya Jaya	2000	89	37	1,956.68
315	Trimulya Jaya	2000	84	36	1,843.38
316	Trimulya Jaya	2000	81	40	1,778.04
317	Bukit Jaya	2001	63	31	1,394.14
318	Bukit Jaya	2001	62	28	1,359.82
319	Air Mas	1997/1998	62	29	1,398.15
320	Trimulya Jaya	2000	63	28	1,376.54
	TOTAL			349	16,807.39

Appendix B: Assessment Programme

Assessment date: 11 – 15 January 2013.

Date	Time	Subjects	Aryo	Nanang	Sedayu
Sunday, January 10 th	08.00 - 09.30	Auditor team travelling to Dangau Sorek Hotel. Overnight in Sorek, Riau Province	√	√	√
Monday, January 11 th	07.30 - 08.00	Auditor team travelling to Asosiasi Petani Sawit Swadaya Amanah office	√	√	√
,	09.00 - 08.30	Opening Meeting e.g.: Introduction Presentation by the Asosiasi Petani Sawit Swadaya Amanah's representative (Smallholder activities, Supply Chain related to the FFB supplied to the mill) Presentation by Audit Team Leader and confirmation on the assessment scope Finalize Audit schedule (including stakeholders consultation)	√	√	√
	08.30 – 12.00	Document review for the independent smallholder (General Documentation e.g. Legal, Manual and Procedure, HCV identification, SEIA documents, Health and Safety, working safety, etc)	-	√	V
	08.30 – 12.00	Document review for Group Certification (Group requirement, Group management documentation, Chain of Custody)	√	-	-
	12.00 - 13.30	Break/lunch/pray (istirahat)	√	√	√
	13.30 – 17.00	Continue document review for the independent smallholder (General Documentation e.g. Legal, Manual and Procedure, HCV identification, SEIA documents, Health and Safety, working safety, etc)	-	V	V
	13.30 – 17.00	Continue document review for Group Certification (Group requirement, Group management documentation, Chain of Custody)	√	-	-
Tuesday, January 12 th	07.30 - 08.00	Auditor team travelling to Asosiasi Petani Sawit Swadaya Amanah office	√	√	√
	08.00 – 12.00	Stakeholder consultation meeting — Independent Smallholders: Meeting and interview with stakeholders from local government, head of villages, Partnering mill, etc.	-	√	-
	08.00 - 12.00	Inspection to independent smallholder's field (Estate Best Practice, Occupational Safety and Health, Worker welfare, environment, etc)	√	-	√
	12.00 - 13.30	Break/lunch/pray	√	√	√
	13.30 – 17.00	Continue Inspection to independent smallholder field (Estate Best Practice, SEIA, Worker welfare, Legal, environment)	√ √	-	√ ·
	13.30 – 17.00	Continue Inspection to independent smallholder field (Social aspects, HCV area) and visiting surrounding villages and/or local communities.	-	V	-

Date	Time	Subjects	Aryo	Nanang	Sedayu
Wednesday, January 13 th	07.30 - 08.00	Auditor team travelling to Asosiasi Petani Sawit Swadaya Amanah office	√	√	√
	08.00 – 12.00	Continue Inspection to independent smallholder plots (Estate Best Practice, HCV, Social, SEIA, Worker welfare, Legal, Safety and Health, Environment)	√	√	√
	12.00 – 13.30	Break/lunch/pray	√	√	√
	13.30 – 17.00	Continue Inspection to independent smallholder plots (Estate Best Practice, HCV, Social, SEIA, Worker welfare, Legal, Safety and Health, Environment)	√	√	√
Thursday, January 14 th	07.30 - 08.00	Auditor team travelling to Asosiasi Petani Sawit Swadaya Amanah office	√	√	√
	08.00 - 10.00	Continue document audit and gather outstanding data/information, preparation for closing meeting.	√	√	√
	10.00 – 12.00	Closing meeting.	√	√	√
	12.00 - 14.00	Break/lunch/pray	√	√	√
	14.00 –	Auditor overnight in Dangau Sorek Hotel	√	√	√
Friday, January 15 th	07.30 - 10.30	Auditor travelling for Pekanbaru	√	√	√
	13.00 - 14.30	Auditor travelling for Jakarta	√	√	√

Appendix C: List of Stakeholders Contacted

Smallholders group member

Sunarno - Group Manager

Jaswijaya – ICS Staff (Internal approval committee)

Warkasa – ICS Staff (Administrator)

Agung Ardi – ICS Staff (Internal approval committee)

Tugiono – ICS Staff (Internal Assessment team)

Sample smallholder group members:

Suwarno – plot number 044/KT 312

Sunarno – plot number 045/KT 312

Jarnoto – plot number 060/KT 312

Katimo – plot number 185/KT 315

Saridi – plot number 188/KT 315

Sugino – plot number 240/KT 307

Wakidi - plot number 251/KT 317

Sutar – plot number 271/KT318

Suwito – plot number 292/KT 318

Sabar – plot number 293/KT 319

Sutarman – plot number 301/KT 319

Kolis - plot number 306/KT 319

Jusi – plot number 317/KT 319

Marni – plot number 320/KT 319

Mardi - plot number 298/KT 319

Juminianto – plot number 151/KT 314

Mahfud – plot number 140/KT 314

Yono - plot number 126/KT 314

Local Communities

Head of Villages: Bukit Jaya, Trimulya Jaya, and Air Mas

Internal Stakeholders

Four workers of Spraying Unit Team (TUS)

Four harvester

Family members

External Stakeholders

Sumarno - Partnering Mill Scheme smallholder

Manager

Dani Rahadian - WWF Indonesia

Margaretha – WWF Indonesia

Mr. Asril Darussamin – RILO Smallholder officer

Plantation Dept. of Pelalawan District.

Appendix D: Supply Chain Assessment for the FFB Sales (Segregated by Individual Independent Smallholder Members) (Reference to Chain of Custody section under RSPO Standard for Group Certification)

	a for Group certification,
Requirements	
1. Documented procedures	The country of the decoupled on the country of the
The Group Manager shall have written procedures and/or work instructions to ensure implementation of all the elements specified supply chain requirements.	The group has written documented procedures for the FFB chain of custody with Segregation model covering certified FFB from group members SOP No.021/DOK/SOP/APSSA/2013 with regards "Prosedur Penjualan Buah kelapa Sawit Asosiasi Petani Sawit Swadaya Amanah" (Procedure of FFB sales and purchasing). The chain of custody is under control collectively by the group manager until the FFB reaches the mill's collection ramp. The sales information is given to the Group Manager and ICS Administrator to update the group management document. At the FFB collection point and mill takes over the responsibility to ensure the continuity of the FFB chain of custody by indicating group member number on the weighbridge ticket and invoice (Delivery Order).
The group Manager shall have documented procedures for selling and receiving certified and non-certified FFBs.	The group has documented procedures for the sales of certified FFB. No purchase of non-certified FFB by the Group manager and group members.
2. Purchasing and goods in	
The Group Manager shall verify and document the volumes of	No purchase of FFB.
certified and non-certified FFBs received.	Procedure related segregation of certified products and non-certified i.e. SOP No.008/DOK/SOP/APSSA/2013 with regards to "Pemisahan TBS Tersertifikasi Dengan TBS Non Sertifikasi" (Segregation on Certified and non-certified FFB). Procedure stated RSPO Segregation certified will be stamped in sales documentation once RSPO certificate is received
The Group Manager shall inform the CB immediately if there is a projected overproduction.	The group management and Group Manager aware of this requirement.
3. Record keeping	
The Group Manager shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of certified and noncertified palm products.	FFB sales records are made by the group member in the production record book once they receive the weighbridge ticket and sales invoice from the mill. Monthly summary prepared and documented by ICS Administrator for all the certified FFB sold. Records verified by Group Manager.
Retention times for all records and reports shall be at least five (5) years	The retention period is specified as five years.
(a) The Group Manager shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO, PKO and palm kernel meal on a three-monthly basis.	All the sales of FFB records are maintained and updated on monthly basis by the group management. No CPO, PK, PKO and PKE sales during the initial certification.
(b) All volumes of palm oil and palm kernel oil that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO.	Delivery/sales of FFB are deducted from the annual budgeted FFB to monitor any over production.
(c) The Group Manager can only deliver Segregated sales from a positive stock.	There is no certified FFB during initial assessment. However the group is aware that they cannot over sell.
The following trade names should be used and specified in relevant documents, e.g. purchase and sales contracts, e.g. *product name*/MB or Mass Balance. The supply chain model used should be clearly indicated.	Independent Smallholders use Segregated Model and indicated on the weighbridge ticket. However the receiving mill confirms that the mill will be using Mass Balance model by indicated on the mill's relevant documents. It is clear that the FFB from each of the group members are certified and
	segregated. The partnering mill makes a marking on the weighbridge ticket to indicate the FFB is from certified group members i.e. written as RSPO and members number.
In cases where a mill outsources activities to an independent palm kernel crush, the crush still falls under the responsibility of the mill and does not need to be separately certified. The mill has to ensure that the crush is covered through a signed and enforceable agreement.	Not applicable for the Independent Smallholders.
4. Sales and goods out	<u> </u>
The Group Manager shall ensure that all sales invoices issued for RSPO certified products delivered include the following information	Group Manager checks and verifies sales through the ICS administrators. Record: Delivery Order, weight bridge ticket, FFB Delivery Note.
(a) The name and address of the buyer	Name and address of buyer written on the invoice (Delivery Order and weight bridge ticket). Group member name and member number is written as well.
(b) The date on which the invoice was issued	Date is written.
(c) A description of the product, including the applicable supply	Product description is written as FFB. Supply chain model is Segregation identified
chain model (Segregated or Mass Balance)	through the group member number.
(d) The quantity of the products delivered	Quantity in Kilogram/tones.
(e) Reference to related transport documentation	Weighbridge documents include all the transport references.

5. Training	
The Group Manager shall provide the training for all staff as	The Independent Smallholder group members and ICS administer were given basic
required to implement the requirements of the Supply Chain	understanding of the supply chain requirement and records maintained by the
Certification Systems.	Group Manager – see Criterion 4.8 RSPO P&C INA-SWG above.
6. Claims	
The Group Manage shall only make claims regarding the use of or	No claims made by the group.
support of RSPO certified oil palm products that are in	
compliance with the RSPO Rules for Communications and Claims.	