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PUBLIC SUMMARY REPORT
RECERTIFICATION ASSESSMENT

Kulim (Malaysia) Berhad

Sedenak Mill and Supply Base

Johor Malaysia

Report Author

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SUMMARY

Kulim (Malaysia) Berhad (Kulim) owns and operates four (4) Mills and twenty (22) oil palm Estates. BSi Group Singapore Pte Ltd (BSi) has conducted the Recertification Assessment of Sedenak Mill and supply base of 5 company owned Estates, support services and infrastructure. An Initial Assessment was carried out of the "Outside Estate" Pertubuhan Peladang, however it was found to be at an early stage of RSPO implementation. BSi concludes that Sedenak Mill and Supply Base of 5 company owned Estates, meet compliance with all of the requirements of RSPO Principles & Criteria: 2007; MY-NI Indicators and Guidance : 2010; and RSPO Supply Chain Certification Standard : 2011, Module E – CPO Mills : Mass Balance.

BSi recommends the continuation of the approval of Kulim's Sedenak Mill and Supply Base as a producer of RSPO Certified Sustainable Palm Oil.

ABBREVIATIONS USED

AMESU	All Malayan Estates Staff Union
BOD	Biological Oxygen Demand
CHRA	Chemical Health Risk Assessment
CDM	Clean Development Mechanism
CPO	Crude Palm Oil
CSPK	Certified Sustainable Palm Kernel
CSPO	Certified Sustainable Palm Oil
DOE	Department of Environment
DOSH	Department of Occupational Safety & Health
EFB	Empty Fruit Bunch
FFB	Fresh Fruit Bunch
HIRAC	Hazard Identification Risk Assessment Control
HCV	High Conservation Value
JCC	Joint Consultative Committee
LTA	Lost Time Accident
MPOB	Malaysian Palm Oil Board
MSDS	Material Safety Data Sheet
NUPW	National Union of Plantation Workers
OER	Oil Extraction Rate
OSH	Occupational Safety and Health
PCD	Pollution Control Device
PK	Palm Kernel
POME	Palm Oil Mill Effluent
PPE	Personal Protective Equipment
QMS	Quality Management System
SIA	Social Impact Assessment
SOP	Standard Operating Procedure
WHO	World Health Organisation

1.0 SCOPE OF RECERTIFICATION ASSESSMENT

1.1 Identity of Certification Unit

Kulim (Malaysia) Berhad operations consist of four (4) Palm Oil Mills and twenty (22) company owned Estates. The Kulim Mills and 21 of the Estates are located in Johor State and the other Estate is located in Pahang State, Malaysia (Figure 1). The Certification Unit of this Recertification Assessment is the Sedenak Mill and supply base of five (5) company owned Estates. The GPS locations of the Mill and Estates are shown in Table 1.

Table 1: GPS Locations Mill and Estates

LOCATION	LONGITUDE	LATITUDE
Sedenak Mill	103° 32' 17.9628"	1° 43' 51.0888"
Estates		
Sedenak	103° 31' 36.246"	1° 42' 48.798"
Ulu Tiram	103° 47' 1.236"	1° 37' 20.0676"
Kuala Kabong	103° 26' 0.87"	1° 41' 20.1012"
Basir Ismail	103° 54' 52.092"	1° 37' 47.3016"
Sungai Papan	104° 6' 21.8052"	1° 31' 1.2576"

1.2 Production Volume

The production tonnages for CPO and PK for the 12 months prior to the Recertification Assessment (01/11/2012 – 31/10/2013) and projections for the next twelve months are listed in Table 2. CPO and PK production increased between 2011/12 and 2012/13 because of the receipt of FFB from the RSPO Certified Sungai Papan Estate which previously supplied the FFB to Tunjuk Laut Mill – Kulim parent company i.e. Johor Corporation (SPO 555209 – ASA2 Certificate re-issued 25/02/2013 – Certificate expiry date 08/02/2016) and the "Outside" Siang Estate. Siang Estate previously supplies FFB to Siang Mill. Siang Mill was under Johor Corporation and has been leased to other private company (AA Sawit) since September 2012. In 2013/14 the Sedenak Mill is expected to continue receive crop from Sungai Papan or Siang Estate. However, at this point forward only Sungai Papan Sedenak, Ulu Tiram, Kuala Kabong, and Basir Ismail Estates will be counted as certified crop, while Siang Estate will be certified according to time bound plan on 2016.

Table 2: Production Tonnages

Sedenak Palm Oil Mill	CPO	PK
Estimate at Certification	44,059**	11,415**
ASA1 Actual 01/01/2009–31/12/2009	36,985**	10,950**
ASA2 Actual 23/01/2010–22/01/2011	28,465**	8,285**
ASA3 Actual 01/11/10– 31/10/11	86,057* 30,120**	25,008* 8,797**
ASA4 Actual 01/11/2011 –31/10/2012	85,178* 28,281**	24,536* 8,140**
Recertification Actual 01/11/12–31/10/13	101,851* 35,915**	28,405* 10,016**
Projected 01/11/13 – 31/10/2014	90,260* 29,319**	25,648* 8,331**

* Kulim Estates + Outside Suppliers tonnages

** Certified Production= Kulim Estates

1.3 Certification Details

Since the Initial Certification, the Kulim Mills and Estates have been registered with RSPO under a single Certificate, the details of which are shown below:

Kulim RSPO Membership No: 1-0006-04-000-00
BSi RSPO Current Certificate No: SPO 537873
Initial Certification Assessment: 14–24 July 2008
Date of Certification: 23/01/2009

ASA1: 12 – 21/01/ 2010 Certificate re-issued 31/03/2010
ASA2: 10 – 17/01/ 2011 Certificate re-issued 28/03/2011
ASA3: 31/10 – 05/11/2011 Certificate re-issued 14/02/2012
ASA4: 05 – 12/11/ 2012 Certificate re-issued 31/01/2013

BSi, on advice from the RSPO Secretariat, will issue a separate new Certificate for each Kulim Mill and Supply Base. Please refer to Appendix A for the Recertification Certificate details.

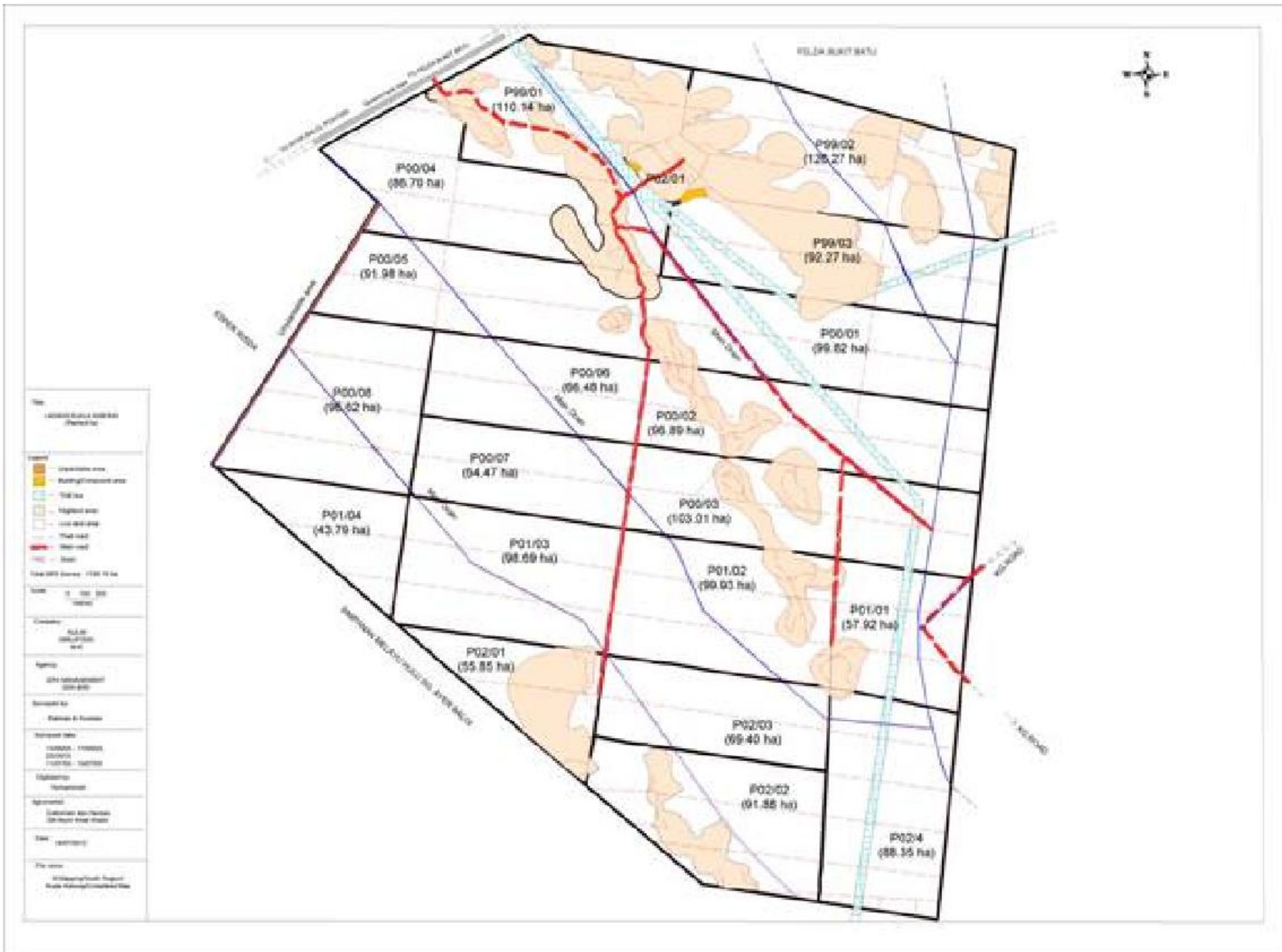


Figure 2: Kuala Kabong Estate Layout

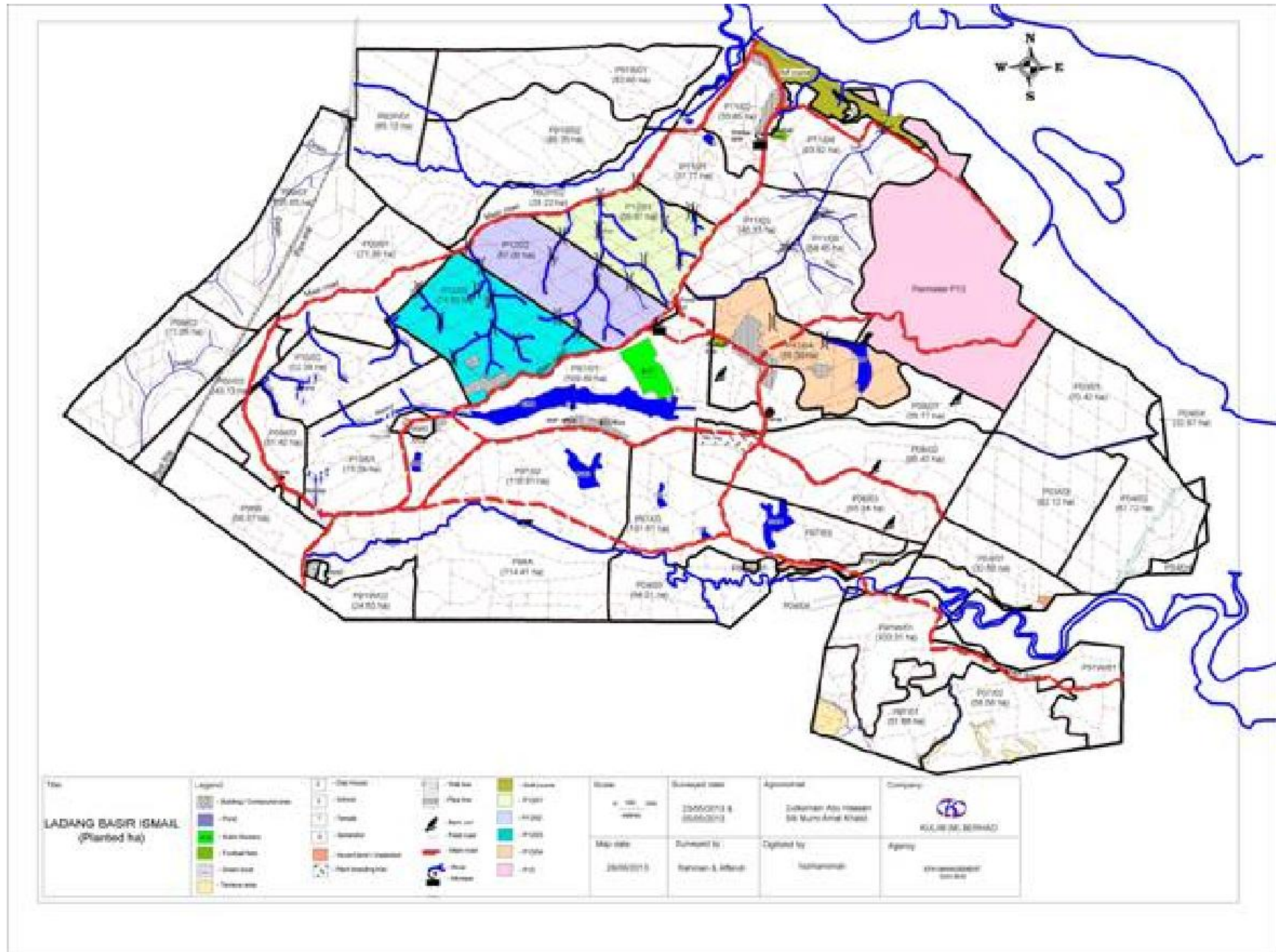


Figure 3: Basir Ismail Estate Layout

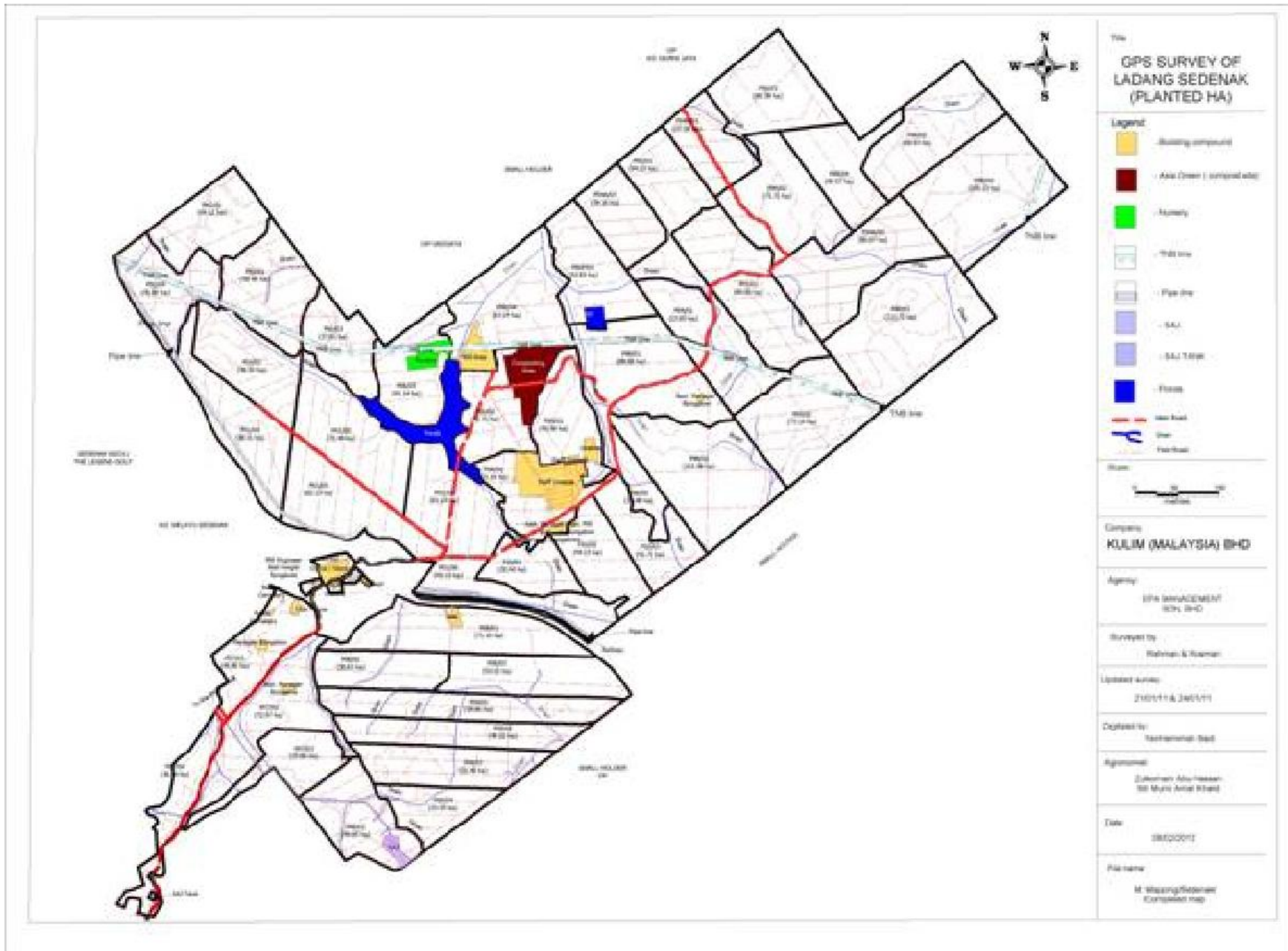


Figure 4: Sedenak Estate Layout

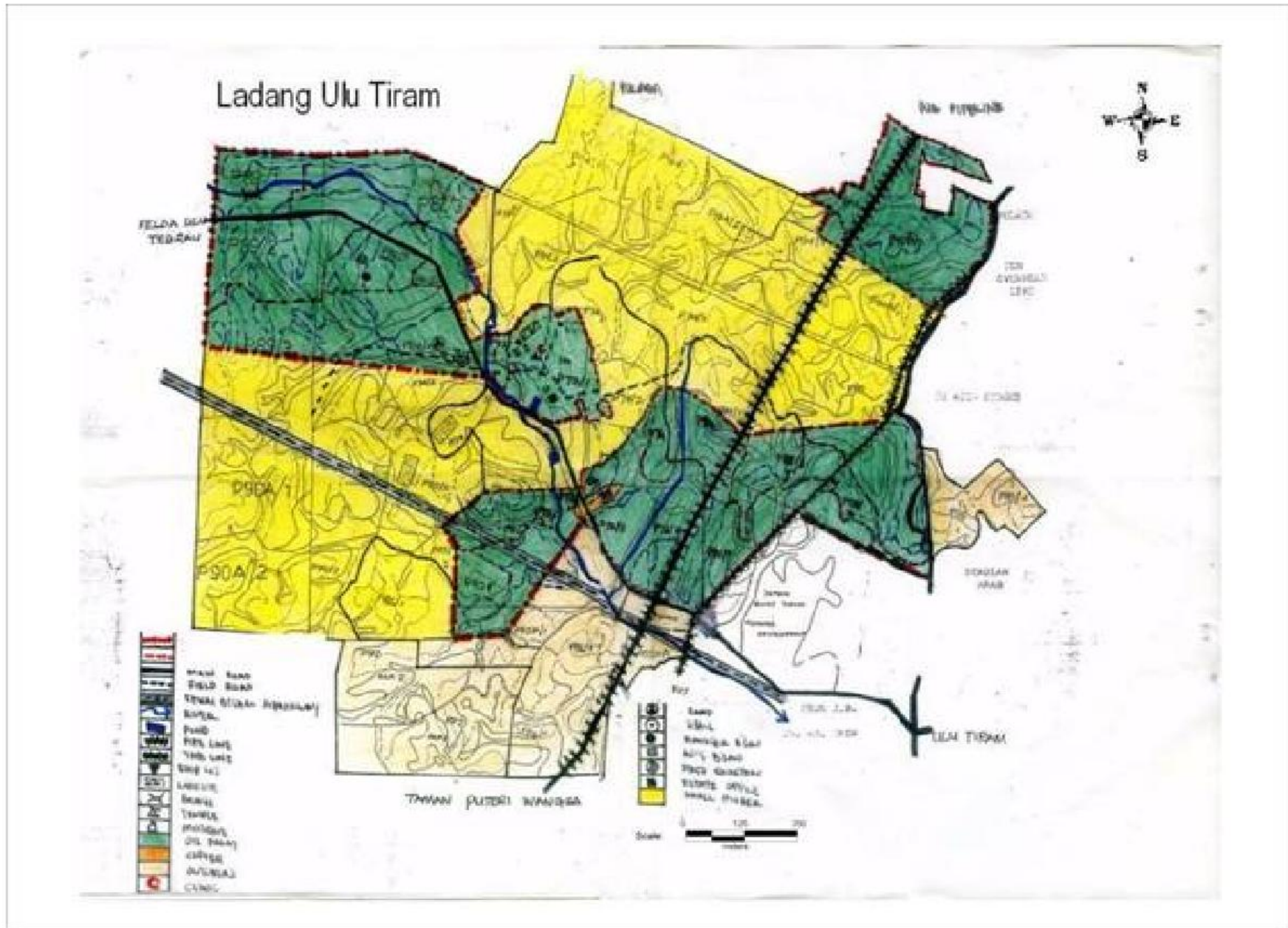


Figure 5: Ulu Tiram Estate Layout

1.4 Description of Supply Base

The supply base is five (5) company owned Estates, six (6) “Outside” Estates and fourteen (14) FFB Traders with their FFB production listed in Table 3. The production from “Outside” Estates and from FFB Traders is not included in the Certificate. Since January 2013, the crop from Sg Papan Estate that is certified under JCorp, is now supplied to Sedenak Mill and is included in the certified crop. Tunjuk Laut Estate has been previously certified as supply base for Tunjuk Laut Mill, under Johor Corporation (Certificate No.SPO 555209) since 09/02/2011. During recertification Tunjuk Laut Estate is not certified under Sedenak Mill, therefore considers as outside estate. Kulim has arranged Tunjuk Laut Estate will continue be as supply base for other mill i.e. Pasir Panjang Mill when enter into will RSPO certification in 2016, as “Workplan Kulim/JCorp Estate” document – see progress of time bound plan.

For re-certification 2013/2014, the Sedenak Mill supply base arranged into Sedenak Estate, Ulu Tiram Estate, Kuala Kabong Estate, Basir Ismail Estate and Sungai Papan Estate. Previously supplying Rengam and REM Estate will divert 100% of its FFB crop into other Kulim’s certified Sindora Mill.

Table 3: FFB Production (Sedenak Mill Supply Base)

Source	Estimate at Certification 23/01/2009	Actual 01/12/12–30/11/13	Projected 01/12/13–30/11/14
Kulim Estates			
Sedenak	50,696	52,319	59,060
Ulu Tiram	17,856	8,574	6,603
Kuala Kabong	38,969	35,765	38,540
Basir Ismail	45,381	45,384	39,205
Rengam	43,647	192	–
REM	24,188	–	–
Sg Papan (certified JCorp)	–	34,516	50,210
Total Kulim Estates	220,737*	176,750*	193,618*
Outside Estates			
Pertubuhan Peladang		3,510	8,936
Siang		33,018	–
Kebun Sedenak		3,562	3,110
Sedenak Bahru		1,501	995
Senai		886	1,872
Asam Bubok		3,710	4,252
Tunjuk Laut Estate		19	--
		46,206	19,165
FFB Traders			
Ree Fong		7,880	10,700
Nirwana Ceria		332	1,300
Bukit Siput	115,970	22,854	14,373
Che Yu Trading		43,420	49,250
Sri Mahtai		2,134	5,349
Hong Hui		48,391	53,250
Fong Tak		12,113	3,206
Keng Ann		17,552	22,250
R & S Enterprise		8,465	7,912
Hup Guan		6,415	11,450
Per MdSangidi		13,217	17,390
Per Sri Misan		4,864	4,990
Choon Guan		26,231	23,700
GuanLeng		64,436	53,800
		278,304	278,920
Total Outside Suppliers	115,970	324,510**	298,085**
OVERALL TOTAL	336,707	501,260	491,703

* Kulim Estates = Certified Production

** Production from “Outside” Estates and FFB Traders is not included in the Certificate

Supply Chain

Kulim uses the Mass Balance mechanism for the Sedenak Mill supply chain. All deliveries of FFB to the Mill are issued with a weighbridge docket that records the name of the supplier, truck registration number, driver’s name and the tonnage. The weighbridge system is computerised and the delivery records are used as the basis for payment for FFB deliveries. A sample of weighbridge dockets was checked at the Mill against the Daily Transaction Summary of FFB deliveries from certified and non-certified supply sources. This confirmed the details of the source and quantity of FFB were recorded accurately and could be verified by tracking. Kulim made sales of CSPO certificates on the GreenPalm trading platform and sold CSPO through e-Trace. Inspection of documents confirmed that Kulim maintains all of the documentation required for supply chain verification (Refer Appendix B).

The mill production is expected to increase due to the crop from Sg Papan Estate that previously certified under JCorp, is now supplied to Sedenak Mill and production from Sedenak and Kuala Kabong Estates is increase due to palms reaching maturity. Meanwhile the crop from Ulu Tiram and Basir Ismail is expected to be less due to replanting. The Mill plans to purchase less crop from “Outside” Estates.

The development of oil palm at the company owned Estates commenced in 1947 and the palms are in their second and third cycles. The age profile of the palms is shown in Table 4a.

Table 4a: Age Profile of Palms

AGE (years)	% of Planted Area	AGE (years)	% of Planted Area
Sedenak		Basir Ismail	
21 +	11.23	21+	15.69
11 – 20	43.63	11 – 20	28.19
4 – 10	45.14	4 – 10	30.13
0 – 3	0	0 – 3	25.99
Ulu Tiram		Kuala Kabong	
21+	51.86	21+	0
11 – 20	4.27	11 – 20	100
4 – 10	0	4 – 10	0
0 – 3	43.87	0 – 3	0
Sg. Papan			
21+	17.74		
11 – 20	24.57		
4 – 10	42.39		
0 – 3	15.31		

The areas of mature and immature palms are detailed in Table 4b for each of the Estates and changes from areas reported in ASA4 are explained as follows. Some of the planted areas have been revised and have decreased following the completion of GPS Surveys during replanting at the following Estates: Basir Ismail (19 ha); Kuala Kabong (3 ha); and Ulu Tiram (90 ha).

Table 4b: Areas Planted

<i>Kulim Estates</i>	<i>Mature (ha)</i>	<i>Immature (ha)</i>	<i>Total Area</i>
Sedenak	2,644	–	2,644
Ulu Tiram	300	234	534
Kuala Kabong	1,640	–	1,640
Basir Ismail	1,995	701	2,696
Sungai Papan	2,386.19	431.21	2817.40
OVERALL TOTAL	8,965.19	1,366.21	10,331.4

1.5 Progress against Time Bound Plan

Kulim holds an interest in New Britain Palm Oil Ltd that is RSPO Certified and managed as a separate autonomous entity. Kulim previously managed the Tunjuk Laut Mill and Supply Base but since October 2013 this has been leased to third party operator (Awan Timur Resources) and Kulim no longer manages the operations. Siang Estate was not certified under Sedenak Mill, therefore considers as outside estate. Siang Estate previously supplies FFB to Siang Mill. Siang Mill was under Johor Corporation, Siang Mill was under Johor Corporation and has been leased to other private company (AA Sawit) since September 2012. Tunjuk Laut Estate has been previously certified as supply base for Tunjuk Laut Mill, under Johor Corporation (Certificate No.SPO 555209) since 09/02/2011. But Tunjuk Laut Estate is not certified under Sedenak Mill, therefore considers as outside estate. Kulim has arranged Tunjuk Laut Estate will be continue as supply base for other mill i.e. Pasir Panjang Mill when enter into RSPO certification in 2016, as “Workplan Kulim/JCorp Estate” document.

Kulim (Malaysia) Bhd has 100% ownership in Mahamurni Plantations Sdn Bhd. Mahamurni Plantations Sdn Bhd is managed by EPA Management Sdn Bhd. Mahamurni Plantations Sdn Bhd have 3 mills i.e.: Sedenak Mill, Palong Mill, and Pasir Panjang Mill. Mahamurni Plantations Sdn Bhd also has 9 estates: Sedenak Estate, Sungai Papan which supply to **certified Sedenak Mill**; Mungka Estate, Kemendak Estate, Palong Estate, Ladang UMAC which supply to **certified Palong Mill**; Rengam Estate supply to **certified Sindora Mill**. Pasir Panjang Estate **will supply to Pasir Panjang Mill**, which due for certification by 2016.

Kulim (Malaysia) Bhd has 100% ownership in Kulim Plantations (Malaysia) Sdn Bhd. Kulim Plantations (Malaysia) Sdn Bhd is managed by EPA Management Sdn Bhd. Kulim Plantations (Malaysia) Sdn Bhd has Tereh Mill and 2 estates i.e. Tereh Utara Estate and Tereh Selatan Estate which supply to **certified Tereh Mill**.

Kulim (Malaysia) Bhd has 100% ownership in Selai Sdn Bhd. Selai Sdn Bhd is managed by EPA Management Sdn Bhd. Selai Sdn Bhd has Selai Estate and Enggang Estate, both supply to **certified Tereh Mill**.

Kulim (Malaysia) Bhd has 100% ownership in Sindora Bhd. Sindora Bhd is managed by EPA Management Sdn Bhd. Sindora Bhd has **certified Sindora Mill**; along with Sindora Estate, supply to **certified Sindora Mill** and Sungai Tawing Estate, supply to **certified Tereh Mill**.

Kulim (Malaysia) Bhd has 94.49% ownership in Kumpulan Bertam Plantation Bhd. Kumpulan Bertam Plantation Bhd is

managed by EPA Management Sdn Bhd. Kumpulan Bertam Plantation Bhd has Sepang Loi Estate supply to **certified Palong Mill**.

Kulim (Malaysia) Bhd itself has 7 estates: Basir Ismail Complex, Ulu Tiram Estate, Kuala Kabong Estate supply to **certified Sedenak Mill**; Sungai Sembrong Estate and Mutiara Estate supply to **certified Tereh Mill**; REM Estate **will supply certified Sindora Mill**; Labis Bahru Estate supply to **certified Palong Mill**.

BSi concludes that Kulim has completed all of the commitments of its Time Bound Plan that relate to company owned and managed Mills and Estates.

Kulim has recently purchased a property in Indonesia and plans to develop the land for oil palm. No work has commenced, however Kulim has initiated the assessment of HCV of the land.

1.6 Progress of Associated Smallholders/ Outgrowers towards RSPO Compliance

Kulim has consulted FFB suppliers and advised them it aims to achieve RSPO Certification for all the Sedenak Mill supply base. Asam Bubuk Estate is owned by Cooperative smallholders and managed by EPA Management Sdn Bhd (subsidiary of Kulim (Malaysia) Bhd). The Management agreement between EPA Management Sdn Bhd and Asam Bubuk Sdn Bhd is in place, dated back May, 2nd 2000. The agreement limited to provision of management services for smallholder plots conducted by EPA Management Sdn Bhd. Asam Bubuk Estate delivers FFB crop to Sedenak Mill since 2000 although there is no agreement Asam Bubuk Estate to supply FFB to Sedenak Mill (or any other mill under Kulim).

However with high commitment and initiative, Kulim (Malaysia) Bhd shows “Smallholder & Outgrowers RSPO Certification Timeline Programme Kulim (M) Bhd Sedenak Mill, Kulai, Johor” document. The document shows plan to get Asam Bubuk Estate and other out growers up to 2016.

Kulim has been working with the “Outside” Estate” Pertubuhan Peladang for achieving RSPO Certification of the FFB it sells to the Mill. The BSi Team carried out an initial assessment, but found the “Outside” Estate Pertubuhan Peladang was at an early stage of RSPO implementation and did not comply with RSPO P&C Requirements.

Kulim will continue to work with the FFB suppliers, comprising Outside Estates and FFB Traders to assist them to implement the RSPO P&C.

1.7 Other Certifications Held

Sedenak Mill operates a Quality Management System to the ISO 9001:2008 standard (Certificate No AR1803), current to 14 October 2014.

1.8 Organisational Information / Contact Person

Kulim (Malaysia) Berhad Contact Person:
 Ulu Tiram Estate Mr Sallehuddin Mohd Noh
 KB 705 Senior Manager
 Johor Bahru Phone: +6078611611
 Johor 80990 Fax: +6078631084
 MALAYSIA Email: sallehuddin@kulim.com.my

2.0 ASSESSMENT PROCESS

2.1 Assessment Team Members

Charlie Ross – Lead Assessor RSPO

B.App.Sc. M.Sc (Env.Studies)

Topics assessed: Legal, Environment, Agricultural Practices, Occupational Health & Safety, Social, Supply Chain

Haeruddin Tahir – Assessor RSPO

B.Forestry

Topics assessed: Legal, Environment, Agricultural Practices, Occupational Health & Safety

Nabila Seth Niven – Social Assessor RSPO

BBA (Hons) Business Studies

Topics assessed: Social, Occupational Health & Safety

Robyn Ross – Social Assessor RSPO

SA8000

Topics assessed: Legal, Social, Women and Families

Dian Ekowati – Facilitator

Graduate Degree (Master Level), Rural Sociology and Gender; Bachelor Degree, Community Empowerment

CVs for Mr Tahir, Ms Seth Niven and Ms Ekowati, new team members, are included at Appendix C.

2.2 Assessment Programme

The Recertification Assessment was carried out 29 and 30 November and 6 and 10 December 2013. The Assessment Programme is included as Appendix D.

The Programme included assessments of the Mill, Kuala Kabong and Basir Ismail Estates against all of the RSPO Principles & Criteria: 2007; MY-NI Indicators and Guidance : 2010 and the RSPO Supply Chain Certification Standard : November 2011, Module E – CPO Mills : Mass Balance. The Estates were selected for assessment on the basis of environmental (peat at Kuala Kabong) and time since previous site visits (Basir Ismail).

The methodology for collection of objective evidence included physical site inspections, observation of tasks and processes, interviews of staff, workers and their families and external stakeholders, review of documentation and monitoring data. Checklists and questionnaires were used to guide the collection of information.

This report is structured to provide a summary for each Principle, together with details for each criterion and indicator. The assessment was based on random samples and therefore nonconformities may exist that have not been identified.

Mr Aryo Gustomo, BSi RSPO Scheme Manager, has reviewed this report for conformance with BSi Procedures and the RSPO Certification System requirements.

2.3 Stakeholder Consultation

Internal and external stakeholders were consulted to obtain their views on Kulim's environmental and social performance and any issues of concern that they may have. Notification of the Recertification Assessment was posted on the RSPO, BSi and Kulim websites. External stakeholders were contacted by email and telephone to arrange meetings where practical and to seek their views on the environmental and social performance of the Mill and supply base. External stakeholders were interviewed at their premises where practical or they were invited to the Mill or the Estate. Internal stakeholders were interviewed in groups in the workplace or at their housing. Company officers were not present at any of the meetings. A list of stakeholders contacted is included at Appendix E.

3.0 ASSESSMENT FINDINGS

3.1 Summary of Findings

During this Recertification Assessment, Nonconformities were assigned to Major Compliance Indicator 4.7.1 and Minor Compliance Indicator 4.3.2. Three (3) Observations/Opportunities for improvement were identified. Refer Section 3.2 Page 18 for details. Kulim prepared a Corrective Action Plan for addressing the identified Nonconformities, which BSi reviewed and accepted. Kulim implemented corrective action for the Nonconformities and provided Objective Evidence which BSi considers is appropriate and the Nonconformities were closed on 25/01/2014. The continuing effectiveness of corrective actions will be checked during the Surveillance Assessment visit planned for 2014.

Review of the nonconformities assigned at Sedenak during previous assessments (CR02 and CR03) found corrective actions were being effectively and consistently implemented and the nonconformities remain closed. The two (2) Observations/Opportunities for Improvement identified at Sedenak during ASA4 also were followed up to check the effectiveness of corrective actions. Refer Section 3.3 Page 19 for details.

BSi concludes that Sedenak Mill and Supply Base of 4 company owned Estates, meet compliance with all of the requirements of RSPO Principles & Criteria: 2007; MY-NI Indicators and Guidance : 2010; and RSPO Supply Chain Certification Standard : 2011, Module E – CPO Mills : Mass Balance.

BSi recommends the continuation of the approval of Kulim's Sedenak Mill and Supply Base as a producer of RSPO Certified Sustainable Palm Oil.

PRINCIPLE 1: Commitment to Transparency

Kulim has maintained up to date policies, procedures and management plans for provision of information to the public on request. The requests for information are received at

Head Office and are then forwarded to the Estates and Mill for provision of site specific information. The majority of requests for information are from the Government.

Criterion 1.1: Growers and Millers provide adequate information to other stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.

Kulim has issued “Communication and Consultation Management Guidelines” that define the responsibilities and actions required for receiving, recording and responding to enquiries and requests from internal and external stakeholders.

The Mill and Estates have implemented the “Communication and Consultation Management guidelines” as evidenced by the maintenance of filing systems for recording written requests for assistance and information. Inspection of a sample of records found that requests for information were received only from Government Departments, NUPW and the MPOB. The sample of records indicated requests for the Mill and Estates to provide information, such as for MPOB surveys, were replied to in a timely manner. For example, The Mill received a request from the MPOB by email on 16 April 2013 for eCost for the 2012 calendar year, to which the Mill Manager replied with the completed survey May 2013. Another example, Basir Ismail Estate received a Request from MPOB October 2013 for area ha harvested for September 2013 and the amount of FFB harvested. Records showed the Estate replied to MPOB 7 November 2013. (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.

Kulim holds copies of each of the 7 management documents that are required to be publicly available. Kulim policy is to make these available upon request.

In addition, Kulim has continued to use as a point of reference the “Sustainability Handbook” June 2007 that details the company’s environmental and social policies and grievance procedure. Copies of the handbook are available on request.

Examination of documents confirmed that Kulim makes copies publicly available on request, except those relating to commercial confidentiality.

Details of Land Titles are held in file "Grant Title" on SPO Server. Hard copy is held by EPA Property Department. (1.2.1)

The Health and Safety Plan for the Mill and Estates is documented in the "Improvement Plan for 2013", issued January 2013. (1.2.2)

Environmental and Social Aspects and Impacts are recorded on a Register for the Sedenak Operating unit that is revised annually and was updated January 2013. Copies are held at the Mill and each Estate. (1.2.3)

Pollution Prevention Plans are included in the Environment Improvement Plan, which was updated in January 2013 and included performance targets. (1.2.4)

Kulim’s Sustainability Handbook (2007) details the dispute resolution process to be followed and the recording of information. (1.2.5)

Kulim follows the Land Acquisition Act 1960 (ACT 486), which details the acquisition, the assessment of compensation to be made on account of the acquisition and any other matters incidental thereto. (1.2.6)

Kulim maintains an Improvement Plan that is reviewed by top management and updated in January each year. (1.2.7)

PRINCIPLE 2: There is compliance with all applicable laws and regulations

Kulim Mill Inspector and Plantation Inspector carry out checks for legal compliance during their six-monthly visits to the mill and estates, respectively. Review of a sample of reports and records confirmed that the Mill and the Estates visited have maintained legal compliance with statutory requirements, such as the Factories & Machinery Act 1967, the OSH Act 1994, the Environmental Quality (Clean Air Regulation) 1978 and the Employment Act 1955. The Estates have maintained boundary stones so that these are clearly marked and visible. Inspection of stakeholder correspondence and interview of local community representatives confirmed there were no land tenure disputes with Kulim.

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

Kulim Legal Department maintains a Register of Legal Requirements for the Mill and Estates that was updated in 2013 to include the Wildlife conservation Act 2010. In addition, each operation has a List of Licenses showing the expiry dates. The most recent Mill Engineer visit to The Mill was 18 September 2013 and he reported that all statutory requirements were being met. A sample of statutory licenses was checked and found to be current, for example, the licence for the Mill Steriliser was current to 02 March 2014.

Inspection of pay records found that the Mill and the Estates complied with the Employment Act 1955 and the Department of Labour monthly overtime limit. For example, the Mill received a letter from Pejabat Tenaga Kerja Johor Bahru (Ministry of Human Resource) dated 26 February 2013 stating written approval for extension to overtime hours was no longer being issued. However, the letter also stated the Government allows the company (Kulim) to extend overtime hours to workers conditional upon Kulim receiving written approval from workers of their agreement to work extended hours. A list was provided to Auditors of names and signatures of each Mill worker with the statement they agree to work extended hours as requested. (2.1.1)

Kulim maintains a Register of Legal Requirements for the Mills and Estates that was updated in 2013 to include the Wildlife Conservation Act 2010. In addition, each operation has a List of Licenses showing the expiry dates. (2.1.2)

Review of internal audit and consultant reports showed that the Mill and the Estates visited had maintained legal compliance with applicable laws and regulations. For example, the Mill boiler emissions were tested on 26 and 27 September 2013 by Spectrum Laboratories (Johor) Sdn Bhd and confirmed the level of dust particulate was in

compliance with Regulation 25 of the Malaysian Environmental Quality (Clean Air) Regulations, 1978. Ambient air quality at areas within and surrounding the Mill were tested by Spectrum Laboratories (Johor) SdnBhd on 26 and 27 September 2013 and the Total Suspended Particulates monitored were within the Malaysian recommended Environmental Air Quality Guideline. At the time of the visit the smoke density meter had been removed for repair and calibration. As an interim measure, hourly manual observations are made of the boiler spoke opacity and compared to a Ringelmann chart. Examination of a sample of records indicated compliance with the Malaysian recommended Environmental Air Quality Guideline. A DOE Officer visited the Mill on 03 June 2013 and did not identify any issue requiring corrective action.

Mill effluent is treated in effluent ponds and used for composting with EFB and the balance is recycled to the palms by land application in furrows. The BOD of treated mill effluent complied with licence limits of 5,000 mg/L throughout the year (Figure 6) and the maximum BOD was 297 mg/L at the Mill in February.

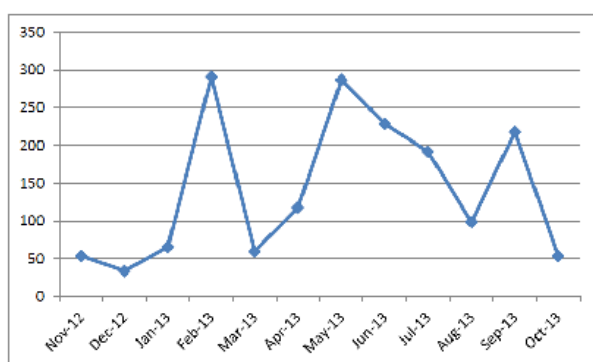


Figure 6: BOD (mg/L) of Treated Mill Effluent

Kulim has continued the capital expenditure program for upgrading existing houses as well as construction of new houses at the locations where houses have only two bedrooms. Water is supplied to housing from the government reticulated supply and from Kulim operated water treatment plants. Laboratory analysis results showed compliance with the Malaysian Drinking Water Quality Standard. The Mill and Estates carry out daily checks of pH and residual free chlorine and at some locations, jar tests to determine the dosing of flocculant. In addition, samples are sent to the Kulim Central Laboratory monthly or an external consultant. Kulim has implemented monthly reporting against performance targets and the system of regular visits by the Mill Visiting Engineer and the Plantation Inspector, respectively who audit legal compliance during site visits.(2.1.3)

Kulim Legal Counsel carries out annual reviews of the legal requirements and any changes or updates are communicated to the Mill and Estates.(2.1.4)

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

Kulim operations are on either “Freehold Land” or “State Leases”. Details of Land Titles and summary of lease history are held in file “Grant Title” on the SPO Server. Kulim Property Department holds a hard copy of land titles. (2.2.1)

Only oil palm is grown on the land, which is consistent with the land titles and lease conditions. (2.2.2)

Several years ago in 2010 Kulim completed the program of surveying the boundaries of all its properties and installing boundary stones. Each of the Estates visited held a copy of a map showing the locations of boundary stones. Inspection of a sample of boundary stones (for example Stone Number 59 at Kuala Kabong) at each of the Estates visited confirmed boundary stones are clearly marked with poles painted red and white and maintained.(2.2.3)

There are currently no Land disputes at any of the Kulim Estates.(2.2.4)

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

The Kulim Mills and Estates operations are on either “Freehold Land” or “State Leases”.The land is not encumbered by Customary Rights.(2.3.1)

The right to use the land is not disputed.(2.3.2)

Since there is no customary land at any Kulim owned Estate, therefore this indicator is not applicable.(2.3.3)

PRINCIPLE 3: Commitment to Long Term Economic and Financial Viability

Kulim has implemented a business management system for monitoring and reporting of performance against production targets and for achieving long-term economic and financial viability. Reports were available showing the details of production and unit costs. Kulim has continued its commitment to sustainability by funding the replanting program and capital expenditure for improvements at the Mill and Estates.

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

The Mill and the Estates have an annual operating budget for the calendar year 2013 and five-year projections (2013 – 2018) for production. The budgets include performance targets for production and product quality and each of the operating units reports monthly results to senior management. The average annual FFB yield for the Estates (Figure 7) has decreased between 2009 and 2013 due to replanting and the large area of young mature palms. Kuala Kabong Estate yields have been adversely affected by the incidence of ganoderma and leaning palms at the peat area.(3.1.1)

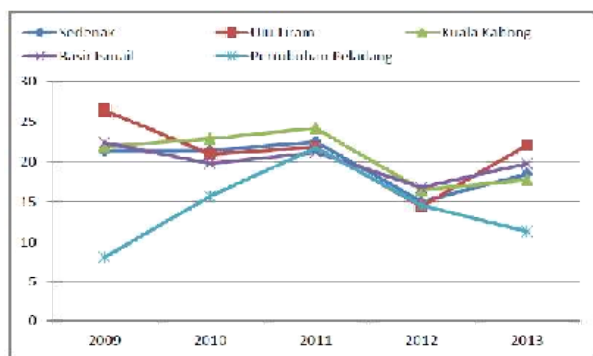


Figure 7: Average Annual FFB Yield 2009 – 2013

Each of the Estates has a ten-year replanting plan that details the schedule and areas to be replanted. The replanting plan was reviewed by Kulim Plantation Department in December 2013 for alignment with the calendar year budget. (3.1.2)

PRINCIPLE 4: Use of Appropriate Best Practices by Growers and Millers

Kulim has well established management systems for monitoring and control of best practice implementation at its Mills and Estates. This includes the programme of regular internal audits by the Mill Visiting Engineer and the Plantation Inspectors and Agronomists for maintaining and improving production. For example, the Mill Visiting Engineer audited the Mill on 18 September 2013 and made recommendations for improving the OER. The average annual OER has remained above 20% (Figure 8) since 2009. A high proportion (67%) of the FFB processed at the Mill is purchased from outside suppliers and because of variable crop quality, improving the OER was stated to be very challenging.

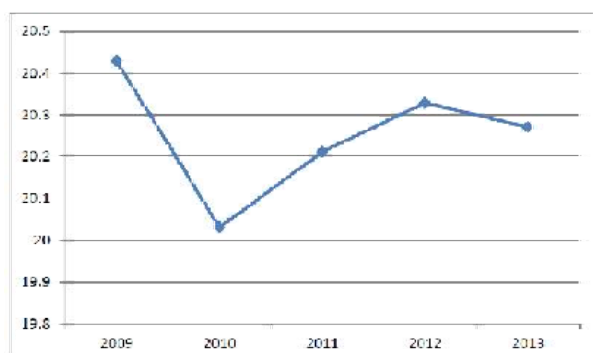


Figure 8: Average Annual Mill OER (%) 2009-2013

The boundaries of stream buffer zones that will be reinstated at future replanting were maintained and inspection showed that herbicides had not been applied to these areas. Inspection of recently replanted areas confirmed the buffer zones were set aside in accordance with Kulim Policy. The use of pesticides is controlled and an important element of the IPM programme. Kulim has continued to give high priority to safety training and safe working practices, which are reflected in a relatively low LTA Index.

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

In 2013, Kulim reviewed the SOPs for the Mill and Estates operations and has uploaded these to the Kulim Portal. The Mill has maintained certification of their Quality Management System to the ISO 9001:2008 standard (Certificate No AR1803, current to 14 October 2014). Implementation of SOPs at the Mill was checked by internal audits and the external ISO9001 audit. (4.1.1)

The Mill and Estates maintain records of the monitoring carried out internally and by the Mill visiting Engineer and the Plantation Inspector's visit (Kuala Kabong Estate 05 & 08 July 2013). Records are maintained for a minimum of three (3) years in accordance with the quality management system requirements. (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 Kulim Agronomists have executed a programme of foliar and soil sampling for assessment of palm nutrition and making recommendations for the annual fertiliser application plan, specific to each Estate. For example, the Agronomist visited Kuala Kabong Estate between 11 and 12 September 2013 and carried out inspection of the palms and foliar sampling. (4.2.1)

The Agronomist team carried out soil sampling at Kuala Kabong in September 2013 and the samples were analysed by UTCL Laboratory, with the results received by the Estate on 01 November 2013. (4.2.2)

Kulim has implemented composting of EFB at a plant near the Mill and the bio-compost is applied to the palms to replace part of the inorganic nitrogenous fertiliser requirement. Kulim R&D Department has an annual programme of monitoring areas on which EFB and POME are applied. (4.2.3)

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

Kulim has overlain a topographic map on the soil map to identify areas of potential erosion risk at each Estate. (4.3.1)

Kulim has identified steep areas for setting aside as conservation areas when replanting is due. Inspection of field conditions at each of the Estates visited generally showed well established and maintained groundcover vegetation. Kulim has implemented roto-slashing of harvesting paths at flat and gently sloping areas, in preference to use of herbicide. On sloping areas and terraces, stacking of pruned fronds along the contour for protection against soil erosion was relatively consistent. (4.3.2) **CR08 – A Nonconformity was assigned at Kuala Kabong Estate, because inspection of field conditions and observation of spraying operations indicated overspraying that was affecting groundcover vegetation, such as on frond stacks along the palm inter-row – refer Section 3.2 Page 18.**

Each of the Kulim Estates has an annual budget and a programme for road maintenance. Inspection of each of the Estates visited showed the roads to be readily accessible, despite recent heavy rain, indicating that road maintenance was being carried out in accordance with the annual programme for roadside pruning, road repair, drain upkeep, culvert maintenance, road gravelling and grading. Kuala Kabong Estate has a ready source of laterite and the roads were in good condition. (4.3.3)

Peat soils occur only at Kuala Kabong Estate where a water management programme has been implemented. The estate carries out monitoring of water levels each morning and afternoon at the network of 60 weirs and data have been recorded since 2001. The height of weirs is adjusted daily, depending upon rainfall and water flow, to achieve the target 60cm water level relative to the ground surface. On a six-monthly basis the ground level is measured relative to bench marks fixed by survey. This provides information on the rate of subsidence. (4.3.4)

There are no sandy, low organic matter or acid sulphate soils at any of the Kulim estates.(4.3.5)

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

Field inspection confirmed buffer zones for reinstatement at future replanting had been demarcated with marker posts painted with “blue and white” rings, as well as the trunks of palms to show clearly the boundaries. At locations where replanting is due, the Estates have ceased the application of chemicals to palms within the demarcated buffer zones. (4.4.1)

Inspection of the Estates visited and information provided by Kulim indicated there was no construction of bunds or dams across waterways. (4.4.2)

Inspections of the Mill and the Estates visited showed that point source pollutants were well controlled through maintenance of pollution control devices. Records were available to show that the PCDs had been inspected and cleaned regularly. The Mill and Estates carry out monthly monitoring of water quality upstream and downstream of the operations. Review of a sample of records indicated no significant difference in concentrations of, for example, BOD and TSS between upstream and downstream locations.(4.4.3)

The Mill and the Estates measure daily rainfall and the information is used for assessment of crop projections and for management of the composting site.(4.4.4)

The Mill monitors and reports water usage monthly to Kulim head office. The water usage increased slightly from 0.96 t/tFFB to 0.98 t/tFFB between 2012 and 2013 (Figure 9).The Mill has recently implemented the recycling of steriliser condensate for use as dilution water in clarification of crude oil. (4.4.5)

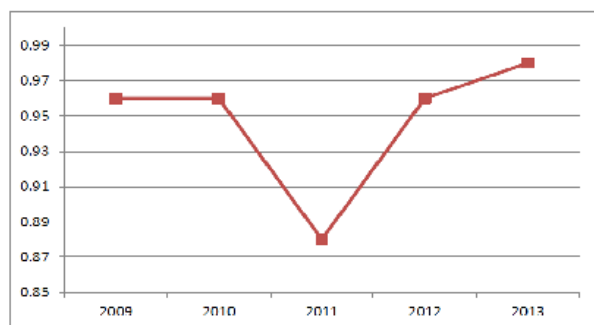


Figure 9: Annual Mill Water Usage (t/tFFB) 2009-2013

Kulim has not constructed any new drains from the land within the estate boundaries. Where drainage of land has been established, groundcover vegetation is maintained to protect water quality from sedimented runoff. (4.4.6)

Kulim has developed a water management plan for the Mill and Estates. The Kulim Agriculture Manual Section A17 “Protection of Water Courses” provides guidance on implementation of buffer zones relative to the width of stream or drain. Inspection of field conditions indicated consistent implementation of the Agriculture Manual guidance.(4.4.7)

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

Kulim’s Agricultural Manual–Section J provides detailed information on Integrated Pest Management including the IPM strategies for a range of palm pests. The IPM Program consists of monitoring pest numbers and the use of biological controls wherever possible. When additional treatment using chemicals is necessary, then this is carried out in a controlled manner. For example, palms are monitored for leaf damage and the results are used to determine whether chemical treatment is necessary for control of leaf-eating pests. Interview of Assistant Managers and inspection of records indicated consistent implementation of IPM practices.(4.5.1)

The main palm pest is rats and damage is monitored in the field as well as for the FFB delivered to the Mill. The occurrence of fresh rat damage is used as a trigger for assessment of the need for treatment. Census data are recorded on a block basis in the form of a map on the “Treatment and Census File”.

Kulim continued the programme for establishment of beneficial plants (*Turnerasubulata* and *Cassia cobanensis*) along roadsides in the Estates for control of leaf eating insects. Barn owls have been introduced at each Estate for control of rats and annual census is used to indicate occupancy, for example 46% occupancy at Basir Ismail Estate.(4.5.2)

The Estates maintain records for each oil palm block of the quantity of pesticides applied that is derived from the daily issues recorded on the pesticide store bin card. (4.5.3)

Kulim has kept records of pesticide usage, including details of the active ingredient since 2008. The data for Kuala Kabong and Basir Ismail Estates (Figure 10) shows significantly higher pesticide toxicity units/ha were applied at Basir Ismail in 2011 and 2012 because of the need to control an outbreak of leaf-eating insects. (4.5.4)

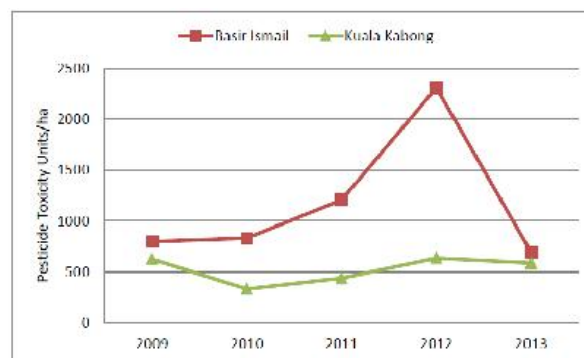


Figure 10: Annual Pesticide Usage at Kuala Kabong and Basir Ismail Estates

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.

The Kulim Agricultural Manual – Section H – provides justification of the use of chemicals in relation to particular field conditions, such as for controlling individual species of weeds. Table H01 of the Manual provides guidance on pesticide application rates. Copies of the Manual were available at the estates visited.(4.6.1)

Inspection of the pesticide stores and stock inventories showed that only pesticides registered under the Pesticides Act 1974 were held. The CHRA (refer Indicator 4.6.5) was appropriate for the types of pesticides being used, including paraquat. A small quantity of paraquat was held at each of the estates visited and this was secured in a separate locked store. (4.6.2)

Inspection of the pesticide stores at the estates visited were stored safely in accordance with the manufacturer's instructions. Inspection of pesticide stores at Kuala Kabong and Basir Ismail Estates confirmed that all pesticide storage areas had spill containment, adequate convective ventilation, clear labelling, physical separation by type of chemical, and safety instructions. (4.6.3)

Kulim Head Office has supplied MSDS in Bahasa Malaysia to each of the Estates. Inspection of the estates visited confirmed information on the safe handling of pesticides is displayed at the pesticides store and mixing area. (4.6.4)

Each of the Estates visited held a copy of the results of the medical surveillance carried out in accordance with CHRA requirements. For example, Kuala Kabong Estate arranged for CHRA medical surveillance to be carried out on 27 April 2013 for 13 sprayers and 12 non-sprayers. The Healthcare Group conducted the surveillance at the Kuala Kabong Estate clinic. Inspection of the report showed all operators were fit to continue working with pesticides. (4.6.5)

Observation 01 – A Nonconformity was initially assigned at Basir Ismail Estate because Annual CHRA Medical Surveillance had not been carried out for pesticide operators. However, the Estate immediately arranged for all pesticide operators to undergo medical surveillance and objective evidence was provided of completion of this requirement – refer Section 3.2 Page18.

Kuala Kabong and Basir Ismail Estates employ only male sprayers.(4.6.6)

Kulim uses WHO Type 1A and Type 1B chemicals only on the basis of pest census data when a threshold level is exceeded. Inspection of records confirmed that Kuala Kabong Estate has not had an outbreak of bagworm requiring treatment since 2002. Kulim has continued to use paraquat dichloride for control of volunteer oil palms and for problematic weeds palms, although usage decreased by 10% and 27% respectively at Kuala Kabong and Basir Ismail, compared with 2012. Kulim Plantation Department advised that they have kept up to date with research and investigations, but to

date there is no suitable economic alternative to the contact herbicide paraquat dichloride.(4.6.7)

Kulim has not applied any pesticide by aerial means.(4.6.8)

Customers have not requested testing of CPO for pesticide residues at Sedenak, although Kulim has done this for Sindora Mill when operating under a single RSP0 Certificate. Testing is planned for Sedenak CPO in 2014. (4.6.9)

Kulim Estates maintain records of pesticide use for a minimum of 5 years, as reported for Indicator 4.5.4 above with details of usage for Kuala Kabong and Basir Ismail Estates.(4.6.10)

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

Kulim has implemented an OSH Management Plan for improvement of safety of employees that was updated in January 2013 for the calendar year.(4.7.1 a)

The Mill reviewed the Safety Risk Assessment (HIRAC) for the main tasks in the Mill in June 2013 and revised the risk for boiler start-up and shut-down following overhaul of the boiler and completion of operator training. The Estates have reviewed the HIRAC, for example, Basir Ismail Estate in July 2013. (4.7.1 b)

In addition to specific training courses, safety briefings are given during muster to reinforce safety awareness, such as correct wearing of PPE. Records are maintained of safety training, for example, the Mill carried out emergency response training for 16 participants on 01 November 2013 for "Response to an Effluent Bund Rupture". (4.7.1 c) **CR09 – A Nonconformity was assigned at Kuala Kabong Estate, because inspection of spraying in the field found lack of understanding of the action required to be taken when a leaking container of pre-mixed pesticide was identified by the auditor – refer Section 3.2 Page18.**(4.7.1 c)

The Mill carries out safety briefings each month at assembly. Inspections of the Mill and the Estates visited indicated that safe work practices were being implemented, except for those situations identified in Section 3.2 of this Report. Workers were observed to be wearing appropriate PPE for the specific task being carried out and the PPE was worn correctly and consistently across most of the sites visited. For example at Kuala Kabong, sprayers were wearing a waterproof apron, respirator, helmet, gloves and boots. At each work location visited safety signs were clearly posted to warn of potential hazards. Records were available of PPE issued to individual workers and contractors, including signatures to confirm receipt. Kuala Kabong Estate carries out PPE inspection each Wednesday morning and replacements are issued when PPE is damaged or worn.(4.7.1 d)

At each Mill and Estate there is a designated OSH Coordinator who is responsible for organising safety training, meetings and investigation and reporting of accidents and incidents. For example, at Basir Ismail Estate the Manager is the OSH Coordinator.(4.7.1 e)

Records were available confirming that quarterly OSH meetings had been held at the Mill and the Estates. For example, the Mill carried out the third OSH meeting of the year on 30 September 2013 attended by 18 persons. Basir Ismail Estate held their quarterly meeting 23 October 2013 with 20 attendees. The meeting minutes included details of

discussion on safety for each work task, review of safety performance and discussion of any accidents that had occurred and workplace health and safety issues.(4.7.1 f)

The Emergency Response Plans at the Mill and the Estates visited had been reviewed and updated where necessary, such as for changed phone numbers, and workers had been trained in emergency evacuation. For example, the Mill updated the Emergency Response Plan in November 2013 with telephone contact details. The Mill and Estates have site specific Plans including maps showing assembly areas and lists of emergency contacts.(4.7.1 g)

First Aid Training has been carried out, for example, the Health Assistant carried out first aid training on 24 October 2013 for 16 Mill workers, including operators. The Health Assistant also carried out first aid training for 16 sprayers at Kuala Kabong on 17 May 2013. Training was also carried out at Basir Ismail Estate by REM Estate Health Assistant on 12 November 2013 for 8 Mandores.(4.7.1 h)

Inspections confirmed First Aid Kits are installed at various work stations at the Mill and Estates and checks of a sample confirmed these were appropriately stocked.(4.7.1 i)

All accidents are investigated and reported in writing to Head Office and to DOSH when the situation requires. The LTA Index (number of lost days per 200,000 man hours worked) is updated monthly for each Mill and Estate (Figure 11). The last reported accident at the Mill was October 2013, with 7 days lost. Kuala Kabong Estate had only minor LTA injuries to workers since June 2013. Accident statistics are reported monthly to head office and yearly to DOSH.(4.7.2)

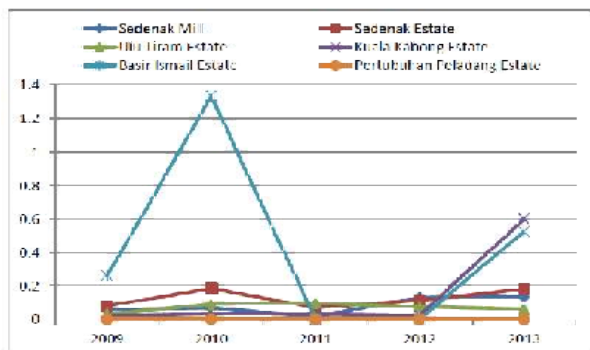


Figure 11: LTA Index for Mill and Estates 2009–2013

Local workers are covered by SOCSO. All locations visited held current Worker Compensation Policies for foreign workers for the period 01/01/2013 – 31/12/2013 with Berjaya Sompo Insurance Berhad.(4.7.3)

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

Kulim has prepared an Annual Training Plan 2013 that lists the internal and external training courses scheduled for the Mill and Estates during the year. In addition the Mill and Estates have a schedule of “on-the-job” training for the main tasks. The Mill and each of the Estates visited maintained records for individual staff and workers of training, including induction of new workers. The Mill Assistant Engineer carried out SOP refresher training on 16 May 2013 for 16 kernel plant workers. Kuala Kabong Estate carried out training of 78

harvesters on 17 May 2013 and at Basir Ismail Estate 20 harvesters underwent training on 10 March 2013.(4.8.1)

PRINCIPLE 5: Environmental Responsibility and Conservation of Natural Resources and Biodiversity

The Mill and Estates reviewed and updated the Environmental Aspect and Impact Register and the associated Improvement Plans. The impact of point source pollutants generally is well controlled. The Mill is implementing a biogas collection system from the mill effluent. The Estates Improvement Plans include expansion of biological controls, such as barn owls and beneficial plants in the IPM Programme. Kulim has continued to engage with the Wildlife Conservation Society, Johor Branch, who have completed field surveys of birds and bats and prepared a report on the study.

Inspections confirmed that conservation set-asides and riparian buffer strips that were re-established during replanting were being protected from disturbance.

Solid wastes are separated at source and recyclables are stored for sale to a recycler. The majority of the Kulim Estates continued to consign empty pesticide containers to G-Planter, a government licensed recycler. Non-recyclables are disposed in small landfills in accordance with Local Government sanitary landfill regulations.

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.

Kulim Sustainability Team worked with representatives from the Mill and Estates at the Training Centre in August 2013 to conduct training and the annual review of the Environmental Aspects and Impacts Register. **Observation 02 – The Aspects and Impacts Register for the Mill and Estates was reviewed in August 2013. The mill has processed a record tonnage of FFB in 2013 year to date and an improvement would be to review the environmental risks for the waste handling systems following completion of the peak crop period – refer Section 3.2 Page 18.**(5.1.1)

Each Kulim operating unit has prepared a site-specific Environmental Improvement Plan as part of the aspect and impact risk assessments process. For example, the Mill Improvement Plan is focused on the efficiency of CPO and PK extraction rates and on reducing water usage.(5.1.2)

Criterion 5.2: The status of rare, threatened or endangered species (ERTs) and high conservation value habitats, if any, that exists 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.

Kulim continued to engage with the Wildlife Conservation Society, Johor Branch, who has completed the survey of birds and bats at Basir Ismail Estate and the adjacent Sungai Johor Forest Reserve. (5.2.1)

Kulim engaged a consultant in 1988 to conduct a biodiversity assessment of the land at each of the mills and estates as well as preparation of site-specific short-term and long-term

HCV Management Plans. Although most of the Estates have only relatively small areas of remnant secondary vegetation, field inspections and interviews of staff and workers confirmed that the HCV Management Plans were being implemented. For example at Kuala Kabong, the management plan concentrates on monitoring and maintenance of water levels to protect the peat area. (5.2.2)

Kulim continued to support the Kulim Wildlife Defenders Program through a range of activities involving school children around Kulim Estates as well as the Estate communities and Estate workers on awareness for the prevention of human-wildlife conflict. (5.2.3)

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

Kulim has identified wastes and sources of pollution in the environmental aspects and impacts register and prepared a Waste Management Plan which follows the hierarchy of "reduce, re-use, recycle or dispose". Inspection confirmed the Mill solid wastes were consistently controlled in accordance with the Waste Management Plan. EFB was shredded in a hammer Mill then composted with treated Mill effluent. Boiler ash and fly ash were stored in bunkers to prevent material from entering the stormwater drain system. Recyclables, such as scrap metal, were stored in a designated area for sale to a recycler. Non-recyclables and domestic refuse were disposed in a small landfill located within the Estates. (5.3.1)

Scheduled wastes, such as spent lubricating oil and used chemical containers, are stored in secure purpose-built stores. Inspection of the scheduled waste stores and associated records confirmed the monthly stocktakes were kept up to date and the scheduled wastes were well controlled and were collected by DOE Licensed contractors.

The Mill arranged collection of spent lubricating oil and other maintenance workshop wastes by Kualiti Alam Sdn Bhd and copies of manifests were available confirming collection, for example, Consignment Notes 0048586-0048591 dated 28 November 2013. Kualiti Alam Sdn Bhd also collected scheduled wastes from Kuala Kabong Estate on 28 November 2013, Consignment Note 0048592.

Medical wastes are stored securely at each Clinic prior to transfer to Sindora Clinic for collection by Pantai Medivest. Records were available for management of medical wastes from the Mill and each Estate clinic visited, for example, at Sedenak Clinic the most recent transfer to Pantai Medivest was 28 October 2013 Serial No P482218. (5.3.2)

EFB is shredded in a hammer Mill then composted with treated Mill effluent. Boiler ash and fly ash were stored in bunkers to prevent material from entering the stormwater drain system. Inspection confirmed the EFB that is excess to composting requirements is recycled to the estate as mulch. Approximately 50% of the treated effluent is applied to the palms in a furrow system. (5.3.3)

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

The Mill maintains records of energy usage (Figure 12), which is reported monthly to head office. The use of the steam turbine for electricity generation has been optimised

in order to reduce the dependence on diesel fossil fuel. Kulim has completed a feasibility study for implementing biogas capture at the Mill. (5.4.1)

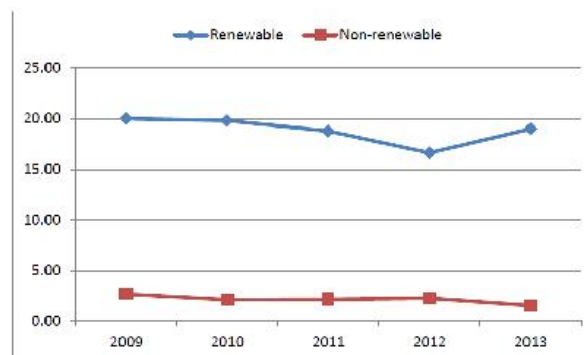


Figure 12: Mill Energy Usage (kWh/tFFB) 2009-2013

The Mill rate of renewable energy usage increased between 2012 and 2013 due to processing greater tonnage of crop. This resulted in decrease in usage of non-renewable energy from the diesel genset operation. (5.4.2)

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.

Inspections of replanting areas showed that the old stands of palms had been felled, chipped and retained in windrows as mulch and there was no evidence of open burning. (5.5.1 and 5.5.2)

The use of fire for waste disposal was not found at any Mill or Estate location inspected. (5.5.3)

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

Kulim has documented the sources of pollution in the environmental aspects and impacts register and plans for pollution prevention are included in the environmental improvements plan that is reviewed annually. Point sources of pollution generally are well controlled. Kulim is implementing a project at the Mill for methane capture from effluent treatment, with the aim of reducing greenhouse gas emissions. At the time of the site inspection two new digester tanks were under construction, with commissioning of the effluent treatment planned for the end of 2013. (5.6.1 and 5.6.2)

Peat soils occur only at Kuala Kabong Estate where a water management programme is implemented. Water levels of drains are controlled using a conventional system to monitor and maintain average water level below the ground surface of 50-70cm. (5.6.3)

Observation 03 – Kuala Kabong Estate has been monitoring peat subsidence at 6 locations since January 2012. Now that the Estate has two years of records, an improvement would be to periodically review the subsidence monitoring data against the corresponding water level monitoring data to assess the effectiveness of the water management program – refer Section 3.2 Page 18.

PRINCIPLE 6: Responsible Consideration of Employees and of Individuals and Communities by Growers and Millers

Kulim has reviewed and updated the SIA and Social Action Plan for the 2013 year.

Kulim continues to make improvements for staff and workers, such as the recent completion of re-painting of Millhouses.

Local community representatives stated there was good communication with the company and the good relationship was maintained. The JCC continued to operate with quarterly meetings at the Mill and Estates.

Interviews of workers and their families indicated they are treated fairly and there were no issues related to discrimination.

The Gender Committees continued to operate successfully for the communication of issues among female staff and workers.

Kulim continued to maintain a good relationship with contractors, FFB traders and outgrowers who confirmed that dealings were fair and transparent.

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 Kulim Sustainability Team visited the Mill and Estates in October 2013 and met with stakeholders, including workers and their families, local community representatives, contractors and suppliers, for review of the social issues. Following the review, the Mill and Estates prepared site-specific social improvement plans consistent with the local situation for the 2013 year. (6.1.1)

Interviews of stakeholders during the Recertification Assessment confirmed that they had been consulted during the annual review of social issues. (6.1.2)

Inspection of records at locations visited found, for example, at Basir Ismail Estate, two issues had been raised during the SIA update process and the Estate prepared an Action Plan to address both items. Review of previous years Plan found all items raised had been addressed. (6.1.3)

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.

Kulim "Communication and Consultation Management Guidelines" that were prepared in 2008 continue to be used by the Managers of the Mill and the Estates. The Guidelines provide local managers with flexibility to use the form of communication that is appropriate for a range of situations that includes workers, community leaders, civil society and government. (6.2.1)

The Mill and Estates Managers are the main point of contact for internal and external stakeholders. Interviews of stakeholders confirmed that Kulim has an open approach to

communication with staff, workers and local communities. (6.2.2)

Inspection of records showed that the Mill and Estates maintained their lists of stakeholders up to date, for example, the Mill List was updated October 2013 and Basir Ismail Estate January 2013. Inspection of records at all locations also indicated that written communications were replied to promptly and the correspondence kept on file. (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.

The Mill responds to customer complaints by means of the ISO 9001 QMS procedures. (6.3.1)

The Mill and Estates maintain "Complaints/Requisition/Visit/Inspection Registers" for receiving and responding to requests and complaints from employees and external stakeholders. Review of the registers found there was no unresolved grievance. (6.3.2 and 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.

All Kulim operations are on land that is either freehold or on state leases and customary rights are not applicable. (6.4.1, 6.4.2 and 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 is a collective Labour Agreement for both workers (NUPW) and staff (AMESU) and pay and conditions are documented and are above the industry minimum standard. (6.5.1)

Interviews of staff and workers confirmed they had been provided with a copy of their employment contract and understood their pay rates and deductions and received all entitlements outlined therein. (6.5.2)

The majority of the workforce is made up of single male foreign workers recruited from Indonesia. Interviews of local and foreign workers indicated satisfaction with the standard of housing and facilities. Inspection of housing found the re-painting of Mill houses had been completed and all areas visited were neat and tidy. Each location visited held a "Housing Repairs Register", for example, inspection of Basir Ismail Estate Register showed repairs are carried out in a very timely manner with no outstanding entries. Electricity and water are provided 24/7 and schools are located nearby. Residents at all company housing have access to facilities established by the company, such as health clinic, sports field, community hall, crèche, and places of worship. Kulim provides free bus transport and one uniform each year for Primary School children of staff and local workers. (6.5.3)

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.

Interviews of staff and workers and Officials from the NUPW Kluang Office confirmed Kulim supports freedom of association. At the Mill and Estates there is a local committee made up of union representatives elected by members. Records are kept of meetings between company representatives and the local union committee members, for example the Mill held a meeting on 25/09/2013 and Basir Ismail Estate on 15 June 2013. (6.6.1 and 6.6.2)

Criterion 6.7: Children are not employed or exploited. 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.

Inspection of a sample of personnel files at the Mill and Estates confirmed recruits' ages were checked against their Malaysian Identity Card, or in the case of foreign workers, their passport. Under-age persons were not observed at any of the work locations inspected. (6.7.1)

Criterion 6.8: Any form of discrimination based on race, caste, national origin, religion, disability, gender, sexual orientation, union membership, political affiliation, or age, is prohibited.

The Kulim Sustainability Handbook includes a Policy on Equal Opportunities. The Kulim Handbook and Policies are publicly available and the policies are displayed prominently on notice boards at the Mill and the Estates. (6.8.1)

Inspection of a sample of pay records and interviews of staff and workers at the Mill and Estates did not identify any issues related to discrimination. The NUPW Union representatives stated they had not received any complaint related to discrimination in Kulim's treatment of employees. (6.8.2)

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

A Policy on Sexual Harassment and Prevention of Violence against Women is displayed prominently on notice boards at the Mill and Estate Offices. Interviews of internal and external stakeholders confirmed awareness and understanding of the Policy. (6.9.1)

Gender Committees continue to operate at each of the locations visited. Interviews and inspection of Meeting Minutes indicated grievances were rare and the gatherings were mainly used for arranging social activities and events. (6.9.2)

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

Kulim Finance Department arranges contracts for the purchase of goods and services, including those with FFB suppliers. Interviews of FFB Traders confirmed Kulim deals fairly with them, that contracts are legal and binding and payments are made in a timely manner. Kulim pays for FFB

in accordance with the MBOB formula plus a premium for FFB quality. The Mill displays the current FFB price on a notice at the Weighbridge and records are available of past prices paid for FFB. A number of contractors and suppliers of equipment and spare parts have worked with Kulim for more than 10 years. At the Mill the first and second generations of an engineering contractor work with Kulim, which confirms a good relationship with the company. (6.10.1 – 6.10.4)

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

The public infrastructure is well developed near the Mill and Estates visited and government services are readily accessible. Kulim has continued to make appropriate contributions to local communities in the form of donations and assistance to schools and places of worship and donations for religious festivals. (6.11.1)

PRINCIPLE 7 is not applicable as there has been no new development at any Kulim Estate.

PRINCIPLE 8: Commitment to Continuous Improvement in Key Areas of Activity

The programme of establishing beneficial plants and the deployment of barn owls has continued, with the aim of reducing the use of pesticides. The use of WHO Type 1A and Type 1B pesticides has been kept to a minimum and as yet there is still no economically viable replacement for paraquat dichloride. (8.1.1)

Kulim Sustainability Team has worked with the Mill and Estates to review and update the environmental aspects and impacts risk registers and to develop improvement plans. The company is continuing with the replanting program to reduce the age profile of the palms. The Mill has been working with the Estates and outside suppliers to improve FFB quality and the OER which is an important indicator of processing efficiency. (8.1.2)

The Mill has optimised the use of steam turbines for generating electricity, which has reduced the dependence on the usage of non-renewable diesel fuel. The Mill has achieved water usage <1.0 t/t FFB and recycles all the empty bunches and mill effluent to the oil palm estates either via composting or direct field application. (8.1.3)

Kulim continues to invest in capital improvements such as the biogas capture project at the Mill for reducing Green House Gas emissions from effluent treatment and co-generation of electricity. (8.1.4)

The Mill and Estates made significant progress on improvements at housing areas, involving the construction of new three-bedroom houses as well as upgrading of existing houses. The company continued to support local schools and places of worship with donations which are considered appropriate for the socio-economic settings. (8.1.5 and 8.1.6)

3.2 Identified Nonconformities and Noteworthy Positive and Negative Observations (ASA4)

During this Recertification Assessment, Nonconformities were assigned to Minor Compliance Indicator 4.3.2 (CR08)

and Major Compliance Indicator 4.7.1. (CR09). The Assessment Team also identified three (3) Observations/Opportunities for Improvement.

CR08 – Minor Compliance Indicator 4.3.2 – Avoid or minimise bare or exposed soils within estates.

A Nonconformity was assigned at Kuala Kabong Estate, because inspection of field conditions and observation of spraying operations indicated overspraying that was affecting groundcover vegetation, such as on frond stacks along the palm inter-row.

Corrective Actions

Kuala Kabong Estate will adhere strictly to the guidelines stipulated in Kulim's Agricultural Manual (Weed Management) and will conduct refresher training for sprayers before undertaking any spraying program. Training given will be recorded and verified by the Assistant Estate Manager and is to cover the following:

1. Spraying technique for different spraying equipment.
2. Type of chemical used and woody plants that need to be sprayed.
3. Accuracy of chemical dosage to be used.

Close monitoring and inspection to be conducted during and after spraying. Kuala Kabong Estate may seek assistance from KSTS* to provide such training to the workers. The same will also apply to all other Estates.

*KSTS - Kulim Safety Training & Services Sdn Bhd is a wholly owned subsidiary of Kulim (Malaysia) Berhad

Objective Evidence Provided:

Kuala Kabong Estate conducted training for pesticide sprayers on 12/12/2013 on the correct spray technique to avoid any over spraying and also for the accuracy of pesticide dosage used – Refer Appendix F Document 1a. A List of Attendees was also provided– Refer Appendix F Document 1b.

BSi considers the Objective Evidence provided is appropriate and the Nonconformity was closed 25/01/2014. The implementation of corrective actions will be checked during the Surveillance Assessment visit 2014.

CR09 – Major Compliance Indicator 4.7.1c i – To ensure all workers involved have been adequately trained in safe working practices.

A Nonconformity was assigned at Kuala Kabong Estate, because inspection of spraying in the field found lack of understanding of the action required to be taken when a leaking container of pre-mixed pesticide was identified by the auditor.

Corrective Actions:

Kuala Kabong Estate has been asked to conduct immediate action to check for leaks on all containers at their store and refrain from using unsuitable containers. The said Estate will conduct periodical training on safety at work place to ensure all workers are aware of the importance of proper handling of hazardous chemicals. Kuala Kabong Estate may liaise with KSTS for the provision of such training. Record of all training will be kept maintained.

Drip trays will be used at the workplace before placing the chemical container on the trailer. Regular inspection of

containers will be conducted and recorded. The same will also apply to all other Estates.

Objective Evidence Provided:

Kuala Kabong Estate conducted training of their sprayers on 12/12/2013 on the correct handling of pesticides used. During training the workers and the sprayers were shown the correct way to check the container used and to be aware of any leakage. The sprayers were also reminded to always place the pesticide containers on a drip tray – Refer Appendix F Document 2a. A List of Attendees was also provided– Refer Appendix F Document 2b.

BSi considers the Objective Evidence provided is appropriate and the Nonconformity was closed 25/01/2014. The implementation of corrective actions will be checked during the Surveillance Assessment visit 2014.

Observations/Opportunities for Improvement

01 (4.6.5) A Nonconformity was initially assigned because Annual CHRA Medical Surveillance had not been carried out for pesticide operators at Basir Ismail Estate. However, the Estate immediately arranged for all pesticide operators to undergo medical surveillance and objective evidence was provided that the surveillance was carried out 3 December 2013 for 44 workers (list of names supplied) by Dr Muzaffar Salim, Medini Occupational Health Services, Johor Baru.

02 (5.1.1) The Aspects and Impacts Register for the Mill and Estates was reviewed in August 2013. The mill has processed a record tonnage of FFB in 2013 year to date and an improvement would be to review the environmental risks for the waste handling systems following completion of the peak crop period.

03 (5.6.3) Kuala Kabong Estate has been monitoring peat subsidence at 6 locations since January 2012. Now that the Estate has two years of records, an improvement would be to periodically review the subsidence monitoring data against the corresponding water level monitoring data to assess the effectiveness of the water management program.

Progress with the three (3) Observations/Opportunities for Improvement will be followed up during the Surveillance Assessment visit 2014.

Noteworthy Positive Observations

- The Company has continued to invest capital for improving Mill performance and throughput.
- The Company has continued with the replanting programme to reduce the overall age profile of palms.
- The Mill and Estates continue to maintain a good safety record with regard to work related LTAs.
- Improvements in FFB quality and FFB Yield, which are strong indicators of efficient production.
- Kulim continues to maintain a very good relationship with both internal and external stakeholders.
- The Mill and Estates have continued to make improvements in utilisation of natural resources with reduction in and diesel fuel consumption.

- Construction of a Biogas Project has commenced at the Sedenak Mill for methane capture from POME and co-generation of electricity for housing.
- Gender Committees continued to be very active at all locations visited, with a good level of support from Management. This has resulted in creating a social network for female staff and worker engagement.
- Kulim has continued to engage with the Wildlife Conservation Society, Johor Branch.

3.3 Status of Nonconformities (Major and Minor) Previously Identified

Corrective Actions implemented for the Nonconformities identified at the Mill and Estates during previous Assessments (CR02 and CR03) remain in place and the nonconformities remain closed.

BSi concludes that Sedenak Mill and Supply Base of 4 company owned Estates, meet compliance with the requirements of RSPO Principles & Criteria: 2007; MY-NI Indicators and Guidance : 2010; and RSPO Supply Chain Certification Standard : 2011, Module E – CPO Mills : Mass Balance.

BSi recommends the continuation of the approval of Kulim's Sedenak Mill and Supply Base as a producer of RSPO Certified Sustainable Palm Oil.

Review of Progress with Observations/ Opportunities for Improvement Identified at Sedenak Mill and Supply Base during Kulim ASA4

The three Observations/Opportunity for Improvement identified at Sedenak during ASA4 were followed up during this Recertification Assessment and the findings are detailed below.

- 05 (4.4.1)** Inspection of replanted areas confirmed buffer zones correctly marked and set aside along small rivers, but found several palms were planted inside the designated buffer zone beside man-made drains (Ulu Tiram P12).

Recertification Findings: *The incorrectly planted palms were removed and the Estate Managers provided photographs of each location to confirm this.*

- 06 (4.4.6)** At the Mill, a blocked transfer pipe between Anaerobic Ponds #3 and #4 had recently been repaired, but this had resulted in increased storage of effluent. The Mill took immediate action to lower the pond effluent levels to ensure adequate freeboard to prevent overflow of Pond #3 and Pond #6.

Recertification Findings: *The Mill has implemented a system of weekly inspection of the effluent treatment system by the effluent treatment plant Supervisor and the Mill Assistant Manager. Monitoring includes checks of the amount of freeboard and any other issues, which are recorded on a "check-sheet" and kept on file.*

- 08 (4.7.1)** The identification of safety hazards could be improved by consistent implementation of workplace inspections using a standard checklist (e.g. damaged power lead of electric welder at Sedenak Estate).

Recertification Findings: *Locations visited during the Recertification Assessment found consistent implementation of safety.*

The Assessment Team concluded Kulim had implemented appropriate and effective improvements for the Observations identified during ASA4.

3.4 Issues Raised by Stakeholders and Findings with Respect to each issue

The two issues raised by stakeholders during ASA4 were followed up during this Recertification Assessment and found to have been actioned appropriately by the company.

Issues Raised by Stakeholders during Recertification

External stakeholders contacted did not raise any issues of concern relating to the Kulim operations. Issues raised by Internal Stakeholders are detailed below:

Sedenak Clinic Health Assistant stated that the clinic "dressing" equipment needed replacing. Inspection of the equipment found it to be rusty and unusable. The HA also requested a replacement steriliser as the current steriliser is broken and cannot be repaired.

Company Response: *The Estate will arrange purchase of the required equipment.*

Basir Ismail Estate FFB Transport Contractor (associated with company for 34 years) advised that his contract was due for renewal 31 December 2013 but he had received no response to his correspondence requesting renewal of his contract and was hopeful that the association continue.

Company Response: *Management advised that all external contracts were being handled through the "Entrepreneur Venture" and the FFB transporter's contract would be renewed through this process. When the Manager was made aware of the Contractor's concern he met with him and advised him of the new process for contract renewal.*

The Assessment Team considered the above responses appropriate and will follow up during the next Surveillance visit.

4.0 CERTIFIED ORGANISATION'S ACKNOWLEDGEMENT OF INTERNAL RESPONSIBILITY

4.1 Date of Next Surveillance Visit

The next Assessment will be scheduled within 12 months of Kulim's Certificate being re-issued.

4.2 Date of Closing Nonconformities (Major and Minor)

Table 5: Status of Nonconformities

CAR	CLASS	ISSUED	CLOSED
CR01 4.4.6 Sindora Mill	Minor	24/07/2008	21/01/2010
CR02 5.6.3 Kuala Kabong Estate	Minor	24/07/2008	21/01/2010
CR036.5.2 Sedenak&Sindora	Minor	27/07/2008	21/01/2010

Mills			
CR04 5.3.2 Tereh Mill	Minor	21/01/2010	10/01/2011
CR05 5.3.3 SindoraEstate	Minor	21/01/2010	13/01/2011
CR06 5.3.2 Sindora Mill	Minor	13/01/2011	05/11/2011
CR07 4.4.6 Sindora Mill	Minor	12/11/2012	"closed" 10/12/2013
CR08 4.3.2 Kuala Kabong Estate	Minor	10/12/2013	"closed" 25/01/2014
CR09 4.7.1c i Kuala KabongEstate	Major	10/12/2013	"closed" 25/01/2014
CR10 2.1.1	SINDORA MILL AND SUPPLY BASE		
CR115.3.2	SINDORA MILL AND SUPPLY BASE		
CR122.1.1	TEREH MILL AND SUPPLY BASE		
CR134.7.1	TEREH MILL AND SUPPLY BASE		
CR145.3.2	TEREH MILL AND SUPPLY BASE		
CR152.1.1	PALONG MILL AND SUPPLY BASE		

Signed for on behalf of
BSi Group Singapore Pte Ltd
 Aryo Gustomo
 Lead Auditor




Date: 28/05/2014

4.3 Sign-off of Recertification Assessment Findings

Please sign below to acknowledge receipt of the assessment visit described in this report and confirm the acceptance of the Public Summary Report contents, including assessment findings.

Signed for on behalf of
Kulim (Malaysia) Berhad
 Zulkifly Bin Zakariah
 Vice President - Plantation Operations



Date: 28/05/2014

Signed for on behalf of
BSi Group Singapore Pte Ltd
 Charlie Ross
 Lead Auditor



Date: 21/02/2014

Appendix “A”

Recertification Certificate Details

Kulim (Malaysia) Berhad	Current Certificate Number:	SPO 537873
Ulu Tiram Estate	Certificate Issue Date:	23/01/2009
KB 705	Recertification Certificate Number:	SPO 537873
Johor Bahru	Certificate Re-issue Date :	31/03/2014 (approved by RSPO)
Johor 80990 Malaysia		30/05/2014 (latest revised report)

Website: www.kulim.com.my

Standards: RSPO Principles & Criteria : 2007; Malaysia National Interpretation & Guidance : 2010; RSPO SCCS 2011 Module E – CPO Mills : Mass Balance

SEDENAK PALM OIL MILL AND SUPPLY BASE	
Location	Kulai, Johor
Address	Sedenak Palm Oil Mill, KB 721, 80990 Johor Bharu, Johor
GPS	E 103° 32' 17.9628" N 1° 43'51.0888"
CPO Tonnage Total Production(mt)	90,260
PK Tonnage Total Production(mt)	25,648
Company owned Estates FFB Tonnage(mt)	Sedenak (59,060);Ulu Tiram (6,603);Kuala Kabong (38,540); Basir Ismail (39,205); Sungai Papan (50,210) TOTAL = 193,618
“Outside” Estates and FFB Traders Tonnages*(mt)	298,085
CPO Tonnage Claimed**(mt)	29,319
PK Tonnage Claimed**(mt)	8,331

* Production from “Outside” Estates and FFB Traders is excluded from the Certificate.

** The tonnage claimed is the proportion of the total FFB production sourced from Company owned Estates.

Appendix “B”

Supply Chain Assessment

APPENDIX B – SUPPLY CHAIN ASSESSMENT REPORT – RSPO SCCS 2011 Module E – CPO Mills: Mass Balance**KULIM (MALAYSIA) BERHAD (SEDEK MILL)****Certified Mill Production – 01 November 2012 – 31October 2013**

MILL	CAPACITY	CSPO	CSPK
Sedenak	75 t/hr	35,915	10,016
Sindora	45 t/hr	29,590	9,113
Tereh	60 t/hr	63,124	17,280
Palong	40 t/hr	24,855	6,572
TOTAL		153,484	42,981

Total Sales* of Kulim Certified Mill Products– 01 November 2012 – 31October2013

CSPO	CSPK
136,942	19,529

* Since the Initial RSPO Certification, Kulim has operated under a single RSPO Certificate and the sales of Certified Mill Products were not recorded against individual mills.

Total Sales* of Kulim Certified Mill Products– 01 November 2012 – 31October 2013

Months	GreenPalm Trade Certificates		RSPO (eTrace)		ISCC Certificates	
	CSPO	CSPK	CSPO	CSPK	CSPO	CSPK
Nov - 12	18,996	-	70	-	-	-
Dec - 12	13,120	7,529	70	-	-	-
Jan - 13	-	-	-	-	-	-
Feb - 13	-	1,000	1,060	-	-	-
Mar - 13	-	-	80	-	5,400	-
Apr - 13	4,011	-	-	-	1,580	-
May - 13	40,000	-	130	-	6,300	-
Jun - 13	10,000	2,000	-	-	6,460	-
July - 13	-	-	100	-	210	-
Aug - 13	-	-	600	-	-	-
Sep - 13	-	600	845	-	800	-
Oct - 13	27,000	8,400	110	-	-	-
Nov - 13	-	-	-	-	-	-
Dec - 13	-	-	-	-	-	-
TOTAL	113,127	19,529	3,065	0	20,750	0

* Since the Initial RSPO Certification, Kulim has operated under a single RSPO Certificate and the sales of Certified Mill Products were not recorded against individual mills.

SEDENAK MILL SUPPLY BASE**Certified FFB Received Monthly - 01 November 2012 – 31 October 2013**

Month	Sedenak	Ulu Tiram	Kuala Kabong	Basir Ismail	Rengam	Sungai Papan	Total FFB/Month
Nov-12	4,691.77	1,024.20	3,462.00	4,235.08	0.00	3,188.84	16,601.89
Dec	4,585.24	935.47	3,252.77	4,290.74	0.00	3,885.10	16,949.32
Jan-13	3,685.71	950.77	2,636.45	3,791.41	0.00	2,607.15	13,671.49
Feb	3,046.65	570.50	1,945.66	3,438.62	0.00	967.29	9,968.72
Mar	3,010.84	660.61	2,009.92	2,475.35	0.00	64.36	8,221.08
Apr	3,692.41	634.29	2,197.56	2,862.86	0.00	1,226.65	10,613.77
May	3,613.94	701.36	2,329.31	3,228.64	0.00	3,343.95	13,217.20
Jun	4,306.44	607.76	3,060.53	3,028.88	0.00	1,508.60	12,512.21
Jul	5,441.49	637.28	3,915.93	4,254.40	0.00	2,527.01	16,776.11
Aug	5,495.20	635.47	3,751.29	4,377.38	47.10	5,043.54	19,349.98
Sep	5,285.73	572.13	3,399.94	4,830.61	72.80	4,845.19	19,006.40
Oct	5,463.84	644.35	3,803.43	4,569.64	72.60	5,307.97	19,861.83
TOTAL	52,319.26	8,574.19	35,764.79	45,383.61	192.50	34,515.65	176,750

Certified Company Details

Kulim (Malaysia) Berhad
 Ulu Tiram Estate
 KB 705
 Johor Bahru
 Johor 80990
 MALAYSIA

Contact Person:

Mr Sallehuddin Mohd Noh
 Senior Manager
 Phone: +6078611611
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RSPO Membership No: 1-0006-04-000-00

Certification Body Details

BSi Group Singapore Pte Ltd
 (Co. Reg. 1995 02096-N)
 3 Lim Teck Kim Road #10-02
 Genting Centre
 SINGAPORE 088934

Contact Person:

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Summary

Supply Chain assessment was made for the production from Sedenak Mill that is owned and operated by Kulim (Malaysia) Berhad. The assessment included site visits to the Mill and Kuala Kabong and Basir Ismail Estates, Kulim Marketing Department, review of records and interviews of staff. Since Initial RSPO Certification, Kulim has operated under a single RSPO Certificate for the four (4) Mills: Sedenak, Sindora, Tereh and Palong. Kulim sold: 113,127 Green Palm Certificates equivalent to 113,127 tonnes of CSPO; 19,529 Green Palm Certificates equivalent to 19,529 tonnes of CSPK; and 23,815 tonnes of CSPO through the eTrace sales system during the period 01 November 2012 – 31 October 2013. Kulim's sales of CSPO and CSPK were within the quantities stated on the RSPO Certificate. The assessor concluded Kulim has implemented an appropriate management system for controlling the purchase of certified FFB, processing of same and for tracking sales. Kulim maintains adequate records for confirming compliance with the RSPO supply chain traceability requirements as applicable to all Kulim Mills.

Conclusion

The Kulim management system and records meet the requirements of the RSPO Supply Chain Certification Standard : November 2011, Module E – CPO Mills : Mass Balance. Kulim Marketing Department manages all sales of CPO and PK on behalf of the Kulim Mills. The system is computerised and Kulim Marketing Department transfers information to the Mills, including the RSPO Supply Chain information for the despatch note and the sales invoice. Inspection of documents confirmed that Kulim maintains all of the applicable documentation required for verification of implementation of the RSPO Supply Chain Certification Standard : November 2011, Module E – CPO Mills : Mass Balance.

Certificate Details

Background to the Report

(a) Report authors

Assessor

Mr Charlie Ross, BSi RSPO Lead Auditor

CB Management Representative

Mr AryoGustomo, BSi RSPO Scheme Manager

(b) Previous assessments ASA4

(c) On-Site Visits

Visit Itinerary

Friday 29 November 2013 – Sedenak Mill – Opening Meeting held at Mill Meeting Room; Weighbridge Station; examined weighbridge records; daily Transaction Report of FFB deliveries, CPO and PK production; CPO Bulk Tank and PK Silo records; shipments of CPO and PK. Closing Meeting Tuesday 10December.

People consulted: Wan Adlin Bin Wan Mahmood (Senior Manager); MohdYusof Bin Mat (Manager); Muhammad Nasir Bin Mohd Shah (Assistant Engineer); and Weighbridge Operator.

Tuesday 10December 2013–EPA Head Office (Marketing Department): Examined sales recorded in the eTrace system and related supply chain documents.

People consulted: MohdRadzi Mohamed (Marketing Manager)

Scope

The scope of the assessment covered Sedenak Palm Oil Mill and the supply base of Kulim owned Kuala Kabong and Basir Ismail Estates. The Supply Chain mechanism used is Mass Balance. The Kulim operations were assessed against the RSPO Supply Chain Certification Standard : November 2011, Module E – CPO Mills : Mass Balance.

Description of Operation's Management System

Kulim uses the mass balance mechanism for Sedenak Mill supply chain because it processed non-certified crop from “outside suppliers” during the period 01/11/2012 – 31/10/2013. All consignments of FFB despatched from the Estates to the Mill are accompanied by a Consignment Note with a unique consecutive number and includes details of: Field Number Harvested; block Number; No of Bunches; Date Harvested; Estimated Tonnage; Vehicle Registration Number; Driver's Name and Bin Number.

All deliveries of FFB received at the Mill are issued with a Weighbridge Docket that records the Name of the supplier, Truck Registration No, Driver's Name and the Tonnage. The weighbridge system is computerised and delivery records are used as the basis for payment for FFB deliveries. A sample of weighbridge dockets was checked at the Mill against the summaries of FFB deliveries from, for example, Kuala Kabong and Basir Ismail Estates. This confirmed the details of the source and quantity of FFB were recorded accurately and could be verified by tracking. The source of the FFB can be traced back to the Estate and the oil palm block from which it was harvested.

The Mill sends a Daily Production Report to Kulim Head Office that records the quantity of FFB received from the Estates and outside suppliers; the tonnage of FFB processed; the tonnages of CPO and PK produced; despatch tonnages; and the quantities of materials held in stock at CPO Tanks and PK Silos. The Mill and Estates also report the above quantities monthly to Kulim Head Office.

Checks of a sample of records at the Mill confirmed the sales of CPO and PK matched the despatch quantities during the preceding 12 months (01 November 2012 – 31October 2013). Inspection of documents confirmed that Kulim maintains the documentation required for supply chain verification (RSPO Supply Chain Certification Standard : November 2011, Module E – CPO Mills : Mass Balance).

Certified Volume Purchased and Claimed

The following certified FFB material was received from Kulim Estates during the 01/11/2012–31/10/2013year and processed at Sedenak Mill: 176,750 t/FFB.

Main Report Details – RSPO SCCS 2011 Module E – CPO Mills: Mass Balance

1. Documented procedures

- 1.1 The facility shall have written procedures and/or work instructions to ensure the implementation of all the elements specified in these requirements. This shall include at minimum the following:
- Complete and up to date procedures covering the implementation of all the elements in these requirements. *Complies – Procedures are controlled documents under the ISO 9001 Quality Management System, are current and include all elements of the Supply Chain for controlling the receipt, sale and dispatch of palm products.*
 - The name of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the facilities procedures for the implementation of this standard. *Complies – The Marketing Manager has overall responsibility for the Supply Chain traceability activities – planning and executing sales of CSPO & CSPK, aspects of FFB receipts, processing and shipping of palm products. Interview of the Marketing Manager confirmed his knowledge of the RSPO Supply Chain requirements and he was able to demonstrate use of eTrace to track sales and shipments of products.*
- 1.2 The facility shall have documented procedures for receiving and processing certified and non-certified FFB. *Complies – the Mill Weighbridge SOP covers the receiving of FFB and recording details of the Supplier and Transporter. All deliveries of FFB are subject to verification of documentation and quality checks. For example:
Document No: LSM/SOP/5.2/ REV No:1; Issue No:2 /Procedure 6.1 Reception of FFB
Document No: LSM/SOP/5.2/ REV No:1; Issue No:2 /Procedure 6.2 Despatch of CPO
Document No: LSM/SOP/5.2/ REV No:1; Issue No:2 /Procedure 6.3 Despatch of PK*

2. Purchasing and goods in

- 2.1 The facility shall verify and document the volumes of certified and non-certified FFBs received. *Complies – the Mill record tonnages received at the weighbridge and these are reported daily to Head Office on the Mill Production Report.*
- 2.2 The facility shall inform the CB immediately if there is a projected overproduction. *Complies – the company has a mechanism for advising the CB of production variations, which are monitored internally, using information from the Monthly Reports.*

3 Record keeping

- 3.1 The facility shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of these requirements. *Complies – Inspection of records at the Mill, such as the daily stock balance of FFB, PKO and PK, confirmed these were updated daily.*
- 3.2 Retention times for all records and reports shall be at least five (5) years. *Complies – Records are archived and stored for 3 years, in accordance with ISO 9001 QMS, but 5 years relating to RSPO.*
- 3.3 a) The facility 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. *Complies – the Mill prepares a “Monthly Progress Report” for Head Office on the quantities of crop received by source, processed, dispatch of CPO & PK and held in stock.*
- 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. *Complies, the volumes held in stock are updated and reported to Head Office daily and monthly.*
- c) The facility can only deliver Mass Balance sales from a positive stock. However, a facility is allowed to sell short. *Complies – The Company policy is to only make sales of stocks of palm product held in storage. The company did not make any physical deliveries of CSPO or CSPK outside of stock holdings.*
- 3.4 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. *Complies – Kulim uses the prefix MB on the Product Code. MB is stamped on dispatch dockets from the mill and on sales invoices issued by Marketing Department.*
- 3.5 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. *Complies – The company does not out-source activities to Kernel Crushing Mills.*

4. Sales and goods out

- 4.1 The facility shall ensure that all sales invoices issued for RSPO certified FFB products delivered include the following information:
- The name and address of the buyer; *Complies – included on invoice.*
 - The date on which the invoice was issued; *Complies*
 - A description of the product, including the applicable supply chain model (Segregated or Mass Balance); *Complies (MB)*
 - The quantity of the products delivered; *Complies*
 - Reference to related transport documentation. *Complies – dispatches include details of the transport vehicle/vessel, tanker seal numbers and the shipper.*

5 Training

- 5.1 The facility shall provide the training for all staff as required to implement the requirements of the Supply Chain Certification Systems. *Complies – Inspection of a sample of records at the Mill and Marketing Department confirmed Kulim maintains records of training. Interviews of Marketing Manager and Mill Staff confirmed knowledge of the Supply Chain requirements. For example, the Mill holds records for training of staff carried out on 31 January 2013 for RSPO Supply Chain.*

6 Claims

- 6.1 The facility shall only make claims regarding the use of or support of RSPO certified oil palm products that are in compliance with the RSPO Rules for Communications and Claims. *Complies – To the best of the Assessor’s knowledge, the company has not made claims outside of the RSPO rules for Communications and Claims.*

Appendix “C”

New Team MembersCV

Haeruddin Tahir, Nabila Seth Niven and Dian Ekowati



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CURRICULUM VITAE

Name : Haeruddin
Date of Birth : 29th July 1970
Nationality : Indonesia
Professional Qualifications : Auditor for RSPO
Academic Qualifications : Bachelor of Forestry, Hasanuddin University, Management Forestry (1989 – 1994)
Languages : Bahasa Indonesia & English

Professional Experience:**BSI Group Indonesia (May 2013 – Present)**

Position : RSPO Auditor

Control Union Certification (August 2010 – April 2013)

Position : RSPO Lead Auditor, Organic scheme Lead Auditor, 4C Lead Assessor, FSC and PEFC Auditor.

Tripatria Group (December 2008 – July 2010)

Position : Assistant Director

PT. Balimuda Persada (March 2007 – December 2008)

Position : Project Manager in Oil Palm Plantation

PT. Huma Sulut Lestari (2001 - 2007)

Position : Head of Forest Planning and Camp manager

PT. Veneer Product Indonesia (1999 – 2000)

Position : Head of Forest Planning Division

PT. Prabu Alaska Group (1995 – 1999)

Position : Head of Forest Planning and Camp Manager

Auditing Experience

NO.	DATE	CERTIFICATION SCHEME	CLIENT	LOCATION
1.	11 – 15 October 2010	Organic	KSU Jatirogo	Jogjakarta
2.	25 Oct. – 04 Nov. 2010	Organic	KSU Permata Gayo and PT. Mandago	Aceh
3.	23 – 27 Nov. 2010	RSPO P & C	PT. Musim Mas	Riau
4.	28 Nov. – 04 Dec. 2010	Pre Assessment RSPO	PT. Rea Kaltim	East Kalimantan
5.	05 – 07 January 2011	RSPO NPP	PT. Agrowiratama	North Sumatera
6.	28 Feb. – 06 March 2011	RSPO P & C	PT. Rea Kaltim	East Kalimantan
7.	07 – 12 March 2011	RSPO P & C	PT. Maju Aneka Sawit	Central Kalimantan
8.	12 – 18 April 2011	Organic	Koperasi Tunas Indah	Aceh
9.	19 – 23 April 2011	Organic	PT. IKA	Aceh
10.	22 – 23 May 2011	Organic	CV. Inagro Jinawi	Central Java
11.	30 May – 07 June 2011	Organic	KSU Arinagata	Aceh



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12.	11 – 23 June 2011	Organic	PT. Indokom Cutra Persada	East Java, Bali and East Nusa Tenggara.
13.	28 June – 03 July 2011	Organic	PT. Dani Foods	Lampung
14.	05 – 09 July 2011	RSPO P & C	PT. SSM	Central Kalimantan
15.	18 – 22 July 2011	4C	PT. Nestle Indonesia	Lampung
16.	24 – 29 July 2011	RSPO NPP	PT. Musim Mas and PT. Mulia Indah	North Sumatera
17.	08 – 12 August 2011	RSPO P & C	PT. Inti Indosawit Subur	Riau
18.	15 – 17 August 2011	RSPO P & C	United Plantation	Malaysia
19.	24 – 25 August 2011	Organic	PT. Bangkit Wangi	Central Java
20.	14 – 15 September 2011	Organic	Desa Tea, Sdn Bhd	Sabah, Malaysia
21.	02 – 07 October 2011	RSPO Scheme Smallholder	PT. Inti Indosawit Subur	Riau
22.	13 – 20 October 2011	Organic	KSU Permata Gayo	Aceh
23.	06 – 12 November 2011	RSPO P & C	PT. Musim Mas	Riau
24.	28 Nov. – 02 Dec. 2011	RSPO Pre Assessment	PT. Evans Plc	North Sumatera
25.	05 - 09 December 2011	RSPO Schema Smallholders	PT. Inti Indosawit Subur	Riau
26.	12 - 17 December 2011	RSPO P & C	PT. SSM	Central Kalimantan
27.	19 - 23 December 2011	RSPO P & C	FELDA	Malaysia
28.	02 - 07 January 2012	Organic	KSU Jatirogo	Central Java
29.	11 -13 January 2012	RSPO Pre Assessment	KLK - Belitung	Belitung
30.	14 – 20 January 2012	RSPO P & C, SCCS and ISCC	PT. Rea Kaltim	East Kalimantan
31.	24 – 31 January 2012	Organic	KSU Baliem Arabica	Papua
32.	12 – 16 March 2012	RSPO P & C	PT. BSS	West Sumatera
33.	19 – 21 March 2012	RSPO - NPP	PT. LAP and PT. Mentari Pratama	North Sumatera
34.	26 – 29 March 2012	4C	PT. IndoCafco	Lampung
35.	03 – 11 April 2012	Organic	PT. RAAS	South Sulawesi
36.	17 – 21 April 2012	RSPO P & C	PT. Agrowiratama	South Sumatera
37.	23 – 29 April 2012	Organic	PT. RAAS	East Nusa Tenggara
38.	06 – 12 May 2012	RSPO P & C	PT. Evans PLC	North Sumatera
39.	21 – 30 May 2012	RSPO P & C	PT. Unggul Lestari	Central Kalimantan
40.	04 – 06 June 2012	Organic	UD. Manna	Semarang
41.	10 – 15 June 2012	RSPO P & C	KLK – Sabah	Sabah, Malaysia
42.	20 – 23 June 2012	4C	PT. Nestle Indonesia	Lampung
43.	27 – 30 June 2012	Organic	KSU Permata Gayo	Aceh
44.	01 – 03 July 2012	Organic	PT. Mandago	Aceh
45.	03 – 06 July 2012	Organic	KSU Gayo Mandiri	Aceh
46.	09 July 2012	RSPO Partial Certification	KLK	Central Kalimantan
47.	10 – 16 July 2012	Organic	PT. Tripper Nature	West Sumatera
48.	23 – 27 July 2012	RSPO P & C	PT. IIS	Central Kalimantan
49.	03 – 07 September 2012	FSC	PT. Sukajaya Makmur	West Kalimantan
50.	10 – 15 September 2012	RSPO P & C	PT. Musim Mas	Riau
51.	18 – 20 September 2012	FSC	PT. Narkata Rimba	East Kalimantan
52.	12 – 17 October 2012	4C	PT. Taman Delta Indonesia	South Sumatera



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53.	05 – 09 November 2012	RSPO P & C	PT. Musim Mas	Riau
54.	25 – 30 November 2012	RSPO P & C	PBB Sabah	Sabah, Malaysia
55.	02 – 04 December 2012	Organic	Sabah Tea, Sdn Bhd	Sabah, Malaysia
56.	10 – 15 December 2012	RSPO NPP	PT. Agrowiratama, and PT. MAS	North Sumatera
57.	03 – 04 January 2013	Organic	PT. Green Mountain Purveyors	West Java
58.	07 – 09 January 2013	PEFC	PT. Tjiwi Kimia	Surabaya
59.	17 – 18 January 2013	PEFC	PT. Pindo Deli	Karawang, West Java
60.	21 – 25 January 2013	RSPO P & C	KLK	Selangor, Malaysia
61.	11 – 14 February 2013	Organic	PT. Haldin	Central Java
62.	17 – 21 February 2013	RSPO NPP	PT. Evans Ind.	East Kalimantan
63.	13 – 16 March 2013	RSPO P & C	PT. BSS	East Sumatera
64.	17 – 20 March 2013	RSPO P & C	KLK	Kedah, Malaysia
65.	25 – 28 March 2013	Organic	PT. Dani Foods Ind.	Lampung, Indonesia
66.	02–09 April 2013	Organic	CV. Inagro Jinawi	Central Java
67.	13 – 18 April 2013	4C	PT. Sarimakmur	Lampung
68.	19 – 23 April 2013	Organic	CV. Manna	Central Java
69.	25 – 29 April 2013	Organic	PT. Sankawangi	West Java
70.	16 – 17 May 2013	RSPO NPP	Golden Veroleum Liberia	Jakarta
71.	26 – 27 June 2013	RSPO NPP	Golden Veroleum Liberia	Jakarta
72.	22 July – 01 August 2013	RSPO Gap Assessment	Olam International Limited	Gabon, West Africa
73.	19 – 24 August 2013	RSPO Gap Assessment	Green Eagle Group	Jakarta
74.	26 August – 01 Sept 2013	RSPO P & C Smallholder	Chonburi and Univanic	Thailand
75.	16 – 20 September 2013	RSPO P & C	PT. Agro Indomas	Central Kalimantan
76.	01 – 03 October 2013	RSPO NPP	Golden Veroleum Liberia	Jakarta

TRAINING/COURSES

No.	Training	Period
1.	Timber Harvesting Manager (Gajah Mada University)	1997
2.	Conflict Resolution (Ministry of Forestry)	2003
3.	Periodic Inventory Forest (Ministry of Forestry)	2008
4.	Sustainable Forest Management (ITTO – Ministry of Forestry)	2008
5.	Organic Training (EU, NOP and JAS) by CUC	Oct. 2010
6.	HCVF – FSC Assessment (CUC)	Nov. 2010
7.	RSPO SCCS (by RSPO/David Ogg)	Dec. 2010
8.	ISO 14001 (Neville Clarck)	Dec. 2010
9.	Timber Legality Verification System (Gajah Mada University and Multistakeholder Forest Program)	March 2011
10.	UTZ Certified (by UTZ)	August 2011
11.	RSPO Lead Auditor (by RSPO and ProForest)	September 2011
12.	ISO 9001 (Neville Clark)	February 2012
13.	ISPO Aditor Course (Agriculture Ministry of Indonesia)	November 2012
14.	RSPO RED Training (RSPO)	January 2013



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CERTIFICATES





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Nabila Seth Mohd Niven

Client Manager, **BSI Services (M) Sdn. Bhd.**

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Professional Qualification (Current)

- Registered Auditor QMS –**IRCA, UK** | Certificate No MY09097-04092
- RSPO-SA – SPO Social Auditor
BSI Services (M) Sdn. Bhd
- Senior Planner since Year 2009

Academic Qualification (Latest)

- BBA (Hons) in Business Studies | Graduated 2006)
University Technology Mara, Malaysia
- Diploma in Business Studies | Graduated 2003)
University Technology Mara, Malaysia

Working Experience (Latest)

- RSPO SA Auditor | January 2012 - Present
BSI Services (M) Sdn. Bhd
- Senior Audit Planner/ISO 9001 Auditor | October 2009 - Present
BSI Services (M) Sdn. Bhd
- Commercial Accounts Desk Senior Officer | August 2007 – August 2009
Netstar Advanced Systems Sdn. Bhd.
- Customer Service Officer | August 2006 - August 2007
Netstar Advanced Systems Sdn. Bhd.
- HR Assistant | March 2006 – August 2006
Nestle Products Sdn. Bhd.



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Audit Capabilities

- ISO 9001 | Auditor
- RSPO | Social Auditor

RSPO Audit Experience

From/To: (MM/YY)	Organisation audited:	Standard:	Role in Audit (Trainee, Auditor, Lead Auditor, etc):
Oct 2012	Sime Darby Plantation Sdn Bhd (SOU Flemington & Supply Base)	RSPO P&C, MYNI (Surveillance Assessment)	PRSP0-SA - SPO Social Auditor
Dec 2012	FELDA Palm Oil Mill (Bukit Sagu & Supply Base)	RSPO P&C, MYNI (Stage 2 Assessment)	PRSP0-SA - SPO Social Auditor
May 2013	TDM Plantation Sdn Bhd - Kemaman	RSPO P&C, MYNI (Stage 2 Assessment)	PRSP0-SA - SPO Social Auditor
June 2013	FELDA Palm Oil Mill (Lepar Utara 4 & Supply Base)	RSPO P&C, MYNI (Surveillance Assessment)	PRSP0-SA - SPO Social Auditor
July 2013	Sime Darby Plantation Sdn Bhd (SOU 26)	RSPO P&C, MYNI (Re-certification Assessment)	PRSP0-SA - SPO Social Auditor
Sept 2013	Sime Darby Plantation Sdn Bhd (PT SEA)	RSPO P&C, MYNI (Surveillance Assessment)	PRSP0-SA - SPO Social Auditor
Oct 2013	FELDA Palm Oil Mill (Jengka 21 & Supply Base)	RSPO P&C, MYNI (Surveillance Assessment)	PRSP0-SA - SPO Social Auditor
Oct 2013	FELDA Palm Oil Mill (Jengka 18 & Supply Base)	RSPO P&C, MYNI (Surveillance Assessment)	PRSP0-SA - SPO Social Auditor
Nov 2013	Sime Darby Plantation Sdn Bhd (Melalap)	RSPO P&C, MYNI (Surveillance Assessment)	PRSP0-SA - SPO Social Auditor

DIAN EKOWATI

Adress : Ciomas Cluster Residence, Jalan Gabus 5, Blok A No. 3A
 Rt. 6/10, Kelurahan Padasuka, Kecamatan Ciomas, Kabupaten Bogor, 16610
 Provinsi Jawa Barat
 Phone : +62 812 2219 162
 Email : dee.ekowati@gmail.com

EDUCATION BACKGROUND

- | | |
|------|---|
| 2012 | Graduate Degree: Bogor Agricultural Institute Graduate School (Master Level), Faculty of Human Ecology, Rural Sociology Study Program, Majoring in Gender and Social Demography. Thesis: Fertility and Gender Relation in Neglasari Village, Jasinga, Bogor, West Java. |
| 2006 | Bachelor Degree: Bogor Agricultural Institute, Communication and Community Development Study Program. Thesis: Community Empowerment in Ecotourism Development; Pesisir Krui, West Lampung. |

PROFESSIONAL HISTORY

- | | |
|-----------|--|
| 2013 | Consultant for Participatory MRV Project: Center for International Forestry Research (CIFOR). |
| 2009-2013 | Facilitator for British Standard Institution Auditors in Conducting RSPO Audits in Indonesia and Malaysia. |
| 2011-2012 | Research on Landless Farmers Livelihood in West Java rural areas, Neglasari Village, Jasinga Sub-District, Bogor, West-Java, Sajogyo Institute (SAINS). |
| 2011-2012 | Research on Gender Relation and Women's Decision on the Number of Children, Neglasari Village, Jasinga Sub-District, Bogor, West-Java. Rural Sociology, IPB Graduate School. |
| 2011 | Co-researcher on research; Farmers Movement to Defend their Land, Atenco, Mexico. SEPHIS. |
| 2010-2011 | Desk Study on Indonesian Land Reform Initiative – SAINS, Asian NGO Coalition (2010) and International Land Coalition (2011). |
| 2010 | Study on Women Participation in Government Program aimed for Women Empowerment (Program Pemberdayaan Wanita Keluarga Sehat Sejahtera), Research Institution of IPB, Bogor District, West Java. |
| 2010 | Impact Study of Government Assistance on Farmers: Superior Rice and Corn Seedlings, Chemical and Organic Fertilizer, Pasuruan and Situbondo Districts, East Java, Indonesia. IPB Research Center. |
| 2010 | Agrarian Systematic Research;"HGU and its Implications: Tajau Pecah Village, Batu Ampar Sub District, Tanah Laut District and Hayup Village, Haruai Sub District, Tabalong District, South Kalimantan Province. Sajogyo Institute and National Land Academy. |
| 2009-2010 | Research on Community Satisfaction on PT Antam Tbk's Community Development Program. Bogor. West Java. IPB Research Center. |

- 2009 Agrarian Systematic Research; "Agricural Institution of Production and Distribution in Rural Households Post Land Reform in Gender Perspective: a Case Study in Banjaranyar and Pasawahan Village, Ciamis, West Java." SAINS and National Land Academy.
- 2008 Study on Adaptation and Ecological Conflict in Community Surrounds Forest Area: Kasepuhan Sinar Resmi (Abah Asep), Sirna Resmi Village, Cisolok Sub District, Sukabumi District, West Java. Rural Sociology Study Program, IPB Graduate School.
- 2008 PT. Aqua Transportation Impact in Social Economic Aspect of the Community, Part of PT. Aqua CSR Research, Sukabumi, West Java.
- 2007 Facilitating community to manage program from the government in PPK-IPM project (West Java Provincial Government Program to Increase the People's Human Development Index).
- 2005 Research on the Potency to Develop Community Based Ecotourism as an Effort in Empowering Rural-Agro forest Community, Lembaga Alam Tropika Indonesia (LATIN), West Lampung.
- 2005 Research on Local Participative Technology, Petungkriyono Sub District, Pekalongan District, Central Java, LATIN.
- 2004 Facilitating community to establish and manage their own Community Radio, LATIN NGO (Lembaga Alam Tropika Indonesia), West Lampung.
- 2003 Research on Rural Community's Social Economic Potency, Pamijahan Sub District, Bogor, IPB.

TRAINING AND FELLOWSHIP

- 2011 Tailor Made Short Course Agrarian Transition For Rural Development in Institute of Social Studies (ISS), Erasmus University The Netherland – a cooperation of ISS and Sajogyo Institute.
- 2010 International Workshop on Agrarian Transition in Indonesia, Department of Anthropology, Faculty of Cultural Science, Gadjah Mada University, Jogjakarta.
- 2009 Workshop on Methodology and Public Lecturer with Tania Muray Li and Ben White – SAINS – Agrarian Research Center of IPB and National Land Academy
- 2008 Training on Analyzing Village Potency Data, Sajogyo Institute.
- 2007 Workshop on Character Building – Teacher Institute, Sampoerna Foundation, Jakarta
- 2004 Facilitator Techniques Training, LATIN NGO, WALHI (Wahana Lingkungan Hidup Indonesia) and West Lampung Government.

PAPER PRESENTED IN CONFERENCES

- 2010 "Negotiating Space of Critical Collaboration" Presented in Yale International Forum: Interdisciplinary Conference, Social Justice and Rule of Law: Addressing the Growth of a Pluralist Indonesian Democracy, Diponegoro University and Yale University, Semarang, Indonesia.
- 2010 "Gender and Fertility in Plantation". Presented in the International Workshop on Agrarian Transition in Indonesia, Department of Anthropology, Faculty of Cultural Science, Gadjah Mada University, Yogyakarta.
- 2009 "Return to Local Knowledge to Achieve Resilient Agriculture to Climate Change". Presented in the International Seminar on Achieving resilient-agriculture to climate change through the development of Climate-Based Risk Management Scheme, on November 2009, held by Indonesian Association of Agricultural Meteorology.
- 2009 "Poverty and Disparity between Upland and Lowland; Indonesian Case". Presented in the 2nd IRSA (Indonesian Regional Science Association) International Institute (July 2009), held By IRSA and IPB.
- 2005 "The Potency to Develop Community Based Ecotourism; Pekon Pahlungan, Krui, West Lampung" Presented in the Meeting of Petani Repong Damar (P2RD), West Lampung Government.

BOOK CHAPTERS IN BAHASA INDONESIA

- 2010 "Membaca Ulang Keberadaan Hak Guna Usaha dan Kesejahteraan Rakyat". (Second Author) in Pengembangan Kebijakan Agraria Untuk Keadilan Sosial, Kesejahteraan Masyarakat dan Keberlanjutan Ekologis. Yogyakarta, Indonesia: SAINS dan National Land Academy Press.
- 2009 "Kelembagaan Produksi-Distribusi Pasca Okupasi dalam Perspektif Gender, Studi Kasus Dua Desa di Kabupaten Ciamis". (First Author) in Memahami dan Menemukan Jalan Keluar dari Problem Agraria & Krisis Sosial Ekologi. Yogyakarta, Indonesia: SAINS dan National Land Academy Press.

ARTICLE IN NATIONAL JOURNAL

- 2009 "Poverty and Disparity between Upland and Lowland Communities". (First Author) in Economic Journal of Emerging Markets. Special Edition on Regional Economics. Yogyakarta: Faculty of Economics, Universitas Islam Indonesia.

Appendix “D”

Recertification Programme

KULIM (MALAYSIA) BERHAD INITIAL RECERTIFICATION ASSESSMENT 29 November – 10 December 2013**SEDENAK MILL AND SUPPLY BASE 29 – 30 NOVEMBER; 6 and 10 DECEMBER 2013**

TEAM: CR: CHARLIE ROSS (LEAD AUDITOR); HT: HAERUDDIN TAHIR; NS: NABILA SETH NIVEN;
RR: ROBYN ROSS; DE: DIAN EKOWATI

DATE	TIME	DETAILS	CR	HT	NS	RR	DE	
Friday 29 November SEDENAK	AM	Opening Meeting Mill & Estates	√	√	√	√	√	
		Inspect Mill/Effluent Ponds/Stores/Workshop/Landfill/Land Application						
		Interview Mill Workers	√				√	
		Joint Interview Contractors/Suppliers (Mill Office)				√	√	
		Joint Interview Local Community Representatives (Mill Office)	√				√	
		Interview Office Staff/Workers	√				√	
	PM	Commence Document Review	√			√	√	
		Visit Clinic Interview Staff				√	√	
		Inspect Housing Interview Residents				√	√	
		Document Review including Supply Chain	√			√	√	
		Closing Briefing	√			√	√	
		AM	Opening Briefing			√	√	
			Inspect Estate ie any peat/conservation/HCV areas/buffer zones			√		
Interview Harvesters/Male Fieldworkers/Sprayers				√				
Interview Female Fieldworkers/Sprayers (if any)					√			
Inspect Stores, Workshop, Landfill				√				
Interview Office Staff/Workers					√			
Review Pay Documentation					√			
PM	Joint Interview Contractors/Suppliers (Estate Office)			√				
	Joint Interview Local Community Representatives (Estate Office)				√			
	LUNCH							
	Visit Clinic (if any) Interview Staff				√			
	Inspect Housing (if any) Interview Residents				√			
1630		Document Review		√	√			
		Closing Briefing		√	√			
Team 1 Sedenak Mill								
Team 2 "Outside" Estate Pertubuhan Peladang								

DATE	TIME	DETAILS	CR	HT	NS	RR	DE		
Saturday 30 November SEDENAK	AM	Opening Briefing	✓		✓				
		Inspect Estate ie any hilly/peat/conservation/HCV areas/buffer zones	✓						
		Interview Fieldworkers/Sprayers	✓		✓				
		Inspect Stores, Workshop, Landfill	✓						
		Interview Office Staff/Workers			✓				
		Joint Interview Contractors/Suppliers (Estate Office)			✓				
		Joint Interview Local Community Representatives (Estate Office)	✓		✓				
		Commence Document Review	✓		✓				
	PM	Visit Clinic Interview Staff			✓				
		Inspect Housing Interview Residents			✓				
		Document Review	✓		✓				
		Closing Briefing	✓		✓				
		Team 2 Basir Ismail Estate	AM	Opening Briefing		✓		✓	✓
				Inspect Estate ie any hilly/peat/conservation/HCV areas/buffer zones		✓			
Interview Harvesters/Male Fieldworkers/Sprayers				✓					
Interview Female Fieldworkers/Sprayers						✓	✓		
Inspect Stores, Workshop, Landfill				✓					
Interview Office Staff/Workers						✓	✓		
Review Pay Documentation						✓	✓		
Joint Interview Contractors/Suppliers (Estate Office)						✓	✓		
Joint Interview Local Community Representatives (Estate Office)						✓	✓		
Visit Clinic Interview Staff						✓	✓		
Inspect Housing Interview Residents						✓	✓		
Document Review				✓					
Closing Briefing				✓		✓	✓		
Friday 6 December	AM	Telephone Contact Government Departments, NGOs and any other relevant Stakeholders			✓				
Tuesday 10 December	AM	Interviews EPA Management, Human Resources, Plantation, Engineering, R&D and Marketing Departments	✓				✓		
	1500	Prepare Visit Report and Closing Presentation				✓			
		Closing Meeting	✓			✓	✓		

Appendix “E”

List of Stakeholders Contacted

**Stakeholders Contacted – Kulim (Malaysia) Berhad
SEDENAK MILL AND SUPPLY BASE**

INTERNAL STAKEHOLDERS

Mill 8 Female Staff/Workers 4 Residents at Housing 3 Male Mill Workers (Local) 1 Male Mill Worker (Foreign) 5 Male Mill Staff (Local) Clinic Staff	Kuala Kabong Estate 7 Male Workers (Foreign) 2 Female Staff/Workers 1 Male Staff Clinic Staff Residents at Housing	Basir Ismail Estate 7 Harvesters (Foreign) 5 Female Staff/Workers 6 Male Staff 20+ Residents at Housing	EPA (Head Office) Marketing Department Human Resources Department Property Department Plantation Department Engineering Department
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EXTERNAL STAKEHOLDERS

Mill Kewaja Industries SdnBhd(Engineering Contractor – 14 years) also contractor to Sindora and Tereh Road Maintenance& Drainage Contractor (20 years) Imam – Kg MelayuSedenak Hong Hui Trading (7 years) FFB Supplier	Kuala Kabong Estate Hj Abdul Rahman Bin Mohamed (Village Head) Lei Ting Woor (Contractor) WW Brothers Earth Work Ent (Contractor)	Basir Ismail Estate FB Fam Brothers Trading SdnBhd (FFB Transporter – 34 yrs) <i>Local Community Representatives were invited to join the Interview process but did not attend.</i>	PertubuhanPeladang 4 Female Staff/Workers 3 Male Fieldworkers (Foreign) Hutan Segi Mas Berhad (Worker Contractor Manager) Hutan Segi Mas Berhad(Contractor Supervisor) 2 Smallholders
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<u>GOVERNMENT DEPARTMENTS/STATUTORY AUTHORITIES</u> Department of Environment (Kluang) Department of Occupational Safety and Health (Johor) Department of Labour (Senior Assistant – Segamat)	<u>NGOs and OTHERS</u> Wildlife Conservation Society, JohorBranch NUPW Kluang (Branch Secretary) AMESU Selangor Tenaganita
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Appendix “F”

Objective Evidence for Closing Nonconformities CR08 and CR09

CR08 – Minor Compliance Indicator 4.3.2 – Avoid or minimise bare or exposed soils within estates.

A Nonconformity was assigned at Kuala Kabong Estate, because inspection of field conditions and observation of spraying operations indicated overspraying that was affecting groundcover vegetation, such as on frond stacks along the palm inter-row.

Corrective Actions

Kuala Kabong Estate will adhere strictly to the guidelines stipulated in Kulim's Agricultural Manual (Weed Management) and will conduct refresher training for sprayers before undertaking any spraying program. Training given will be recorded and verified by the Assistant Estate Manager and is to cover the following:

1. Spraying technique for different spraying equipment.
2. Type of chemical used and woody plants that need to be sprayed.
3. Accuracy of chemical dosage to be used.

Close monitoring and inspection to be conducted during and after spraying. Kuala Kabong Estate may seek assistance from KSTS* to provide such training to the workers. The same will also apply to all other Estates.

**KSTS - Kulim Safety Training & Services Sdn Bhd is a wholly owned subsidiary of Kulim (Malaysia) Berhad*

Objective Evidence Provided:

Kuala Kabong Estate conducted training for pesticide sprayers on 12/12/2013 on the correct spray technique to avoid any over spraying and also for the accuracy of pesticide dosage used. Refer Appendix F Document 1a.

List of Attendees Refer Appendix F Document 1b.

BSi considers the Objective Evidence provided is appropriate and the Nonconformity was closed 25/01/2014. The implementation of corrective actions will be checked during the Surveillance Assessment visit 2014.

Appendix F Document 1a – Record of Training for Pesticide Sprayers**LADANG KUALA KABONG****LAPORAN KURSUS DAN LATIHAN**TAJUK : **TEKNIK MERACUN BULATAN DI KAWASAN RATA, BERALUN DAN BUKIT (TERES)**TARIKH : **12.12.2013**TEMPAT : **P99/1 & P02/4**MASA : **8.30 PAGI – 9.30 PAGI**JUMLAH PESERTA : **12 ORANG****PENGENALAN :-**

Seramai 12 orang pekerja meracun telah diberikan taklimat, penerangan dan latihan yang betul mengenai teknik meracun bulatan di kawasan rata, beralun dan bukit (teres) yang disampaikan oleh PenolongPengurus – En Nor Halis dan staff ladang – En Fauzi .

KETERANGAN PROGRAM LATIHANWHEN : **12.12.2013 jam 8.30 pagi – 9.30 pagi**WHERE : **P99/1 & P02/4**WHY : **Menyampaikan maklumat yang betul kepada pekerja mengenai teknik meracun bulatan di kawasan rata, beralun, dan bukit (teres)**WHO : **Penerangan disampaikan oleh Penolong pengurus Ladang – En NorHalis dan staff ladang - En Fauzi .**WHAT : **Menerangkan teknik yang betul meracun bulatan di kawasan
(1) Rata (2) Beralun (3) Bukit(teres)****SukatanBahan Kimia (racun) yang digunakan**

TYPE OF SPRAY	TYPE OF EQUIPMENT	CHEMICAL UKD	RATE / PUMP ML / PUMP
CIRCLE	CKS PB 16	GLYPHOSATE ALLY DUPONT	300 ML 15 G 20 ML
SELECTIVE	CKS PB 16	RANGER	300 ML
STENOCHLEANA	CKS PB 16	PARAQUAT	100 ML

MERACUN DI KAWASAN RATA (GAMBUT)

- 1- Pekerja hendaklah meracun dikawasan bulatan pokok kelapa sawit sahaja. (2meter diameter)
- 2- Semasa bergerak dari satu pokok kepokok yang lain pekerja meracun hendaklah memberhentikan semburan dan memulakan semula ketika sampai kepokok yang lain.
- 3- Untuk pokok yang condong,terdapat 2 bulatan yang perlu diracun iaitu kawasan bulatan pokok dan juga kawasan tandan dan biji gugur.

MERACUN DI KAWASAN BERALUN

- 1- Konsep meracun di kawasan beralun adalah sama dengan kawasan berbukit
- 2- Pekerja hendaklah meracun dikawasan bulatan sahaja dan menghentikan semburan ketika bergerak dari satu pokok ke pokok yang lain.

MERACUN DI KAWASAN BUKIT

- 1- Pekerja hendaklah meracun di kawasan lorong teres (strip).
- 2- Tumbuhan penutup bumi seperti kekacang dan pakis hendaklah dibiarkan untuk mengelakkan hakisan tanah di kawasan bukit
- 3- Pekerja tidak dibenarkan meracun dikawasan tebing dan 1 kaki dari kawasan bibir teres .



Di sediakan Oleh :-

Di semak Oleh :-

SIGNED ON HARDCOPY

SIGNED ON HARDCOPY

Gambar latihan teknik meracun bulatan



Diameter untuk meracun bulatan ialah 2 meter.



Pekerja meracun mesti memberhentikan semburan apabila mahu berpindah dari satu pokok ke pokok yang lain.



Kawasan bulatan dan tempat biji dan tandan gugur di racun bulatan.



Di kawasan bukit atau teres, hanya lorong pokok sahaja yang di benarkan untuk di racun. Kawasan tebing dan 1 kaki dari tebing di larang untuk di racun kerana tumbuhan penutup bumi seperti kekacang dan pakis perling untuk mengelakkan hakisan tanah.



Kawasan tebing yang di tumbuh kecacang dan pakis tidak di racun untuk mengelakkan hakisan tanah.

Appendix F Document 1b – Training for Pesticide Sprayers – List of Attendees

TRAINING ATTENDANCE LIST
 Training on Penjagaan & Pengendalian Pun Racun,
Tong Air dan Arah Kekelamatan.

Date of Training : 12-12-13 Time : 7-00-8-00 Duration : 1 hr.
 Name of Estate / Organisation : Ladang Kuala Kabong
 Contact Person : Tn. Mohd Hussni Bin Osman
 Tel : 07-6540271
 Location : Stor Racun
 Trainer : En. Nor Haffiz B. Abu Zar &
En. Norfauzi Mohammad

NO.	NAME	IC NO. / PASSPORT NO.	SIGNATURE
1	MISBAH		
2	AHMAD ROSIDIN		
3	AMBULLOH		
4	MUSTIASI		
5	MASRIADI		
6	MUSLIM		
7	SAMSUL		
8	MEKARIANTO		
9	PERDI		
10	WILDAN		
11	ADEL		
12	SUDARJAT		
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24			
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26			
27			
28			
29	KULIM (MALAYSIA) BERHAD		
30	(LADANG KUALA KABONG)		

Total Participant : 12

Reported by : NOR HAFIZ B. ABU ZAR
 ASSISTANT MANAGER
 KULIM (MALAYSIA) BERHAD
 LADANG KUALA KABONG

Verified by : Mohd Hussni Bin Osman
 MOHD HUSSNI BIN OSMAN

Date : _____
 Date : 13/12/2013

Remark : This report to submitted to HOD before 7th of each month.

CR09 – Major Compliance Indicator 4.7.1c i – To ensure all workers involved have been adequately trained in safe working practices.

A Nonconformity was assigned at Kuala Kabong Estate because inspection of spraying in the field found lack of understanding of the action required to be taken when a leaking container of pre-mixed pesticide was identified by the auditor.

Corrective Actions

Kuala Kabong Estate has been asked to conduct immediate action to check for leaks on all containers at their store and refrain from using unsuitable containers. The said Estate will conduct periodical training on safety at work place to ensure all workers are aware of the importance of proper handling of hazardous chemicals. Kuala Kabong Estate may liaise with KSTS for the provision of such training. Record of all training will be kept maintained.

Drip trays will be used at the workplace before placing the chemical container on the trailer. Regular inspection of containers will be conducted and recorded. The same will also apply to all other Estates.

Objective Evidence Provided:

Kuala Kabong Estate conducted training of their sprayers on 12/12/2013 on the correct handling of herbicides and other pesticides used. In the training the workers and the sprayers were shown the correct way to check the container used and to be aware of any leakage. The sprayers were also reminded to always place the containers on a drip tray. (*Appendix F Document 2a*)

BSi considers the Objective Evidence provided is appropriate and the Nonconformity was closed 25/01/2014. The implementation of corrective actions will be checked during the Surveillance Assessment visit 2014.

Appendix F Document 2a – Record of Training for Safe Work Practices**LADANG KUALA KABONG****LAPORAN KURSUS DAN LATIHAN**

TAJUK	: Penjagaan & Pengendalian Pum Racun, Tong Air dan aspek – aspek keselamatan yang perlu di ambil berat.
TARIKH	: 12/12/2013
TEMPAT	: Stor Racun
MASA	: 7.00 – 8.00 pagi
JUMLAH PESERTA	: 12 orang

PENGENALAN

Seramai 12 orang pekerja meracun telah diberikan taklimat penerangan dan latihan yang betul mengenai pengendalian dan penjagaan pam racun, tong air dan tong racun di tempat kerja yang disampaikan oleh Pengurus, Penolong Pengurus dan penyelia ladang.

KETERANGAN PROGRAM LATIHAN

WHEN	: Pada 12/12/2013 jam 7.00 pagi hingga 8.00 pagi
WHERE	: Kawasan stor racun Ladang Kuala Kabong
WHY	: Menyampaikan maklumat yang betul kepada pekerja mengenai teknik penyelenggaraan, penjagaan pam racun, penjagaan tong racun dan tong air dan aspek keselamatan yang mesti di ambil berat.
WHO	: Penerangan di sampaikan oleh Pengurus Tuan Hussni, Penolong Pengurus En. Halis dan penyelia Ladang En. Norfauzi.
WHAT	: Untuk mendedahkan kepada pekerja tentang :- 1) Penjagaan dan pengendalian pam racun. 2) Penjagaan tong racun dan tong yang di kitar semula untuk kegunaan lain. 3) Aspek keselamatan yang perlu di ambil berat.

PENGENDALIAN DAN PENJAGAAN PAM RACUN

- 1) Pam yang digunakan mestilah dalam keadaan yang baik dan selamat.
- 2) Mandur mesti memeriksa setiap pam racun yang digunakan dan sekiranya ada kerosakan ia mesti dibaiki segera.
- 3) Pam racun mesti disimpan di tempat yang disediakan.

- 4) Perkara-perkara yang dilarang :-
- i) Membawa pam racun pulang ke rumah.
 - ii) Meninggalkan pam racun di dalam ladang.
 - iii) Menggunakan pam racun yang bocor dan nozel tersumbat.
 - iv) Menghempas pam racun ke tanah.

PENGENDALIAN TONG-TONG RACUN DAN AIR

- 1) Tong racun mestilah disimpan di dalam stor yang disediakan.
- 2) Tong racun yang dikitar semula mestilah dibilas 3 kali dengan air (triple rinsing) sebelum digunakan.
- 3) Tong yang digunakan mestilah diletakkan tarikh mula dan tamat digunakan. Setiap tong yang dikitar semula hanya boleh digunakan selama 3 bulan.
- 4) Setiap tong yang di bawa ke dalam ladang mestilah di letakkan di dalam bekas (tray).Ia penting untuk mengelakkan racun tumpah ke tanah jika terdapat kebocoran.
- 5) Mandur hendaklah memeriksa setiap tong yang digunakan dan memastikan setiap tong tidak bocor ataupun rosak.
- 6) Tong yang digunakan untuk campuran hendaklah dilabel "Racun" manakala untuk air dilabel "Air" untuk air bersih juga perlu dilabel "Air Bersih".

Di sediakan Oleh :-

Di semak Oleh :-

SIGNED ON HARDCOPY

SIGNED ON HARDCOPY

.....

.....

Gambar latihan penjagaan tong racun dan pam

Pengurus dan penolong pengurus memberi taklimat dan penerangan kepada para pekerja meracun tentang aspek-aspek keselamatan dalam mengendalikan racun. Pemakaian PPE amatlah di titik beratkan kerana ia penting untuk kesihatan dan keselamatan pekerja.



Tong racun yang hendak di gunakan semula mestilah di periksa supaya tiada kebocoran pada tong itu. Bilasan 3 kali di praktikkan untuk tong kitar semula.



Tong yang digunakan semula (recycle) mestilah di cat dengan warna merah bagi tujuan penandaan. Tong itu mestilah di tandakan tarikh mula guna dan tamat tempoh. Tempoh yang di berikan untuk menggunakan tong terpakai ini adalah 3 bulan sekiranya tidak terdapat apa apa kerosakan seperti bocor.



Pam racun akan diperiksa setiap hari oleh pekerja meracun dan mandur supaya tidak terdapat kebocoran dan kerosakan pam. Pam racun akan diisi dengan air bersih dan semburan di lakukan untuk memastikan kelancaran pam dan nozel tidak tersumbat.



Tong air akan di hantar ke dalam ladang dengan menggunakan traktor. Setiap tong akan di agihkan mengikut keperluan dan ia perlu di letakkan dengan berhati hati supaya tidak berlaku kebocoran. Tong air di dalam trailer hendaklah diletakkan di dalam bekas (tray).



Tong air yang di agihkan di dalam ladang juga di letakkan di dalam bekas (tray) untuk keselamatan. Tong air akan diambil oleh pemandu MB untuk di agihkan kepada pekerja. Pemakaian PPH sangat penting untuk keselamatan pekerja.



Bekas (tray) di letakkan di dalam MB untuk memastikan campuran racun yang di letakkan di dalam MB selamat.

Appendix F Document 2b – Training for Safe Work Practices – List of Attendees

TRAINING ATTENDANCE LIST
 Training on Teknik Merawat Bulatan di
Kawasan Rata, Beratan dan Terai.

Date of Training : 12.12.13 Time : 8.30 - 9.30 Duration : 1 hour
 Name of Estate / Organisation : Ladang Kuala Kabong.
 Contact Person : M. Mohd Husni B. Osman
 Tel : 07-6840271
 Location : P01/1 & P02/4.
 Trainer : En. Nor Hake B. Abu Zar &
En. Norfandi Muhammad.

NO.	NAME	I/C NO. / PASSPORT NO.	SIGNATURE
1	ADEL		<i>Adel</i>
2	SUDARJAT		<i>Sud</i>
3	MISBAH		<i>Mis</i>
4	AHMAD ROSIDIN		<i>Ahmad</i>
5	MASRIADI		<i>Masri</i>
6	SAMSUL		<i>Samsul</i>
7	WILDAN		<i>Wildan</i>
8	ADEL MEKARIANTO		<i>Adel</i>
9	DEDDI		<i>De</i>
10	MUSTIATI		<i>Musti</i>
11	MUSLIM		<i>Muslim</i>
12	AMBULLOH		<i>Ambullo</i>
13			
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29	KULIM (MALAYSIA) BERHAD		
	(LADANG KUALA KABONG)		
30			

Total Participant : 12
 NOR HAKE BIN ABU ZAR
 ASSISTANT MANAGER

Reported by : [Signature]
 KULIM (MALAYSIA) BERHAD
 LADANG KUALA KABONG

Date : _____

Verified by : [Signature]
 MOHD HUSNI BIN OSMAN
 MANAGER

Date : 13/12/2013

Remark : This report to submitted to MCD before 7th of each month.