

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

<b>Olam International Limited</b>
Client company Address: 9 Temasek Boulevard #11-02 Suntec Tower Two Singapore
Certification Unit:  <b>Olam Palm Gabon – Bilala Palm Oil Mill &amp; Supply Base</b>  Location of Certification Unit: Galerie Tsika, En Face de city Sport, mbolo BP: 1024, Libreville Gabon, Africa

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## Section 1: Scope of the Certification Assessment

1. Company Details			
<b>RSPO Membership Number</b>	1-0114-12-000-00	<b>Membership Approval Date</b>	10/02/2011
<b>Parent Company Name</b>	Olam International Limited		
<b>Address</b>	9, Temasek Boulevard, #11-02 Suntec Tower Two, Singapore		
<b>Subsidiary (Certification Unit Name)</b>	Olam Palm Gabon SA – Bilala Palm Oil Mill		
<b>Address</b>	Galerie Tsika, En Face de city Sport. Mbolo, BP: 1024. Libreville, Gabon		
<b>Contact Name</b>	Ms Audrey Lee Mei Fong (Sustainability Manager)		
<b>Website</b>	<a href="http://olamgroup.com">http://olamgroup.com</a>	<b>E-mail</b>	<a href="mailto:audrey.lee@olamnet.com">audrey.lee@olamnet.com</a>
<b>Telephone</b>	+603 64416771	<b>Facsimile</b>	+603 64416772

2. Certification Information			
<b>Certificate Number</b>	RSPO 671034	<b>Date of First Certification</b>	28/12/2017
		<b>Certificate Start Date</b>	28/12/2017
		<b>Certificate Expiry Date</b>	27/12/2022
<b>Scope of Certification</b>	Palm Oil and Palm Kernel Production at Bilala Palm Oil Mill and Supply Base: (Estate 1, Estate 2, Estate 3, Estate 4, Estate 5, Estate 6, Estate 10, Estate 11, Estate 12, Estate 13, Estate 14 and Estate 15)		
<b>Applicable Standards</b>	Gabon RSPO Principles and Criteria National Interpretation endorsed by the RSPO Board of Governors meeting on 6th March 2017; RSPO Supply Chain Certification Standard 2017 (CPO Mill – Module E)		

3. Other Certifications			
<b>Certificate Number</b>	<b>Standard(s)</b>	<b>Certificate Issued by</b>	<b>Expiry Date</b>
EU-ISCC-Cert-DE119-24187028	ISCC EU	ASG Cert GmbH	26/06/2019

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base)	Location [Map Reference #]	GPS Coordinates	
		Latitude	Longitude
Bilala Palm Oil Mill	Mouila, Gabon, Central Africa	10° 51' 16.30 "E	1° 39' 07.76" S
Estate 1	Mouila, Gabon, Central Africa	10° 57' 43.80" E	1° 46' 37.30" S

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Estate 2	Mouila, Gabon, Central Africa	10° 51' 20.20" E	1° 41' 25.70" S
Estate 3	Mouila, Gabon, Central Africa	10° 51' 16.30" E	1° 39' 07.76" S
Estate 4	Mouila, Gabon, Central Africa	10° 49' 53.50" E	1° 39' 29.80" S
Estate 5	Mouila, Gabon, Central Africa	10° 47' 24.10" E	1° 38' 13.20" S
Estate 6	Mouila, Gabon, Central Africa	10° 51' 29.00" E	1° 37' 55.30" S
Estate 10	Mouila, Gabon, Central Africa	10° 58' 47.96" E	1° 54' 01.85" S
Estate 11	Mouila, Gabon, Central Africa	11° 00' 37.13" E	1° 57' 00.95" S
Estate 12	Mouila, Gabon, Central Africa	11° 02' 50.08" E	2° 00' 18.42" S
Estate 13	Mouila, Gabon, Central Africa	11° 07' 08.88" E	2° 04' 28.61" S
Estate 14	Mouila, Gabon, Central Africa	11° 07' 48.17" E	2° 08' 39.27" S
Estate 15	Mouila, Gabon, Central Africa	11° 10' 38.14" E	2° 10' 01.76" S

### 5. Description of Supply Base

Estate	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Estate 1	2,848.46	2,574.06	217.56	5,640.08	50.50
Estate 2	2,783.09	3,022.30	315.21	6,120.60	45.47
Estate 3	2,280.16	1,257.32	124.70	3,662.18	62.26
Estate 4	2,438.61	1,673.76	551.51	4,663.88	52.29
Estate 5	2,908.70	4,604.00	222.45	7,735.15	37.60
Estate 6	2,625.90	4,703.00	203.22	7,532.12	34.86
Estate 10	2,543.00	1,277.85	139.47	3,960.32	64.21
Estate 11	2,545.00	1,100.60	1,285.79	4,931.39	51.61
Estate 12	3,282.00	1,641.44	1,664.36	6,587.80	49.82
Estate 13	3,500.00	1,120.10	579.35	5,199.45	67.31
Estate 14	3,413.00	645.06	164.86	4,222.92	80.82
Estate 15	2,989.00	5,393.46	5,079.17	13,461.63	22.20
<b>Total</b>	<b>34,156.92</b>	<b>29,012.95</b>	<b>10,547.65</b>	<b>73,717.52</b>	<b>46.33</b>

**Note:**

Total planted area did not change when compare to last year assessment. The changes of the planted area for Estate 1 till Estate 6 was due to was consolidating the estate master block area on Olam's SAP system.

**6. Plantings & Cycle**

Estate	Age (Years)					Mature**	Immature
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		
Estate 1	0.00	2,848.46	0.00	0.00	0.00	2,848.46	0.00
Estate 2	0.00	2,783.09	0.00	0.00	0.00	2,783.09	0.00
Estate 3	0.00	2,280.16	0.00	0.00	0.00	2,280.16	0.00
Estate 4	0.00	2,438.61	0.00	0.00	0.00	2,438.61	0.00
Estate 5	152.36	2,756.34	0.00	0.00	0.00	2,756.34	152.36
Estate 6	599.09	2,026.81	0.00	0.00	0.00	2,026.81	599.09
Estate 10	2,543.00	0.00	0.00	0.00	0.00	0.00	2,543.00
Estate 11	2,545.00	0.00	0.00	0.00	0.00	0.00	2,545.00
Estate 12	3,282.00	0.00	0.00	0.00	0.00	0.00	3,282.00
Estate 13	3,500.00	0.00	0.00	0.00	0.00	0.00	3,500.00
Estate 14	3,413.00	0.00	0.00	0.00	0.00	0.00	3,413.00
Estate 15	2,989.00	0.00	0.00	0.00	0.00	0.00	2,989.00
<b>Total (ha)</b>	<b>19,023.45</b>	<b>15,133.47</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>15,133.47</b>	<b>19, 023.45</b>

**Note:**

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

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

Estate	Tonnage / year		
	Estimated (Dec 17 – Dec 18)	Actual (Jan 18 – Oct 18)	Forecast (Dec 18 – Dec 19)
Estate 1	27,194.52	15,692.72	43,122.69
Estate 2	17,733.45	8,796.86	29,587.49
Estate 3	14,818.34	9,158.04	27,886.89
Estate 4	17,342.76	11,597.82	29,803.32
Estate 5	12,957.75	9,715.16	28,165.57
Estate 6	4,731.55	3,970.84	19,912.11
Estate 10	0	0	1,951.85
Estate 11	0	0	5,612.51
Estate 12	0	0	18,375.79
Estate 13	0	0	23,405.01
Estate 14	0	0	14,460.85

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Estate 15	0	0	0
<b>Total</b>	<b>94,778.37</b>	<b>58,931.44</b>	<b>242,284.08</b>
<b>Note:</b> There are 7,371.82mt uncertified FFB was processed during this period. The source of the uncertified FFB are from Mouila Lot 2 and Mouila Lot 3. Both lots are belongs to Bilala POM's supply base which are under certification process. Please refer to timebound plan for detail plan on certifying the estates.			
The client was certified on 28/12/2017. Hence the certified volume was taken from January 2018 onwards. This is considered the volume verified until the last assessment.			

8. Certified Tonnage of FFB (from other certified unit(s)) if applicable *			
Estate	Tonnage / year		
	Estimated	Actual	Forecast
	N/A	N/A	N/A
		N/A	
<b>Total</b>		N/A	
<b>Note:</b>			

9. Non-Certified Tonnage of FFB (outside supplier – excluded from certificate) if applicable			
Independent FFB Supplier	Tonnage / year		
	Estimated	Actual	Forecast
N/A	N/A	N/A	N/A
<b>Total</b>			
<b>Note:</b>			

10. Certified Tonnage			
Mill Capacity: 90 MT/hr  SCC Model: MB	Estimated (Dec 17 – Dec 18)	Actual (Jan 18 – Oct 18)	Forecast (Dec 18 – Dec 19)
	FFB	FFB	FFB
	94,778.37	58,931.44	242,284.08
	CPO (OER: 22.4 %)	CPO (OER: 22.29 %)	CPO (OER: 24 %)
	21,230.36	13,135.82	58,148.18
	PK (KER: 4.07 %)	PK (KER: 4.02 %)	PK (KER: 4.31 %)
	3,857.48	2,369.04	10,442.44
<b>Note:</b>			

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#### 11. Actual Sold Volume (CPO)

	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSB		
<b>CPO (MT)</b>	0	0	0	8,827.89	8,827.89

**Note:** The remaining of the CPO is stored at the Bilala Palm Oil Mill Storage tank and Awala Palm Oil Mill Storage tank. Awala POM is the sister company of Bilala POM, both belongs to OPG. The mass balance records are able to show the volume of the physical CPO storage.

#### 12. Actual Sold Volume (PK)

	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSB		
<b>PK (MT)</b>	350	0	0	1,910.95	2,260.95

#### 13. Actual Group certification Claims

	Credit	Physical Volume (MT)
<b>IS-CSPO</b>	N/A	N/A
<b>IS-CSPKO</b>	N/A	N/A
<b>IS-CSPKE</b>	N/A	N/A



## Section 2: Assessment Process

### Certification Body:

BSI Services Malaysia Sdn Bhd,  
(ASI Accreditation Number: ASI-ACC-067)  
Unit 3, Level 10, Tower A  
The Vertical Business Suites, Bangsar South  
No. 8, Jalan Kerinchi  
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Tel +603 2242 4211 Fax +603 2242 4218  
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BSI is a leading global provider of management systems assessment and certification, with more than 80,000 certified locations and clients in over 180 countries. BSI Standards is the UK's National Standards Body. BSI provides independent, third-party certification of management systems. BSI is ASI Accredited (ASI-ACC-067) to conduct RSPO assessment since 31/10/2014 with accredited office located at Kuala Lumpur, Malaysia and an office at Jakarta and Australia which involve in RSPO Certification Program.

### 2.1 Assessment Methodology, Programme, Site Visits

The on-site surveillance assessment was conducted from 22-29/11/2018. This assessment includes the extension of scope to include Estate 10-15 into the current certification. The audit programme is included as Appendix D. The approach to the audit was to treat the mill and its supply base as an RSPO Certification Unit. Mill was audited together with the sample estates. A range of environmental and social factors were covered. This includes consideration of topography, palm age, proximity to areas with HCVs, declared conservation areas and local communities.

The Major NC onsite verification was not conducted due to at the time of the NCs closure, Gabon was political unstable to be visited due to attempted military coup in Jan 2019. The Team Leader had conducted an offsite closure for all Major NC raised.

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. Gabon RSPO Principles and Criteria National Interpretation endorsed by the RSPO Board of Governors meeting on 6th March 2017 and RSPO Supply Chain Certification Standard 2017 were used to guide the collection of information to assess compliance. The comments made by external stakeholders were also taken into account in the assessment.

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

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

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

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

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

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

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

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

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

Assessment Program					
Name (Mill / Supply Base)	Year 1 (Certification)	Year 2 (ASA 1)	Year 3 (ASA 2)	Year 4 (ASA 3)	Year 5 (ASA 4)
Bilala Palm Oil Mill	√	√	√	√	√
Estate 1	√		√		√
Estate 2	√		√		√
Estate 3		√		√	
Estate 4		√		√	
Estate 5		√		√	
Estate 6			√		√
Estate 10		√		√	
Estate 11		√		√	
Estate 12		√		√	
Estate 13			√		√
Estate 14			√		√

Estate 15			√		√
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**Tentative Date of Next Visit:** November 18, 2019 - November 28, 2019 (including travelling man days)

**Total No. of Mandays:** 22 onsite mandays (subject to revise with to comply with RSPO P&C 2018)

## 2.2 BSI Assessment Team:

Team Member Name	Role	Qualifications
Nicholas Cheong (NC)	Team Leader	Holds a Master of Environmental Management from the University Putra Malaysia and Bachelor of Science (Food Science) from Charles Sturt University Australia. He has more than 7 years of working experience in sustainability auditing for palm oil industry and hydropower plant. He is also an expert in Greenhouse Gas emissions accounting. He has also 2 years of working experience in wastewater treatment and operations. He has completed the ISO9001, ISO14001, RSPO P&C Lead Auditor course, RSPO Supply Chain Lead Auditor Course, RBA Labor & Ethic Lead Auditor Course and MSPO Awareness Training. In his previous certification body, he was a Lead Assessor for Clean Development Mechanism, World Commission of Dam and ISCC. He had been involved in Sustainable Palm Oil auditing for more than 5 years. In this assessment, the focus element includes legal requirements, social and workers welfare, workers health and safety and supply chain. He is fluent in both verbal/written in English.
Mohamed Hidhir Zainal Abidin (MH)	Team member	Holds a Bachelor Degree in Chemical Engineering from National University of Malaysia. He has 7 years working experience in palm oil industry specifically on palm oil milling for 5 years. He also has the experiences as auditor for several standards including ISO 9001, ISO 14001, ISO 45001, MSPO and RSPO in his previous certification body. He completed the ISO 9001 Lead Auditor Course, ISO 14001 Lead Auditor Course and ISO 45001 Lead Auditor Course, Endorsed RSPO P&C Lead Auditor Course, MSPO Awareness Training and Endorsed RSPO SCCS Lead Auditor Course. He had been involved in RSPO auditing since May 2012 in more than various companies in Malaysia. In this assessment, he assessed on the aspects of supply chain, legal, mill best practices, safety and health, environmental and workers and stakeholders consultation. He is fluent in both verbal/written in English.
Ragu Samy A Erulappan (RE)	Team member	Holds a Bachelor Degree in Civil Engineering from University Technology Malaysia. He has more than 5 years working experience in environmental and occupational health safety engineer. He has more than 5 years of auditing experience in ISO 9001:2008, ISO 14001, IS 45001, C-TPAT (Supply Chain Security), SCAN, EICC/RBA, RSPO and GDPMD (Good Distribution Practice for Medical Devices). He has completed ISO 9001:2008 Quality Management System Lead Auditor Course, ISO 14001 Lead Auditor Course, ISO 45001 Lead Auditor Training and Endorsed RSPO P&C Lead Auditor Course. In this assessment he assessed the mill and estate OSH, Legal, and Environment aspects. He is fluent in both verbal/written in English.

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Joseph Bogui Ahikpa Lezoutche (JB)	Technical Expert	He gained his palm oil experience through being technical expert for serveral certification bodies conducting RSPO assessment in Africa region. He understands the local condition and culture of Gabon. In this assessment he provide his local expert advise to the assessment team and as a translator. He is fluent in both verbal/written in French and English.
Gauthier Perciano Iboinga Kombila (GP)	Translator	He working as a translator providing translation and interpretation service to clients where needed. In this assessment he provides translation of French to English and vice-versa. He is fluent in both verbal/written in French and English.

#### Accompanying Persons:

No.	Name	Role

### 2.3 Assessment Plan

The Assessment plan was sent to the client prior to the assessment (attached assessment plan).

Date	Time	Subjects	NC	MH	RE	JB	GP
Monday, 19/11/2018	23:10	Depart from Kuala Lumpur to Libreville via Addis Ababa	√	√	√		
Tuesday, 20/11/2018	11:45	Arrival at Libreville and overnight at Libreville (Le Meridian)	√	√	√	TBC	
Wednesday, 21/11/2018	08:00	Depart from Libreville to Mouila, overnight at PK19 Guesthouse (Estate 1)	√	√	√	√	√
Thursday, 22/11/2018	08:00 – 09:00	<b>Opening Meeting at Main Office (PK19 Office)</b> <ul style="list-style-type: none"> <li>Safety briefing and presentation by Olam Team (if any)</li> <li>Presentation by BSI Lead Auditor -introduction of team member and assessment agenda</li> <li>Confirmation of assessment scope and finalized stakeholders list for interview</li> <li>Depart from PK19 office to Bilala Mill.</li> </ul>	√	√	√	√	√
	09:30 – 11:30	<b>Palm Oil Mill</b> <ul style="list-style-type: none"> <li>Mill Visit covering FFB receiving, milling process, warehouse, workshop, wastes management (including Landfill is applicable), Effluent Ponds, OSH &amp; ERP, environmental management, POME application, water treatment, chemical storage and laboratory.</li> <li>Workers interview covering social elements</li> </ul>	√	√	√	√	√
	11:30 – 13:00	Depart from Bilala Mill to PK19 Guesthouse for lunch break	√	√	√	√	√
	13:00 – 16:00	<b>Main Office – Documentation review covering entire certification unit:</b> P1 – Commitment to Transparency P1 – Company Policies and ethical business	√			√	

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		P2 – Compliance with Applicable Laws and Regulations / Land use rights P6: Workers list and sampling; Social impact assessment / management plan; Communication and Grievance procedures; Freedom of association / equality ; Smallholders payment and FFBs pricing; Local sustainability					
		P4: Occupational health and safety plan; Worker trainings; Risk assessment and medical records; Chemical utilization risk; Medical surveillance record; PPE issuance and monitoring  P5: Environmental Impact assessment / Environmental Management plant for whole certification unit; Water management and consumptions			√		
		P3 – Commitment to Long-Term Economic and Financial Viability P4 – Operation procedures P5: HCV / RTE and management plan; Waste management / fossil fuel consumptions / GHG and pollutant management / POME		√			
	16:00 – 16:30	Interim Meeting	√	√	√	√	√
Friday, 23/11/2018	08:00 – 10:30	<b>Mouila Lot 1 – Estate 3</b> Field visit covering boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, SEIA requirement.	√	√	√	√	√
	10:30 – 12:00	<b>Interview with stakeholders for Mouila Lot 1:</b> Village rep Community/stakeholder/ affected parties  <b>PK19 Office</b> Records review – fertilizer usage, chemical usage, Training records and other records available	√			√	
	12:00 – 13:00	Lunch / Break at PK19 guesthouse	√	√	√	√	√
	13:00 – 16:00	<b>PK19 Office-</b> Documentation review continue P4: Health and safety plan; Workers insurance / Lost time accident records / clinical records P5: No use of fire			√		√
		P4: Soil analysis (mapping) and fertility; Road maintenance and peat soil; IPM and Pesticide usage plan; Planting and land statement		√			
		P6:	√			√	

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		Land use (customary) and land use rights; Housing planning vs growth; Accessing to food; Work place harassment and equality					
	16:00 – 16:30	Interim Meeting	√	√	√	√	√
Saturday, 24/11/2018	08:00-10:30	<b>Mouila Lot 1 – Estate 4</b> Field visit covering boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, SEIA requirement workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, waste management, housing compound.	√	√	√	√	√
	10:30 – 12:00	<b>PK19 Office</b> Records review – fertilizer usage, chemical usage, Training records and other records available	√	√	√	√	√
	12:00 – 13:00	Lunch / Break at PK19 guesthouse	√	√	√	√	√
	13:00 – 16:00	<b>PK19 Office</b> Covering outstanding documentation review and remaining activities	√	√	√	√	√
	14:30 – 15:30	Gender Committee and Workers Union association interview	√			√	
	16:00 – 16:30	Interim Meeting at PK19 office	√	√	√	√	√
Sunday, 25/11/2018	08:00 – 11:00	<b>Bilala Palm Oil Mill Supply Chain</b> • General Chain of Custody • Claims and communication	√				
	12:00	Lunch / Break at PK19 guesthouse					
	13:00 – 16:00	Supply Chain modular requirements – Mass Balance	√				
Monday, 26/11/2018	08:00-10:30	<b>Mouila Lot 1 – Estate 5</b> Field visit covering boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, SEIA requirement	√	√	√	√	√
	10:30 – 12:00	<b>PK19 office</b> Records review – fertilizer usage, chemical usage, Training records and other records available		√	√	√	
	12:00 – 13:00	Lunch / Break at PK19 guesthouse	√	√	√	√	√
	13:00 – 16:00	<b>Main Office</b> Covering outstanding documentation review and remaining activities		√	√		√
		Pay and conditions / pay-slips; Workers employment procedures (HR) – Interview with HR personnel or relevant check roll clerk	√			√	
	16:00 – 16:30	Interim Meeting at PK19 office	√	√	√	√	√
Tuesday, 27/11/2018	08:00 – 10:30	<b>Mouila Lot 3 – Estate 10</b>	√	√	√	√	√

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Date	Time	Subjects	NC	MH	RE	JB	GP
		Field visit covering boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, SEIA requirement					
	10:30 – 12:00	<b>Mouila Lot 3 office</b> Records review – fertilizer usage, chemical usage, Training records and other records available		√	√		√
		<b>Interview with stakeholders for Mouila Lot 3:</b> Village rep Community/stakeholder/ affected parties	√			√	
	12:00 – 13:00	Lunch / Break at Lot 3 guesthouse	√	√	√	√	√
	13:00 – 16:00	<b>Mouila Lot 3 office</b> Covering outstanding documentation review and remaining activities		√	√		√
		Gender Committee and Workers Union association interview	√			√	
	16:00 – 16:30	Interim Meeting at Lot 3 Office	√	√	√	√	√
Wednesday, 28/11/2018	08:00- 10:30	<b>Mouila Lot 3 – Estate 12</b> Field visit covering boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, SEIA requirement workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, waste management, housing compound.	√	√	√	√	√
	10:30 – 12:00	<b>Mouila Lot 3 office</b> Records review – fertilizer usage, chemical usage, Training records and other records available		√	√		√
		Pay and conditions / pay-slips; Workers employment procedures (HR) – Interview with HR personnel or relevant check roll clerk	√			√	
	12:00 – 13:00	Lunch / Break at Lot 3 guesthouse	√	√	√	√	√
	13:00 – 16:00	<b>Mouila Lot 3 office</b> Covering outstanding documentation review and remaining activities	√	√	√	√	√
	16:00 – 16:30	Interim Meeting at Lot 3 Office	√	√	√	√	√
Thursday, 29/11/2018	08:00- 10:30	<b>Mouila Lot 3 – Estate 11</b> Field visit covering boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, SEIA requirement	√	√	√	√	√
	10:30 – 12:30	<b>Mouila Lot 3 office</b> Records review – fertilizer usage, chemical usage, Training records and other records available	√	√	√	√	√
	13:30 – 14:30	Lunch / Break at PK19 guesthouse	√	√	√	√	√
	14:30 – 15:30	<b>PK 19 office</b> Covering outstanding documentation review and remaining activities	√	√	√	√	√

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Date	Time	Subjects	NC	MH	RE	JB	GP
	15:30 – 16:30	Assessment team preparing for closing meeting	√	√	√	√	√
	16:30 – 17:00	<b>Closing meeting at PK19 Office</b>	√	√	√	√	√
	17:00	<b>End of assessment</b>					
Friday, 30/11/2018	08:00	Depart from Mouila to Libreville	√	√	√	√	√
Saturday, 01/12/2018	12:35	Depart from Libreville to final home destination	√	√	√	√	√



## Section 3: Assessment Findings

### 3.1 Normative requirement applied for this assessment:

- ☒ Olam International Limited Time Bound Plan
- ☐ RSPO P&C 2013 Generic
- ☐ RSPO Group Certification Standard 2016
- ☒ RSPO Supply Chain Certification Standard 2017
- ☐ RSPO P&C GA-NIWG 2017
- ☐ RSPO P&C INA-NIWG 2016
- ☐ RSPO P&C MY-NIWG 2014
- ☐ RSPO P&C PNG-NIWG 2017
- ☒ RSPO P&C GABON-NIWG 2017

### 3.2 Time Bound Plan progress for multiple management units

Time Bound Plan		
Requirement	Remarks	Compliance
Does the plan include all current subsidiaries, estates and mills?	<p>The time bound plan includes all operating units in Gabon, Africa i.e. Awala, Mouila Lot 1, 2 and 3, Makouke and Sotrader Ndende.</p> <p>The certification plan s last revised and approved in August 2016 and April 2018 to include new acquisition (Makouke) and bring forward Lot 3 RSPO certification from 2019 to 2018 respectively.</p> <p>To date, certification was achieved according to the time bound plan. There are two established CPO mills and one KCP, all these facilities are currently certified. Progress are reported on the quarterly palm sustainability dashboard which is available on the Olam's <a href="#">website</a>.</p>	Yes
Have all the estates and mills certified within five years after obtaining RSPO membership?	<p>Olam joined the RSPO in 2011. When join RSPO as member, Olam has no Oil Palm concession. All the Olam development are new planting (since 2011 to 2017). All new development has been developed according to the RSPO NPP. Hence certification timebound plan is designed according to the completion of planting and establishment of infrastructure i.e. mill and others.</p> <p>Considering that all Olam oil palm's concensions are started with new planting, BSI deems that despite Olam join RSPO in 2011, the commitment of Olam to have all their mills and estate to be certified by 2021 is sufficient to address this requirement.</p>	Yes
Have there been any new acquisitions? If yes, the new acquisitions shall be certified within three-year from the date of acquisition.	Yes. New acquisition of existing plantation from SIAT Gabon (Makouke) was finalized in July 2016. Announcement was published and declared on the	Yes

Certification plan for the new acquisition shall be available.	<a href="#">website</a> and 2017 ACOP. At the time of the assessment the time of certifying this new acquisition has not yet lapsed.	
Have there been any changes to the time-bound plan since the last audit (both new acquisition and existing)? If yes, justification is required. Is this consistent with the ACOP reporting?	Based on the age of plantations, location, mill developments, infrastructure and compliance with applicable law, the time bound plan was deemed to be challenging since Olam has developed the plantation at very early stage which involved the New Planting Procedure (NPP) where the land development and initial planting was only started in 2012 in Gabon.	Yes
Have there been any isolated lapses in implementation of the plan? If yes a <b>Minor</b> non-compliance shall be raised	Considering Olam's concessions are NPP development, no lapse shall be considered at this moment.	Yes
Have there been any fundamental failure (e.g. unable to justify delay in planning the assessments) to proceed with implementation of the plan? If yes a <b>Major</b> non-compliance shall be raised	There is not fundamental failure in proceeding the plan. In fact the time bound plan has been closely implemented. As example the TBP identified Mouila Lot 1 to conduct initial certification audit in December 2017. The certification of Mouila Lot 1 was granted by BSI on 28/12/2017.	Yes
Have there been any stakeholder comments?	There is not stakeholder comments received by the CB nor the CB has received comments from RSPO Secretariat. Olam have developed communication procedures to manage any received stakeholder comments.	Yes
<b>Un-Certified Units or Holdings</b>		
No replacement after dates defined in NIs Criterion 7.3: <ul style="list-style-type: none"> <li>Primary forest.</li> <li>Any area required to maintain or enhance HCVs in accordance with RSPO P&amp;C criterion 7.3.</li> </ul>	The uncertified areas including Mouila 2, 3, Lot 3 extension are NPP development. The new planting are as per HCV assessment recommendation. Relevant reports are available on the <a href="#">RSPO NPP website</a> or the <a href="#">Olam's palm website</a> .	Yes
Any new plantings since January 1 <sup>st</sup> 2010 shall comply with the RSPO New Plantings Procedure.	All uncertified new development areas including Mouila 2, 3, Lot 3 extension have completed NPP and published in the RSPO website for 30-days public consultation. No comments was received during this process.	Yes
Any Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 2.2, 6.4, 7.5 and 7.6.  The RSPO RaCP tracker shall be checked to confirm for any land conflicts/Liabilities <a href="https://www.rspo.org/certification/remediation-and-compensation/racp-tracker">https://www.rspo.org/certification/remediation-and-compensation/racp-tracker</a> . The progress on the Liabilities shall be verified and reported.	Mouila Lot 2 in March 2017, 242 ha of community set aside (HCV6) identified through FPIC process claimed by Bemboudie Village is mistakenly classified as development area under Boungounga Village who share some families and territories with Bemboudie.  Mutual agreement and resolutions was reached through direct engagement and third party facilitation. Grievance is closed. See <a href="#">public record</a> .	Yes

	Meeting record, agreement and official reply from the Bemboudie village are available.	
Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 6.3.	Meeting and strikes called by self-elected workers' representative from Mouila was registered in Oct 2018. Key issues raised including: 1. Non-renewal of temporary contract workers (CDI). 2. Employment of foreign workers 3. Additional demands on top of the Collective Agreements made in Feb 2017. Discussion with workers' representative from Mouila was conducted on 28 Nov 2019. All additional demands were discussed, and agreement/minutes was recorded and signed for communication with all workers through their representatives and the Labour Department.	Yes
Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1	No legal non-compliance. A separate external legal audit was conducted in 2017 and 2018 (annual basis).	Yes
Did the company conduct internal audit against the uncertified management units requirement? If yes, a positive assurance statement shall be available.	Internal assessment against the standard has been completed and action plan is implemented. A positive assurance statement has been produced and verifiable through the internal audit report and action plan.	Yes

### 3.3 Progress of scheme smallholders and/or outgrowers

Progress of scheme smallholders or outgrowers towards compliance with relevant standards		
Requirement	Remarks	Compliance
Has 100% of scheme smallholders and/or scheme outgrowers comply with the standard within three years of the mill's initial certification?	N/A	N/A

### 3.4 Details of findings

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

During the 1<sup>st</sup> Annual Surveillance Assessment there were five (5) Major & two (2) Minor nonconformities raised. The Bilala Palm Oil Mill Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

The implementation of the corrective action plans to address the minor nonconformity will be followed up during the next surveillance assessment. The implementation of the Corrective Actions for the Major Nonconformity(ies) has been verified for its effectiveness and closed accordingly.

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Summary of Total Number of Nonconformity			
Nonconformity			
NCR Ref #	1712399-201611-M1	Clause & Category (Major / Minor)	Indicator 4.7.3 Major
Date Issued	29/11/2018	Due Date	26/02/2019
Closed (Yes / No)	Yes	Date of nonconformity Closure	20/02/2019
Statement of Nonconformity:	Workplace safety, PPE compliance and monitoring of effectiveness implementation is not adequate.		
Requirement Reference:	All workers involved in the operation shall be adequately trained in safe working practices (see Criterion 4.8). Adequate and appropriate protective equipment shall be available to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations and land preparation, harvesting and if it is used, burning.		
Objective Evidence:	<p>a) Noticed 1 contractor worker conducting grading &amp; unloading of FFB from the lorry at the receiving platform without wearing safety helmet. Another worker (truck driver) was found supervising the unloading of FFB activity with wearing slipper and smoking at the receiving platform.</p> <p>b) On site safety inspection on a backhoe in operation found that the safety seat belt, steering horn, back head light &amp; break light were not functioning. Interview session with the backhoe operator indicate that he performs daily visual safety inspections. However, the backhoe operator was not aware that the daily Tractor Safety Checklist was to be used for recording the safety inspection to be carried out as per Procedure of Agriculture Tractor Management, Doc. No. OPG-MLA-EHS-SOP-08. Further follow up interview session with the QSHE team indicate that the backhoe operator competency was determined by his previous employment competency certificate and there was no formal training been provided to the backhoe operator especially on the Olam's Agriculture Tractor Management safe work procedure.</p> <p>c) PPE issuance record for eye protection was not available for the sampled manuring field workers at Lot 3 Estate 11. Information on Kieserite Material Safety Data Sheet indicate that eye protection to be provided when handling with the chemical/fertilizer.</p>		
Corrections:	<p>Objective evidence a)</p> <p>a) Policy briefing to all existing contractors.</p> <p>b) Monthly verification by EHS team on contractors performance.</p> <p>c) Continuous communication of contractors performance by estate managers to EHS team.</p> <p>d) Sanctions procedure applies for contractors in case of non-compliance.</p> <p>e) Train mill security on PPE compliance requirement for all vehicles moving into mill operation site.</p>		

	<p>Objective evidence b)</p> <ol style="list-style-type: none"> <li>Formal safety training to backhoe operators (and other heavy machines operators including tractors, FFB loaders, machine operators etc.).</li> <li>Monthly verification (sampling) and guidance to machine operators on their daily checklist.</li> <li>Request immediate maintenance service to workshop for malfunction machines.</li> <li>Continue to carry out preventive maintenance on backhoe and other machines according to planned schedule.</li> </ol> <p>Objective evidence c)</p> <ol style="list-style-type: none"> <li>Listing all chemical/ fertilizers used on site and appropriate PPE according to the MSDS.</li> <li>Circulate list to relevant managers (estates, mill, store, workshop) for implementation.</li> <li>Updated list if new chemical/ fertilizer has been requested.</li> </ol>
<b>Root Cause Analysis:</b>	<ol style="list-style-type: none"> <li>Safety induction mechanism to introduce Olam's policies and relevant procedures is in place but only designed for new recruitment, workers/ operators transfer from other OPG sites are not included as part of the induction.</li> <li>The induction does not cover contractors and their workers either. There is no initiative from OPG to train contractors on Olam's safety policies prior to signing of a contract. Currently, contractors are not held responsible of non-compliance by their workers despite clear requirements stated in the contract on policy and legal compliance by the contractors. Contractors performance including their worker's safety compliance are monitored by respective estate managers without routine independent check/ audit by EHS team to ensure standardized compliance level by all estates.</li> <li>PPE are issued to relevant workers, however PPE requirements is not fully in compliance to the MSDS recommendation. There is no review conducted on the PPE based on current list of chemical used on site.</li> </ol>
<b>Corrective Actions:</b>	<ol style="list-style-type: none"> <li>Policy briefing to all existing contractors and to new contractors upon signing of contract. Contractors performance rating has included safety compliance performance, non-performing contractors. As per the contract, contract will be sanction according to the Sanction Procedure which is stated within the contract and findings to be included as part of the evaluation during contract renewal.</li> <li>All workers including workers from other OPG's sites must complete Safety Induction. HR shall inform EHS team and request induction upon preparation of new worker's contract.</li> <li>Minimal yearly review of chemical used on sites and update PPE requirements according to the MSDS. Latest list of chemical and appropriate PPE was circulated to the Safety Committee for further communication. In case of procurement of new chemical (i.e. referring to new active ingredient which is not from existing system record, not referring to new brand or new supplier), Procurement team shall seek opinion from head of EHS prior to making order of new chemical to ensure policy compliance (e.g. no paraquat, no WHO I etc.).</li> </ol>
<b>Assessment Conclusion:</b>	OPG has implemented performance monitoring of the contractors. This performance monitoring will able to eliminate potential non-compliance on safety

	<p>of the contractors. The monitoring will allow OPG to take instant actions when it is found that contractors are not complying.</p> <p>Training has been provided to staff especially securities officers whom will be monitoring the safety of the workers and personally that is in the mill vicinity.</p> <p>The safety induction is provided to all new staff. The process of the HR personnel to inform EHS team to provide safety training prior contract is able to demonstrate that each workers knows the safety procedures of OPG prior start work.</p> <p>OPG had implemented preventive maintenance schedule to operations moving vehicles. The preventive maintenance schedule will enable OPG to monitor the conditions of the vehicles and perform maintenance prior the vehicles fails.</p> <p>The yearly review of the chemical and fertilizer list with the required PPEs implemented by OPG are able to demonstrate that a process is in place to ensure updated informations are monitored on periodic basis.</p> <p>The corrective action implemented by OPG is deemed sufficient close this non-compliance. The continuous implementation will be further verified in the next assessment.</p>
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<b>Nonconformity</b>			
<b>NCR Ref #</b>	1712399-201611-M2	<b>Clause &amp; Category (Major / Minor)</b>	Indicator 6.5.2 Major
<b>Date Issued</b>	29/11/2018	<b>Due Date</b>	26/02/2019
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	20/02/2019
<b>Statement of Nonconformity:</b>	Information in the employment contracts does not clearly details the service of contract.		
<b>Requirement Reference:</b>	Labour laws, union agreements or direct contracts of employment detailing payments and conditions of employment (e.g. working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc.) shall be available in the languages understood by the workers or explained carefully to them by a management official.		
<b>Objective Evidence:</b>	<ol style="list-style-type: none"> <li>1. The job title stated in the mill general workers are still plantation workers despite they have been transferred to mill.</li> <li>2. The job title after renewal of contract of plantation workers in Lot 3 does not specifically state the job title. It is only stated as OE1AA.</li> <li>3. The Indonesia foreign worker contract does not include an appropriate exit clause (e.g. period of notice, acceptable reason of exiting) if the workers decide to return home without completing the contract. Furthermore in the contract there is no stated information on the working days, working hours, holiday entitlement, sick leave and does not reference to any labor law.</li> <li>4. The CNSS number for sample worker is available. However, the payment system is not updated.</li> </ol>		
<b>Corrections:</b>	<p>Objective Evidences 1 &amp; 2:</p> <ol style="list-style-type: none"> <li>a) All existing contract are reviewed to reflects latest job title or status.</li> <li>b) All existing contract are reviewed to reflects starting date.</li> <li>c) Contract with revision are circulated to relevant employee/worker for acknowledgement.</li> </ol>		

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	<p>Objective Evidences 3:</p> <ul style="list-style-type: none"> <li>a) Revision of IFWs contract has including exit clause, information on working days, working hours, holiday entitlement, sick leave and reference to relevant labour law as per earlier agreement with IFWs.</li> <li>b) Contract with revision was circulated to relevant employee/worker for acknowledgement.</li> </ul> <p>Objective Evidences 4:</p> <ul style="list-style-type: none"> <li>a) Current CNSS numbers to be updated on payslip (SAGE system) by Dec 2018.</li> <li>b) Provide monthly update from HR to Payroll team on payslip for future CNSS enrollment starting from Jan 2019</li> </ul>
<b>Root Cause Analysis:</b>	<p>Employment contract and collective agreement in French is available to national workforce. Besides that, the OPG <i>Manuel de Procedures des Ressources Humaines</i> also stated specific work conditions including working hour, leaves, holiday, legal deduction i.e. CNSS etc. BUT there is no procedure for contract renewal of existing employees/workers in terms of their new assignment (job title), workers' contract are not being updated accordingly.</p> <p>There are two relevant teams who are responsible for CNSS application for all workforce (HR team) and issuance of payslip (Payroll team). CNSS application is not granted immediately by the authorized agency, and no timely coordination between HR and Payroll team on updating CNSS application status of our workers on their monthly payslip.</p> <p>In terms of contract for foreign workers, it is prepared in Bahasa but not legally reviewed to ensure all required terms as per the RSPO or national legal requirement.</p>
<b>Corrective Actions:</b>	<ol style="list-style-type: none"> <li>1. Contract renewal process has defined with specified conditions that can trigger a contract revision e.g. promotion, new job scope.</li> <li>2. During application of CNSS for workers, HR shall inform workers on potential delay of CNSS enrollment by relevant authority and communicate latest status of CNSS application result from time to time through their delegate.</li> <li>3. Annual external legal audit (i.e. labour law checklist) has included review of contract template for national or foreign workforce as part of the legal audit. Findings from external legal review (if any) to be addressed as part of the RSPO monthly action plan</li> </ol>
<b>Assessment Conclusion:</b>	<p>The appraisal form was revised to allowed the Managers to input the job title of the workers. Once the HR has received the appraisal form, the contract will be prepare according to the information in the appraisal form. The process corrected by OPG can ensure that the contracts are prepare as per the actual information.</p> <p>The process implemented by the HR to inform the workers periodically shows that the process on periodic following with the authorities for information. This process demonstrate that OPG has made its best effort to ensure the CNSS of the workers are being registered.</p> <p>The external legal audit on the contract is able to demonstrate that periodic review of workers contracts are according to the latest law and regulations.</p>



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	The corrective action implemented by OPG is deemed sufficient close this non-compliance. The continuous implementation will be further verified in the next assessment.
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Nonconformity			
NCR Ref #	1712399-201611-M3	Clause & Category (Major / Minor)	Indicator 6.3.2 Major
Date Issued	29/11/2018	Due Date	26/02/2019
Closed (Yes / No)	Yes	Date of nonconformity Closure	20/02/2019
Statement of Nonconformity:	There is no specific timeline to resolve internal grievance		
Requirement Reference:	Documentation of both the process by which a dispute was resolve and the outcome shall be available.		
Objective Evidence:	The Procedure de Gestions Des Plaintes et Reclamations has not considered resolution timeline for internal grievance. Reviewing the grievance logbook for Mouila Lot 3 did not clearly indicate the date of resolution and acceptance of the resolution by the complainant.		
Corrections:	a) The <i>Procedure de Gestions Des Plaintes et Reclamations</i> was reviewed to include timelines to resolve internal grievances. b) Update Internal Grievances Logbook by indicating complaint resolution date and acceptance of the resolution by complainants. c) Communicate to all delegate on the Internal Grievance Procedures and publish notification to inform all workers on the notification board near to biometric centre.		
Root Cause Analysis:	Internal Grievance Procedure is not in place to ensure timely resolution of internal grievance and proper record keeping of the grievance.		
Corrective Actions:	1. <i>Procedure de Gestions Des Plaintes et Reclamations</i> has been aligned to Olam's Grievance Protocol i.e. with timeline, acknowledgement by complainant on case closure and protection for anonymous submission. 2. The revised procedure and update delegate was been communicated.		
Assessment Conclusion:	The corrective action of amendments of procedures and grievance logbook demonstrate that the process of handling grievance has able to capture if the resolution is accepted by the complainant. The procedures has indicated the timeline for the management to response / accept the grievance. Notification was made by OPG to delegates and the revised grievance procedures are published at strategic area which workers can easily access.  The corrective action implemented by OPG is deemed sufficient close this non-compliance. The continuous implementation will be further verified in the next assessment.		

Nonconformity			
NCR Ref #	1712399-201611-M4	Clause & Category (Major / Minor)	Indicator 5.6.1



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			Major
<b>Date Issued</b>	29/11/2018	<b>Due Date</b>	26/02/2019
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	20/02/2019
<b>Statement of Nonconformity:</b>	Information on the RSPO certified products are not available		
<b>Requirement Reference:</b>	<p>The supplying site shall ensure that the following minimum information for RSPO certified products is made available in document form.</p> <ul style="list-style-type: none"> <li>• A unique identification number</li> <li>• Supply chain certificate number of the seller</li> </ul>		
<b>Objective Evidence:</b>	The certificate number used in the mill delivery note is not according to the certificate number. The certificate number is RSPO 671034. There is no unique identification number shown in the delivery note.		
<b>Corrections:</b>	<p>Objective evidence 1:</p> <p>a) Communicate management decision to remove certificate number on delivery note.</p> <p>b) Only present certificate number <b>RSPO 671034 (and other required info)</b> in sales contract of certified products.</p> <p>Objective evidence 2:</p> <p>Setting up unique ID (identification number) of each Delivery Note.</p>		
<b>Root Cause Analysis:</b>	<p>The SCCS SOP section 1.6.3 Sales &amp; Goods Out (MB) defines all required info such as name and address of seller, delivery date, description of products etc. to be included in the documentation without specifying document that will present these info.</p> <p>Existing system is inadequate to ensure the unique identification number is presented either on a single document or across a range of documents to trace certified sales. Current system is based on paper delivery note (DN) and SAP system. Paper DN is digitalized into the SAP system on daily basis. The SAP system is identifiable with a randomized unique ID which is generated on the next day of delivery process, total daily volume is traceable on DN and SAP, HOWEVER missing unique ID on DN.</p>		
<b>Corrective Actions:</b>	<ol style="list-style-type: none"> <li>1. The Supply Chain SOP was revised to incorporate the RSPO certificate number specifically into the sales contract of certified products.</li> <li>2. Upcoming annual internal audit on SCCS to ensure DN are match to each batch of delivery process on SAP.</li> </ol>		
<b>Assessment Conclusion:</b>	By revising the SOP, it is able to demonstrate the OPG has put in place the process of checking the RSPO certificate number. Along with the internal audit to confirm the implementation of the SOP, it is deemed sufficient to close this non-compliance. The continuous implementation will be further verified in the next assessment.		

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Nonconformity			
NCR Ref #	1712399-201611-M5	Clause & Category (Major / Minor)	Indicator 5.11.1 Major
Date Issued	29/11/2018	Due Date	26/02/2019
Closed (Yes / No)	Yes	Date of nonconformity Closure	20/02/2019
Statement of Nonconformity:	The palm Trademark use without license number		
Requirement Reference:	<p>The site shall only make claims regarding the use of support of RSPO certified oil palm products that are in compliance with the RSPO Rules on Market Communications and Claims.</p> <p>Members are allowed to use the RSPO label in one of the following ways:</p> <ul style="list-style-type: none"> <li>Wherever the RSPO trademark is displayed, the applicable trademark license number must be shown immediately under or next to the trademark or the 'statement'. Font must be Calibri, font size must be at least 4 pt (1.4 mm or 0.6 inch).</li> </ul>		
Objective Evidence:	In the delivery note of CPO and PK of Bilala Palm Oil Mill, it has promoted the RSPO trademark logo and the RSPO membership (especially for the sales or conventional or uncertified material). However, there is no license number accompanied with it.		
Corrections:	<ol style="list-style-type: none"> <li>Remove RSPO trademark on delivery note. Communicate management decision in removal of the RSPO Trademark on DN.</li> <li>Revise and update the Supply Chain SOP Section 1.3 Duties and Responsibilities and Section 1.6.6 Claims for the usage of the RSPO Trademark.</li> </ol>		
Root Cause Analysis:	There is lack of system and personnel in monitoring usage of the RSPO label (RSPO Trademark & license number) according to RSPO Rules on Market Communications and Claims.		
Corrective Actions:	The Supply Chain SOP was revised to include internal audit on usage of the RSPO Trademark and RSPO Rules of Communication.		
Assessment Conclusion:	By revising the SOP, it is able to demonstrate the OPG has put in place the process of checking the RSPO Rules on Communication. Along with the internal audit to confirm the implementation of the SOP, it is deemed sufficient to close this non-compliance. The continuous implementation will be further verified in the next assessment.		

Nonconformity			
NCR Ref #	1712399-201611-N1	Clause & Category (Major / Minor)	Indicator 4.7.5 Minor
Date Issued	29/11/2018	Due Date	Next annual surveillance assessment
Closed (Yes / No)	No	Date of nonconformity Closure	N/A

<b>Statement of Nonconformity:</b>	Lot 3: Estate 12 Landfill – First aid equipment and the assigned trained first aider was not available at worksite.
<b>Requirement Reference:</b>	Accident and emergency procedures shall exist and instructions shall be clearly understood by all workers. Accident procedures shall be available in the appropriate language of the workforce. Assigned operatives trained in First Aid should be present in both field and other operations, and first aid equipment shall be available at worksites. Records of all accidents shall be kept and periodically reviewed.
<b>Objective Evidence:</b>	There was no first aid kit (including clean water for emergency washing purpose) was provided at the landfill worksite. Further verification indicate that there was no trained first aider at the landfill worksite.
<b>Corrections:</b>	1. Provide First Aid Kit and clean water at landfill worksite. 2. Carry out first aid training to the assigned personnel at landfill worksite.
<b>Root Cause Analysis:</b>	The Accident and Emergency Procedure is in place however it is not reviewed based on new establishment of facilities (e.g. Landfill of Lot 3 was established since May 2018). Document control including timely review for all safety procedures is not in place to ensure alignment with latest condition on site (e.g. from land preparation to harvesting and FFB loading).
<b>Corrective Actions:</b>	Implement annual first aid training to selective workers to ensure presence of first aider at all field and operation areas. Establish document control of all safety procedures to include timely review of these document based on actual site situation and needs.
<b>Assessment Conclusion:</b>	The implementation of the corrective action will be evaluate in te next assessment.

<b>Nonconformity</b>			
<b>NCR Ref #</b>	1712399-201611-N2	<b>Clause &amp; Category (Major / Minor)</b>	Indicator 5.3.3 Minor
<b>Date Issued</b>	29/11/2018	<b>Due Date</b>	Next annual surveillance assessment
<b>Closed (Yes / No)</b>	No	<b>Date of nonconformity Closure</b>	N/A
<b>Statement of Nonconformity:</b>	Lot 3: Estate 12 – Waste management and disposal plan to avoid or reduce pollution was not implemented adequately		
<b>Requirement Reference:</b>	A waste management and disposal plan to avoid or reduce pollution shall be documented		
<b>Objective Evidence:</b>	Chemical spill response material (fibre materials) was available at the Chemical Store & Lubricant Oil Storage Drums at the workshop. However, appropriate tools to clean up the contaminated fibres was not provided at the above workstations.		
<b>Corrections:</b>	a) Conduct briefing to all workstation personel on safe handling of contaminated fibre and refresher training on emergency preparedness procedure in case of spillage across the management unit.		

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	b) Provide specific tools to clean up contaminated fibres as part of emergency response preparedness.
<b>Root Cause Analysis:</b>	<p>On-going construction of new facilities are being pursued currently as part of the annual development plan for these new plantations. The waste management and disposal plan is in place and implemented but regular review to identify all the source of pollutions in different workstations is not conducted.</p> <p>Although internal and external training were conducted (last external training conducted in Oct to Nov 2018 by MyCrop Sdn. Bhd. for all sites) but lack of focus on emergency preparedness.</p>
<b>Corrective Actions:</b>	<ol style="list-style-type: none"> <li>1. Review and update existing waste management and disposal plan in terms of emergency preparedness which is covering all the workstation include new facilities.</li> <li>2. Provide schedule of training and refresher training on emergency preparedness procedure and implement as per schedule.</li> <li>3. Monitoring and annual internal audit to ensure all the workstation complying to the waste management and disposal plan including emergency response preparedness.</li> <li>4. Repeat external and internal awareness training and briefing on waste management and disposal plan including emergency preparedness to all workers on yearly basis, next scheduled training to focus on emergency preparedness and safe handling of contaminated material.</li> </ol>
<b>Assessment Conclusion:</b>	The implementation of the corrective action will be evaluate in te next assessment.

Opportunity for Improvements	
OFI #	Description
OFI 1	N/A

Positive Findings	
PF #	Description
PF 1	Usage of Drone system to monitor current SPH for elephant intrusion, major pest and disease and HCV within the whole concession area.
PF 2	Implementin IPM by stablishment of beneficial plant, i.e Antigonon at lot 3 estates
PF 3	Prohibition of WHO class 1A, 1B and II chemicals
PF 4	Safety precaution – speed limits and humps (speed limiter), signages at work area (workshop, chemical and fertilizer store)
PF 5	Negative emission per palm product

## 3.4.1 Status of Nonconformities Previously Identified and Observations

Summary of Total Number of Nonconformity			
Nonconformity			
NCR Ref #	1562544-201709-N1	Clause & Category (Major / Minor)	Indicator 5.1.3 Minor
Closed (Yes / No)	Yes	Date of nonconformity Closure	22/11/2018
Statement of Nonconformity:	Effectiveness of mitigation measure for dark smoke emission at the mill's chimne		
Requirement Reference:	This plan shall incorporate a monitoring protocol, adaptive to operational changes, which shall be implemented to monitor the effectiveness of the mitigation measures. The plan shall be reviewed as a minimum every two years to reflect the results of monitoring and where there are operational changes that may have positive and negative environmental impacts.		
Objective Evidence:	Bilala POM is monitoring its dark smoke emission from its boiler's chimney by using smoke density meter. The limit of darkness set by the mill is 70% opacity. However, it was not clear that why 70% was selected. There was no clear reference to support the selection.		
Corrective Actions:	The Standard Operating Procedure for Olam Palm Mill's Boiler Operation process was established to include monitoring procedures pollutants from the stack.		
Assessment Conclusion:	During this assessment it was assessed that the corrective action was effectively implemented at the mill. Monitoring records are documented and implemented. Thus this minor non-conformance has been effectively closed on 22/11/2018		

Opportunity for Improvement	
OFI#	Description
OFI 1	<b>1712399-201611-I1</b> <b>Indicator 6.2.3</b> Requirement : A list of stakeholders, records of all communication, including confirmation of receipt and that efforts are made to ensure understanding by affected parties, and records taken in response to input from stakeholders, shall be maintained.  Details : It is acknowledge by the assessment team that effort of communication with the communities has been carried out. However, information received from the communities varies. The effectiveness of the communication to be further improved.
	<b>1712399-201611-I2</b> <b>Indicator 6.9.1</b> Requirement : A policy to prevent sexual and all other forms of harassment and violence shall be implemented and communicated to all levels of the workforce.

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	Details : Grievance of sexual harassment are recorded and managed. However, the implementation of awareness and education program to be further enhanced.
<b>OFI 3</b>	<p><b>1712399-201611-I3</b></p> <p><b>Indicator 5.8.2</b></p> <p>Requirement : Appropriate training shall be provided by the organization for personnel carrying out the tasks critical to the effective implementation of the supply chain certification standard requirements.</p> <p>Details : Training shall be specific and relevant to the task(s) performed. Training of the weighbridge operators to be further enhanced.</p>

### 3.4.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Major / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
1562544-201709-N1	Minor	5.1.3	24/11/2017	22/11/2018
1712399-201611-M1	Major	4.7.3	29/11/2018	Closed out on 10/02/2019
1712399-201611-M2	Major	6.5.2	29/11/2018	Closed out on 10/02/2019
1712399-201611-M3	Major	6.3.2	29/11/2018	Closed out on 10/02/2019
1712399-201611-M4	Major	5.6.1	29/11/2018	Closed out on 10/02/2019
1712399-201611-M5	Major	5.11.1	29/11/2018	Closed out on 10/02/2019
1712399-201611-N1	Minor	4.7.5	29/11/2018	"Open"
1712399-201611-N2	Minor	5.3.3	29/11/2018	"Open"

### 3.5. Stakeholders Consultation

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

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

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

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List of Stakeholders Contacted	
<b>Internal Stakeholders</b> Workers from mill Workers from estates Foreign workers	<b>Union/Contractors/Local Communities</b> Workers Union Previous Land user – Mboukou village Previous Land user – Moutassou village Previous Land user – Okoumbou village Previous Land user – Ikolo village Previous Land user – Doubou village Previous Land user – Guiamba village
<b>Government Departments</b> Department of Water and Forestry Department of Human Resource / Social Securities	<b>NGO</b>

IS #	Description
1	<p><b>Feedbacks:</b> There was a strike occurred in Olam. The company has used the police to suppress the situation.</p> <p><b>Management Responses:</b> OPG began discussion with employee representatives on 29 Sept 2018. Constructive discussions resulted in some issues being immediately resolved, with further discussions planned on the remaining points. Following the release of the mid-point update:  a. The on-going discussion were halted by some employees who sought to change their representation.  b. Strikes started on 14 Oct 2018.  During the strike, a small group of employees and non-employees came into the property, threatened our staff and damaged equipment and property at the Mouila mill, offices and plantations. One foreign worker was assaulted.  In order to protect the employees who wished to work as usual and prevent further incidents, Olam enlisted the help of police to secure the premise.  Negotiation with workers representatives has been concluded on all issues after a meeting dated 28 Nov 2018. Minutes was recorded and signed for communication with all workers through their representatives and the Labour Department.  Monthly discussion with workers' representatives has been scheduled and meeting conducted in mid-Dec 2018.</p> <p><b>Audit Team Findings:</b> A police report was made by OPG dated 15/10/2018. The police report was reviewed stating the incident of the strike went into violent where some workers by burning down palms and damaging company properties and assets (the minutes of meeting on Investigation report following the worker's strike dated 16/10/2018 with photograph shows the damages). As per the Labor Code, the company is required to protect the all workers within the company. Therefore the police riot force was called in to suppress the situation. Prior the police was brought it, it was reported the strike went for 2 weeks. During the 2 weeks there was no riot police involvement and rather a peaceful strike followed by both parties (as Labor Code). Progressive reports prepared by the company was reviewed showing that peaceful discussion between the</p>


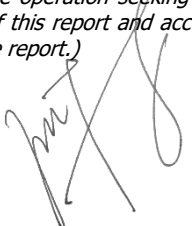


	company and the workers when workers started to put up barricades in front of the mill and estates. Discussion was done and the barricades was removed peacefully.
2	<p><b>Feedbacks:</b></p> <p>Community from Mboukou informed the auditor that there is CFA28,000,000 distributed to amount villages for land compensation and they were not consulted regarding the this compensation and there is no direct agreement with the Villagers. The villager informed the audit team that the decision was done between Olam and the local Governor and Prefet. The villager representative deemed that Olam has not received their consent regarding the compensation. Furthermore the village representative deemed that they should receive a bigger portion due to they are the bigger community.</p> <p><b>Management Responses:</b></p> <p>Fund mentioned is referring to the social fund created through sales of timber. It is not a land compensation. Logs available after land preparation have been sold to timber companies by forest administration for benefit of the Forest Administration and impacted villages. The fund is owned and managed by the Community Steering Committee from all eight impacted villages. Representatives of the Community Steering Committee are elected by the villagers.</p> <p>Olam does not own the fund neither benefit from the timber sales. Our presence during the meeting is to witness and ensure fair process has been taken place by the Community Steering Committee. The meetings were facilitated by the local Forestry Department and governor.</p> <p>It was determined during a meeting dated 8 Nov 2016, attended by all impacted villages that the fund shall be fairly distributed amongst all villages.</p> <p><b>Audit Team Findings:</b></p> <p>The assessment team had evaluated the records of Olam. The compensation of CFA28,000,000 distributed to amount villages is not any form of compensation. The CFA28,000,000 is sales of the timber from the cause of land clearing for the approved NPP. Olam informed the assessment team that rather than wasting the timber, Olam had requested approval from the authorities to fell and sell the timber while revenue generated (after deducting cost) from the selling will be given back to the community. The agreement between the OPG and Ministry of Forest dated 28/10/2013 was reviewed.</p> <p>The assessment team had verified the meeting minutes conducted between the villagers and the local authority to decide the distribution of the CFA28 Million. The meeting was conducted on 08/11/2016. During the meeting it was agreed upon that the CFA28 million will be distributed among the 8 villagers equally. The representative from Mboukou identified attending this meeting was Mr Bibalou Barnabe (chef de regroupement) and Mdm Boukandou Therese (chef de village).</p>
3	<p><b>Feedbacks:</b></p> <p>The villagers informed the auditors that there are restricted from performing their customary hunting. Furthermore the Mboukou village representative informed the audit team that Olam had constructed trenches to prevent elephant encroaching to their plantation without consulting them which has restricted them to perform their customary hunting.</p> <p><b>Management Responses:</b></p> <p>Villagers with customary rights are issued with access card to their forest and allowed to enter to the HCV conservation area, however logging and hunting of protected species are not permitted within the set aside HCV areas. These restrictions have been communicated to our villagers.</p> <p>Sensor node, barbed wire and trenches are put in place to prevent elephant intrusion. Location of trenches has been fully mapped and based on feedback from villagers, footbridges have been placed to enable access to their forest. However, Olam does not construct bridge that could allow vehicle to access into HCV forest in order to control illegal activities by external parties.</p> <p><b>Audit Team Findings:</b></p>



	<p>The trenches was started since 2015. There is no communication made by the company regarding the construction of the trenches. A meeting was conducted with Mboukou communities on 31/11/2017. During this meeting the issue of building of trenches was raised by the communities. OPG had acknowledge that during that time there was lacking of communication and consultation with the communities due to unaware of specific operation within the company. Hence OPG has implemented CR&amp;S Weekly reporting to highlight the operations activities to prevent any future communication breakdown.</p>
<b>4</b>	<p><b>Feedbacks:</b></p> <p>The Mboukou village representative informed the assessment team that Olam has taken the land in Ngoumou that was allocated to the community use for construction of telco tower. They informed the audit team that, if it not because of the Olam, the telco tower will not be there and they will not lose the land allocated to them.</p> <p><b>Management Responses:</b></p> <p>Telecommunication network was requested as one of the basic infrastructure by the communities, it was also surveyed and reported as part of the ESIA in 2012 on lack of network access in surrounding villages. Final construction of the network tower was determined by the telecommunication company i.e. Libertis Gabon Telecom. Furthermore, it is clearly stated in the OPG lease agreement, article 4, clause (c) that the company has to relinquish rights to the land area for public service including installation of telecommunication line, electricity cable or other public utilities.</p> <p><b>Audit Team Findings:</b></p> <p>As per the FPIC negotiation between Olam and Mboukou village, on 27/07/2012, it was identified that the communities would like to enhance communication and requested that a telco tower to be installed to boost signal. The building of the telco tower was fully the responsibility of the telco company. During the decision of the location, the telco company and OPG had already socialized with the local communities. However, there are no documented meeting minutes kept by the company.</p>
<b>5</b>	<p><b>Feedbacks:</b></p> <p>The villagers informed the audit team that Olam has violated the social contract where there was no maintenance on the street lights and bore well especially. Furthermore, the social contract has not been completely implemented.</p> <p><b>Management Responses:</b></p> <p>OPG is respecting the social contracts and weekly progress report has been prepared to track progress of social infrastructures. It is bilateral responsibilities from the company and the communities to maintain good condition of constructed street lights and borewells. Log book and OPG's contact person are provided to facilitate issues with regards to the social infrastructure.</p> <p>Communication of the progress shall be enhanced, besides Community Steering Committee, OPG will seek other channel to communicate with all villagers directly.</p> <p><b>Audit Team Findings:</b></p> <p>The Social contract for Lot 1 and Lot 3 was evaluated by the assessment team. According to the agreed Social Contract that was developed with participation during the FPIC, OPG is to provide solarized public lights at the village. In with regards to completing the implementation of the contract, OPG is making effort and a monthly monitoring on the progress is available.</p>
<b>6</b>	<p><b>Feedbacks:</b></p> <p>No shelters provided to workers for rain cover and rain coats are only provided to Indonesia workers.</p> <p><b>Management Responses:</b></p> <p>Shelter construction is still in progress and monitored by the Safety Committee.</p>

	<p>Raincoat is issued to workers who are harvesters regardless of their nationality. Other operation activities such as spraying, and manuring are not advisable during rainy day as per industry best management practices.</p>
	<p><b>Audit Team Findings:</b></p> <p>The action plan of the health and safety committee had identified to build additional shelter for each 100 person every 200 ha. The responsible person for this action is Jamaludin the estate manager. The dateline to complete this action is December 2018. The progress is 50%.</p> <p>The Indonesian workers are mainly harvester and maid. The raincoat distribution records for Lot 3 was reviewed that raincoats are also distributed to National workers doing harvesting (e.g. Distribution records at Estate 12 on 02/11/2018; at Estate 13 on 29/10/2018). Therefore there is no sign of discrimination.</p>

<b>Formal Signing-off of Assessment Conclusion and Recommendation</b>	
<p>The audit objectives have been achieved and the certificate scope remains appropriate. Based on the results of this audit, it is concluded that Bilala Palm Oil Mill Certification Unit has complied with RSPO P&amp;C Gabon-NI March 2017, RSPO Supply Chain Certification Standard 2017 and audit criteria identified within the audit report. It is deemed that the management system continues to achieve its intended outcomes. Therefore, it is recommended that the certification of Bilala Palm Oil Mill is continued.</p>	
<b>Report prepared by</b>	<b>Acceptance of Assessment Conclusion</b>
<b>Name:</b> <b>Nicholas Cheong</b>	<b>Name:</b> <b>Audrey Lee Mei Fong</b>
<b>Company Name:</b> <b>BSI Services Malaysia Sdn Bhd</b>	<b>Company Name:</b> <b>Olam Palm Gabon</b>
<b>Title:</b> <b>Team Leader</b>	<b>Title:</b> <b>Sustainability General Manager</b>
<b>Signature:</b> 	<b>Signature:</b> <p>(I the undersigned, being the most senior relevant management representative of the operation seeking or holding certification, agree with the contents of this report and accept the liability in execution of the procedure in the report.)</p> 
<b>Date: 02/03/2019</b>	<b>Date: 11 Mar 2019</b>

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**Appendix A: Summary of Findings**

Criterion / Indicator		Assessment Findings	Compliance
<b>Principle 1: Commitment to Transparency</b>			
<b>Criterion 1.1</b>			
<b>Growers and millers provide adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow the effective participation in decision making</b>			
1.1.1	There shall be evidence that growers and millers provide adequate information on (environmental, social and/or legal) issues relevant to RSPO Criteria to relevant stakeholders for effective participation in decision making -Major compliance-	The Stakeholders List is established and last updated in November 2018. The stakeholders include – Village Leaders; Notable Representative from the Village; local NGOs; contractors and Local Authorities.	Complied
1.1.2	Records of the requests for information and responses shall be maintained -Major compliance-	There are no request for documented information so far since certification. However, Olam has kept the records for any request from the external parties. Samples: Request for material for housing construction for the nurse working at government health center dated 23/05/2018 from Rembo Village. Request for shelter and electrical item for the electrification project (by government) dated 05/08/2018 from Rembo Village. As per the procedure for Consultation and Communication with Local Communities dated 02/07/2012 (which was developed with the community through FPIC process) provides the information that the type of information that can be obtained by the communities. After the procedures are develop jointly, the procedures are then validate with the communities. The validation with the communities was conducted on 02/07/2012 until 08/07/2012.	Complied

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Criterion / Indicator		Assessment Findings	Compliance
<b>Criterion 1.2</b> <b>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.</b>			
1.2.1	Publicly available documents shall include, but are not necessarily limited to: Land titles/user rights (Criterion 2.2); Occupational health and safety plans (Criterion 4.7); Plans and impact assessments relating to environmental and social impacts (Criteria 5.1, 6.1, 7.1 and 7.8); HCV documentation (Criteria 5.2 and 7.3); Pollution prevention and reduction plans (Criterion 5.6); Details of complaints and grievances (Criterion 6.3); Negotiation procedures (Criterion 6.4); Continual improvement plans (Criterion 8.1); Public summary of certification assessment report; Human Rights Policy (Criterion 6.13). -Major compliance-	As per the procedure for Consultation and Communication with Local Communities dated 02/07/2012 (which was developed with the community through FPIC process) provides the information that the type of information that can be obtained by the communities. The CR&S team manages any information request. Olam International has publish several information in their website for public access. The information includes: Summary of Management plan SEIA and HCV report Grievance procedures Olam Sustainable Palm Oil Policy (includes Human Rights) Living Landscapes Policy Fair employment Policy	Complied
<b>Criterion 1.3</b> <b>Growers and millers commit to ethical conduct in all business operations and transactions</b>			
1.3.1	There shall be a written policy committing to a code of ethical conduct and integrity in all operations and transactions, which shall be documented and communicated to all levels of the workforce and operations -Minor compliance-	The Olam Code of Conduct dated Feb 2016 has been established has included the UN Convention Against Corruption in particular to Article 12 committing to maintain complete and accurate books and records of account recording all business transactions and dealings entered into for or on behalf of or conducted in connection with the Company. The Code of Conduct is available in both English and French.	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		<p>The Code of Conduct has been published in the Olam website <a href="https://www.olamgroup.com/content/dam/olamgroup/pdf/policies%2c-codes%2c-standards/Olam%20Code%20Of%20Conduct.pdf">https://www.olamgroup.com/content/dam/olamgroup/pdf/policies%2c-codes%2c-standards/Olam%20Code%20Of%20Conduct.pdf</a></p> <p>For internal parties, the Code of Conduct is being induct during the induction. HR Department conducts the induction of the Code of Conduct.</p> <p>Samples of induction:</p> <p>Plantation worker – contract worker dated 01/06/2018.</p> <p>Driver – permanent worker dated 15/09/2018</p> <p>Q.H.S.E Assistant dated 13/11/2018</p>	
<b>Principle 2: Compliance with Applicable Laws And Regulations</b>			
<b>Criterion 2.1</b>			
<b>There is compliance with all applicable local, national and ratified international laws and regulations.</b>			
2.1.1	<p>Evidence of compliance with relevant legal requirements shall be available</p> <p>-Major compliance-</p>	<p>Bilala Palm Oil Mill and supply base had continued to comply with legal requirements as per indicator. Compliance to each applicable law and regulation is monitored by the operating units and sustainability team.</p> <p>Two certificates of compliance and one Authorization of exploiting have been delivered by DGEPN (the main state environmental administration putting in place and assessing the national environmental politic) are enough to attest the respect of legal requirements:</p> <p>Certificate of Compliance ref. no. 2013/MPERNFM/SG/DGEPN established on 3 December 2015 addressing the environmental and social impact of Olam Palm Mouila Lot 1. (Bilala POM)</p> <p>Certificate of Compliance ref. no. 1370/MEEDD/SG/DGEPN established on 9 July 2012 addressing the environmental and social impact of Olam Palm Mouila Lot 1. (Mouila Lot 1 Plantation)</p>	Complied

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Criterion / Indicator	Assessment Findings	Compliance
	<p>Besides, a prescription by Department of General Direction of Environment and Protection (DGEPN) listed all the monitoring, reporting and analysis requirements for the activities in the mill and plantation. A summary report which cover monitoring of surface water, air, soil, health &amp; security and employment which need to submit to DGEPN. The latest submission dated February 2018 was sighted during onsite visit.</p> <p>For Mouila Lot 1 Plantation, similar report which cover extra criteria for local communities, biodiversity and waste submitted on February 2018.</p> <p>Mouila Lot 3 Plantation:</p> <p>Seen the Environmental &amp; Social Assessment Plan &amp; the Output Action Plan for Plantation of Palm at Mouila Lot 3, dated May 2015. The assessment was carried out Terea Proforest.</p> <p>Certificate of Compliance ref. no. 1190/MPERNM/SG/DGEPN established on 06/07/2015 addressing the environmental and social impact of Olam Palm Mouila Lot 3.</p> <p>Verified also the Certificate of Compliance ref. no. 1309/MEFPEPGE/SG/DGEPN/CE DG-BNE established on 29/06/2017 addressing the environmental and social impact of Olam Palm Mouila Lot 3 Plantation.</p> <p>Yearly Environmental Assessment Follow Up Report as prescription by Department of General Direction of Environment and Protection (DGEPN) listed all the monitoring, reporting and analysis requirements for the activities in the mill and plantation. A summary report which cover monitoring of surface water, air, soil, health &amp; security and employment which need to submit to DGEPN. The latest submission dated March 2018 was sighted during onsite visit.</p>	

Criterion / Indicator		Assessment Findings	Compliance
2.1.2	A documented system, which includes written information on legal requirements, shall be maintained. -Minor compliance-	<p>Bilala POM and its supply base (Mouila Lot 1 &amp; 3) had documented the Legal requirements &amp; Conventions covering all the necessary regulatory requirements.</p> <p>List was updated in May 2017 (with no further changes for year 2018) and it was aligned with the latest Gabon NI which incorporated the key international laws and conventions including Law no. 002/2014: Sustainable Development (Ministry of Sustainable Economy Prospective Investment Promoting) and Law no. 007/2014: Protection of the Environment. The updating and document management of the required regulations are done by the Legal Department of the Olam Palm Gabon based at Libreville office.</p> <p>Sampled also on the pesticide &amp; fertilizer importation permit as follows: Special Authorization for Importation for Pesticide Permit No. 003/MAEPG/DG-AGASA/DICSP/SPP/BSP issued on 18/1/18 (valid for 1 year) for Pesticide Pounce, Memento 20% WP &amp; Dalopir 480 EC. Certificate for Importation for Fertilizer – Agrobien. Certificate No. 001901 issued on 13/06/2017.</p>	Complied
2.1.3	A mechanism for ensuring compliance shall be implemented. -Minor compliance-	<p>The latest internal audit for Bilala Palm Oil Mill and its supply base (Mouila Lot 1 &amp; 3) was conducted in October 2018 by AIC Audit Body.</p> <p>The 2018 internal audit plan was reviewed to ensure that the mechanism is in place.</p>	Complied
2.1.4	A system for tracking any changes in the law shall be implemented -Minor compliance-	<p>Documented procedure has been established and implemented; refer to Procedure for Legal and Compliance Requirements updated on May 2017 (no further changes for year 2018).</p> <p>The objective of the procedure is to identify the relevant laws, legal requirements and conventions which applicable to the plantation and mill operation. The process is carry out by the legal department which based in Libreville office of Gabon.</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance																
<b>Criterion 2.2:</b> <b>The right to use the land is demonstrated, and is not legitimately contested by local people who can demonstrate that they have legal, customary or user rights</b>																			
2.2.1	Documents showing legal ownership or lease, history of land tenure and the actual legal use of the land shall be available. -Major compliance-	Documents showing legal ownership or lease, history of land tenure and the actual legal use of the land was made available. There are total of 3 concessions area awarded to Olam Palm Gabon located at Mouila, province of Ngounie. Summary of land concession agreement as per follow: <table border="1"> <thead> <tr> <th>Land lease</th><th>Concession area (ha)</th><th>Lease period</th><th>Land use type</th></tr> </thead> <tbody> <tr> <td>Convention no. 06 (Department of Tsamba Magotsi)</td><td>35,354</td><td>50 years (effective from 13/11/2012 - 12/11/2062)</td><td>Plantation of oil palm and other crops</td></tr> <tr> <td>Convention no. N8-001 (Department of Douya Onoye)</td><td>23,763</td><td>50 years (effective from 22/4/2015 - 21/04/2065)</td><td>Plantation of oil palm</td></tr> <tr> <td>Convention no. 052</td><td>14,600.492</td><td>50 years (effective from 14/09/2016 - 13/09/2066)</td><td>Plantation of oil palm</td></tr> </tbody> </table>	Land lease	Concession area (ha)	Lease period	Land use type	Convention no. 06 (Department of Tsamba Magotsi)	35,354	50 years (effective from 13/11/2012 - 12/11/2062)	Plantation of oil palm and other crops	Convention no. N8-001 (Department of Douya Onoye)	23,763	50 years (effective from 22/4/2015 - 21/04/2065)	Plantation of oil palm	Convention no. 052	14,600.492	50 years (effective from 14/09/2016 - 13/09/2066)	Plantation of oil palm	Complied
Land lease	Concession area (ha)	Lease period	Land use type																
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Criterion / Indicator		Assessment Findings	Compliance
2.2.2	Legal boundaries shall be clearly demarcated and visibly maintained. -Minor compliance-	Legal boundaries were clearly demarcated by putting concrete pegs painted with red and white colour at the critical points of the land concession. Physical boundary as such trenches was also constructed to clearly demarcate the area. The trenches also are part of mitigation to prevent elephant intrusion at newly planted area. Verification through site visit of two of the pegs (estate 5 and estate 12) showed that the GPS coordinates of the pegs were consistent with those stated on the land title map.	Complied
2.2.3	Where there are or have been disputes, additional proof of legal acquisition of title and evidence that fair compensation has been made to previous owners and occupants shall be available, and that these have been accepted with free, prior and informed consent (FPIC). -Major compliance-	Any land dispute the <i>Procédure de Gestions Des Plaintes et Reclamations</i> Doc SOP No 07/CRS/Mouila/0517 dated May 2017 and supplemented with <i>Procédure de reglement des differends, litiges, plaints et reclamations</i> – Doc MLA 1-PRO 2-CR&S.	Complied
2.2.4	There shall be an absence of significant land conflict, unless requirements for acceptable conflict resolution processes (see Criteria 6.3 and 6.4) are implemented and accepted by the parties involved. -Major compliance-	Interview with the land owners or communities that previously used the land, confirms that there was no significant land conflicts occurred.	Complied
2.2.5	For any conflict or dispute over the land, the extent of the disputed area shall be mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable). -Minor compliance-	Any land dispute will be captured in the SocProg. Sample of case verified in Lot 3 – Mbadi Moutassou Village (Lot 3) where the company had mistakenly encroached into scared site (graves). The resolution was conducted with participatory and compensation in terms of CFA1,5000,000 was compensated to the Boussougou family.	Complied
2.2.6	To avoid escalation of conflict, there shall be no evidence that palm oil operations have instigated violence in maintaining peace and order in their current and planned operations.	Interview with the land owners and communities confirmed that OPG has not use instigated violence in maintaining peace and order in their operations. Please refer to stakeholders comment.	Complied

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	-Major compliance-		
<b>Criterion 2.3:</b> <b>Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free prior and Informed consent.</b>			
2.3.1	<p>Maps of an appropriate scale showing the extent of recognised legal, customary or user rights (Criteria 2.2, 7.5 and 7.6) shall be developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities)</p> <p>-Major compliance-</p>	<p>The FPIC process was conducted following the New Planting Procedures. The updated procedure <i>sure le consentement libre informe et prealable (CLIP)</i> dated September 2017 is re-established to standardized the FPIC of entire OPG operations in Gabon.</p> <p>The maps of the affected areas are as per participatory mapping conducted during the NPP phase. During the interview with local communities it was observed that maps are kept by the communities leaders and confirmed that it was done with their participation.</p>	Complied
2.3.2	<p>Copies of negotiated agreements detailing the process of free, prior and informed consent (FPIC) (Criteria 2.2.,7.5 and 7.6) shall be available and shall include: a) Evidence that a plan has been developed through consultation and discussion with all affected groups in the communities, and that information has been provided to all affected groups, including information on the steps that shall be taken to involve them in decision making; b) Evidence that the company has respected communities' decisions to give or withhold their consent to the operation at the time that this decision was taken; c) Evidence that the legal, economic, environmental and social implications for permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal status of their land at the expiry of the company's title, concession or lease on the land.</p>	<p>Interview with land owners and/or communities that had previous used the land confirmed that he FPIC process has been demonstrated by OPG.</p> <p>The original FPIC procedure developed during the NPP was socialized with the affected communities.</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
	-Major compliance-		
2.3.3	All relevant information shall be available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements. -Minor compliance-	The SEIA, FPIC procedures, management plan, procedures for resolving complaints and grievance, negotiation agreement and compensation plan are available in French. French is the main language of Gabon.  Negotiation between land owners or communities that previously used the land concluded a Social Contract. The Social Contract is in French and during interview with the communities, it was confirmed that the social contract was developed together with OPG in a participatory way. Samples of OPG has carried out the contract was reviewed. The CR&S team conducted a monthly monitoring on the progress of implementing the contract. Monitoring of month of November and October 2018 for Lot 3 was observed.	Complied
2.3.4	Evidence shall be available to show that communities are represented through institutions or representatives of their own choosing, including legal counsel. -Major compliance-	In the FPIC and compensation process, communities are represented by themselves and relevant governmental department including Chairman of Council Department, local head of agriculture department, Regional head of health department, regional head of education department, the regional forestry department and NGOs. Since there is no land compensation (only agriculture compensation) there was not direct legal counsel involved. For any agriculture compensation, it is managed under the legal requirement of Gabon.	Complied
<b>Principle 3: Commitment to Long-Term Economic and Financial Viability</b>			
<b>Criterion 3.1</b>			
<b>There is an implemented management plan that aims to achieve long-term economic and financial viability</b>			
3.1.1	A business or management plan (minimum three years) shall be documented that includes, where appropriate, a business case for scheme smallholders.	OPG has gazetted long range business plan (OPEX and CAPEX: FY2016 - FY2041) for Mouila Lot 1 and 3. The projection covers FFB forecast, extraction rate (OER & KER), direct cost (upkeep, fertilizer, R&D, mechanization, upkeep tools, harvesting, mill processing and overhead –	Complied

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	-Major compliance-	manager & staff emolument) and in-direct cost (corporate allocation). CAPEX allocation for 2019 has included budget on safety and health, social and welfare as well as for operation. Example of CAPEX for 2019:			
		Allocations	CAPEX approved	Remark	
		Building and houses	i) Estate 4 - new primary school ii) G10 housing for working – 51 blocks x 10 unit per blocks Estate 4 – 16 units (lot 1) Estate 9 – 10 units (lot 2) Estate 12 – 10 units (lot 3) Estate 15 – 16 units (lot 3) iii) Elevated water tank (lot 1 and lot 3) iv) Water treatment plant – lot 1 and 3	Social and welfare	
		Vehicle	i)Workers transport – truck 60 workers capacity ii)Greader and compactor	Transportation and road maintenance	
		Plant and machinery	i)New Kernel Crushing Plant at Lot 3 (7.5 mt/hr) ii)New palm oil mill at lot 3 – 90 mt/hr iii)New chemical and fertilizer store	Operation	

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3.1.2	An annual replanting programme projected for a minimum of five years (but longer where necessary to reflect the management of fragile soils, see Criterion 4.3), with yearly review, shall be available.  -Minor compliance-	There will be no replanting at least for the next 20-25 years for Mouila lot 1 and 3 estates as the first planting was done in 2012.	Complied						
Principle 4: Use of Appropriate Best Practices by Growers and Millers									
Criterion 4.1: Operating procedures are appropriately documented, consistently implemented and monitored.									
4.1.1	Standard Operating Procedures (SOPs) for estates and mills shall be documented.  -Major compliance-	<p>OPG estates continue to implement the SOPs for the estate are documented in "Olam Palm Gabon-Agriculture Policy Manual Volume 1 and Volume 2 dated April 2013 endorsed by Olam Global Head of Plantation. Volume 1 and 2 of the Agriculture Policy Manual consist of 20 SOPs covering all operations (immature and mature planting) from land preparation and clearing, nursery establishment, planting technique, harvesting, FFB evacuation, field upkeep, IPM practices, water management and drainage system, innovative mechanization practices and etc.</p> <p>Sample of the estates operation reviewed:</p> <p>Treatment and Management of Rhynchophorus Phoenicis – the disposal method (phyto-sanitary disposal) for late stage is control burning in a 200 litre drum with supervision and ensuring smoke is absent when leaving location of drum.</p> <p>Treatment as per pesticides recommendation – No WHO class 1A and 1B allowed to be used. Only class III and class II with allowed provided with SDS information for the chemical.</p> <table><tr><td>Active ingredient</td><td>Trade name</td><td>Remarks</td></tr><tr><td>Deltamethrin</td><td>Tenega/Decis</td><td>Insecticide</td></tr></table>	Active ingredient	Trade name	Remarks	Deltamethrin	Tenega/Decis	Insecticide	Complied
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Criterion / Indicator		Assessment Findings			Compliance						
		<table><tr><td>Captan</td><td>Thiram/Criptan</td><td>Fungicide</td></tr><tr><td>Abamectin</td><td>Acarius</td><td>Insecticide</td></tr></table>	Captan	Thiram/Criptan	Fungicide	Abamectin	Acarius	Insecticide	The palm oil mill operation are operated following the documented "Olam Palm Gabon-Standard Operating Procedure for Palm Oil Mill, dated 24/04/2015", which consist of 14 SOPs covering all operations including starting from reception station and fruit handling, sterilization and pressing, pressing and clarification station, kernel recovery station, boiler station, power generation station, laboratory, water treatment plant, ETP operation, workshop and maintenance. As for RSPO SCC implementation, RSPO Supply Chain & Traceability (Mass Balance Model), ref: POM-SC/MB001, rev:2 dated 1/9/18 is referred to. This procedure has explained on the handling of incoming FFB, processing and outgoing Crude Palm Oil (CPO) and Palm Kernel (PK) for the traceability with Mass Balance model covering certified and non-certified FFB received.		
Captan	Thiram/Criptan	Fungicide									
Abamectin	Acarius	Insecticide									
4.1.2	A mechanism to check consistent implementation of procedures shall be in place. -Minor compliance-	Mechanism to check consistent implementation of procedures are in place through internal check and balance by the operation and sustainability team. Audits are conducted following the Agriculture Policy Manual, Chapter 17: Field Quality Audit. On top of the audits, agronomist team will regularly provide solutions and recommendations related to operational field practices.			Complied						
4.1.3	Records of monitoring and any actions taken shall be maintained and available, as appropriate. -Minor compliance-	Records of monitoring were maintained and made available at all visited operating units. Sample of monitoring records verified: i) Internal audit report (RSPO P&C) for Lot 1, audit date: 23-27/07/2018. Total of 12 findings raised by the internal auditor. Status of closure is being monitored and tabled under RSPO P&C action plan by the management team. Latest update dated 31/10/2018. Majority of the findings were closed and there were a few findings which still in progress.			Complied						

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		<p>ii) Monthly report summary by agronomist department, ref: 65/1018/AT dated 31/10/2018. The report contains harvesting audit, FFB grading, fertilizer application summary, manuring audit (immature and mature), pest and disease and drip irrigation system status.</p> <p>iii) Annual agronomic report, 2<sup>nd</sup> report dated May 2018. Summary of palm status, leaf nutrient survey, crop productivity and 2017/2018 fertilizer recommendation were presented in the report.</p>	
4.1.4	<p>The mill shall record the origins of all third-party sourced Fresh Fruit Bunches (FFB).</p> <p>-Major compliance-</p>	<p>There are total 15 Olam's estates registered in Bilala's POM SAP system and no third party (non-OPG) is in the list. Estates registration reference in the SAP as per the following:</p> <p>i) Lot 1 estates</p> <p>GA-16-02-01-01 – Estate 1</p> <p>GA-16-02-01-02 – Estate 2</p> <p>GA-16-02-01-03 – Estate 3</p> <p>GA-16-02-01-04 – Estate 4</p> <p>GA-16-02-01-05 – Estate 5</p> <p>GA-16-02-01-06 – Estate 6</p> <p>ii) Lot 2 estates</p> <p>GA-16-02-02-07 – Estate 7</p> <p>GA-16-02-02-08 – Estate 8</p> <p>GA-16-02-02-09 – Estate 9</p> <p>iii) Lot 3 estates</p> <p>GA-16-02-03-10 – Estate 10</p>	Complied

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		GA-16-02-03-11 – Estate 11 GA-16-02-03-12 – Estate 12 GA-16-02-03-13 – Estate 13 GA-16-02-03-14 – Estate 14 The FFB chit from the estates provides information about the location (field no. and name of estate) of the FFBs were originated, number of bunches, vehicle registration number. All the data will be recorded in the SAP system and is able to be retrieved anytime.	
<b>Criterion 4.2:</b> <b>Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.</b>			
4.2.1	There shall be evidence that good agriculture practices, as contained in Standard Operating Procedures (SOPs), are followed to manage soil fertility to a level that ensures optimal and sustained yield, where possible. -Major compliance-	Good agriculture practices, as contained in Standard Operating Procedures (SOPs) 'Olam Palm Gabon-Agriculture Policy Manual Volume 1 and Volume 2" dated April 2013 are found complying by all estates visited. Specific SOP – Leaf and Soil Sampling Procedure, Chapter 19 is referred to. Based on the SOP, under clause <i>3.6 Annual Leaf Sampling Exercise and Audit</i> , foliar analysis is being carried out on annual basis. The analysis results will be used for the next year fertilizer recommendation. As for the soil sampling, under clause <i>3.7 Soil Sampling Methodology</i> - conducted once every 5 years after a detailed or semi detailed soil survey is done for the plantation area. The practices are being monitored by estate operation and agronomist team to ensure soil fertility is maintained as well as to ensure optimal and sustained yield can be achieved.	Complied



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4.2.2	Records of fertiliser inputs shall be maintained. -Minor compliance-	<p>Fertilizers are applied as per agronomist recommendation. Record shows application date, filed number, dosage applied per palm, type of fertilizer and number of applicators. The 2019 Fertiliser Recommendation For Oil Palm Plantings in Mouila Plantations, Lot 1 was made available for review. Sample of recommendation verified include</p> <p>For Lot 1 field V61 (planting date: March 2014):</p> <table> <tr> <th>Month</th><th>Fertilizer type</th><th>Dosage</th><th>Major Soil Type</th></tr> <tr> <td>February</td><td>Borax 48</td><td>0.1 kg/palm</td><td rowspan="5">Tbk/2</td></tr> <tr> <td>March</td><td>NPK 11/7/35/3+B</td><td>2 kg/palm</td></tr> <tr> <td>April</td><td>Ks</td><td>0.75 kg/palm</td></tr> <tr> <td>September/October</td><td>NPK 11/7/35/3+B</td><td>1.75 kg/palm</td></tr> <tr> <td>December</td><td>RP/SOA</td><td>0.5/0.5 kg/palm</td></tr> </table> <p>For lot 3 estate 12 (field: 045, planting date: Oct 2015):</p> <table> <tr> <th>Month</th><th>Fertilizer type</th><th>Dosage</th><th>Major Soil Type</th></tr> <tr> <td>February</td><td>Borax 48</td><td>0.1 kg/palm</td><td rowspan="4">Bso/2-Rsu/2</td></tr> <tr> <td>March</td><td>NPK 11/7/35/3+B</td><td>1.25 kg/palm</td></tr> <tr> <td>April</td><td>Ks/Dol</td><td>0.5 kg/palm</td></tr> <tr> <td>September/October</td><td>NPK 11/7/35/3+B</td><td>1.25 kg/palm</td></tr> </table>	Month	Fertilizer type	Dosage	Major Soil Type	February	Borax 48	0.1 kg/palm	Tbk/2	March	NPK 11/7/35/3+B	2 kg/palm	April	Ks	0.75 kg/palm	September/October	NPK 11/7/35/3+B	1.75 kg/palm	December	RP/SOA	0.5/0.5 kg/palm	Month	Fertilizer type	Dosage	Major Soil Type	February	Borax 48	0.1 kg/palm	Bso/2-Rsu/2	March	NPK 11/7/35/3+B	1.25 kg/palm	April	Ks/Dol	0.5 kg/palm	September/October	NPK 11/7/35/3+B	1.25 kg/palm	Complied
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Criterion / Indicator		Assessment Findings				Compliance
		December	RP/SOA	0.5/0.75 kg/palm		
		The fertilizer application records were maintained. Sample of application verified: Estate 4 – Latest application record recorded for September 2018. The programme will be completed by December 2018 or January 2019. Example of NPK 11/7/35/3+B application records;				
		Division/Block	Field Hectare	Dosage	Actual tonne applied	
		1/I31	28.82	2 kg/palm	7.650 mt	
		1/K41	25.07	2 kg/palm	7.950 mt	
		Estate 5 – the last application is in November 2018 for Rock Phosphate (RP). Summary of application as per below:				
		Division/Block	Field Hectare	Dosage	Actual tonne applied	
		3/J18	29.90	0.5 kg/palm	2.392 mt	
		3/J17	28.7	0.5 kg/palm	2.296 mt	
		3/J16	31.6	0.5 kg/palm	2.528 mt	
		Estate 10 – the last application is in November 2018 for Ammonium Sulphate (SOA). Summary of application as per below				
		Division/Block	Field Hectare	Dosage	Actual tonne	

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					applied	
		3/H17	20.12	0.75 kg/palm	2.414 mt	
		2/E2	20.73	0.75 kg/palm	2.487 mt	
		Estate 12 – supplementary application is on November 2018 for Kieserite. Summary of application as per below				
		Division/Block	Field Hectare	Dosage	Actual tonne applied	
		3/J29	29.88	1 kg/palm	4.78 mt	

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4.2.3	There shall be evidence of periodic tissue and soil sampling to monitor changes in nutrient status. -Major compliance-	<p>Internal Agronomist from Agronomy and Research Department visited the estates to carry out foliar sampling prior to the fertilizer recommendation for 2019. Leaf and soil nutrient analysis are commonly used in the diagnosis of nutrient deficiencies in oil palms. Summary of foliar analysis results for lot 1 estates as per the following table:</p> <table border="1"> <thead> <tr> <th>Estate/block</th><th>Lab code/reference</th><th>Date of sampling</th><th>Major Soil Type</th></tr> </thead> <tbody> <tr> <td>3/L31</td><td>P-2018-8-1/MO1/E3/L 31-3/100218</td><td>April 2018</td><td>Bso/2-Tbk/2</td></tr> <tr> <td>4/B34</td><td>P-2018-9-1/MO1/E4/B34-3/070218</td><td>April 2018</td><td>Gmi/2-Tbk/2</td></tr> </tbody> </table> <p>Foliar analysis was done from 24/04/2018 to 10/04/2018 by Agronomy team. The leaf samples were collected from 69 blocks at lot 3 estates (231 leaf samples). For example at Estate 12, foliar samples were taken from:</p> <table border="1"> <thead> <tr> <th>Estate/block</th><th>Lab code/reference</th><th>Date of sampling</th><th>Major Soil Type</th></tr> </thead> <tbody> <tr> <td>12/O57</td><td>P-2018-15/MO3/E12/O57-1/280318</td><td>April 2018</td><td>Nrg/fsl/2-Bso/2</td></tr> </tbody> </table> <p>Initial soil study was carried out in September 2014 by Param Agriculture Soil Surveys (M) Sdn Bhd. Refer to report entitled Soil of Mouila Lot 1 Plantation, Ngounie Province, Republic of Gabon Africa dated September 2014.</p>	Estate/block	Lab code/reference	Date of sampling	Major Soil Type	3/L31	P-2018-8-1/MO1/E3/L 31-3/100218	April 2018	Bso/2-Tbk/2	4/B34	P-2018-9-1/MO1/E4/B34-3/070218	April 2018	Gmi/2-Tbk/2	Estate/block	Lab code/reference	Date of sampling	Major Soil Type	12/O57	P-2018-15/MO3/E12/O57-1/280318	April 2018	Nrg/fsl/2-Bso/2	Complied
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Criterion / Indicator		Assessment Findings	Compliance																												
		Initial soil sampling for lot 3 estates was reported in Preliminary Soil Assessment of Mouila Lot 3 Estate, Ngounie, Republic of Gabon, Africa dated September 2014 was carried out by Param Agricultural Surveys (M) Sdn Bhd. There are total of 5 management group and sub-group and classified under mineral soil. No problematic and fragile soil within lot 3 estates.																													
4.2.4	A nutrient recycling strategy shall be in place, and may include use of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), and palm residues after replanting. -Minor compliance-	<p>Based on Olam Palm Gabon-Agriculture Policy Manual Volume 1 dated April 2013, Chapter 7: Fertilizing Programme for Nursery, Immature and Mature Plantings, the nutrient strategy includes the use of Empty Fruit Bunches (EFB) distributed in the field to improve the soil structure and to conserve soil moisture. Recommendation is 35 mt/ha/yr (mature) and 25 mt/ha/yr for newly planted immature.</p> <p>Sample of the EFB application verified:</p> <table border="1"> <thead> <tr> <th>Estate</th><th>Tonnage Applied</th><th>Hectare covered</th><th>Application rate</th></tr> </thead> <tbody> <tr> <td>Lot 1, Estate 3</td><td>12,799 mt</td><td>365.69 ha</td><td>34.99 mt/ha</td></tr> <tr> <td>Lot 1, Estate 4</td><td>4,429 mt</td><td>122.5 ha</td><td>36.15 mt/ha</td></tr> <tr> <td>Lot 1, Estate 5</td><td colspan="3">No EFB application programme available</td></tr> <tr> <td>Lot 3, Estate 10</td><td colspan="3">No EFB application programme available</td></tr> <tr> <td>Lot 3, Estate 11</td><td colspan="3">No EFB application programme available</td></tr> <tr> <td>Lot 3, Estate 12</td><td colspan="3">No EFB application programme available</td></tr> </tbody> </table> <p>Nutrient recycling strategy on (POME) will be applied at Estate 6. Total of 400 ha of land application area is planned and expected to be completed by end of 2019. No discharge of treated POME as the is mill processing half of the rated capacity @ 45 mt/hr.</p>	Estate	Tonnage Applied	Hectare covered	Application rate	Lot 1, Estate 3	12,799 mt	365.69 ha	34.99 mt/ha	Lot 1, Estate 4	4,429 mt	122.5 ha	36.15 mt/ha	Lot 1, Estate 5	No EFB application programme available			Lot 3, Estate 10	No EFB application programme available			Lot 3, Estate 11	No EFB application programme available			Lot 3, Estate 12	No EFB application programme available			Complied
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Lot 3, Estate 11	No EFB application programme available																														
Lot 3, Estate 12	No EFB application programme available																														

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Criterion / Indicator		Assessment Findings	Compliance												
Criterion 4.3															
Practices minimize and control erosion and degradation of soils.															
4.3.1	Maps of any fragile soils shall be available. -Major compliance-	<p>Soil assessment was done in September 2014 by Param Agriculture Soil Surveys (M) Sdn Bhd. Semi-detailed soil map of the plantation at scale of 1:25,000 has been produced as a result of the soil sampling and survey. Summary of the soil types is reported under Appendix II, Semi Detailed Soil Map Legend. Majority of soil type summarized as per below:</p> <table><tr><td>No.</td><td>Soil type</td><td>Remarks</td></tr><tr><td>1</td><td>Gajah Mati</td><td rowspan="4">All soil type categorized as mineral soil.</td></tr><tr><td>2</td><td>Pedu</td></tr><tr><td>3</td><td>Tebok</td></tr><tr><td>4</td><td>Terap</td></tr></table> <p><u>Lot 3 estate</u></p> <p>Soil map is incorporated in Preliminary Soil Assessment of Mouila Lot 3 Estate, Ngounie, Republic of Gabon, Africa dated September 2014. A reconnaissance soil map of Mouila Lot 3 estate at a scale of 1:50,000 has been produced. The parent materials found in the Mouila Lot 3 estates consist mainly of sedimentary rocks, pediments (sol remanie) and sub-recent alluvium. No problematic and fragile soil within lot 3 estates.</p>	No.	Soil type	Remarks	1	Gajah Mati	All soil type categorized as mineral soil.	2	Pedu	3	Tebok	4	Terap	Complied
No.	Soil type	Remarks													
1	Gajah Mati	All soil type categorized as mineral soil.													
2	Pedu														
3	Tebok														
4	Terap														
4.3.2	A management strategy shall be in place for plantings on slopes above a certain limit (this needs to be soil and climate specific). -Minor compliance-	<p>The management strategy has been described in the Agricultural Manual, chapter 6: Soil and Water Conservation Methods. Below are the management strategies for planting:</p> <p>i) Excessive steep terrain (slope more than 20°) – No construction of terrace</p>	Complied												

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		<p>ii) Very steep terrain – slope in excess of 20°, planting is not recommended. Planted with LCC or remained untouched.</p> <p>Most of the area at Mouila Lot 1 are generally flat area. No hilly or steep area at all visited estates. The slope classes at Mouila Lot 1 was identified in the Soils of Mouila Lot 1 Plantation report by Param Agricultural Soil Surveys (M) Sdn Bhd. The slope classes are:</p> <p>0-2° = (Level) 1,215.5ha (6.5%)  2-6° = (Undulating) 15,136.0ha (80.5%)  6-12° = (Rolling) 2,287.2ha (12.1%)  Nursery = 171.3ha (0.9%)</p> <p>For lot 3 estates, the majority soil category is under undulating (2-6°): 98.7% - 23,326.7 ha and the rest is rolling (6-12°): 1.3% - 320.3 ha. Reference is made to Preliminary Soil Assessment of Mouila Lot 3 Estate, Ngounie, Republic of Gabon, Africa dated September 2014.</p>	
4.3.3	A road maintenance programme shall be in place. -Minor compliance-	<p>The road maintenance program is available. Upkeep of roads are carried out continuously with chambering and road side drains. Roads are maintained with own machineries. Field visit confirm that Mouila Plantation maintains the main and field roads well with hazard and warning signs at designated places. Sighted work program road maintenance records for Oct 2018:</p> <p>Collection road and Main road (lateriting and grading) as at Oct-18:</p> <p>Lot 1:</p> <p>a) Estate 3: 17,462m  b) Estate 4: 6,315m  c) Estate 5: 14,807m</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		Lot 3: a) Estate 10: 56328.73m b) Estate 11: 53869.97m c) Estate 12: 97693.35m	
4.3.4	Subsidence of peat soils shall be minimised and monitored. A documented water and ground cover management programme shall be in place. -Major compliance-	Based on the soil study report by Param Agriculture Soil Surveys (M) Sdn Bhd entitled Soil of Mouila Lot 1 Plantation, Ngounie Province, Republic of Gabon Africa dated September 2014, there are 7 soil management groups and all are on mineral soil. There is no problematic and fragile soil within lot 1 estates.  <u>Lot 3 estate</u> A Preliminary Soil Assessment of Mouila Lot 3 Estate, Ngounie, Republic of Gabon, Africa dated September 2014 was carried out by Param Agricultural Surveys (M) Sdn Bhd. There are total of 5 management group and sub-group and classified under mineral soil. No problematic and fragile soil within lot 3 estates.	Complied
4.3.5	Drainability assessments shall be required prior to replanting on peat to determine the long-term viability of the necessary drainage for oil palm growing. -Minor compliance-	There is no problematic and fragile soil within lot 1 and 3 estates.	Complied
4.3.6	A management strategy shall be in place for other fragile and problem soils (e.g. sandy, low organic matter, acid sulphate soils). -Minor compliance-	There is no problematic and fragile soil within lot 1 and 3 estates.	Complied
<b>Criterion 4.4</b>			



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Criterion / Indicator	Assessment Findings	Compliance
Practices maintain the quality and availability of surface and ground water		

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4.4.1	<p>An implemented water management plan shall be in place.          -Major compliance-</p>	<p>Water Management Plan for Mouila Lot 1 was last reviewed on 12/11/2017. The plan was implemented and monitored on monthly basis by the HSE team &amp; Corporate Responsibility &amp; Sustainability team.</p> <p>The objectives and methods of water management is provided in the Management Plan.</p> <p>Sample of water management monitoring verified:</p> <p>Water consumptions records – Quality of drinking water is monitored on quarterly basis by Lebamba Analytical Services laboratory. The test report dated 30/10/2018 verified that the overall test result indicates the treated water is according to the standards for household use with water boiling is recommended before drinking.</p> <p>Quality of surface water:– e.g. Doubou River &amp; Rembo River ampling analysis was conducted together with Ministry of Petrol and Hydrocarbon. The frequency is 6 months once . Latest sampling was done on 13/6/2018 where the parameters tested were pH, T, turbidity, Phosphates, Cl, COD, BOD, total hydrocarbon (O&amp;G). Results indicates results within allowable tolerable range limit.</p> <p>Water Management Plan for Lot 3 dated November 2018 is available.</p> <p>Sample of water management monitoring verified:</p> <p>Water consumptions records – Quality of drinking water is monitored on quarterly basis by Lebamba Analytical Services Laboratory. Sampled the test report dated 30/10/2018 &amp; 16/07/2018 respectively. Overall test result indicates the treated water is according to standards for household use with water boiling is recommended before drinking.</p> <p>Quality of surface water – e.g. Dola River, Iroungou River, Dibotsa River, Douya River, Koutsou River, Ikola River sampling analysis was conducted together with Ministry of Petrol and Hydrocarbon. The frequency is 6 months once. Latest sampling was done on 13/06/2018 where the</p>	Complied
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		parameters tested were pH, T, turbidity, Phosphates, Cl, COD, BOD, total hydrocarbon (O&G). Results indicates results within allowable tolerable range limit.	
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Criterion / Indicator		Assessment Findings	Compliance								
4.4.2	Protection of water courses and wetlands, including maintaining and restoring appropriate riparian and other buffer zones (refer to national best practice and national guidelines) shall be demonstrated  -Major compliance-	<p>Protection of water courses and wetlands, including maintaining and restoring appropriate riparian and other buffer zones is based on the guidelines under Gabon National Interpretation (NI) and Olam’s International Limited internal policy of buffer zone dimension at lot 1 and 3 estates.</p> <table><tr><td>Width of major watercourses</td><td>Minimum riparian buffer zone width (m) on each side of water courses</td></tr><tr><td>&lt;20 m (small river)</td><td>30 meters</td></tr><tr><td>&gt;20 meters (main river)</td><td>300 - 500 meters</td></tr><tr><td>Lake, ponds &gt;1,000 m2</td><td>30 meters</td></tr></table> <p>Clear marking and demarcation of buffer zone was observed at all visited site. Some buffer zone is located adjacent to HCV and conservation area. Most of the river width is less &lt; 20 m within the estates and minimum riparian buffer zone size is maintained and conserved.</p> <p>Water sampling analysis is conducted to ensure that the estate operations are not impacting the water courses. Sample of the records reviewed: <u>Lot 1 estates (Ngounie, PK19-Mboukou)</u></p> <p>Water Sampling analysis is carried out on 6 month basis by General Directorate’ of Studies and Laboratories: Water Service, Gabon. Total of 6 sampling points [P1 (Doubou), P2 (Doubou), P3 (Rembo), P4 (Rembo), P5 (Doure’ri) and M30] selected for analysis. Refer to analysis report dated 13/6/18. Total of 7 parameters tested. Noted that COD results for P2, P3 and P5 have exceeded the limit of 30mg/l. Retest will be carried out in the next coming analysis on December 2018.</p>	Width of major watercourses	Minimum riparian buffer zone width (m) on each side of water courses	<20 m (small river)	30 meters	>20 meters (main river)	300 - 500 meters	Lake, ponds >1,000 m2	30 meters	Complied
Width of major watercourses	Minimum riparian buffer zone width (m) on each side of water courses										
<20 m (small river)	30 meters										
>20 meters (main river)	300 - 500 meters										
Lake, ponds >1,000 m2	30 meters										

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Criterion / Indicator		Assessment Findings	Compliance
		<p><u>Lot 3 estates (Route Mouila-Ndende)</u></p> <p>Water Sampling analysis is carried out on 6 month basis by General Directorate' of Studies and Laboratories: Water Service, Gabon. Total of 14 sampling points selected for analysis. Refer to analysis report dated 13/6/18. Total of 7 parameters tested. All parameters are in compliance with the reference standard.</p>	
4.4.3	<p>Appropriate treatment of mill effluent to required levels and regular monitoring of discharge quality, especially Biochemical Oxygen Demand (BOD), shall be in compliance with national regulations (Criteria 2.1 and 5.6).</p> <p>-Major compliance-</p>	<p>The mill commenced its operation on 30/12/2016. The POME is still filling the lagoon system. Verified that there is no regulated limit of BOD for land application in Gabon. Nevertheless, OLAM is committed to comply with Indonesian or Malaysian limit i.e. 5,000 ppm [ref.: Standard Operating Procedure, Station 13: ETP Operation, page 8] and yearly effluent final discharge monitoring will be done by the appointed laboratory by the Ministry of Petrol &amp; Hydrocarbon. Seen the yearly effluent final discharge analysis, all the parameters have been complied. Analysis was done once a year by the Ministry of Petrol &amp; Hydrocarbon appointed laboratory. The following parameters (e.g. BOD, pH, COD) are checked in the report sample dated 4/6/18. Result of final discharge results (BOD) mg/l is 1450mg/l and within the allowable limit set.</p> <p>The furrow system for POME land application is still progress and expected to be completed in year 2019.</p>	Complied
4.4.4	<p>Mill water use per tonne of Fresh Fruit Bunches (FFB) (see Criterion 5.6) shall be monitored.</p> <p>-Minor compliance-</p>	<p>The water usage by the mill is monitored on daily basis. As of October 2018, the water consumption is 0.77 mt water/mt FFB [ref.: Monthly Water to FFB record] vs. 1.2 mt/mt FFB [ref.: annual budget].</p>	Complied
<p><b>Criterion 4.5</b>  <b>Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management techniques. (IPM).</b></p>			

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Criterion / Indicator		Assessment Findings	Compliance																
4.5.1	Implementation of Integrated Pest Management (IPM) plans shall be monitored. -Major compliance-	<p>Implementation of IPM is being monitored according the established guidelines under OLAM PALM GABON – Agriculture Policy Manual Volume 1 and Volume 2 dated April 2013 Environmental friendly approach to treat if there is any outbreak using <i>Bacillus Thuringiensis</i> (BT), <i>Cordyceps Militar</i>is for treatment of bagworms and nettle caterpillars is recommended. Threshold level is defined in the Agriculture Policy Manual. Last option of control is through agrochemical use. The component of IPM includes early warning system, immediate control, and census prior and after control as part of evaluation. It was noted that beneficial plant such as <i>Antigonon Leptopus</i> and <i>Turnera Subulata</i> were planted along some of the field roads to host the predators Major pest and disease at the moment are elephant and Ryncophorus are exist at Mouila lot 1 and 3 Plantation. IPM monitoring summary as per below:</p> <p>Beneficial Plant establishment</p> <table><tr><th>Estate</th><th>Plots/Length/Distance</th><th>Remarks</th></tr><tr><td>3</td><td>306 plots</td><td rowspan="6">5 Ha = 2 plots, 1 plot=4 meters  The most species planted: <i>Antigonon Leptopus</i> and <i>Turnera Subulata</i></td></tr><tr><td>4</td><td>787 plots</td></tr><tr><td>5</td><td>787 plots</td></tr><tr><td>10</td><td>13.4 km</td></tr><tr><td>11</td><td>10.64 km</td></tr><tr><td>12</td><td>16.74 km</td></tr></table> <p>Pest and disease mitigation plan</p>	Estate	Plots/Length/Distance	Remarks	3	306 plots	5 Ha = 2 plots, 1 plot=4 meters  The most species planted: <i>Antigonon Leptopus</i> and <i>Turnera Subulata</i>	4	787 plots	5	787 plots	10	13.4 km	11	10.64 km	12	16.74 km	Complied
Estate	Plots/Length/Distance	Remarks																	
3	306 plots	5 Ha = 2 plots, 1 plot=4 meters  The most species planted: <i>Antigonon Leptopus</i> and <i>Turnera Subulata</i>																	
4	787 plots																		
5	787 plots																		
10	13.4 km																		
11	10.64 km																		
12	16.74 km																		

Criterion / Indicator		Assessment Findings			Compliance
		Estate	Major pest and disease	Mitigation	
		3	Rhychophorus	i)Chemical spraying using deltamethrin/cypermethrin ii) Uprooting for phyto sanitation	
		4	Elephant intrusion	i) Construction of elephant trenches (28 km) ii) 35 units of sensor nodes and barb wire installation at 17 locations.	
		5	Elephant intrusion	i) Construction of elephant trenches (35.53 km) ii) 31 units of sensor nodes and barb wire installation at 12 locations.	
		10	Rhychophorus	i)Chemical spraying using deltamethrin/cypermethrin ii) Uprooting for phyto sanitation	
		11	Elephant intrusion and Rhychophorus	i) Construction of elephant trenches ii) Sensor nodes and barb wire installation iii)Chemical spraying using deltamethrin/cypermethrin iv) Uprooting for phyto sanitation	

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Criterion / Indicator		Assessment Findings				Compliance												
		12	Elephant intrusion	i) Construction of elephant trenches ii) Sensor nodes and barb wire installation iii)Chemical spraying using deltamethrin/cypermethrin iv) Uprooting for phyto sanitation														
4.5.2	Training of those involved in IPM implementation shall be demonstrated. -Major compliance-	Training for those involve with IPM implementation has been effectively demonstrated. Training records for those involved on IPM implementation were available and verified during on-site assessment for lot 1 and 3 estates. Sample of training records checked: <table><tr><td>Theme of Training</td><td>Date of training</td><td>Trainer</td><td>Participant</td></tr><tr><td>IPM field practices</td><td>23-25/01/2018</td><td>Agronomy team</td><td>Lot 1 estates</td></tr><tr><td>Refresher and filed training on pest and disease</td><td>29-30/01/2018</td><td>Agronomy team</td><td>Lot 3 estates</td></tr></table>				Theme of Training	Date of training	Trainer	Participant	IPM field practices	23-25/01/2018	Agronomy team	Lot 1 estates	Refresher and filed training on pest and disease	29-30/01/2018	Agronomy team	Lot 3 estates	Complied
Theme of Training	Date of training	Trainer	Participant															
IPM field practices	23-25/01/2018	Agronomy team	Lot 1 estates															
Refresher and filed training on pest and disease	29-30/01/2018	Agronomy team	Lot 3 estates															
Criterion 4.6																		
Pesticides are used in ways that do not endanger health or the environment																		
4.6.1	Justification of all pesticides used shall be demonstrated. The use of selective products that are specific to the target pest, weed or disease and which have minimal effect on non-target species shall be used where available. -Major compliance-	Justification of all pesticides used is available under Olam Palm Gabon, Agriculture Policy Manual Volume 1 and Volume 2 dated April 2013. The use of pesticide is specific to the target pest, weed and disease. Based on Olam Palm Gabon, Chapter 9: Immature Maintenance and Ablation; a systemic type of chemical is recommended for circle spraying activities. As				Complied												



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Criterion / Indicator		Assessment Findings	Compliance													
		<p>for pest and disease treatment, IPM Practices dated 25/11/2017, entitled OPG Agriculture Circular no.3: Treatment and Management of <i>Rhynchophorus Phoenixis</i> is referred to.</p> <p>Sample of pesticide used and justification:</p> <table><tr><td>Chemical (active ingredients)</td><td>Target weeds</td></tr><tr><td>Glyphosate IPA</td><td>Circle with grass predominating</td></tr><tr><td>Glyphosate IPA + Metsulfuron Methyl</td><td>Circle with broadleaf weeds and grasses</td></tr><tr><td>Triclopyr-2-butoxyethyl ester + surfactant (sticking agent)</td><td>Woody growth</td></tr><tr><td>Cypermethrin/Deltamethrin</td><td><i>Rhynchophorus Phoenixis</i></td></tr></table>	Chemical (active ingredients)	Target weeds	Glyphosate IPA	Circle with grass predominating	Glyphosate IPA + Metsulfuron Methyl	Circle with broadleaf weeds and grasses	Triclopyr-2-butoxyethyl ester + surfactant (sticking agent)	Woody growth	Cypermethrin/Deltamethrin	<i>Rhynchophorus Phoenixis</i>				
Chemical (active ingredients)	Target weeds															
Glyphosate IPA	Circle with grass predominating															
Glyphosate IPA + Metsulfuron Methyl	Circle with broadleaf weeds and grasses															
Triclopyr-2-butoxyethyl ester + surfactant (sticking agent)	Woody growth															
Cypermethrin/Deltamethrin	<i>Rhynchophorus Phoenixis</i>															
4.6.2	<p>Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) shall be provided.</p> <p>-Major compliance-</p>	<p>Records of pesticides and their active ingredients used, LD50, area treated, amount of a.i. applied per ha, and number of applications for 2018 (to date October 2018) was maintained. Summary of Ai/Ha as per below table:</p> <table><tr><td>Estate</td><td>Active ingredient</td><td>Ai per Ha</td></tr><tr><td rowspan="3">Lot 1, estate 3</td><td>Metsulfuron Methyl @ Ally</td><td>0.05</td></tr><tr><td>Glyphosate Isopropyl Ammonium</td><td>0.79</td></tr><tr><td>Triclopyr-2-butoxyethyl ester</td><td>0.86</td></tr><tr><td>Lot 1, estate 4</td><td>Metsulfuron Methyl @ Ally</td><td>0.015</td></tr></table>	Estate	Active ingredient	Ai per Ha	Lot 1, estate 3	Metsulfuron Methyl @ Ally	0.05	Glyphosate Isopropyl Ammonium	0.79	Triclopyr-2-butoxyethyl ester	0.86	Lot 1, estate 4	Metsulfuron Methyl @ Ally	0.015	Complied
Estate	Active ingredient	Ai per Ha														
Lot 1, estate 3	Metsulfuron Methyl @ Ally	0.05														
	Glyphosate Isopropyl Ammonium	0.79														
	Triclopyr-2-butoxyethyl ester	0.86														
Lot 1, estate 4	Metsulfuron Methyl @ Ally	0.015														

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Criterion / Indicator		Assessment Findings			Compliance
			Glyphosate Isopropyl Ammonium	0.77	
			Triclopyr-2-butoxyethyl ester	0.53	
		Lot 1, estate 5	Metsulfuron Methyl @ Ally	0.024	
			Glyphosate Isopropyl Ammonium	0.5	
			Triclopyr-2-butoxyethyl ester	0.5	
		Lot 3, estate 10	Metsulfuron Methyl @ Ally	0.02	
			Glyphosate Isopropyl Ammonium	0.39	
			Triclopyr-2-butoxyethyl ester	0.02	
			Deltamethrin	0.2	
		Lot 3, estate 11	Metsulfuron Methyl @ Ally	0.02	
			Glyphosate Isopropyl Ammonium	0.6	
			Triclopyr-2-butoxyethyl ester	0.2	
		Lot 3, estate 12	Metsulfuron Methyl @ Ally	0.02	
			Glyphosate Isopropyl Ammonium	0.6	
			Triclopyr-2-butoxyethyl ester	0.2	
4.6.3	Any use of pesticides shall be minimised as part of a plan, and in accordance with Integrated Pest Management (IPM) plans. There shall be no prophylactic use of pesticides, except in specific situations identified in national Best Practice guidelines. -Major compliance-	The management has committed to minimise pesticide usage as per IPM plan. The use of biological control measures such as barn owls for rats control should be implemented if suitable and feasible. There is no prophylactic use of pesticides at all visited estates.			Complied

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Criterion / Indicator	Assessment Findings	Compliance
<p>4.6.4 Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, are not used, except in specific situations identified in national Best Practice guidelines. The use of such pesticides shall be minimised and eliminated as part of a plan, and shall only be used in exceptional circumstances.</p> <p>-Major compliance-</p>	<p>Based on the chemical register and site observation at visited estates, there was no class IA, IB and II used in Mouila Lot 1 and 3 Estates. Paraquat is totally banned by Olam. Refer to Olam Palm Gabon Manual, Chapter 9: Immature Maintenance and Ablation under clause 3.1.4.4; based on recommendation of the WHO Pesticide Action Network (PAN), WHO 1a, 1b and II should be banned or usage avoided as much as possible. PAN dirty dozen and total 18 chemical i.e Paraquat, Parathion and Aldrin were banned totally by Olam. Verified at all visited estates, no chemical under WHO 1a, 1b and II used in the plantation.</p> <p>All chemical used by the estates granted with Authorization for Special Importation (Chemical) permits from Ministry of Agriculture. Sample of permit reviewed and checked:</p> <p>Permit no. 003/MAEPG/DG-AGASA/DICSP/SPP/BSP dated 18/01/2018 valid until 17/01/2019</p> <p>Chemical: Momento 20% WP @ Ally/Metsulfuron Methyl, Country of origin: Malaysia (</p> <p>Permit no. 005/MAEPG/DG-AGASA/DICSP/SPP/BSP dated 07/02/2018 valid until 06/02/2019</p> <p>Chemical: Momento 20% WP @ Ally/Metsulfuron Methyl, Country of origin: Malaysia</p> <p>Chemical: BEST UP 480 SL @ Glyphosate IPA, Country of Origin: Malaysia</p> <p>Chemical: DALOPIR 480 EC @ GARLON/ Triclopyr-2-butoxyethyl ester, Country of Origin: Malaysia</p> <p>Chemical: JUPITER 25 EC @ Deltamethrin, Country of Origin: Indonesia</p>	<p>Complied</p>

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Criterion / Indicator		Assessment Findings	Compliance						
		Permit no. 020/MAEPG/DG-AGASA/DICSP/SPP/BSP dated 20/07/2018 valid until 19/07/2019 Chemical: Ammonium Sulphate, Country of Origin: China Chemical: Warfarin Rat Bait, Wet and Stick 747, Country of Origin: Malaysia							
4.6.5	Pesticides shall only be handled, used or applied by persons who have completed the necessary training and shall always be applied in accordance with the product label. Appropriate safety and application equipment shall be provided and used. All precautions attached to the products shall be properly observed, applied, and understood by workers (see Criterion 4.7). -Major compliance-	<p>Pesticide operators given training on the safe handling and application of the pesticides. Suitable personal protective equipment and application equipment provided to the operators. Sample of PPE provided for specific work units:</p> <table><tr><th>Activity/work unit</th><th>PPE recommendation</th></tr><tr><td>Spraying</td><td>Respirator with filter element (EN 14387:2004 +A1:2008) Rubber nitrile gloves Anti-Fog Chemical goggles Spraying suite (new coverall) Wellington boots</td></tr><tr><td>Manuring/fertilizer</td><td>Dust mask (N95) @ CE0194 Rubber nitrile gloves Body Apron Wellington boots</td></tr></table> <p>All precautions attached to the products explained to operators and understood by them. This was also verified during site visit at Lot 1 and Lot 3 estates.</p>	Activity/work unit	PPE recommendation	Spraying	Respirator with filter element (EN 14387:2004 +A1:2008) Rubber nitrile gloves Anti-Fog Chemical goggles Spraying suite (new coverall) Wellington boots	Manuring/fertilizer	Dust mask (N95) @ CE0194 Rubber nitrile gloves Body Apron Wellington boots	Complied
Activity/work unit	PPE recommendation								
Spraying	Respirator with filter element (EN 14387:2004 +A1:2008) Rubber nitrile gloves Anti-Fog Chemical goggles Spraying suite (new coverall) Wellington boots								
Manuring/fertilizer	Dust mask (N95) @ CE0194 Rubber nitrile gloves Body Apron Wellington boots								

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4.6.6	Storage of all pesticides shall be according to recognised best practices. All pesticide containers shall be properly disposed of and not used for other purposes (see Criterion 5.3). -Major compliance-	<p>The Storage of all pesticides and agrochemicals are well managed with locking system and good ventilation. All pesticide containers are properly disposed and not used for other purposes. Proper waste disposal according to procedures were sighted. Annually training is conducted to raise awareness of proper waste disposal to workers as well as to the estate personnel. E.g. training for waste handling done on 06/02/2018 for workers and managers.</p> <p>Wastes are identified e.g. domestic waste, scheduled waste, recyclable waste and empty chemical containers. Centralized location at Estate 4 (for Lot 1) have designated areas to store litter and waste, which do not create a safety or health hazard. All the domestic wastes (from Lot 1: estate 3, 4, 5 &amp; from Lot 3: estate 10, 11, 12) were disposed at designated landfill in the Lot 1 estate 6 and Lot 3 estate 12.</p>	Complied
4.6.7	Application of pesticides shall be by proven methods that minimise risk and impacts. -Minor compliance-	<p>The type and dosage of agrochemicals required for targeted weeds in different age profile are documented and justified in OLAM PALM GABON – Agriculture Policy Manual Volume 1 and Volume 2 (French &amp; English) dated April 2013. The implementation in the field is consistent with the established procedure. For weeding activities, knapsack spray pump is used for circle spraying.</p> <p>Semi-mechanized chemical spray has been introduced at lot 1 and 3 estates. Area coverage is around 6 ha per sprayer, 12-13 ha per semi-mechanized sprayer unit/tractor. Total workforce requirement for semi-mechanized operation is 3; 2 sprayers, 1 driver.</p>	Complied
4.6.8	Pesticides shall be applied aially only where there is documented justification. Communities shall be informed of impending aerial pesticide applications with all relevant information within reasonable time prior to application. -Major compliance-	No aerial spray at Mouila Lot 1 and 3 estates.	Complied

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Criterion / Indicator		Assessment Findings	Compliance
4.6.9	Maintenance of employee and associated smallholder knowledge and skills on pesticide handling shall be demonstrated, including provision of appropriate information materials (see Criterion 4.8). -Minor compliance-	The employees interviewed (Store assistant, field supervisor) have knowledge and skills on pesticide handling. There is no associated smallholder within Mouila Lot 1 & Lot 3 Plantation.	Complied
4.6.10	Proper disposal of waste material, according to procedures that are fully understood by workers and managers shall be demonstrated (see Criterion 5.3). -Minor compliance-	Proper disposal of waste material are carried out as per the company procedures. The procedures are fully understood by workers and managers. Workers interview reveal that they are aware of the zero burning policy including domestic waste are not allowed to be burned. Management of waste material disposal such as empty chemical container as in accordance with scheduled waste and domestic waste regulations and guidelines.	Complied
4.6.11	Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, shall be demonstrated. -Major compliance-	Annual medical surveillance for sprayers and pesticide operators were demonstrated (biological – once a year and clinical – twice a year) Medical examination programme established for sprayers which conducted by Estate Doctor for biological (limit of cholinesterase, max 12.20 Ui/L) Sampled the medical surveillance record done on April 2018 for workers ID: 053574, 037094 & 047631 for estate 3, estate 4 & estate 5. Results indicate normal and fit for works. Whereas for the Lot 3 (estate 10,11&12) sampled medical surveillance record done on 14/3/18 for workers ID: 046375, 016679 & 043814 for estate 10, estate 11 & estate 12. Results indicate normal and fit for works. If any abnormality been identified during the medical check-up, the workers will be transferred to other work activity and continued medical surveillance will be conducted for the affected worker.	Complied
4.6.12	No work with pesticides shall be undertaken by pregnant or breastfeeding women -Major compliance-	No pregnant or breast feeding women undertaking the work with pesticide. It was confirmed during interview the female workers and they well aware related regulation. During interview with female workers confirmed	Complied

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		knowledge of the policy of transfer to alternative duties if they wished to continue working when pregnancy was confirmed or breast-feeding.	
<b>Criterion 4.7</b> <b>An occupational health and safety plan is documented effectively communicated and implemented.</b>			
4.7.1	<p>The health and safety plan shall cover the following:  A health and safety policy shall be in place. A health and safety plan covering all activities shall be documented and implemented, and its effectiveness monitored.  -Major compliance-</p>	<p>Health and safety policy, issue 2_WD5, document P-04 dated 1/4/16 signed by group MD and CEO of Olam International Limited. Environmental Sustainability Policy, issue2_WD5, document P-02 dated 1/4/16 Quality and food Safety Policy, issue 2_WD5,document P-01 dated 1/4/16 ESH Manual, document ref: OPG-KNG-QSHEMAN01,rev: 01 approved on 3/3/14.</p> <p>The ESH Improvement plan 2018 was established. The progress of programme was monitored on daily basis by SHO. Sampled: .</p> <p>Bi-yearly Electrical Test Report by Bureau Veritas dated 21/02/2017.</p> <p>Lifting equipment test report by Bureau Veritas dated 01/12/2017. Frequency of test is once a year.</p> <p>Hydro Test for Boiler by Bureau Veritas dated 01/08/2018. Frequency of test is once a year.</p> <p>Diesel Storage Tank Calibration Record by the Agency of Gabon dated 12/12/2016 valid for 10 years.</p> <p>Working at Height Permit – sampled record dated 09/07/2018.</p> <p>Hot Work Permit – sampled record dated 08/06/2018. Permit issued by the SHO and necessary details such as name of workers, work details, permit validity and checklist been recorded accordingly.</p>	Complied
4.7.2	<p>All operations where health and safety is an issue shall be risk assessed, and procedures and actions shall be documented and implemented to address the identified</p>	<p>The risk assessment was established as per Safety Risk management (S-101.1, Issue 4, Date: 01/04/2016). The management was identified and registered the risk and summarized it in the Mouila Palm Oil Mill Risk Assessment and Mouila Plantation Risk Assessment. The risk assessment was last reviewed on 29/06/2017 by SHO (for Bilala POM) and 13/10/2017</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
	<p>issues. All precautions attached to products shall be properly observed and applied to the workers.</p> <p>-Major compliance-</p>	<p>by Safety Manager (Mouila Lot 1 &amp; Lot 3 Plantation). The risk assessment will be reviewed whenever there is a change of activity/process or any incidents or at least 2 years once. Eg: FFB reception, Loading ramp, Pressing Station, Sterilisation Station, Laboratory, Store, Oil room, Nut plant, Boiler, Power House, Workshop, Cleaning, dispatching of CPO and PK, preparation of terrain, operation of HCV, construction of roads, operations of nursery, plantation, agronomic activities, store, transport of material, spraying and pre-mix, irrigation, diesel station, workshop, construction activity, transport of workers, harvester, landfill activity etc.</p> <p>Necessary safety data sheets for risk control are available for chemicals used. Sampled as follows at Lot 1 &amp; 3 plantation:</p> <ul style="list-style-type: none"> <li>a) Isopropyl alcohol</li> <li>b) Gengear 320</li> <li>c) Engen Readymix Coolant</li> <li>d) Sodium Carbonate</li> <li>e) Triclopir 480 EC/Dalopir 480 EC</li> <li>f) Glyphosate 41% WW/Pounce 410</li> <li>f) Metsulfuron Methyl 20% WP/Momento 20% WP</li> </ul>	
4.7.3	<p>All workers involved in the operation shall be adequately trained in safe working practices (see Criterion 4.8). Adequate and appropriate protective equipment shall be available to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, and land preparation, harvesting and, if it is used, burning.</p> <p>-Major compliance-</p>	<p>PPE issuance record at Lot 1 Estate 3 sampled for Fertilizer handling workers on Hand gloves and Safety Boots dated 02/11/2018, at Mill on PPE issuance for laboratory workers on safety shoes, hand gloves and safety helmet dated 31/08/2018, at Lot 1 Estate 6 (for landfill workers) on safety boots, hand gloves &amp; face mask dated 13/11/2018, Lot 3 Estate 10 dated 29/10/2018 (for Pesticide Sprayers).</p>	Major nonconformance



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		<p>Work place safety, PPE compliance and monitoring of effectiveness implementation is not adequate.</p> <p>Noticed 1 contractor worker conducting grading &amp; unloading of FFB from the lorry at the receiving platform without wearing safety helmet. Another worker (truck driver) was found supervising the unloading of FFB activity with wearing slipper and smoking at the receiving platform.</p> <p>On site safety inspection on a backhoe in operation found that the safety seat belt, steering horn, back head light &amp; break light were not functioning. Interview session with the backhoe operator indicate that he performs daily visual safety inspections. However, the backhoe operator was not aware that the daily Tractor Safety Checklist was to be used for recording the safety inspection to be carried out as per Procedure of Agriculture Tractor Management, Doc. No. OPG-MLA-EHS-SOP-08. Further follow up interview session with the QSHE team indicate that the backhoe operator competency was determined by his previous employment competency certificate and there was no formal training been provided to the backhoe operator especially on the Olam's Agriculture Tractor Management safe work procedure.</p> <p>PPE issuance record for eye protection was not available for the sampled manuring field workers at Lot 3 Estate 11.</p> <p>Information on Kieserite Material Safety Data Sheet indicate that eye protection to be provided when handling with the chemical/fertilizer.</p> <p>Thus, a major non-compliance has been raised.</p>	
4.7.4	The responsible person/persons shall be identified. There shall be records of regular meetings between the responsible person/s and workers. Concerns of all parties	The responsible persons are the SHO an. HSE meeting members consist of employer & employee representatives. The HSE Committee Organization Chart is available accordingly with adequate number of representatives from Lot 1 & Lot 3. Records of regular meetings between the responsible	Complied

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Criterion / Indicator		Assessment Findings	Compliance
	<p>about health, safety and welfare shall be discussed at these meetings, and any issues raised shall be recorded.</p> <p>-Major compliance-</p>	<p>person and workers were maintained. There was no major issue raised during the meeting. The frequency of the HSE meeting is every 3 months once. Seen the OHS meeting at Mouila Plantation (Lot 1 &amp; Lot 3) dated 09/03/2018, 08/06/2018 &amp; 07/09/2018. Verified that discussion on the all relevant Health &amp; Safety including environmental matters were done accordingly.</p>	
4.7.5	<p>Accident and emergency procedures shall exist and instructions shall be clearly understood by all workers. Accident procedures shall be available in the appropriate language of the workforce. Assigned operatives trained in First Aid should be present in both field and other operations, and first aid equipment shall be available at worksites. Records of all accidents shall be kept and periodically reviewed.</p> <p>-Minor compliance-</p>	<p>Accident and emergency procedures have been communicated to employees, contractors and visitors. Fire drill and Fire evacuation drill was last conducted on 23/05/2018 at Mill, Lot 1 Estate 3 on 09/11/2018, Lot 1 Centralized Workshop (Estate 4) on 06/09/2018 and Lot 1 Office (Estate 3, 4, 5) on 25/06/2018, Lot 3 Office (Estate 10, 11, 12) on 16/11/2018 &amp; Lot 3 Centralized Workshop (Estate 12) on 13/11/2018 to test the state of readiness during emergency situation. Workers trained in First Aider were present in the mill and field operations. This fire drill and first aid training was conducted by Gabonese Fire Department together with the QHSE team. Seen the First Aid Training record dated 02/03/2018 at mill, 10/03/2018 at Lot 1 estate 3, 26/02/2018 at Lot 1 estate 4 &amp; Lot 1 estate 5, 28/05/2018 at Lot 3 estate 10, 12/03/2018 at Lot 3 Estate 11 &amp; 12. Fire extinguisher was monitored and still in good condition, sample expiry date on 29/05/19.</p> <p>Lot 3: Estate 12 Landfill - First aid equipment and the assigned trained first aider was not available at worksite.</p> <p>There was no first aid kit (including clean water for emergency washing purpose) was provided at the landfill worksite. Further verification indicate that there was no trained first aider at the landfill worksite. Thus, a minor non-compliance has been raised.</p>	Minor nonconformance

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4.7.6	<p>All workers shall be provided with medical care, and covered by accident insurance.</p> <p>-Minor compliance-</p>	<p>All workers provided with medical care, and covered by accident insurance. Local workers were covered by CNSS while for Indonesian workers, they were covered by Great Eastern Insurance. Sample insurance policies checked:</p> <table border="1" data-bbox="1010 549 1883 1342"> <thead> <tr> <th>Insurance</th><th>Period</th><th>Mill/Estate</th><th>Policy No.</th></tr> </thead> <tbody> <tr> <td>CNSS</td><td>Oct-18</td><td>Mill</td><td>CNSS#0 04-1 15 829 0-0 &amp; CNSS# 0 01-077 519 5-0</td></tr> <tr> <td>Great Eastern Insurance</td><td>1/1/18-31/12/18</td><td>Mill</td><td>Policy No. G0003696</td></tr> <tr> <td>Great Eastern Insurance</td><td>1/1/18-31/12/18</td><td>Estate 3</td><td>Policy No. G0003698</td></tr> <tr> <td>CNSS</td><td>Oct-18</td><td>Estate 3</td><td>CNSS# 0 01-1 09 265 2-4</td></tr> <tr> <td>CNSS</td><td>Oct-18</td><td>Estate 4, 5</td><td>CNSS# 0 04-1 25 862 2-2, CNSS# 0 01-1 11 080 3-1 &amp; CNSS# 0 01-1 09 936 8-0</td></tr> <tr> <td>CNSS</td><td>Oct-18</td><td>Estate 10, 11, 13</td><td>CNSS# 0 01-1 06 333 6-9, CNSS# 0 01-1 12 610 0-4, CNSS# 0 04-1 25 136 1-1</td></tr> </tbody> </table>	Insurance	Period	Mill/Estate	Policy No.	CNSS	Oct-18	Mill	CNSS#0 04-1 15 829 0-0 & CNSS# 0 01-077 519 5-0	Great Eastern Insurance	1/1/18-31/12/18	Mill	Policy No. G0003696	Great Eastern Insurance	1/1/18-31/12/18	Estate 3	Policy No. G0003698	CNSS	Oct-18	Estate 3	CNSS# 0 01-1 09 265 2-4	CNSS	Oct-18	Estate 4, 5	CNSS# 0 04-1 25 862 2-2, CNSS# 0 01-1 11 080 3-1 & CNSS# 0 01-1 09 936 8-0	CNSS	Oct-18	Estate 10, 11, 13	CNSS# 0 01-1 06 333 6-9, CNSS# 0 01-1 12 610 0-4, CNSS# 0 04-1 25 136 1-1	Complied
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4.7.7	Occupational injuries shall be recorded using Lost Time Accident (LTA) metrics -Minor compliance-	<p>Records of incident and accident were available, using internal reporting system. Records on Lost Time Accident (LTA) metrics had been verified to be satisfactory.</p> <p>Sample of accident statistic as shown below :</p> <p>Bilala POM: LTA hours as to date for year 2018: 168 hours. LTA reported 2 cases.</p> <p>Lot 1 (Estate 3, 4 &amp; 5): LTA hours as to date for year 2018: 717 hours. LTA reported 43 cases.</p> <p>Lot 3 (Estate 10, 11 &amp; 12): LTA hours as to date for year 2018: 414 hours. LTA reported 31 cases.</p> <p>Verified that Accident Investigation Report has been done accordingly for incidents at work place in mill and the estates.</p>	Complied
<b>Criterion 4.8</b> <b>All staff, workers, smallholders and contract workers are appropriately trained.</b>			
4.8.1	A formal training programme shall be in place that covers all aspects of the RSPO Principles and Criteria, and that includes regular assessments of training needs and documentation of the programme. -Major compliance-	<p>The records of training were available at mill and estate office. Sample training checked:</p> <p>Lot 1, Estate 3: Pesticide Spraying Training dated 20/11/2018, Pesticide Spraying Training dated 18/01/2018, First Aid Training dated 10/03/2018.</p> <p>Mill: Infrared Thermography Camera dated 13/03/2017, Safety Workshop Training dated 12/02/2018.</p> <p>Lot 1, Estate 5: Manuring Training dated 15/11/2018, Harvesting dated 10/11/2018, Pesticide Spraying Training dated 19/11/2018, Training on productivity and pruning dated 10/08/2018,</p> <p>Lot 1, Estate 4: Training on HSE Communication dated 07/08/2018, Pesticide Spraying Training dated 28/03/2018.</p>	Complied

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		Lot 3, Estate 10, 11 & 12: Pesticide Spraying Training dated 11/09/2018, Waste Handling Training dated 02/06/2018, Training on Safety Awareness for Truck & Light Vehicles Drivers dated 22/10/2018	
4.8.2	Records of training for each employee shall be maintained. -Minor compliance-	Records of training for each employee are available & maintained accordingly in Mill and estates. Cross refer 4.7.3.	Complied
<b>Principle 5: ENVIRONMENTAL RESPONSIBILITY AND CONSERVATION OF NATURAL RESOURCES AND BIODIVERSITY</b>			
<b>Criterion 5.1</b> <b>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 continual improvement.</b>			
5.1.1	An environmental impact assessment (EIA) shall be documented. -Major compliance-	<p>Mouila Lot 1 Plantation:</p> <p>The EIA is completed following to the requirements of the General Direction of Environment and Natural Protection.</p> <p>Environmental Impact Assessment (EIA) for Mouila Plantation Lot 1 was completed by ECOSPHERE SARL, Libreville (Environmental Consultant) in May 2012. The EIA is certified by DGEPN: Compliance Certificate (article 67 and 71 of law 16/93 regarding protection and improvement of environment, n°1370/MEEDD/SG/DGEPN the 09/07/2012. The EIA addresses institutional and legal frames, project detailed description, preliminary studies to define environmental sensibilities, all project needs, initial state description according to the Palm oil requirements, impacts assessments on each social and environmental project components, the monitoring system and many annexes such as all analysis results (soil, water, IHO norms for drinkable water, DGEPN recommendations, all public consultation reporting, carbon balance, etc.</p> <p>Due to the NPP, specific Environmental &amp; Social Impact Assessment on Palm Oil Mouila Lot 1 dated September 2015 and Specific Env. &amp; Social</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		<p>Impact Assessment for Palm Oil Mill was completed by Terre Environmental Amenagement (TEREA).</p> <p>Mouila Lot 3 Plantation:  The Environmental &amp; Social Assessment Plan &amp; the Output Action Plan for Plantation of Palm at Mouila Lot 3, dated May 2015 was carried out Terea Proforest with Certificate of Compliance ref. no. 1190/MPERNM/SG/DGEPN established on 06/07/2015 addressing the environmental and social impact of Olam Palm Mouila Lot 3.</p>	
5.1.2	<p>Where the identification of impacts requires changes in current practices, in order to mitigate negative effects, a timetable for change shall be developed and implemented within a comprehensive management plan. The management plan shall identify the responsible person/persons.</p> <p>-Minor compliance-</p>	<p>Timetable for mitigating negative impacts is developed in the Environmental and Social Management Plan (ESMP), established by Terea for Lot 1 &amp; Lot 3.</p> <p>Environmental analysis to identify environmental aspect and impact</p> <p>Leakage from machinery – to construct concrete foundation in the mill, spillage kit, construct concrete bund walls at the diesel skid tank</p> <p>Maintain the vehicles and generator sets (2 units) and training awareness to the people in-charge of the machines</p> <p>Regular maintenance of boiler</p> <p>Spent chemicals are disposed through ETP</p>	Complied
5.1.3	<p>This plan shall incorporate a monitoring protocol, adaptive to operational changes, which shall be implemented to monitor the effectiveness of the mitigation measures. The plan shall be reviewed as a minimum every two years to reflect the results of monitoring and where there are operational changes that may have positive and negative environmental impacts.</p>	<p>The management and monitoring plan is required by Department of General Direction of Environment and Protection (DGEPN). The monitoring report shall include all the analysis requirements for the activities in the mill and estate. A summary report which cover monitoring of surface water, air, soil, health &amp; security and employment which need to submit to DGEPN. The latest submission dated February 2018 for Lot 1 &amp; March 2018 for Lot 3 was sighted during onsite visit.</p>	Complied

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	-Minor compliance-		
<b>Criterion 5.2</b> <b>The status of rare, threatened or endangered species and other High Conservation Value habitats, if any, that exist in the plantation or that could be affected by plantation or mill management, shall be identified and operations managed to best ensure that they are maintained and/or enhanced.</b>			
5.2.1	<p>Information shall be collated in a High Conservation Value (HCV) assessment that includes both the planted area itself and relevant wider landscape-level considerations (such as wildlife corridors).</p> <p>-Major compliance-</p>	<p>HCV assessment has been conducted for Lot 1 concession area before the development for plantation. It was conducted by Proforest with an initial scoping assessment beginning February 2012. The final report entitled "HCV Assessment Olam Palm, Gabon, 35,354 ha Concession North of Mouila" [ver. 4.0 May 2012]. The assessment was conducted by HCV assessment team consisted of 13 specialists and 11 technicians. The Global HCV toolkit and the draft HCV National Interpretation Document for Gabon were used. It was identified HCV 1.2, 1.3, 3, 4.1, 5 and 6 within the concession area.</p> <p><u>Lot 3 Estate</u></p> <p>Main HCV assessment was last carried between July 2014 to February 2015 by Proforest. The assessment was started prior to the launch of the HCVRN Assessor Licensing Scheme (ALS) and prepared in accordance to new ALS and requirements and guidelines. The assessment covering the concession area of 23,780 ha in Ngounie' Province, South Gabon. There are no RAMSAR site near Mouila lot 3. The nearest is approx. 100 km away from development site. In lot 3, no overlapping of any Intact Forest Landscape (IFL) based on the report. A few stakeholder session was carried out in July and December 2014 and February 2015. WWF, WCS, Brainforest, ANPN and local communities were among pertinent stakeholders consulted.</p> <p>Summary of HCV identification for lot 3:</p>	Complied

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		HCV type	Assessment identification	Justification	
		1	Present	Fauna –mammals i) Method - Recce transect of 38 km and 38 camera traps; 12 mammals identified including flagship species protected in Gabon such as Elephant, buffalos, sitatungas and chimpanzees. The said species were listed under IUCN redlist and protected in Gabon especially chimpanzees (endangered, protected)	
		4	Present	i) Lot 3 spans 5 sub-catchments, upstream of a few villages and Mouila town. ii) Forest galleries	
		5	Present	Main livelihood strategy is based on small farming and, hunting, fishing and collection of local non-timber forest product (NTFPs)	
		6	Present	Sacred site and burial grounds and identified through participatory mapping exercise and validated on community maps	
		2,3	Absent		
5.2.2	Where rare, threatened or endangered (RTE) species, HCVs, or legally protected species or areas are present or are affected by plantation or mill operations, appropriate	Potential presence of RTE fauna such as Gorilla (Gorilla Gorilla), chimpanzee (Pan troglodytes), Elephant (Loxodonta Africana cyclotis) and Forest Buffalo (Syncerus caffer nanus) were identified in Lot 1 and 3 estates. Two endemic species of fish, including one listed as Endangered by the IUCN, in the River			Complied



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<p>measures that are expected to maintain and/or enhance them shall be implemented through a management plan.</p> <p>-Major compliance-</p>	<p>Douya at Lot 3. Whereas RTE flora identified was Ebenacea (Diospyros crassiflora) at lot 1. Overall 59 herbaceous species were identified at lot 3, all of which considered common or widespread, none of particular conservation significance in the Gabonese context or listed on the IUCN Red List.</p> <p>Among the appropriate measures established by the plantation are:</p> <p>Mammal survey of the northern half of the concession during dry season.</p> <p>Delineate conservation areas in the central and northern parts of the concession.</p> <p>Delineate habitat corridor between "central bowl" swampy areas and Igegi/Ngounie floodplain and Dakar/Ngounie floodplain to enable animal movement.</p> <p>Define an ape management strategy.</p> <p>Define elephant management strategy.</p> <p>Engage with local communities on the value present and develop a programme to mitigate the threat from overfishing.</p> <p>Mbengui forest block needs to be managed for its mammals and forest cover. A local agreement needs to be reached to restrict hunting pressure in this zone.</p> <p>Gallery forest around the River Douya should be integrally preserved as a buffer against potential runoff.</p> <p>Construction of trenches at strategic areas to limit the movement of elephant and subsequently minimise the human conflict. Installation of elephant sensor near to trenches area avoid further intrusion of elephant into the plantation.</p>	

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		<p>Signage's are erected and placed at the field to create awareness and individuals/employees are notified of the HCV area to ensure that no illegal hunting is carried out within the Lot 1 and lot 3 concession area. For visual identification, colour coding is used to differentiate type of HCV as such:</p> <p>Yellow : environmental, flora and fauna HCV</p> <p>Red: Social and community HCV</p> <p>Blue: buffer zone HCV</p>	
5.2.3	<p>There shall be a programme to regularly educate the workforce about the status of these RTE, HCV or protected species and habitats, and appropriate disciplinary measures shall be instigated in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect or kill these species.</p> <p>-Minor compliance-</p>	<p>A plan entitled "Plan Pratique de Protection de la Faune" with a main objective to protect the fauna including ape. Among the action plans defined</p> <p>Routine patrolling – to check if there is any indication of illegal hunting of the protected species.</p> <p>Awareness training for employees on prohibition of illegal activities in July 2018.</p> <p>Programme to regularly educate the workforce about the status of these RTE, HCV or protected species and habitats is in place. Induction training given to the new worker recruit by the RSPO department. The latest training was carried on 1/6/18 at lot 3 estate. According to Article 275 under Forest Code of Gabon, the one that involved in prohibited activities will be penalized for the maximum of 10,000,000 CFA if found to be guilty. Capturing, detention, commercialization and transportation of totally protected species i.e Chimpanze', Buffle, Ele'phant is prohibited based on Article 3, d'ecret n0 164/PR/MEF.</p> <p>Management and monitoring plans were developed based on the HCV consultants' recommendations and these were inspected during the field visit and document review.</p>	Complied

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5.2.4	<p>Where a management plan has been created there shall be ongoing monitoring:</p> <p>The status of HCV, RTE and protected species and areas that are affected by plantation or mill operations shall be documented and reported;</p> <p>Outcomes of monitoring shall be fed back into the management plan.</p> <p>-Minor compliance-</p>	<p>Patrolling groups are setup to monitor presence and absence of the RTE species. Other method implemented was placing cameras at strategic places to capture the presence of animals. The outcome was documented in "Weekly Activity Report [Rapport D'Activite Hebdomadaire]. Latest report based on visit on 10-16/11/2018 [Block L-33,34] and patrolling at all estate 1 to 6 was also maintained.</p> <p>In order to monitor the presence of elephant , the Damage Analysis Record is updated weekly. The purpose of te report is to record the number of oil palm destroyed by the elephants. Latest record was until September 2018 reporting 18,920 palm oil damages in 128 ha.</p> <p>Other HCV monitoring reports verified at lot 3 estates:</p> <p>i) HCV weekly report from 24-29/9/18</p> <p>- Archaeology mission, monitoring of corridors, HCV signboards monitoring</p> <p>ii) "Rapport De Signalisation Des HCV" @ HCV signage report</p> <p>- The survey/monitoring was carried out from 11-13/10/18. Summary of monitoring as per the table below:</p> <table border="1"> <thead> <tr> <th>Estate</th><th>Red sign</th><th>Yellow sign</th><th>Total</th></tr> </thead> <tbody> <tr> <td>10</td><td>81</td><td>22</td><td>103</td></tr> <tr> <td>11</td><td>68</td><td>11</td><td>79</td></tr> <tr> <td>12</td><td>65</td><td>17</td><td>82</td></tr> <tr> <td>13</td><td>56</td><td>15</td><td>71</td></tr> <tr> <td>14</td><td>61</td><td>13</td><td>74</td></tr> <tr> <td>15</td><td>78</td><td>20</td><td>98</td></tr> </tbody> </table>	Estate	Red sign	Yellow sign	Total	10	81	22	103	11	68	11	79	12	65	17	82	13	56	15	71	14	61	13	74	15	78	20	98	Complied
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12	65	17	82																												
13	56	15	71																												
14	61	13	74																												
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Criterion / Indicator		Assessment Findings				Compliance
		Total	409	98	507	
		<p>iii) "Rapport D'exploitation Illegale De Bois" @ Illegal activities report  Location: lot 3, estate 14/T97. Date of patrolling: 16/7/18  Location: Lot 3, estate 10 block A14/15/16/17 &amp; B09/10/13/14/5/16. Date of patrolling: 18/6/18</p> <p>Observed at the above locations, illegal activities was sighted by SANGA population and 3<sup>rd</sup> party. Appropriate action was taken and the case was reported to local Forest Administration for further action.</p> <p>Olam has also collaborate with Gabon Forest Administration to conduct inventory study and surveillance monitoring at the wildlife corridor. Method of monitoring is currently at total of 49 transects within the corridor. Camera trap is used to cross-check transect data.</p> <p>OPG has planned to collaborate with National Agency of National Park to jointly monitor the HCV area. This initiative focused to further control and mitigate all illegal activities such as poaching, logging within the concession area. The plan is to conduct monthly monitoring for lot 1 and 3 estates. The implementation will be further verified in the next assessment.</p>				
5.2.5	Where HCV set-asides with existing rights of local communities have been identified, there shall be evidence of a negotiated agreement that optimally safeguards both the HCVs and these rights. -Minor compliance-	<p><u>Lot 1 estates</u></p> <p>There are HCV set-aside for the local communities and the agreement between Olam and the communities can be seen in Social Contract signed on 30/07/2012 between Olam Palm Gabon and Population of Lot 1, in presence of President of Departmental Council, department of Douya Onoye, Dept of Tsamba Magotsi, Governor of Province of Ngounie. The right communities for hunting, fishing will be respected and according to</p>				Complied

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	<p>Gabonese Law. Social HCV such as sacred area, river and lakes will be protected by Olam.</p> <p>Total of 8 villages were consulted and mentioned in the said social contract. Demands such as to provide proper infrastructure i.e hydraulic pump, solar power for lighting, school and house for teachers, income generating activities assistance and equipment etc.</p> <p><u>Lot 3 estates</u></p> <p>There are HCV set-aside for the local communities and the agreement between Olam and the communities can be seen in Social Contract signed on 28/05/2015 between Olam Palm Gabon and Population of Lot 3, in presence of President of Departmental Council, La Douya-Onoye, President of Departmental Council, La Dola and Department of Agriculture (Representative for Mouila town) under Province of Ngounie. Negotiated agreement was done with FPIC process which involved 7 villages and 1 district of Mouila town 1 and local authorities. Agreed demands and commitments;</p> <p>Social HCV such as sacred area and cemetery will be protected by Olam. Respecting the rights of communities to fish, hunting and collecting fruit in the forest.</p> <p>Water supply – bore well</p> <p>Employment opportunity for the communities</p> <p>Public solar panel, rehabilitation of equipment, building</p> <p>CSR – donation of medicine</p> <p>Agriculture inputs and support</p>	
Criterion 5.3:		

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Waste is reduced, recycled, re-used and disposed in an environmentally and socially responsible manner.			
5.3.1	All waste products and sources of pollution shall be identified and documented. -Major compliance-	Lot 1 & Lot 3 wastes products and source of pollution is documented in "Waste Register in the Plantation" [OPG-MLA-QESH-PLN-01, dated 1/2/2016, ver. 1] which has the information source of wastes, types of waste, classification (organic, plastic, metallic, toxic wastes), location of storage, method of transportation, person in-charged, method of disposal, PIC for disposal.	Complied
5.3.2	All chemicals and their containers shall be disposed of responsibly. -Major compliance-	At the mill, empty chemical containers (from isopropanyl, n-hexane, etc.) were kept in designated store and it is in plan to be shredded which is expected to be materialized December 2018.  For the Lot 1 & Lot 3 estates, empty chemical containers are stored in the waste yard where they were punctured and kept in a locked store. Monitoring of movements is recorded in "Chemical Details" log book which has the information about month, name of chemicals, quantity (uom: Lt or kg), no of bottles, date of receipt, location (e.g. Lot 1 Estate 3, 4, 5 & Lot 3 Estate 10, 11, 12), person who return the containers, signature of the person who return the containers. Spent oil from mill and Lot 1 estates sent to workshop (Lot 1 Estate 4) whereas spent oil from Lot 3 estates were sent to Lot 3 Estate 12 Workshop to be accumulated, then will be collected by licensed contractor to be disposed through incineration process. The latest inventory record was dated 24/11/2018.	Complied
5.3.3	A waste management and disposal plan to avoid or reduce pollution shall be documented and implemented. -Minor compliance-	The waste management plan was established as part of IMS Manual as Environment Standard - Waste Management Doc. No. E-101; Issue 4; Dated 1/4/2016. The plan to avoid or reduce or prevent plan consist of method of waste treatment and disposal as following:  Recycle or reuse	Minor nonconformance

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	<p>Thermal treatment-not include open burning  Wastewater treatment, chemical treatment, encapsulation, hydrolysis, extraction and steam stripping  Secure landfill  Sanitary landfill and land farming</p> <p>As per Environment Standard of Release Prevention and Response Doc. no. E101; Issue 4; dated 01/04/2016; Minimum Engineering and Administrative Control Requirements OPG is required to:  Implement the engineering and administrative controls for release prevention a minimum as per Appendix 1. Comply with local codes and regulations if they are more stringent.  Set objects to remove underground storage tanks.  Monitor progress, including testing, removal/replacement objectives and appropriate corrective as necessary.</p> <p>It was observed OPG has perform waste segregation i.e. general wastes and scheduled wastes including clinical waste was verified to be satisfactory in the clinic/estates. Proper storage areas were identified for the storage of the recyclable wastes at the landfill station with adequate pollution control methods been implemented e.g. disposal of non-scheduled waste (empty chemical container). Th following was aampled:  a) Waste Oil Certificate of Destruction No. 012011/2018 dated 17/11/18, Location: Mbouku, Quantity: 6500Liter  Collection done by approved licensed collector Asahi Consulting and disposed at licensed approved contractor Horizon Petro Products Sarl.</p>	

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	<p>b) Waste Oil Certificate of Destruction No. 022506/2018 dated 4/6/18, Location: Mbouku, Quantity: 6400Liter Collection done by approved licensed collector Asahi Consulting and disposed at licensed approved contractor Horizon Petro Products Sarl.</p> <p>c) Waste Oil Certificate of Destruction No. 130 dated 18/11/18, Location: Moutassou, Quantity: 2200Liter Collection done by approved licensed collector Asahi Consulting and disposed at licensed approved contractor Horizon Petro Products Sarl.</p> <p>The collection of hydrocarbon was collected by Authorised Licensed. Asahi Consulting is licensed collector from Ministry of Petroleum &amp; Hydrocarbon , Certificate No. 1633, valid until 22/5/19. For the recycle waste such plastic &amp; metals, Olam is in finalisation in sourcing the appropriate contractor which is Secret Recyc Gabon – Authorised Licensed Collector Certificate No.1852.</p> <p>Lot 3: Estate 12 - Waste management and disposal plan to avoid or reduce pollution was not implemented adequately. Chemical spill response material (fibre materials) was available at the Chemical Store &amp; Lubricant Oil Storage Drums at the Workshop. However, appropriate tools to clean up the contaminated fibres was not provided at the above workstations. Thus, a minor non-compliance has been raised.</p>	
<b>Criterion 5.4:</b> <b>Efficiency of fossil fuel use and the use of renewable energy is optimized.</b>		



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5.4.1	<p>A plan for improving efficiency of the use of fossil fuels and to optimise renewable energy shall be in place and monitored.</p> <p>-Minor compliance-</p>	<p>POM:</p> <p>Plan for improving efficiency of the use of fossil fuels and to optimise renewable energy in place and monitored accordingly. Sample verified - Diesel consumption/CPO Production: 4.28 l/tonne (October 2018). The plan was monitored by Mill Manager on monthly basis.</p> <p>At Mouila Lot 1 Plantation (for estate 3, 4, 5), there was a plan established for improving efficiency of the use of fossil fuel as well. Sighted the diesel consumption 2016 – 2018 (as at October 2018). Diesel consumption/FFB processed: 35.5 l/mt (Oct 2018).</p> <p>At Mouila Lot 3 Plantation (for estate 10, 11, 12), there was a plan established for improving efficiency of the use of fossil fuel as well. The diesel consumption record was started from April 2018. Diesel consumption/FFB processed: 68.0 l/mt (as at Oct 2018).</p> <p>Verified that the efficiency monitoring is based on budgeted consumption – should there be any over consumption of diesel, investigation will be done.</p>	Complied
<p><b>Criterion 5.5:</b>  <b>Use of fire for preparing land or replanting is avoided, except in specific situations as identified in the ASEAN guidelines or other regional best practice.</b></p>			
5.5.1	<p>There shall be no land preparation by burning, other than in specific situations as identified in the 'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003, or comparable guidelines in other regions.</p> <p>-Major compliance-</p>	No burning method is practiced in the visited Lot 1 & Lot 3 estates.	Complied

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5.5.2	Where fire has been used for preparing land for replanting, there shall be evidence of prior approval of the controlled burning as specified in 'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003, or comparable guidelines in other regions -Minor compliance-	No used of fire for land preparation.	Complied
<b>Criterion 5.6:</b> <b>Plans to reduce pollution and emissions, including greenhouse gases, are developed, implemented and monitored.</b>			
5.6.1	An assessment of all polluting activities shall be conducted, including gaseous emissions, particulate/soot emissions and effluent (see Criterion 4.4) -Major compliance-	The assessment of all polluting activities was conducted through various approach as mentioned in 5.1.1. This includes the GHG emission, smoke emission and effluent discharge.	Complied
5.6.2	Significant pollutants and greenhouse gas (GHG) emissions shall be identified, and plans to reduce or minimise them implemented. -Major compliance-	<p>For the estates, GHG emissions identified from various sources including fossil fuel, chemical, sinks, crop sequestration, fertilizer consumptions and sequestration in conservation area. For mill, GHG emission identified from POME and fuel consumption. Plan to construct biogas /methane capture plant has been planned in the next 3 years at Bilala POM and after completion of the new 90 mt/hr mill for lot 3.</p> <p>Monitoring of the GHG quantity was done through RSPO PalmGHG Calculator Version 3.0.1 is used and the management opted for full version was applied. The report prepared on for 2017. These GHG calculations were done as per certification unit basics including other group estates that supplied to Bilala POM. Summary emissions:</p> <p>Emission/ mt CPO= -24.27 tCO<sub>2</sub> e/mt CPO</p> <p>Emission/ mt PK= -24.27 tCO<sub>2</sub> e/mt PK</p> <p>*Lot 3 was not included in the GHG calculation for 2017.</p>	Complied

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5.6.3	A monitoring system shall be in place, with regular reporting on progress for these significant pollutants and emissions from estate and mill operations, using appropriate tools. -Minor compliance-	A monitoring system is in place, with regular reporting on progress for significant pollutants and emissions from plantation activities. For examples, records of dark smoke emission using smoke density meter and mill effluent analysis by reputable laboratory.	Complied
<b>Principle 6: RESPONSIBLE CONSIDERATION OF EMPLOYEES AND OF INDIVIDUALS AND COMMUNITIES AFFECTED BY GROWERS AND MILLERS</b>			
<b>Criterion 6.1:</b> <b>Aspects of plantation and mill management that have social impacts, including replanting, 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 continual improvement.</b>			
6.1.1	A social impact assessment (SIA) including records of meetings shall be documented. -Major compliance-	<p>The development for both Lot 1 and Lot 3 is started with new planting development. For Lot 1 there is 2 part of Social Impact Assessment. The Mouila Lot 1 SIA covering Estate 1 – Estate 6 was carried out by Ecosphere with the participation of local authorities – Environment Department, local communities chief and representatives from October 2011 – February 2012 (23/10/2011 specifically for socioeconomic studies). Public consultations were made with the local authorities and local communities. The first consultation was made on 14/01/2012 and the second consultation was made on 09/03/2012 in order to receive any other impacts raised by the stakeholders. The attendance lists of all the stakeholders that involved in the public consultations is provided in the report. The report is dated May 2012.</p> <p>The Bilala Palm Oil mill SIA was carried out by TEREa with participation of local authorities from 22/07/2015 – 25/07/2015. The report was dated September 2015.</p> <p>For Mouila Lot 3, there is 2 part of the SIA. The Lot 3 SIA was conducted by Terrea Proforest between July 2014 – Feb 2015 and reported in May</p>	Complied

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		2015. While for Lot 3 Extension was conducted between May 2016 – December 2016 by Terra and reported in January 2017.	
6.1.2	There shall be evidence that the assessment has been done with the participation of affected parties. -Major compliance-	The assessment was conducted for New Planting Procedure. The participation of the affected parties are provided in the assessment report. During the interview with local communities, it is confirmed that they have involved in the assessment process and had been consulted.	Complied
6.1.3	Plans for avoidance or mitigation of negative impacts and promotion of the positive ones, and monitoring of impacts identified, shall be developed in consultation with the affected parties, documented and timetabled, including responsibilities for implementation. -Major compliance-	The basis of the management plan was developed following the SEIA conducted for the NPP (Lot 1, Lot 3 and Lot 3 extension). The original management plan was dated May 2015 (Lot 3) and January 2017 (Lot 3 extension). The management plan was developed base consultation. As sample, OPG had implemented the Social Contract for Lot 3 and Lot 3 extension. The Social contract was agreed upon consultation with local communities. The Social Contract is part of the management plan. Monitoring of the social contract implementation was observed. The month CSR Board for November 2018 shows the progress of the implementation.	Complied
6.1.4	The plans shall be reviewed as a minimum once every two years and updated as necessary, in those cases where the review has concluded that changes should be made to current practices. There shall be evidence that the review includes the participation of affected parties. -Minor compliance-	OPG is obliged to update the management plan and submitted to The General Direction of Environment on yearly basis. The latest management plan was dated 12/03/2018. On periodic basis, the social team is will visit the community for engagement. The sensitization campaign program is available.	Complied
6.1.5	Particular attention shall be paid to the impacts of smallholder schemes (where the plantation includes such a scheme). -Minor compliance-	Not applicable as the Mouila Lot 1 certification unit does not involved any scheme smallholders.	Not applicable
<b>Criterion 6.2</b>			

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<b>There are open and transparent methods for communication and consultation between growers and/or millers, local Communities and other affected or interested parties.</b>			
6.2.1	Consultation and communication procedures shall be documented -Major compliance-	For external parties, the procedure for Consultation and Communication with Local Communities dated 02/07/2012. The purpose of the procedure is to describe the methods to consult and communicate with the surrounding communities. The procedure was develop as part of the implementation of FPIC process.  For internal parties, communications are done via internal memorandum. The records of memorandum are retained by the human resources department.	Complied
6.2.2	A management official responsible for these issues shall be nominated. -Minor compliance-	The management official responsible person for external parties' communication is the CR&S (Corporate Responsibilities & Sustainability) team.  For internal parties, the management official responsible person is Human Resource Manager.	Complied
6.2.3	A list of stakeholders, records of all communication, including confirmation of receipt and that efforts are made to ensure understanding by affected parties, and records of actions taken in response to input from stakeholders, shall be maintained -Minor compliance-	The lists of stakeholders and communication records are maintained by OPG.  At the communities a communication and grievance logbook is maintained and will be managed by OPG social officers.  During the interview with the communities, it was observed that the logbook is available. A list of responsible person for social communication with the communities has been assigned. OPG has been disseminated the <i>Numeros de telefonos des responsables du service social d'Olam Palm Mouila</i> to the communities.  It is acknowledge by the assessment team that effort of communication with the communities has been carried out. However, information received	Complied

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		from the communities varies. The effectiveness of the communication need to be further improved.	
<b>Criterion 6.3</b> <b>There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties.</b>			
6.3.1	<p>The system, open to all affected parties, shall resolve disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants and whistleblowers, where requested.</p> <p>-Major compliance-</p>	<p>OPG has established Procedure de Gestions Des Plaintes et Reclamations – Doc SOP No 07/CRS/Mouila/0517 dated May 2017.</p> <p>Log books are available in operating sites to capture grievances. Other than the local logbook, grievance received locally will be registered in SocProg. Objective evidences will be uploaded into the system and once complaint resolved, it shown "Closed" in the system.</p> <p>The external complaint will be received by the CR&amp;S team while for internal complaint will be manager by HR department.</p> <p>OPG has also demonstrated transparently to received complaints from out external parties through having a grievance platform and procedure published in their website (<a href="https://www.olamgroup.com/sustainability/grievance.html#">https://www.olamgroup.com/sustainability/grievance.html#</a>) the website has also published the complaint log. OPG as respected the anonymity by not making it compulsory to provide names for any grievances.</p>	Complied
6.3.2	<p>Documentation of both the process by which a dispute was resolved and the outcome shall be available.</p> <p>-Major compliance-</p>	<p>For internal there are 2 records of grievance mainly directly from workers and from union. Grievances received and resolution available.</p> <p>Sample of grievance records:</p> <p>Grievance on expatriates managers using abusive words towards National workers was received through the Strike Notice dated 01/09/2018. The resolution meeting minutes together with the Minister of Labour and Employment dated 18/09/2018 is available. The resolution is to provide training and briefing to the managers. The minutes of the meeting dated</p>	Major nonconformance

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		<p>29/10/2018; attendance of the briefing and witnessing workers are available.</p> <p>Grievance of workers harassed and insulted by Assistant was reported on 23/07/2018. The resolution of grievance was conducted by the HR personnel in Mouila Lot 3. The resolution was to conduct briefing to the accuser.</p> <p>Grievance on destruction of fishes was received by the Social Officers from Mbadi Community (Lot 3). The complaint was raised on 10/10/2017. The case was recorded in the ScoProg 14/10/2017. The first engagement after the complaint was n 10/10/2017 which is within the 5 days as per the Procedure on Settlement Disputes, Litigation, Complaints and Claims. The resolution was completed on 09/11/2017.</p> <p>There is no specific timeline stated in the grievance logbook if the resolution is accepted by the complainant and the date of resolution. The Procedure de Gestions Des Plaintes et Reclamations has not considered resolution timeline for internal grievance.</p>	
<b>Criterion 6.4</b> <b>Any negotiations concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.</b>			
6.4.1	<p>A procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, shall be in place.</p> <p>-Major compliance-</p>	<p>There are no land compensation <i>per say</i> for this certification. The compensation identified for this certification is crop compensation.</p> <p>Procedure of Identification of People Entitled to a Compensation Doc No. MLA 1-PRO-004-CR&amp;S, version 02 dated June 2015 was established to identify legal, customary or user rights and compensation to the communities affected by the project. The procedure is to describe the methods and processes to identify the people who are entitled to compensation. Mapping social participatory will be carried out by Olam to locate qualitatively and quantitatively human activities in the area before</p>	Complied

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		concession. Meeting with the Head of Department of Agriculture will be held to discuss the results of evaluation and carried out compensation accordingly.	
6.4.2	A procedure for calculating and distributing fair compensation (monetary or otherwise) shall be established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. This procedure shall take into account: gender differences in the power to claim rights, ownership and access to land; differences of transmigrants and long-established communities; and differences in ethnic groups' proof of legal versus communal ownership of land. -Minor compliance-	According to the Procedure stated in 6.4.1 above, the calculation for crop compensation shall follow Decree no 1016/PR/MAEDR – price fixing for total amount of voluntary destruction of crops, cattle, farm building, ponds and other resources.	Complied
6.4.3	The process and outcome of any negotiated agreements and compensation claims shall be documented, with evidence of the participation of affected parties, and made publicly available -Major compliance-	The calculation for crop compensation followed the National Decree no 1016/PR/MAEDR – price fixing for total amount of voluntary destruction of crops, cattle, farm building, ponds and other resources. The compensation amount is approved by the provincial government. Sample of compensation observed for Lot 3: Sample 1 (Bavanga Community) – the compensation amount is CFA100,000 paid on 05/10/2016 Sample 2 (Bavanga Community) – the compensation amount is CFA50,000 paid on 06/09/2017. The compensation payout records are retained by OPG.	Complied
<b>Criterion 6.5</b> <b>Pay and conditions for employees and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages.</b>			



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6.5.1	Documentation of pay and conditions shall be available. -Major compliance-	<p>The pay slip are issued to the workers (both National and foreign labors). The payslip provide details such as of the day the worker worked, basic daily wage, deduction of CNSS and CNAMGS, deduction of tax and deduction of advance pay. The payslip are issued with local language for National workers and in English for foreign labor.</p> <p>Interview conducted with workers confirmed that the payslip made available to the workers are understood by them.</p> <p>According to the Labor Law, the minimum wage is CFA150,000. However, if the company is providing other allowances, the adding of the allowance and the offered salary shall not be less than the minimum wages.</p>	Complied
6.5.2	Labour laws, union agreements or direct contracts of employment detailing payments and conditions of employment (e.g. working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc.) shall be available in the languages understood by the workers or explained carefully to them by a management official. -Major compliance-	<p>All workers had entered into contract agreement with OPG. In OPG, there are mainly Permanent workers, temporary workers (re-contracted every 6 months and maximum of 2 year temporary contract. If deemed to continue, the workers is required to be converted to permanent staff), foreign workers and staff. OPG has found to be compliance with the implementation of temporary workers. However, the following non-compliance are found:</p> <p>The job title stated in the mill general workers are still plantation workers despite they have been transferred to mill.</p> <p>Lot 3 – the job title after renewal of contract does not specifically state the job title. It is only stated as OE1AA.</p> <p>The Indonesia foreign worker contract does not include an appropriate exit clause (e.g. period of notice, reason of exiting) if the workers decide to return home without completing the contract. Furthermore in the contract there is no stated information on the working days, working hours, holiday entitlement, sick leave and does not reference to any labor law.</p>	Major nonconformance

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		<p>Payslip for sampled workers at Lot 3 did not have the CNSS number. The CNSS number was available in the CNSS system. However the number was not retrieved and the Olam payment system is not updated.</p> <p>Contract of sampled workers at Mouila Lot 1 did not indicate the contract date.</p>	
6.5.3	<p>Growers and millers shall provide adequate housing, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible.</p> <p>-Minor compliance-</p>	<p>At the moment, Olam is providing 1,200 units of housing facilities at the entire Mouila project. Currently the housing plan are not able to facilitate all the employee of Olam. The long-term housing plan was review by the assessment team that by 2019 plan, it is plan to have 2,460 units, which will be able to house approximately 4,300 workers. The consideration of 2,460 units was calculate based on 1.75 workers per house. Olam has considered that the foreign labours will be slowly replaced by national workers and the temporary workers are not 100% considered for housing due to their outturn of work may not be justify for providing housing. However, Olam is providing free transportation to transport all workers (both permanent and temporary) from villages to the plantations. On top of that, for permanent workers that do not have housing now, it is provide with CFA 15,000 as housing allowance.</p> <p>The assessment team visited the housing compound. The housing compound are keep clean. Water and sanitation are available in the each house. It was observe that water treatment facility is available to treat and provide clean water to the houses. Interview conducted with one of the house tenant evident that water and electricity are free of charge and if any needed fixing of the house, it is free of charge. The tenant describe that it only required to make request and the maintenance team will proceed with fixing the damage.</p>	Complied

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		Clinic is make available to workers. The propose of the clinic is mainly to provide job related injuries treatment; foreign workers illness treatment; medical monitoring for pregnant ladies; medical monitoring job related complications reported to the clinic and medical monitoring and health screening for workers handling chemical. The clinic will also provide first treatment for any reported disease / illness of national workers if it is report during work hours. After the first treatment, the doctor will provide referral to the national healthcare centre / hospital for further treatment where National Insurance covers the national workers.	
6.5.4	Growers and millers shall make demonstrable efforts to monitor and improve workers' access to adequate, sufficient and affordable food. -Minor compliance-	The National workers are mainly staying in nearby towns. For those National workers and foreign workers that are staying in the estate, there are stores setup for them to buy their daily needs. The price of the items sold is appropriately priced. Interviewed with the workers confirmed that the price differences are minimal. Assessment team has visited the store to confirm that the item sold are able to meet the daily needs. Furthermore, the foreign workers are able to freely moving to Mouila town to purchase their food.	Complied
<b>Criterion 6.6</b> <b>The employer respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.</b>			
6.6.1	A published statement in local languages recognising freedom of association shall be available. -Major compliance-	Olam Palm Gabon has established a Human Rights Policy dated 1/8/2015 signed by Country Head, Mr. Gagan Gupta. The company does not interfere with the rights of employee to form or join unions or other associations of their own choosing and to bargain collectively.  There are 2 main union in this operation mainly <i>Confederation Democratique des Syndicats Autonomes</i> (CDSA) and <i>Confederation Gabonaise des Syndicats Libres</i> (CGSL).	Complied

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		<p>Interview with the union representatives confirmed that there are no restriction imposed by OPG for the representative to promote union to the workers. The company has also not restriction for workers to join union.</p> <p>Interview with the union representatives confirmed that they are impartial with OPG. They understood that their responsibility is to negotiate, to protect the rights of the workers and to ensure that OPG is following the Labor Code and the collective agreement.</p> <p>OPG allows the unions to freely carry out their activity. OPG has also no interference in collecting union fee.</p>	
6.6.2	<p>Minutes of meetings with main trade unions or workers' representatives shall be documented.</p> <p>-Minor compliance-</p>	<p>Minutes of meeting records between the Unions and OPG are maintained. Meetings with the Unions are normally requested by the Unions. Sample of the meeting minutes observed in this assessment:</p> <p>Mouila Lot 1 – meeting was conducted on 25/01/2018 and 08/03/2018.</p> <p>Mouila Lot 3 – meeting was conducted o 26/07/2018 and 09/07/2018.</p>	Complied
<b>Criterion 6.7</b> <b>Children are not employed or exploited.</b>			
6.7.1	<p>There shall be documentary evidence that minimum age requirements are met.</p> <p>-Major compliance-</p>	<p>There is no engagement of any form of child labour as defined by ILO standards and national laws. The Human Rights Policy was established and communicated to the workers. In addition, the Olam Code of Conduct handbook has clearly stated that the company will not recruit any employees that under age of 18 years old.</p> <p>The SAGE system was checked to confirmed that there is no employment below the age of 18. Interview with workers did not identify any workers below age of 18.</p>	Complied
<b>Criterion 6.8</b>			

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Criterion / Indicator		Assessment Findings	Compliance
6.8.1	A publicly available equal opportunities policy including identification of relevant/affected groups in the local environment shall be documented. -Major compliance-	Olam Palm Gabon has developed The Olam Code of Conduct where the company provides equal opportunity of employment to all the people without regard to the employee's race, colour, religion, sex, age, national origin, sexual orientation, disability, citizenship status, marital status and etc.  To further commit to equal opportunity, Olam has established the Fair Employment Policy approved on 13/08/2018.	Complied
6.8.2	Evidence shall be provided that employees and groups including local communities, women, and migrant workers have not been discriminated against. -Major compliance-	Interviewed with the national and foreign workers with different genders found that they are treated equally without any discrimination. They are providing equal opportunity to work according to their fitness. They are allowed to change the job station if they found that they are not suitable for the job offered.  There is also no discrimination between foreign and national workers. During the field assessment, it was informed by the national workers that the company are giving priority for medical treatment to foreign labors. As per the Gabon social welfare, medical is provided by the government to all Gabonese. Addition for the Gabonese working group, the government will subsidise medical through the National CNAMGS insurance program. Therefore the National workers have more accessible to medication compare to foreign workers. The assessment team had verified the medical records which has shown that Olam is also treating the National workers with priority.	Complied
6.8.3	It shall be demonstrated that recruitment selection, hiring and promotion are based on skills, capabilities, qualities, and medical fitness necessary for the jobs available. -Minor compliance-	Recruitment process of Olam is conducted transparently through publications (mainly skilled employment) and/or spread of mouth or radio announcement (mainly unskilled workers).  Sample of recruiting Security Chief was observed by the assessment team. The recruitment was based on qualification and experience. The person	Complied

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		<p>employed for this position is Edou Nso who was ex-army. The records of his resume, qualifications, trainings and application letter are kept by Olam.</p> <p>The company does not have prejudice towards candidate that are pregnant or with diseases. The company doctor will perform medical fitness base on job requirement. The medical certificate issued to the HR does not show any complication of the candidate. The medical certificate only provide simple information such as fit without restriction or fit with restriction or unfit to work.</p>	
<b>Criterion 6.9</b> <b>There is no harassment or abuse in the work place, and reproductive rights are protected.</b>			
6.9.1	<p>A policy to prevent sexual and all other forms of harassment and violence shall be implemented and communicated to all levels of the workforce.</p> <p>-Major compliance-</p>	<p>Olam Palm Gabon has developed Human Rights Policy dated 1/8/2015 signed by Country Head, Mr. Gagan Gupta. The company will ensure to provide an environment that free from discrimination and harassment or abused in workplace and the reproductive rights are protected. Olam also ensure that there is no reprisal or retaliation of any kind as a result of reporting and participation in any investigation.</p> <p>The gender committee is established since 13/10/2017. The chairperson was select by election. The election notice was issue by the HR Manager on 11/09/2017.</p> <p>Grievance of sexual harassment are recorded and managed. However, the implementation of awareness and education program need to be further enhanced.</p>	Complied
6.9.2	<p>A policy to protect the reproductive rights of all, especially of women, shall be implemented and communicated to all levels of the workforce.</p> <p>-Major compliance-</p>	<p>Policy as above Criteria 6.9.1. By interviewing the doctor, it was confirmed that there is no discrimination on not hiring pregnant workers. The pre-employment test does not mandate pregnancy test while if pregnancy test is conducted, consent from the candidate shall be given to do so. The pre-</p>	Complied

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		<p>employment certificate issued by the doctor was reviewed. The certificate only indicate if the workers are fit or unfit. Samples sighted was reviewed.</p> <p>There is no compulsory monthly check on the female workers (except those chemical handlers) for pregnancy. It is the freedom and rights of the female workers to inform the company for their pregnancy. The doctor informed the assessment team that it is encouraged for the female workers to informed the company so the company can monitor the maternity period.</p> <p>The doctor had informed the assessment team that for chemical handlers it is compulsory to conduct the monthly pregnancy test due to early protection of the foetus is vital as the early stages of pregnancy, it is delicate period of the foetus.</p>	
6.9.3	<p>A specific grievance mechanism which respects anonymity and protects complainants where requested shall be established, implemented, and communicated to all levels of the workforce</p> <p>-Minor compliance-</p>	<p>Introductory Notes, Policies and Procedures for Sexual Harassment at Workplace dated 7/9/2009 was established to manage sexual harassment cases.</p> <p>There was 1 sexual harassment case reported on 19/04/2018. Investigation was conducted by the Gender Committee and it was found that the complaint was not valid. The investigation was conducted without prejudice and bias. The committee members interviewed witness before making decision about the invalid complaint.</p>	Complied
<b>Criterion 6.10</b> <b>Growers and millers deal fairly and transparently with smallholders and other local businesses.</b>			
6.10.1	<p>Current and past prices paid for Fresh Fruit Bunches (FFB) shall be publicly available.</p> <p>-Minor compliance-</p>	There is no smallholder program associated with this certification. Olam is only receiving FFB from its own supply base.	Not applicable
6.10.2	Evidence shall be available that growers/millers have explained FFB pricing, and pricing mechanisms for FFB and	OPG has established the Procurement Standards of Conduct dated 01/01/2016; SOP for Central Procurement – Common Function dated	Not applicable

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	inputs/services shall be documented (where these are under the control of the mill or plantation). -Major compliance-	01/01/2016 and Procurement Manual dated 01/01/2016 to manage the procurement and contracting matters. The Procurement Manual and SOP for Central Procurement – Common Function described the transparency of procurement where quotation is required; evaluation of quotation; approving; raising PO and contract signing.	
6.10.3	Evidence shall be available that all parties understand the contractual agreements they enter into, and that contracts are fair, legal and transparent. -Minor compliance-	There is no smallholder program associated with this certification. Olam is only receiving FFB from its own supply base.	Complied
6.10.4	Agreed payments shall be made in a timely manner. -Minor compliance-	According to the procedures, the payment terms was clearly stated in the agreement by not later than 3 <sup>rd</sup> week of the month followed by the last payment. Sample of procurement verified: Procurement of Agro chemical from PT Dalzon Chemicals Indonesia in October 2017. Procurement of fertilizer from Triferto Belgium N.V in August 2018.	Complied
<b>Criterion 6.11</b> <b>Growers and millers contribute to local sustainable development where appropriate.</b>			
6.11.1	Contributions to local development that are based on the results of consultation with local communities shall be demonstrated. -Minor compliance-	Local contribution to local developments are based on result from consultation with local communities. The Social Contract dated 28/05/2015 for Mouila Lot 3 covering Mbadi Village, Moutassou Village, Mouladoufouala Village, Okoumbou Makanda Village, Ikolo Village, Koumbanou Maramba Village and Douya Village indicated the required from the communities.	Complied



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		The implementation of the social contract is still in progress. The assessment team had able to observed the installation of solar street lights, water bore-well and rehabilitation of school at Moutassou Village.	
6.11.2	Where there are scheme smallholders, there shall be evidence that efforts and/or resources have been allocated to improve smallholder productivity. -Minor compliance-	Not applicable as the certification unit does not involved any scheme smallholders.	Not applicable
<b>Criterion 6.12</b> <b>No forms of forced or trafficked labour are used.</b>			
6.12.1	There shall be evidence that no forms of forced or trafficked labour are used. -Major compliance-	<p>Olam Palm Gabon has developed a Human Rights Policy dated 1/8/2015 where the company does not participate in or benefit from any form of forced labour or human trafficking.</p> <p>Olam is employing foreign labor from Indonesia. Olam has established the Foreign Workers' Recruitment Policy dated 18/05/2017. According to the policy the recruitment are direct from Indonesia. There is no involvement of agencies. Interview with foreign workers confirmed that there is no agencies involved in the recruitment.</p> <p>It was made known to the assessment team that passport are surrendered for safe keeping. Letter of consent is provided by the foreign workers to the company.</p> <p>Despite the passport are safe keeping by Olam, the workers are free to move around with identity. All workers are carrying the "Carte De Sejour" (Foreign Worker Card) issued by the Gabon government. Interview with workers confirmed that they can access to their passport when required.</p>	Complied

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		The company pays all the employment fee which includes visa, passport, yellow fever vaccine, medical check-up and air ticket.	
6.12.2	Where applicable, it shall be demonstrated that no contract substitution has occurred. -Minor compliance-	Contract from the Indonesia workers are reviewed. The signed contract are in Indonesia language. Interview with Indonesia workers confirmed that they understood that they will be working in oil palm plantation in Olam. The workers are able to inform the assessment team that there are no substitution. The employment are signed in Indonesia after the worker has received the Kartu Tenaga Kerja Luar Negeri (KTKLN) – Foreign worker Permit.	Complied
6.12.3	Where temporary or migrant workers are employed, a special labour policy and procedures shall be established and implemented. -Major compliance-	<p>Olam is employing temporary National workers. As according to the Gabon Labor Law, temporary workers are required to be converted into permanent workers after 2 years of employment as temporary workers. Olam has observed this regulation and convert their temporary workers to permanent workers. Prior converting the temporary workers to permanent workers, performance evaluation is conducted.</p> <p>OPG has developed the Foreign Worker's Recruitment Policy dated 18/05/2017 to commit to ensure that all workers identified and recruited from overseas are given facilities and benefits in accordance to internationally accepted standards consistent with an orderly manpower recruitment and management practices particular in the Agriculture sector is Gabon plantations. Interview conducted with the Indonesian workers shows that there are satisfied with the current conditions especially the housing facilities and medical care.</p>	Complied
<b>Criterion 6.13</b> <b>Growers and millers respect human rights.</b>			

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6.13.1	<p>A policy to respect human rights shall be documented and communicated to all levels of the workforce and operations (see Criteria 1.2 and 2.1).</p> <p>-Major compliance-</p>	<p>Olam Palm Gabon has developed a Human Rights Policy dated 1/8/2015 which signed by the Country Head, Mr. Gagan Gupta. The company is committed to respect and protect the workplace rights and human rights which guided by United Nations Declaration of Human Rights, ILO Declaration on Fundamental Principles and Rights at Work and other related international covenants.</p> <p>The Human Rights Policy are being inducted to all level of workers when they are employed. The induction forms of the workers are observed. Example of OPG respecting Article 20 of Universal Declaration of Human Rights in giving freedom of peaceful assembly and associated; respecting Article 23 of Universal Declaration of Human Rights on giving the rights to form and join trade union for protection of workers interest.</p>	Complied
<b>Principle 7: Responsible development of new plantings</b>			
<b>Criterion 7.1</b> <b>A comprehensive and participatory independent social and environmental impact assessment is undertaken prior to establishing new plantings or operations, or expanding existing ones, and the results incorporated into planning, management and operations</b>			
7.1.1	<p>An independent social and environmental impact assessment (SEIA), undertaken through a participatory methodology including the relevant affected stakeholders, shall be documented.</p> <p>-Major compliance-</p>	Please refer to 6.1.1 above.	Complied
7.1.2	<p>Appropriate management planning and operational procedures shall be developed and implemented to avoid or mitigate identified potential negative impacts.</p> <p>-Minor compliance-</p>	Please refer to 6.1.2 above.	Complied

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7.1.3	Where the development includes an outgrower scheme, the impacts of the scheme and the implications of the way it is managed shall be given particular attention. -Minor compliance-	No outgrower scheme was involved.	Not applicable
<b>Criterion 7.2</b> <b>Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.</b>			
7.2.1	Soil suitability maps or soil surveys adequate to establish the long-term suitability of land for oil palm cultivation shall be available and taken into account in plans and operations. -Major compliance-	<u>Lot 1 estate</u> Soil suitability maps developed through soil surveys adequate to establish the long-term suitability of land for oil palm cultivation available and taken into account in plans and operations. soil sample was done in September 2014 by Param Agriculture Soil Surveys (M) Sdn Bhd. 25 soil series were identified.  <u>Lot 3 estate</u> Soil map is incorporated in Preliminary Soil Assessment of Mouila Lot 3 Estate, Ngounie, Republic of Gabon, Africa dated September 2014. A reconnaissance soil map of Mouila Lot 3 estate at a scale of 1:50,000 has been produced. The parent materials found in the Mouila Lot 3 estates consist mainly of sedimentary rocks, pediments (sol remanie) and sub-recent alluvium. No problematic and fragile soil within lot 3 estates.	Complied
7.2.2	Topographic information adequate to guide the planning of drainage and irrigation systems, roads and other infrastructure shall be available and taken into account in plans and operations. -Minor compliance-	<u>Lot 1 Estates</u> Topographic information adequate to guide the planning of drainage and irrigation systems, roads and other infrastructure available and taken into account in plans and operations. Most of the area at Mouila Lot 1 (Estate 1 and Estate 2) were flat area. No hilly or steep area at both estate visited.	Complied

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		<p>The slope classes for Mouila Lot 1 was identified in the Soils of Mouila Lot 1 Plantation report by Param Agricultural Soil Surveys (M) Sdn Bhd. The slope classes are:</p> <p>0-2° = (Level) 1,215.5ha (6.5%)  2-6° = (Undulating) 15,136.0ha (80.5%) 6-12° = (Rolling) 2,287.2ha (12.1%)  Nursery = 171.3ha (0.9%)</p> <p>For lot 3 estates, the majority soil category is under undulating (2-6°): 98.7% - 23,326.7 ha and the rest is rolling (6-12°): 1.3% - 320.3 ha. Reference is made to Preliminary Soil Assessment of Mouila Lot 3 Estate, Ngounie, Republic of Gabon, Africa dated September 2014.</p>	
<b>Criterion 7.3</b> <b>New plantings since November 2005 have not replaced primary forest or any area required to maintain or enhance one or more High Conservation Values.</b>			
7.3.1	<p>There shall be evidence that no new plantings have replaced primary forest, or any area required to maintain or enhance one or more High Conservation Values (HCVs), since November 2005. New plantings shall be planned and managed to best ensure the HCVs identified are maintained and/or enhanced (see Criterion 5.2).</p> <p>-Major compliance-</p>	<p>No new plantings have replaced primary forest, or any area required to maintain or enhance one or more High Conservation Values (HCVs), since November 2005. Verification is made through submission of NPP to RSPO. Document entitled Summary Report of ESIA and HCV Assessments Olam Palm Gabon, Mouila Lot 3 May 2015 was verified. In the report, land use change analysis (LUCA) based on LANDSAT imagery was conducted to determine changes of vegetation since November 2005 using data from Global Forest Watch. The analysis shows no clearance of primary forest since 2005 and HCV assessment has been conducted prior to new planting development.</p>	Complied

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		Based on the analysis, there is no clearance of primary forest since 2005. The findings also shows approximately 65 ha of secondary forests were lost between year 2005 to 2010; and 41 ha were cleared between year 2010 to 2013. It is important to note that these areas lost are not due to commercial clearance for palm plantation. As a member of RSPO since February 2011, Olam has completed all new plantings according to the new planting procedures including HCV assessment conducted prior to any land development	
7.3.2	<p>A comprehensive HCV assessment, including stakeholder consultation, shall be conducted prior to any conversion or new planting. This shall include a land use change analysis to determine changes to the vegetation since November 2005. This analysis shall be used, with proxies, to indicate changes to HCV status.</p> <p>-Major compliance-</p>	<p><u>Lot 1 Estate</u></p> <p>Comprehensive HCV assessment conducted between September 2011 – March 2012 by Proforest (HCV National Toolkit for Gabon was the main HCV reference document for this study), covering 35,354 ha including stakeholder consultation, conducted prior new planting. Prior to the time of the new planting, land use change analysis was not a requirement under RSPO P&amp;C. However the company took consideration to analyse the changes to the landscape to determine changes to the vegetation since new planning.</p> <p><u>Lot 3 Estate</u></p> <p>Main HCV assessment was last carried between July 2014 to February 2015 by Proforest. The assessment was started prior to the launch of the HCVRN Assessor Licensing Scheme (ALS) and prepared in accordance to new ALS and requirements and guidelines. The assessment covering the concession area of 23,780 ha in Ngounie' Province, South Gabon. There are no RAMSAR site near Mouila lot 3. The nearest is approx. 100 km away from development site. In lot 3, no overlapping of any Intact Forest Landscape (IFL) based on the report. A few stakeholder session was carried out in July</p>	Complied

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		and December 2014 and February 2015. WWF, WCS, Brainforest, ANPN and local communities were among pertinent stakeholders consulted. Summary of HCV identification for lot 3:		
		HCV	Assessment identification	Justification
		1	Present	Fauna –mammals i) Method - Recce transect of 38 km and 38 camera traps; 12 mammals identified including flagship species protected in Gabon such as Elephant, buffalos, sitatungas and chimpanzees. The said species were listed under IUCN redlist and protected in Gabon especially chimpanzees (endangered, protected)
		4	Present	i) Lot 3 spans 5 sub-catchments, upstream of a few villages and Mouila town. ii) Forest galleries
		5	Present	Main livelihood strategy is based on small farming and, hunting, fishing and collection of local non-timber forest product (NTFPs)
		6	Present	Sacred site and burial grounds and identified through participatory mapping exercise and validated on community maps
		2,3	Absent	

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7.3.3	Dates of land preparation and commencement shall be recorded. -Minor compliance-	<p><u>Lot 1 estates</u></p> <p>Dates of land preparation and commencement of planting was recorded and progress of planting is reported on a weekly basis. Land clearing was done on July 2012 after the completion of 30 days NPP Notification at the end of the month of July 2012. Plant was started in early May 2013</p> <p><u>Lot 3 estates</u></p> <p>Dates of land preparation and commencement of planting was recorded and progress of planting is reported on a weekly basis. Land clearing was commenced on July 2015 after the completion of 30 days NPP Notification at the end of the month of June 2015. The first planting was started in October 2015.</p> <p>Lot 3 extension – land preparation was started on May 2017 and first planting was commenced on October 2018.</p>	Complied
7.3.4	An action plan shall be developed that describes operational actions consequent to the findings of the HCV assessment, and that references the grower's relevant operational procedures (see Criterion 5.2). -Major compliance-	<p>Action plan developed describes operational actions consequent to the findings of the HCV assessment, and references the grower's relevant operational procedures included in the management and planning document.</p> <p>Lot 3 – management plan incorporated in ESIA dated May 2015.</p>	Complied
7.3.5	Areas required by affected communities to meet their basic needs, taking into account potential positive and negative changes in livelihood resulting from proposed operations, shall be identified in consultation with the communities and incorporated into HCV assessments and management plans (see Criterion 5.2). -Major compliance-	<p>Areas required by affected communities to meet their basic needs, taking into account potential positive and negative changes in livelihood resulting from proposed operations identified in consultation with the communities and incorporated into HCV assessments and management plans. This area is set aside and marked in the map as HCV5. As for lot 3, set aside area are categorized as HCV 5 and 6.</p>	Complied



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<b>Criterion 7.4</b>															
<b>Extensive planting on steep terrain, and/or marginal and fragile soils, including peat, is avoided.</b>															
7.4.1	Maps identifying marginal and fragile soils, including excessive gradients and peat soils, shall be available and used to identify areas to be avoided  -Major compliance-	<p>Soil assessment was done in September 2014 by Param Agriculture Soil Surveys (M) Sdn Bhd. Semi-detailed soil map of the plantation at scale of 1:25,000 has been produced as a result of the soil sampling and survey. Summary of the soil types is reported under Appendix II, Semi Detailed Soil Map Legend. Majority of soil type summarized as per below:</p> <table><tr><td>No.</td><td>Soil type</td><td>Remarks</td></tr><tr><td>1</td><td>Gajah Mati</td><td rowspan="4">All soil type categorized as mineral soil.</td></tr><tr><td>2</td><td>Pedu</td></tr><tr><td>3</td><td>Tebok</td></tr><tr><td>4</td><td>Terap</td></tr></table> <p><u>Lot 3 estate</u></p> <p>Soil map is incorporated in Preliminary Soil Assessment of Mouila Lot 3 Estate, Ngounie, Republic of Gabon, Africa dated September 2014. A reconnaissance soil map of Mouila Lot 3 estate at a scale of 1:50,000 has been produced. The parent materials found in the Mouila Lot 3 estates consist mainly of sedimentary rocks, pediments (sol remanie) and sub-recent alluvium. No problematic and fragile soil within lot 3 estates.</p>	No.	Soil type	Remarks	1	Gajah Mati	All soil type categorized as mineral soil.	2	Pedu	3	Tebok	4	Terap	Complied
No.	Soil type	Remarks													
1	Gajah Mati	All soil type categorized as mineral soil.													
2	Pedu														
3	Tebok														
4	Terap														
7.4.2	Where limited planting on fragile and marginal soils, including peat, is proposed, plans shall be developed and	No problematic and fragile soil within lot 1 and lot 3 estates.	Complied												

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	implemented to protect them without incurring adverse impacts. -Major compliance-		
<b>Criterion 7.5</b> <b>No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their free, prior and informed consent. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.</b>			
7.5.1	Evidence shall be available that affected local peoples understand they have the right to say 'no' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the grower/miller is signed and ratified by these local peoples. -Major compliance-	The local communities has given consent to OPG to develop the Lot 1 and Lot 3 concession. In the negotiation of the communities has restricted OPG to develop areas that are mutually agreed through participatory mapping. OPG has also respected the communities that set aside savannah and remain the forest for their tradition activity.	Complied
<b>Criterion 7.6</b> <b>Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their free, prior and informed consent and negotiated agreements.</b>			
7.6.1	Documented identification and assessment of demonstrable legal, customary and user rights shall be available. -Major compliance-	During SEIA, FPIC process was used to identify the demonstrable legal, customary and user rights. Please refer to 6.4 above.	Complied
7.6.2	A system for identifying people entitled to compensation shall be in place -Major compliance-	During SEIA, FPIC process was used to identify the demonstrable legal, customary and user rights. Please refer to 6.4 above.	Complied

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7.6.3	A system for calculating and distributing fair compensation (monetary or otherwise) shall be in place. -Major compliance-	The calculation for crop compensation followed the National Decree no 1016/PR/MAEDR – price fixing for total amount of voluntary destruction of crops, cattle, farm building, ponds and other resources. Sample of compensation observed for Lot 3: Sample 1 (Bavanga Community) – the compensation amount is CFA100,000 paid on 05/10/2016 Sample 2 (Bavanga Community) – the compensation amount is CFA50,000 paid on 06/09/2017.	Complied
7.6.4	Communities that have lost access and rights to land for plantation expansion shall be given opportunities to benefit from plantation development. -Minor compliance-	During the interview with the communities, it was confirmed that communities are being employed in OPG. OPG has developed the Procedure for Priority Employment – Doc MLA1-Pro 5 – CR&S to guide the company on priority in hiring National workers that are affected by the project. It was also informed by the Guiamba Community, OPG has given funding to community to start up farming. The local communities are still allow to perform their customary hunting and forest harvesting.	Complied
7.6.5	The process and outcome of any compensation claims shall be documented and made publicly available. -Minor compliance-	In the Gabon context, agriculture compensation is required to obtain approval from the provincial government.  The approval are given to both OPG and the community to demonstrate transparency. Furthermore the identification of land to be compensated was conducted participatory.	Complied
7.6.6	Evidence shall be available that the affected communities and rights holders have access to information and advices that is independent of the project proponent, concerning	Please refer to 2.3.1.	Complied

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	the legal, economic, environmental and social implications of the proposed operations on their lands. -Minor compliance-		
<b>Criterion 7.7</b> <b>No use of fire in the preparation of new plantings other than in specific situations, as identified in the ASEAN guidelines or other regional best practice.</b>			
7.7.1	There shall be no land preparation by burning, other than in specific situations, as identified in the 'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003, or comparable guidelines in other regions. -Major compliance-	The zero burning policy has been implemented. The field visit revealed that there are no burning activities during land clearing. Interview with stakeholders further confirm the zero burning technique was used for land clearing.	Complied
7.7.2	In exceptional cases where fire has to be used for preparing land for planting, there shall be evidence of prior approval of the controlled burning as specified in 'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003, or comparable guidelines in other regions. -Minor compliance-	Fire was not used for preparing land for planting.	Complied
<b>Criterion 7.8</b> <b>New plantation developments are designed to minimize net greenhouse gas emissions.</b>			
7.8.1	The carbon stock of the proposed development area and major potential sources of emissions that may result directly from the development shall be identified and estimated. -Major compliance-	Carbon stock of the proposed development area has been identified and estimated. There are 2 land cover types (savannah and forest) at the proposed development area for Mouila lot 1 and 3 estates. No high carbon stock area as there was no peat area within lot 1 and 3 estates. Net emission per hectare is recorded at -154 tCO <sub>2</sub> eq/ha.	Complied

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7.8.2	<p>There shall be a plan to minimize net GHG emissions which takes into account avoidance of land areas with high carbon stocks and/or sequestration options.</p> <p>-Minor compliance-</p>	<p>GHG emission resulting from 2 phases of project:</p> <p><u>Phase preliminary work</u></p> <p>i) Land use change i.e. loss of carbon from biomass, and carbon fixing in oil palm plantations. For this analysis the carbon stock compartments are aboveground biomass, belowground biomass and soil organic carbon (SOC);</p> <p>ii)Energy consumption for land preparation operations;</p> <p><u>Operating phase</u></p> <p>i)The energy consumption for the operation of the plantation;</p> <p>ii)The use of nitrogen inputs</p> <p>Plan to minimize net GHG emission is documented under Olam Palm Gabon GHG Assessment. Summary of plan as per the following:</p> <p>i) To limit site preparation to an absolute minimum, promote site preparation in highly degraded areas and to avoid swampy areas as far as possible;</p> <p>ii. To quickly re-use the biomass residues to offset emissions (energy biomass, timber, etc.);</p> <p>iii. Limit consumption of generators operating the site. An alternative being studied by Olam Palm Gabon to limit such emissions is to connect to the electricity distribution network;</p>	Complied

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		iv. Avoid losses and unnecessary energy consumption by ensuring regular maintenance of equipment and optimizing travel;  v. To rehabilitate the infrastructure areas to allow for restoration of the natural environment at the end of the project.  vi. Construct methane capture facility for palm oil mill.  vii. Continue to measure, disclose, manage greenhouse gas emissions reductions through Carbon Disclosure Project (CDP).	
<b>Principle 8: Commitment to continuous improvement in key areas of activity</b>			
<b>Criterion 8.1</b> <b>Growers and millers regularly monitor and review their activities, and develop and implement action plans that allow demonstrable continual improvement in their key operations.</b>			
8.1.1	The action plan for continual improvement shall be implemented, based on a consideration of the main social and environmental impacts and opportunities of the grower/mill, and shall include a range of Indicators covered by these Principles and Criteria. -Major compliance-	Pollution and greenhouse gas (GHG) emissions (Criteria 5.6 and 7.8) – OPG has forecasted CAPEX for biogas plant construction after completion of new 90 mt/hr mill at lot 3. Social impacts (Criterion 6.1) – budget for workers quarter (51 unit of G10 housing) and school. Optimising the yield of the supply base – motor grader and compactor for road maintenance and for the ease of FFB evacuation.	Complied

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#### Appendix B: Approved Time Bound Plan



**RSPO Certification Time Bound Plan (revised April 2018<sup>1</sup>)**

		2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021
OLAM	Olam joined RSPO as Processor and Trader	Feb 11										
	Olam Sustainable Palm Policy v1	June 11										
	Olam renewed membership as Grower		Feb 12									
	Olam Sustainable Palm Policy v2					June 15						
AWALA	NPP notification	Feb 11										
	RSPO independent gap assessment			Apr 13								
	Mill commissioned					Sep 15						
	<b>RSPO initial certification</b>						June 16					
Mouila LOT 1	RSPO surveillance audit											
	NPP notification		June 12									
	RSPO independent gap assessment						June 16					
	Mill commissioned							Jan 17				
Mouila LOT 3	<b>RSPO initial certification</b>							Dec 17				
	RSPO surveillance audit											
	NPP notification					May 15						
	RSPO independent gap assessment							May 17				
OPG Makouke	Mill commissioned									Jan 19		
	<b>RSPO initial certification<sup>2</sup></b>								Dec 18			
	RSPO surveillance audit											
	Inclusion under Olam RSPO membership						Aug 16					
Mouila LOT 2	RSPO independent gap assessment								Jan 18			
	Mill activation								Dec 18			
	<b>RSPO initial certification</b>									July 19		
	RSPO surveillance audit											
Mouila LOT 2	NPP notification			Dec 13								
	RSPO independent gap assessment									Dec 19		

<sup>1</sup> Last revision was dated Aug 2016 to include OPG's latest acquisition i.e. Makouke.

<sup>2</sup> Lot 3 initial certification is brought forward from 2019 to 2018. It is planned to be certified as part of the Lot 1 mill supply base.

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#### Appendix C: GHG Reporting Executive Summary

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

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

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

Emission per product	tCO <sub>2</sub> e/tProduct	Extraction	%
CPO	-24.27	OER	20.65
PKO	-24.27	KER	3.39

Production	t/yr	Land Use	Ha
FFB Process	43,379.52	OP Planted Area	24,945.59
CPO Produced	8,969.79	OP Planted on peat	0
PKO Produced	1,471.57	Conservation (forested)	38,393.00
		Conservation (non-forested)	0
		<b>Total</b>	<b>63,338.59</b>

#### Summary of Field Emission and Sink

	Own Crop*		Group		3 <sup>rd</sup> Party		Total	
	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB
<b>Emission</b>								
Land Conversion	106,733.41	2.46	178,665.25	3,764.54	0	0	285,398.7	3767
CO <sub>2</sub> Emission from fertilizer	7,183.93	0.17	3,729.81	78.59	0	0	10,913.74	78.76
NO <sub>2</sub> Emmision	4,265.18	0.10	2,023.40	42.63	0	0	6,288.58	42.73
Fuel Consumption	9,519.38	0.22	5,621.37	118.44	0	0	15,140.75	118.66
Peat Oxidation	0	0	0	0	0	0	0	0
<b>Sink</b>								
Crop Sequestration	-147,713.85	-3.43	-84,820.11	-1,787.19	0	0	-232,534.0	-1,790.62



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Conservation Sequestration	-161,984.16	-3.73	-177,409.96	-3,738.09	0	0	-339,394.1	-3,741.82
<b>Total</b>	<b>-182,996.11</b>	<b>-4.22</b>	<b>-72,190.24</b>	<b>-1521.08</b>	<b>0</b>	<b>0</b>	<b>-571,928.1</b>	<b>-5,532.44</b>

*\*Note: Includes both estates and smallholders*

#### Summary of Mill Emission and Credit

	tCO <sub>2</sub> e	tCO <sub>2</sub> e/tFFB
<b>Emission</b>		
POME	1,395.13	0.03
Fuel Consumption	397.33	0.01
Grid Electricity Utilisation	0	0
<b>Credit</b>		
Export of Grid Electricity	0	0
Sales of PKS	0	0
Sales of EFB	0	0
<b>Total</b>	<b>1,792.46</b>	<b>0.04</b>

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

Emissions	tCO <sub>2</sub> e
PK from own mill	-35712.48
PK from other source	0
Fuel Consumptions	0
<b>Total Crusher emissions</b>	<b>0</b>

\*This mill has no kernel crusher operation.

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

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

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#### Appendix D: General Chain of Custody Requirements for the Supply Chain

General Chain of Custody Requirements for the Supply Chain			
Requirement		Evidence	Compliance (Yes/No/N/A)
<b>5.1 Applicability of the general chain of custody requirements for the supply chain</b>			
5.1.1	The General Chain of Custody requirements of the RSPO Supply Chain Standard shall apply to any organization throughout the supply chain that takes legal ownership and physically handles RSPO Certified Sustainable oil palm products at a location under the control of the organization including outsourced contractors. After the end product manufacturer, there is no further requirement for certification.	Bilala Palm oil mill is producer of Cruel Palm Oil and Palm Kernel. There is no production of Palm Kernel Oil in Bilala Palm Oil mill. The mill is on Mass Balance and producing Mass Balance CPO and PK. However, there is no sales of RSPO CPO. The RSPO PK is sold to Awala Kernel Crushing Plant.	Yes
5.1.2	Traders and distributors require a licence obtained from RSPO Secretariat to sell RSPO certified product but do not themselves require certification. When selling RSPO certified products, a licensed trader and/or distributor shall pass on the certification number of the product manufacturer and the applicable supply chain model.	The trading activities are done by Olam Palm Gabon SA. There is no third party or sister company of Olam Palm Gabon SA that is trading the CPO or PK produced by Bilala Palm Oil Mill.	Yes
5.1.3	Either the operator at site level or its parent company seeking certification shall be a member of the RSPO and shall register on the RSPO IT platform.	The Bilala Palm Oil Mill is operated under its parent company Olam International Limited with RSPO membership number 1-0114-12-000-00. Olam International Limited is an RSPO member since 10/2/2011. For trading activities, Bilala POM is registered with the RSPO IT Platform (PalmTrace) with PalmTrace ID RSPO_PO1000006576.	Yes
5.1.4	Processing aids do not need to be included within an organization's scope of certification.	There is no processing aids involved in CPO and PK production.	Yes
<b>5.2 Supply chain model</b>			
5.2.1	The site can only use the same supply chain model as its supplier or go to a less strict system. Declassification/downgrading can only be	The supply chain model established for this mill is Mass Balance. Material sold is with model Mass Balance. Procedure for RSPO	Yes

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	done in the following order: Identity Preserved -> Segregated -> Mass Balance.	Supply Chain & Traceability established is for Mass Balance (Doc - POM-SC/MB/001 Rev 2 dated 01/09/2018). Section 1.6.2 detailing the processing of Mass Balance Model.	
5.2.2	The site can use one (1) or a combination of supply chain models as audited and certified by the CB.	It is only the Mass Balance supply chain model is being used.	Yes
<b>5.3. Documented Procedures</b>			
5.3.1	The site shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following: <ul style="list-style-type: none"> <li>Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements.</li> </ul>	SOP for RSPO Supply Chain & Traceability (Mass Balance Model) with Doc. No. POM-SC/MB/001, Rev. 2 dated 01/09/2018 was developed. The scope of the procedure is to cover the entire supply chain activities and record data from the intake of certified and non-certified raw material till the delivery of certified and non-certified products such as processing, sales and goods out, record keeping and monitoring, production volume, training, claims, complaints, internal audit and management review. The requirements under new RSPO SCCS System and Standard revised June 2017 were incorporated into the SOP.	Yes
	<ul style="list-style-type: none"> <li>Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records).</li> </ul>	Incoming and outgoing material and products is recorded on real time basis format [ref.: Section 1.9 of the supply chain procedure entitled "Palm Products (CPO & PK) Mass Balance Calculation Records". Based on simulation, the format was found to be capable to record the incoming material and outgoing products at the correct amount through mass balance accounting.	Yes
	<ul style="list-style-type: none"> <li>Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the organization's procedures for the implementation of this standard.</li> </ul>	SOP for RSPO Supply Chain & Traceability (Mass Balance Model) with Doc. No. POM-SC/MB/001, Rev. 2 dated 01/09/2018 has clearly identified every responsible personal who involved in the implementation RSPO Supply Chain Certification.  The Mill Manager is responsible to ensure the operation in the mill are being progressed systematically as per SOP in compliance with RSPO P&C and SCCS while the Deputy Site Head is responsible to	Yes

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		ensure overall implementation of Mouila Plantation Lot-1 RSPO P&C and SCCS. The Bilala Palm Oil Mill Manager at the time of this assessment Mr Ravendran while the Deputy Site Head is Mr Isnaini. The Job Function of the Mill Manager was verified that is responsibilities is to manage supply chain management.	
5.3.2	The site shall have a written procedure to conduct annual internal audit to determine whether the organization; i) Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.	The overall Internal audit procedure is written in section 1.6.8 Internal Audit and Management Review of the RSPO Supply Chain & Traceability (Mass Balance Model) SOP – Doc. No. POM-SC/MB/001, Rev. 2 dated 01/09/2018. The internal audit procedure specific the requirement on conforming the RSPO SCCS requirements and the RSPO Market Communications and Claims requirements.  The RSPO Supply Chain & Traceability (Mass Balance Model) SOP – Doc. No. POM-SC/MB/001, Rev. 2 dated 01/09/2018 is supplemented with Internal Audit (RSPO and ISCC system) SOP – Doc OPGM-RSPO-ISCC/IA/001 Rev 0 dated 01/09/2018.	Yes
	ii) Effectively implements and maintains the standard requirements within its organization.	According to the Internal Audit (RSPO and ISCC system) SOP – Doc OPGM-RSPO-ISCC/IA/001 Rev 0 dated 01/09/2018, sample requirement before conducting the Internal Audit was verified including produce the audit plan or schedule before proceed with audit process and internal auditor requires relevant training and experiences.  The Internal Audit schedule was identified in the Bilala Palm Oil Mill – Mill Management Agenda on RSPO SCCS & ISCC. The Internal audit was schedules in Jan 2018. However the internal audit was conducted in August 2018. The deferral of the actual audit is accordance the SOP whereby internal audit is conducted once a year and at least one month prior the external audit.  The last internal audit was conducted on 31/08/2018. The internal audit was conducted following the RSPO Supply Chain Certification	Yes

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		<p>Standard requirements (both General Chain of Custody and Specific supply chain modular – Mass Balance. The audit checklist has been developed and the internal audit reporting is based on the audit checklist.</p> <p>The internal auditor is Mr Denie Arifianto (RSPO Manager for Olam Gabon) who was trained in RSPO Supply Chain. Mr Denie is an independent party not involved in the mill operations.</p>	
<b>5.4. Purchasing and goods in</b>			
5.4.1	<p>The receiving site shall ensure that purchases of RSPO certified oil palm products are in compliance and the following minimum information for RSPO certified products is made available by the supplier in document form:</p> <ul style="list-style-type: none"> <li>• The name and address of the buyer;</li> <li>• The name and address of the seller;</li> <li>• The loading or shipment/delivery date;</li> <li>• The date on which the documents were issued;</li> <li>• A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations);</li> <li>• The quantity of the products delivered;</li> <li>• Any related transport documentation;</li> <li>• Supply Chain certificate number of the seller;</li> <li>• A unique identification number</li> </ul>	<p>Bilala Palm Oil Mill is receiving FFBs only from its own supply base. The certified supply base includes Mouila Lot 1. There are 2 other supplying plantations mainly Mouila Lot 2 and Mouila Lot 3 (undergoing certification).</p> <p>The delivery note from the estates indicated the estate number. Based on the estate number, it will be able to identify which Lot is the material coming from and hence able to identify if the material are certified material or not.</p> <p>The delivery note from the estate includes the approximate weight of the consignment, block of the FFB collected, number of FFB, ticket number and date. There is no RSPO certified identification. This is acceptable as the FFBs are internal crops and the SAP system provide the information of which estates are certified with RSPO.</p>	Yes
	<p>Information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation).</p>	<p>The daily records are prepared at the entry point at the weighbridge. Daily summary and monthly summary documented for all the certified and non-certified FFB. The information of the certified or uncertified material are a combination from the delivery sheet from estate and SAP system.</p>	Yes

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	<ul style="list-style-type: none"> <li>The site receiving RSPO certified oil palm products shall ensure that the products are verified as being RSPO certified. For sites that are required to announce and confirm trades in the RSPO IT platform, this shall include making Shipping Announcements/Announcements and Confirmations on the RSPO IT platform per shipment or group shipments. Refer to section 5.7.1 of this document for further guidance.</li> </ul>	<p>Bilala POM only received FFBs from its own plantations (Mouila Lot 1, Lot 2 and Lot 3). Announcement are not applicable for received FFB from own supplying base.</p>	Yes
	<ul style="list-style-type: none"> <li>A check of the validity of the Supply Chain Certification of suppliers is required for all sites that are SC certified. This shall be checked via the list of RSPO Supply Chain Certified sites on the RSPO website (<a href="http://www.rspo.org">www.rspo.org</a>) at least annually or through the RSPO IT Platform by confirmation of (shipping) announcements.</li> </ul>	Not applicable as Bilala only received FFBs from its own plantations (Mouila Lot 1, Lot 2 and Lot 3).	Yes
	<ul style="list-style-type: none"> <li>The validity of license for traders and distributors shall also be checked via the RSPO website at least annually or through the RSPO IT platform by confirmation of shipping announcements / announcements.</li> </ul>	Not applicable as Bilala only received FFBs from its own plantations (Mouila Lot 1, Lot 2 and Lot 3).	Yes
5.4.2	The site shall have a mechanism in place for handling non-conforming oil palm products and/or documents.	The Mill Supply Chain Flow Chart for RSPO SCCS in the RSPO Supply Chain & Traceability (Mass Balance Model) SOP – Doc. No. POM-SC/MB/001, Rev. 2 dated 01/09/2018 indicated the non-conforming oil palm products shall be notify to Manager and if it is not solved it should be escalated to higher management.	Yes
<b>5.5. Outsourcing activities –</b>			
5.5.1	In cases where an operation seeking or holding certification outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the operation seeking or holding certification shall ensure that the independent third party complies with the requirements of the RSPO Supply Chain Certification Standard. A CPO mill and independent mil cannot outsource processing activities like refining or crushing.	The CPO is transported by sister logistic company – GSEZ (Under Olam Group) where Olam has the management control. For PK it is transported to Awala by own transport. Hence there is no outsource activity considered.	Yes

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	This requirement is not applicable to outsourced storage facilities where the management of the oil palm product(s) and instructions for tank movements are controlled by the certified organization (not the tank farm manager).		
5.5.2	Sites which include outsourcing within the scope of their RSPO Supply Chain certificate shall ensure the following: a. The site has legal ownership of all input material to be included in outsourced processes;	The CPO is transported by sister logistic company – GSEZ (Under Olam Group) where Olam has the management control. For PK it is transported to Awala by own transport. Hence there is no outsource activity considered.	Yes
	b. The site has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the site to ensure that certification bodies (CBs) have access to the outsourcing contractor or operation if an audit is deemed necessary.	The CPO is transported by sister logistic company – GSEZ (Under Olam Group) where Olam has the management control. For PK it is transported to Awala by own transport. Hence there is no outsource activity considered.	Yes
	c. The site has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.	The CPO is transported by sister logistic company – GSEZ (Under Olam Group) where Olam has the management control. For PK it is transported to Awala by own transport. Hence there is no outsource activity considered.	Yes
	d. The site seeking or holding certification shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and any and all information, when this is announced in advance.	The CPO is transported by sister logistic company – GSEZ (Under Olam Group) where Olam has the management control. For PK it is transported to Awala by own transport. Hence there is no outsource activity considered.	Yes
5.5.3	The site shall record the names and contact details of all contractors used for the processing or physical handling of RSPO certified oil palm products.	The CPO is transported by sister logistic company – GSEZ (Under Olam Group) where Olam has the management control. For PK it is transported to Awala by own transport. Hence there is no outsource activity considered.	Yes

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5.5.4	The site shall at its next audit inform its CB of the names and contact details of any new contractor used for the processing or physical handling of RSPO certified oil palm products.	The CPO is transported by sister logistic company – GSEZ (Under Olam Group) where Olam has the management control. For PK it is transported to Awala by own transport. Hence there is no outsource activity considered.	Yes
<b>5.6. Sales and goods out</b>			
5.6.1	<p>The supplying site shall ensure that the following minimum information for RSPO certified products is made available in document form.</p> <ul style="list-style-type: none"> <li>• The name and address of the buyer;</li> <li>• The name and address of the seller;</li> <li>• The loading or shipment/ delivery date;</li> <li>• The date on which the documents were issued;</li> <li>• A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations);</li> <li>• The quantity of the products delivered;</li> <li>• Any related transport documentation;</li> <li>• Supply chain certificate number of the seller;</li> <li>• A unique identification number</li> </ul>	<p>Since last year, no CPO was sold under RSPO. Only PK was sold/transferred to Awala Palm Oil Mill (sister mill under Olam Palm Gabon) as RSPO material.</p> <p>In the delivery note the following are shown:</p> <ol style="list-style-type: none"> <li>1. Vehicle number</li> <li>2. Destination</li> <li>3. Weight and product carried</li> <li>4. Date of the delivery</li> </ol> <p>All material are delivered as certified MB material with RSPO certificate number.</p> <p>The certificate number used in not according to the certificate number and there is no unique identification number shown in the delivery note.</p>	Major nonconformance
	<ul style="list-style-type: none"> <li>• Information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation).</li> </ul>	For this assessment the goods are sold as RSPO certified is PK. The PK was sold to the sister mill (Awala Mill) within OPG. The information on certified product are available in multiple documentations included internal SAP records.	
	<ul style="list-style-type: none"> <li>• For sites that are required to announce and confirm trades in the RSPO IT platform, this shall include making Shipping Announcements / Announcements and Confirmations on the RSPO IT platform per shipment or group of shipments. Refer to section 5.7.1 of this document for further guidance.</li> </ul>	Shipping announcement of transactions of RSPO certified CPO and PK was done by General Manger of Sustainability in Malaysia in the RSPO IT Platform after the shipment has loaded. Sampled the shipping announcement 5.6.1	



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<b>5.7. Registration of transactions</b>			
5.7.1	<p>Supply chain actors who:</p> <ul style="list-style-type: none"> <li>• Are mills, traders, crushers and refineries and;</li> <li>• Take legal ownership and/or physically handle RSPO Certified Sustainable oil palm products that are available in the yield scheme of the RSPO IT Platform (Figure 2 and 3, Refer Annex 1) shall register their transaction in the RSPO IT platform and confirm upon receipt where applicable.</li> </ul>	The registration of PalmTrace will be carried out by the General Manager of Sustainability in Head Office. All the transactions will be registered in the PalmTrace. Company has registered their mill in the PalmTrace with Member ID: Bilala Palm Oil Mill: RSPO_PO1000006576. The member category is Oil Mill.	Yes
5.7.2	<p>The involved supply chain actors mentioned in 5.7.1 shall do the following actions in the RSPO IT Platform:</p> <ul style="list-style-type: none"> <li>• Shipping Announcement / Announcement: When RSPO certified volume is sold as certified, the volumes of products that are in the yield scheme (Figure 2 and 3, refer Annex 1) shall be registered as a Shipping Announcement / Announcement in the RSPO IT Platform. The declaration time to do Shipping announcement / Announcement is based on members' own standard operating procedures.</li> </ul>	Shipping announcement of transactions of RSPO certified CPO and PK was done by General Manger of Sustainability in Malaysia in the RSPO IT Platform after the shipment has loaded. Sampled the shipping announcement 5.6.1	Yes
	<ul style="list-style-type: none"> <li>• Trace: When RSPO certified volumes are sold as RSPO certified to actors in the supply chain beyond the refinery, the volume shall be traced at least annually. Tracing triggers the generation of a trace document with a unique traceability number. Tracing can be done in a consolidated way at least annually.</li> </ul>	Traceability (Mass Balance) Data Sheet and update at weekly basis by the mill and send to Sustainability Department.	Yes
	<ul style="list-style-type: none"> <li>• Remove: RSPO certified volumes sold under other scheme or as conventional, or in case of underproduction, loss or damage shall be removed.</li> </ul>	There was volume sold as conventional (refer to Table 11 & 12; Supply Chain declaration of Table C & D; Summary Template).	Yes
	<ul style="list-style-type: none"> <li>• Confirm: Acknowledge the purchase of RSPO certified volume by confirming Shipping Announcements / Announcements.</li> </ul>	Sampled of shipping announcement documents and found that the management done the shipping announcement accordingly. However, please refer to criteria 5.6.1.	Yes

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<b>5.8. Training</b>			
5.8.1	The organization shall have a training plan on RSPO Supply Chain Standards requirements, which is subject to on-going review and is supported by records of the training provided to staff.	Training Program for Year 2018 was developed for Bilala Palm Oil Mill where RSPO SCCS training is incorporated into the RSPO training plan.	Yes
5.8.2	Appropriate training shall be provided by the organization for personnel carrying out the tasks critical to the effective implementation of the supply chain certification standard requirements. Training shall be specific and relevant to the task(s) performed.	The training will be provided by Mr Denie the Olam Gabon RSPO Manager. The last training was conducted on 08/08/2018. Training of the weighbridge operators to be further enhanced.	OFI
<b>5.9. Record Keeping</b>			
5.9.1	The organization shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of these RSPO Supply Chain Certification Standard requirements.	Bilala Palm Oil Mill has maintained the accurate, complete, up-to-date and accessible records and reports covering all aspects of these RSPO Supply Chain Certification requirements. All records also available in SAP system which is retrievable at any time.	Yes
5.9.2	Retention times for all records and reports shall be a minimum of two (2) years and shall comply with legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock.	As per the RSPO Supply Chain & Traceability (Mass Balance Model) SOP – Doc. No. POM-SC/MB/001, Rev. 2 dated 01/09/2018, the records will be retained for 5 years.	Yes
5.9.3	The organization shall be able to provide the estimate volume of palm oil/palm kernel oil content (separate categories) in the RSPO certified oil palm product and keep an up to date record of the volume purchased (input) and claimed (output) over a period of twelve (12) months.	The forecast volume for Bilala POM, Dec 2018 to Dec 2019: CSPO= 16,609.00 MT CSPK= 2,768.00 MT	Yes
<b>5.10. Conversion factors</b>			
5.10.1	Where applicable a conversion rate shall be applied to provide a reliable estimate for the amount of certified output available from the associated inputs. Organizations may determine and set their own conversion rates which shall be based upon past experience,	The conversion rate is per the OER and PKE reported. The monitoring is conducted daily.	Yes

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	documented and applied consistently. Guidance on conversion rates is published on the RSPO website ( <a href="http://www.rspo.org">www.rspo.org</a> ); RSPO Rules for Physical Transition of Oleo-chemicals and its Derivatives. This is relevant for derivatives of Palm Oil and Palm Kernel Oil, as used in the oleo-chemical and personal care industries.		
5.10.2	Conversion rates shall be periodically updated to ensure accuracy against actual performance or industry average if appropriate.	The conversion rate is per the OER and PKE reported. The monitoring is conducted daily.	Yes
<b>5.11. Claims –</b>			
5.11.1	The site shall only make claims regarding the use of or support of RSPO certified oil palm products that are in compliance with the RSPO Rules on Market Communications and Claims.	In the delivery note of CPO and PK of Bilala Palm Oil Mill, it has promoted the RSPO trademark logo and the RSPO membership (especially for the sales on conventional or uncertified material). However there is no license number accompanied with it.	Major nonconformance
<b>General corporate communications</b>			
4.1	A corporate communication is one made by any RSPO member that highlights its membership of the RSPO and/or its commitment to the principles of the RSPO. Corporate communication is an 'off-product' claim.	No RSPO logo was use in any general corporate communication by verified through the company website, invoices, letter head, contract with customers and others relevant records. However, please refer to 5.11.1.	Major nonconformance
4.2	In corporate communications a member is allowed to: a. Display its RSPO membership status b. Display the RSPO web address ( <a href="http://www.rspo.org">www.rspo.org</a> ) c. State that the member supports the work of the RSPO d. State the member's history with regard to the RSPO. e. Use the RSPO trademark to promote its membership of the RSPO. Additionally, where an RSPO member displays the RSPO trademark in digital format this must be accompanied by the text 'Check our progress at <a href="http://www.rspo.org">www.rspo.org</a> ' where the link must lead to the member's profile page.	Please refer to 5.11.1.	Major nonconformance

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4.3	In corporate communications RSPO members must not make any statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products.	The Olam website did not show that their membership implies the selling of RSPO-certified oil palm products. In the Palm Quarterly Dashboard published in Olam website, it is published that there are currently 2 certified mills.	Yes
4.4	Members must ensure that all communication is consistent, clear and cannot mislead consumers or other stakeholders as to the certified content of oil palm products in the member's own products.	Corporate communication by OPG has not mislead consumers.	Yes
4.5	Members are not allowed to use the RSPO corporate logo as shown in the RSPO Rules on Market Communications & Claims document. This is for the sole use of the RSPO secretariat.	No RSPO corporate logo usage was observed in Olam webpage, official documentations, contracts and facilities.	Yes
<b>Business to business communications</b>			
5.1	Business to Business communication relates to RSPO members in the supply chain selling to and/or communicating with other organizations in the supply chain about the use of certified sustainable oil palm products.	Please refer to 5.11.1 as there is a potential B2B communication.	Major nonconformance
5.2	When confirming the sale of certified oil palm products, members must adhere to the requirements of the RSPO SCCS. This includes stating the supply chain model and certificate number under which the claim is being made.	At the moment the company only claim the PK. Please refer to 5.6.1.	Major nonconformance
5.3	Where a distributor or wholesaler takes title to products containing certified sustainable oil palm products, the requirements of the RSPO SCCS can follow either of two options: a. If the distributor or wholesaler holds only a Distributor license, it may only communicate RSPO-certified oil palm products by linking the product to the manufacturer using the manufacturer's SCCS certificate number. This covers both brand and own brand products. However, in the case of own brand products it is essential that customers are aware that the product has been	Not applicable as the company is not distributor or wholesaler.	Not applicable

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	made on behalf of the distributor or wholesaler, with specific evidence either through on-pack claims or documentation. b. If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2.		
5.4	A certified member can provide information to its customers detailing the presence of certified palm oil contained within a product even if it is not eligible for a product-specific under RSPO rules. The end product must not be labelled as certified or sold in such a way that implies RSPO certification.  For example, a retailer or food service company may require a breakdown of all palm based ingredients within an end product and the certified status of each. This information may be provided by a certified RSPO member without constituting a product-specific claim.	Please refer to finding 5.11.1 above.	Major nonconformance
<b>Business to consumer communication</b>			
6.1	Only RSPO members that have supply chain certification are allowed to make business to consumer claims about the certified sustainable oil palm products contained within product(s), which are known as 'product-specific' claims. Product-specific claims are voluntary.	Product claim are seen on the delivery note. Please refer to 5.11.1	Major nonconformance
6.2	Only RSPO members who have supply chain certification are authorised to use the RSPO trademark and/or RSPO label, with the exception of RSPO Credits and of retailers in accordance with 6.8 below.	Product claim are seen on the delivery note. Please refer to 5.11.1	Major nonconformance
6.3	When on-pack claims on RSPO-certified sustainable oil palm products are used, the RSPO trademark and associated identification number must be present.	There is no on pack claims.	Yes
6.4	Business to consumer communication shall not include information about the claimant's RSPO membership status.	There is no such claimant.	Yes

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6.5	Members shall not communicate to consumers information about their suppliers' RSPO membership status.	There was no any information related to the supplier's membership status in any business to consumer communication.	Yes
6.6	Use of the RSPO trademark is restricted to claims about RSPO-certified sustainable palm oil products and it is not authorised for use in relation to any other ingredient.	Please refer to 5.11.1	Major nonconformance
6.7	Use of any other trademark or logo to highlight the presence of RSPO-certified sustainable oil palm products is an unauthorised product-specific claim.	The company does not use logo that highlighted the presence of RSPO-certified sustainable oil palm products to make claim verified through the documentation review and site visit.	Yes
6.8	RSPO members who are retailers or food service companies can apply for an RSPO trademark license for use in business to consumer communications, provided they can demonstrate the validity of these claims to an RSPO-accredited certification body (CB). This will be undertaken via a remote audit, prior to the trademark use, during which the retailer or food service company will need to demonstrate that the use of the trademark is in compliance with the rules contained within this document and that the claim itself can be supported through a certified supply chain. Any other palm oil claims, including those highlighting the absence of palm oil, must be highlighted to the CB during the audit to ensure that all claims comply with the requirements of these rules. The CB will confirm the outcome of these audits, to be conducted annually, to RSPO who may continue to grant a trademark license or withdraw permission based upon the audit findings. This is in keeping with the rules applying to RSPO supply chain certified members. The guidance document for audits is available on <a href="http://www.rspo.org">www.rspo.org</a> .	Not applicable as the company is not retailer or food service companies.	Not applicable

**MODULE B – MASS BALANCE SPECIFIC RULES**

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Minimum Mass Balance content			
	95% or above of the oil palm content must be RSPO MB-certified.	Not applicable as palm oil mill only claims those oil palm that are produced by certified FFBs.	N/A
	Where there is any percentage of non-certified oil palm within the product, the reason for this must be fully justified and an action plan for moving to fully certified oil palm must be in place, in accordance with the requirements of the RSPO SCCS. In addition, the non-certified volume must be covered by equivalent volume of RSPO Credits.	Not applicable as palm oil mill only claims those oil palm that are produced by certified FFBs.	N/A
Labelling and trademark (MB)			
	<p>Members are allowed to use the RSPO label in one of the following ways:</p> <ul style="list-style-type: none"> <li>• Surrounded by the text: 'Certified sustainable palm oil'.</li> <li>• The RSPO label MUST contain the tag 'MIXED'. The tag MIXED designates oil palm products sourced under the Mass Balance (MB) supply chain system, which administratively balances inputs and outputs of certain palm oil volumes. The tag 'MIXED' on a product does not guarantee that the product itself contains the certified material; some or all of it may reside in a product that does not carry a claim.</li> <li>• The RSPO label can also include the statement: '[The palm oil contained in this product] contributes to the production of certified sustainable palm oil'.</li> <li>• Wherever the RSPO trademark is displayed, the applicable trademark license number must be shown immediately under or next to the trademark or the 'statement'. Font must be Calibri, font size must be at least 4 pt (1.4 mm or 0.06 inch).</li> <li>• In on-pack communications, the RSPO trademark can be printed anywhere on the pack. Further guidance on use of the trademark is provided in the RSPO Trademark License Terms and Conditions and in Annex 1 of the Rules on Market Communications &amp; Claims document.</li> </ul>	In the delivery note of CPO and PK of Bilala Palm Oil Mill, it has promoted the RSPO trademark logo and the RSPO membership (especially for the sales on conventional or uncertified material). However there is no licence number accompanied with it.	Major nonconformance
Messaging (MB)			

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	<p>Messaging ALLOWED in storytelling in product-related communications includes:</p> <ul style="list-style-type: none"> <li>• [Oil palm products]/[palm oil]/[palm kernel oil] from RSPO-certified mills and plantations were mixed with non-certified oil palm products in the supply chain.</li> <li>• The volume of [oil palm products]/[palm oil]/[palm kernel oil] in this product reflects an equivalent volume of palm oil or palm kernel oil produced by RSPO certified mills and plantations.</li> <li>• In off-product communications, reference to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown in company records is allowed.</li> </ul>	There are no messaging used by the certificate holder.	Yes
	<p>Messaging NOT ALLOWED in storytelling in product-related communications:</p> <ul style="list-style-type: none"> <li>• Anything that can lead consumers to believe that RSPO-certified palm products are (certified to be) part of the product.</li> </ul>	There are no messaging used by the certificate holder.	Yes
<b>MODULE C – PARTIAL PRODUCT CLAIMS</b>			
	<p>To increase awareness among consumers of the availability of sustainable oil palm products and to help accelerate the uptake, it is permissible to make a claim on product when the percentage of the oil palm content is less than 95% certified, but only when the following conditions have been met:</p> <ul style="list-style-type: none"> <li>• The member making the claim is the end product manufacturer, is an RSPO member and is certified against the RSPO SCCS or is an RSPO retailer member authorized to use the trademark by the RSPO.</li> <li>• At least 50% of the oil palm content has been supplied through an RSPO certified supply chain as IP, SG or MB.</li> <li>• The remainder of the oil palm content that is not RSPO-certified is covered by the purchase of RSPO Credits to an equivalent volume.</li> <li>• The product-specific claim is limited to only the following phrase: 'This product contributes to the production of certified sustainable palm oil'.</li> </ul>	Not applicable	N/A



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	<ul style="list-style-type: none"> <li>The use of the RSPO label with this claim is mandatory and must include the tag '50% MIXED'. No other percentage is allowable within this claim.</li> </ul>		
<b>MODULE D – COMBINED SUPPLY CHAIN MODELS SPECIFIC RULES</b>			
	<p>Where a mixture of inputs supplied through different RSPO supply chain models are present in a product, the following applies:</p> <p>75% IP + 20% SG =&gt; 95% SG claim is made          65% SG + 30% MB =&gt; 95% MB claim is made          55% MB + 40% B&amp;C =&gt; 95% partial product claim can be made          45% SG + 55% B&amp;C &lt; 50% B&amp;C claim can be made</p>	Not applicable	N/A
	<p>Where one supply chain model accounts for 95% of the oil palm content, the claim for this specific model may be made:</p> <p>95% IP + 5% MB =&gt; 95% IP IP claim can be made          95% SG + 5% MB =&gt; 95% SG SG claim can be made          95% MB + 5% C =&gt; 95% MB MB claim can be made</p>	Not applicable	N/A

**Appendix E: CPO Mill Supply Chain Assessment Report (Module E - CPO Mills: Mass Balance)**

<b>D.1 Definition</b>		
<b>Requirement</b>	<b>Evidence</b> For any N/A raised, justification is required.	<b>Compliance</b> (Yes / No or N/A)
<b>E.1 Definition</b>		
E.1.1 Certification for CPO mills is necessary to verify the volumes of certified and uncertified FFB entering the mill and sales volume of RSPO certified products. A mill may be taking delivery of FFB from uncertified	Bilala Palm Oil Mill receives and process both certified and non-certified FFB. Therefore, it uses the Mass Balance supply chain system and module. During the P&C assessment, the audit team verified the	Yes

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growers, in addition to those from its own and 3 <sup>rd</sup> party certified supply base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.	volumes and sources of certified and non-certified FFB entering the mill, the implementation of processing controls and volume sales of RSPO certified Products.	
<b>E.2 Explanation</b>		
E.2.1 The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall be recorded by the CB in the public summary of the P&C certification report. For an independent mill, the estimated tonnage of CPO and PK products shall be recorded in the RSPO IT platform, supply chain certificate and public summary audit report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.	The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill is recorded in this public summary report.	Yes
E.2.2 The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization (RSPO IT platform).	<p>The mill has met all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization (RSPO IT platform or book and claim). Refer to palm trace ID, RSPO_PO1000006576 and valid until 27/12/18.</p> <p>The only sales of certified product (CSPK) was recorded on June 2018, refer to shipping confirmation no. TR-0fc0ba3fb6f dated 22/6/18 for 350 mt of CSPK.</p>	Yes
<b>E.3 Documented procedures</b>		
E.3.1 The site 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: a) Complete and up to date procedures covering the implementation of all the elements in these requirements;	Latest written documented procedure entitled, RSPO Supply Chain & Traceability (Mass Balance Model), ref: POM-SC/MB001, rev:2 dated 1/9/18 is referred to. This procedure has explained on the handling of incoming FFB, processing and outgoing Crude Palm Oil (CPO) and Palm Kernel (PK) for the traceability with Mass Balance model covering certified and non-certified FFB received.	Yes

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	<p>This developed based on the RSPO SCCS July 2017. There were some changes in the procedure on 2 pertinent elements related to:</p> <p>i) Purchasing and goods in – Outside Purchase Fruit (OPF) purchase and supplier details/information</p> <p>ii) Processing – Fixed inventory period option using monthly fixed inventory system</p> <p>The mill manager has the responsibility to ensure implementation assisted by the on-site compliance executive.</p>	
b) 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 site procedures for the implementation of this standard.	The mill manager has awareness of the supply chain system. The manager has responsibility to ensure all the reception and dispatch activities in operation are being progressed systematically as per the SOP and in compliance with RSPO P&C and SCCS. Deputy site head is responsible to ensure overall implementation of Mouila Plantation Lot 1 RSPO P&C and SCCS.	Yes
E.3.2 The site shall have documented procedures for receiving and processing certified and non-certified FFBs.	The receiving and processing certified and non-certified FFBs procedure is addressed in the procedure mentioned in E.3.1.	Yes
<b>E.4 Purchasing and goods in</b>		
E.4.1 The site shall verify and document the volumes of certified and non-certified FFBs received.	<p>Daily records are prepared at the entry point at the weighbridge. Daily summary and monthly summary documented for all the certified and noncertified FFB. Records verified by internal and external audit.</p> <p>All new suppliers to be authorized by Mill Manager and to be registered within SAP system before accepting any outside crops/palm products. There are 15 Olam's estates registered in Bilala's POM SAP system and no third party (non-OPG) is in the list so far. Estates registration reference in the SAP as per the following:</p>	Yes

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	<p>i) Lot 1 estates</p> <p>GA-16-02-01-01 – Estate 1</p> <p>GA-16-02-01-02 – Estate 2</p> <p>GA-16-02-01-03 – Estate 3</p> <p>GA-16-02-01-04 – Estate 4</p> <p>GA-16-02-01-05 – Estate 5</p> <p>GA-16-02-01-06 – Estate 6</p> <p>ii) Lot 2 estates</p> <p>GA-16-02-02-07 – Estate 7</p> <p>GA-16-02-02-08 – Estate 8</p> <p>GA-16-02-02-09 – Estate 9</p> <p>iii) Lot 3 estates</p> <p>GA-16-02-03-10 – Estate 10</p> <p>GA-16-02-03-11 – Estate 11</p> <p>GA-16-02-03-12 – Estate 12</p> <p>GA-16-02-03-13 – Estate 13</p> <p>GA-16-02-03-14 – Estate 14</p> <p>When FFB trucks arrived at the mill, the weighbridge operator will verify the Dispatch Chit – has info about block no., total bunch, LF weight, gross/tare/net weight (from weighbridge readings) and truck registration number. Non-certified crop is coming from other uncertified concession area/lot; (lot 2&amp; 3 estates)</p>	
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	Summary of FFB received (certified and uncertified) verified through 2 reports; i) Daily FFB receipt report, SAP report reference no. <i>ozmagr020</i> ii) Palm Product (CPO and PK) Mass Balance Calculation Record (ref 1.9) FFB Dispatch Chit will be issued by mill and used as confirmation of receipt.										
E.4.2 The site shall inform the CB immediately if there is a projected overproduction of certified tonnage.	The facility is aware of this procedure. There was no projected overproduction for the period under review.	Yes									
<b>E.5 Record keeping</b>											
E.5.1 a) The site shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and/ or three-monthly basis.	<p>Daily records are prepared at the entry point at the weighbridge. Daily summary and monthly summary documented for all the certified and noncertified FFB. Computerized system in place. Records verified by internal and external audit.</p> <p>Summary of FFB received, CPO and PK produced (certified and uncertified) verified via 2 reports; i) Daily FFB receipt report, SAP report reference no. <i>ozmagr020</i> ii) Palm Product (CPO and PK) Mass Balance Calculation Record (ref 1.9)</p> <p>From 1/1/18 to 31/10/18, to date production figure of certified FFB, CPO and PK are as per the following table:</p> <table border="1"> <thead> <tr> <th>Infeed/commodity</th><th>Volume (tonne)</th><th>Remarks</th></tr> </thead> <tbody> <tr> <td>FFB</td><td>58,931.44</td><td>No overproduction of FFB</td></tr> <tr> <td>CPO</td><td>13,138.16</td><td></td></tr> </tbody> </table>	Infeed/commodity	Volume (tonne)	Remarks	FFB	58,931.44	No overproduction of FFB	CPO	13,138.16		Yes
Infeed/commodity	Volume (tonne)	Remarks									
FFB	58,931.44	No overproduction of FFB									
CPO	13,138.16										

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	PK	2,369.66	Monthly fixed inventory period is opted	
(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.	Computerized system in place with the delivery deducted accordingly. Refer to Palm Product (CPO and PK) Mass Balance Calculation Record (ref 1.9) as at November 2018.			Yes
c) The site can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a site is allowed to sell short.(ie product can be sold before it is in stock.)	Based on verification of MB accounting, Palm Product (CPO and PK) Mass Balance Calculation Record (ref 1.9), the mill opted for monthly basis recording, it was found that the certified CPO and PK were always delivered from positive stock. No negative stock recorded at the end of inventory period. The only sales of certified product was recorded on June 2018, refer to shipping confirmation no. TR-0fc0ba3fb6f dated 22/6/18 for 350 mt of CSPK.			Yes

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Supply Chain Declaration *(Applicable For Appendix E)*

A. Monthly Records of Certified and Uncertified FFB Received since the last audit				
No.	Month - Year	Volume of FFB from certified supply bases (mt)	Volume of FFB from uncertified supply bases (mt)	Total FFB/Month (mt)
1	January 2018	6,636.40	161.82	6,798.22
2	February 2018	5,973.40	124.32	6,097.72
3	March 2018	7,226.08	155.50	7,381.58
4	April 2018	7,450.30	322.04	7,772.34
5	May 2018	6,316.70	521.58	6,838.28
6	June 2018	3,897.36	625.30	4,522.66
7	July 2018	3,342.60	770.90	4,113.50
8	August 2018	5,310.34	1,069.30	6,379.64
9	September 2018	6,717.68	1,487.90	8,205.58
10	October 2018	6,060.58	2,133.16	8,193.74
	<b>TOTAL</b>	<b>58,931.44</b>	<b>7,371.82</b>	<b>66,303.26</b>
<b>Note:</b>				

B. Monthly Records of Certified CPO & PK since the last audit			
No.	Month - Year	Certified CPO (mt)	Certified PK (mt)
1	January 2018	1,644.24	262.93
2	February 2018	1,413.73	226.93
3	March 2018	1,762.69	294.47
4	April 2018	1,531.24	282.83
5	May 2018	1,439.59	262.87
6	June 2018	901.76	160.62
7	July 2018	740.09	135.83
8	August 2018	1,093.47	218.69
9	September 2018	1,353.63	277.30
10	October 2018	1,257.72	247.19
	<b>TOTAL</b>	<b>13,138.16</b>	<b>2,369.66</b>
<b>Note:</b>			

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C. Records of Certified CPO & PK Sold under PalmTrace to Buyers since the last audit (if any)				
Palmtrace Trading reference	Buyers Name	Palmtrace Trading License Number	Certified CPO Sold (mt)	Certified PK Sold (mt)
TR-0fc0ba3f-b6f0	Olam Palm Gabon - Awala Kernel Crushing Plant	CB61975	-	350
<b>TOTAL</b>			-	350
<b>Note:</b>				

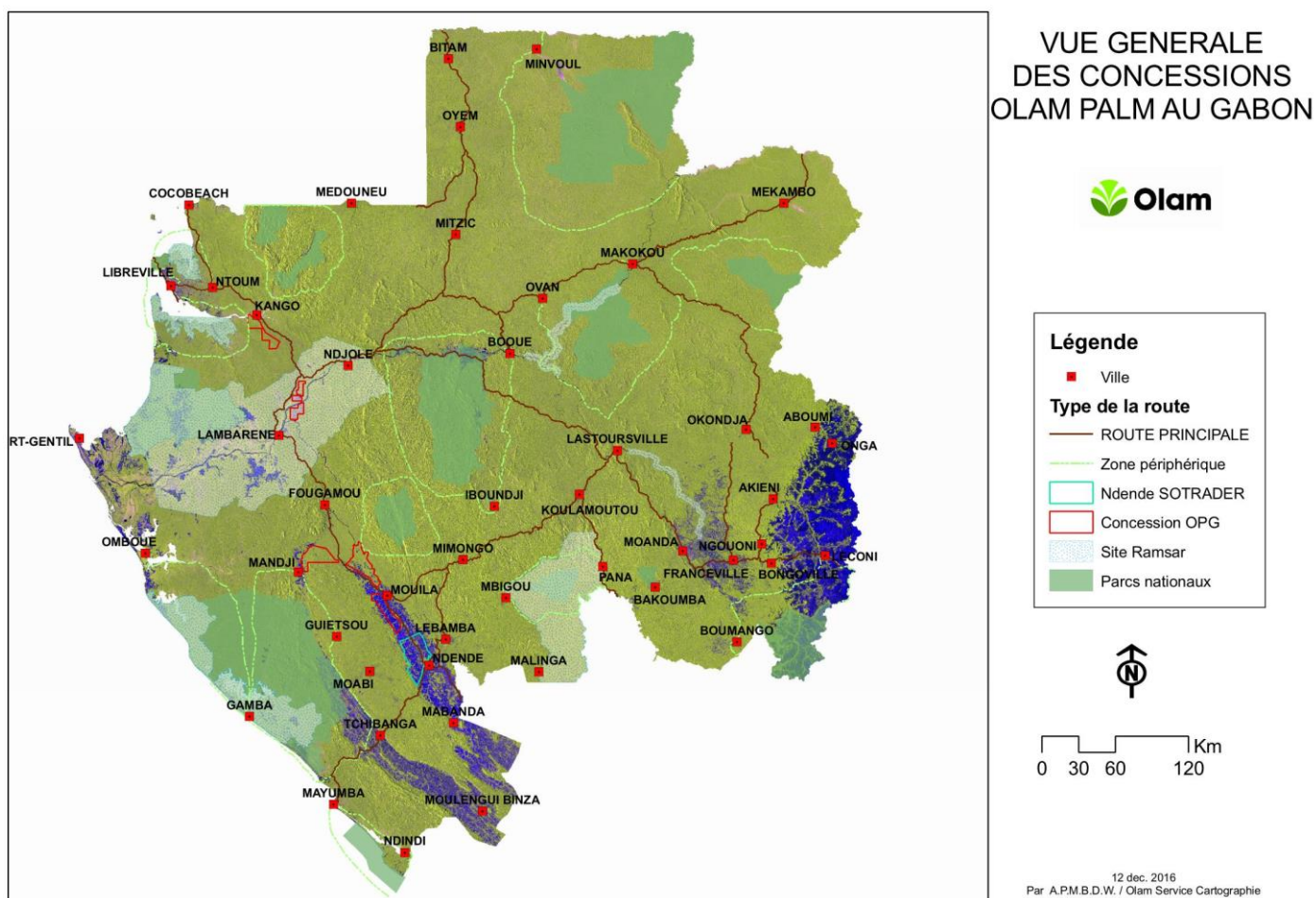
D. Records of CPO & PK Sold under other schemes to Buyers since the last audit (if any)				
No.	Buyers Name	Scheme Name	CPO Sold (mt)	PK Sold (mt)
N/A				
<b>Note:</b>				

E. Records of CPO & PK Sold as conventional to Buyers since the last audit (if any)			
No.	Buyers Name	CPO Sold (mt)	PK Sold (mt)
1	Buyer A	-	1,910.95
2	Buyer B	8,827.89	-
<b>Note:</b> Buyer details are provided to the assessment team. The names are removed for confidentiality.			

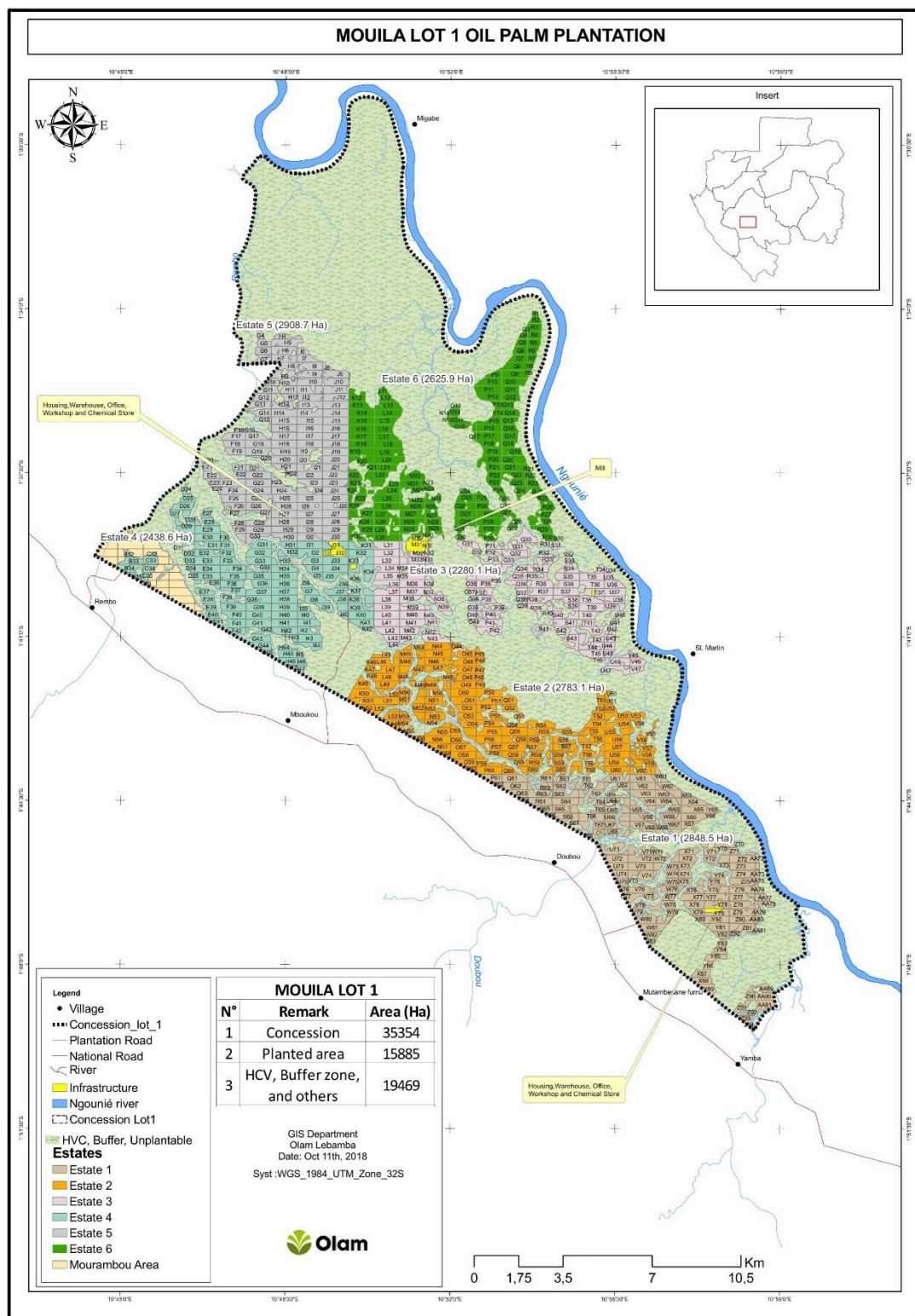
F. Records of Certified CPO Sold under RSPO Credits to Buyers since the last audit (if any)			
No.	Buyers Name	PalmTrace Trading License Number	RSPO Credits of Certified CPO Sold (mt)
N/A			
<b>Note:</b>			

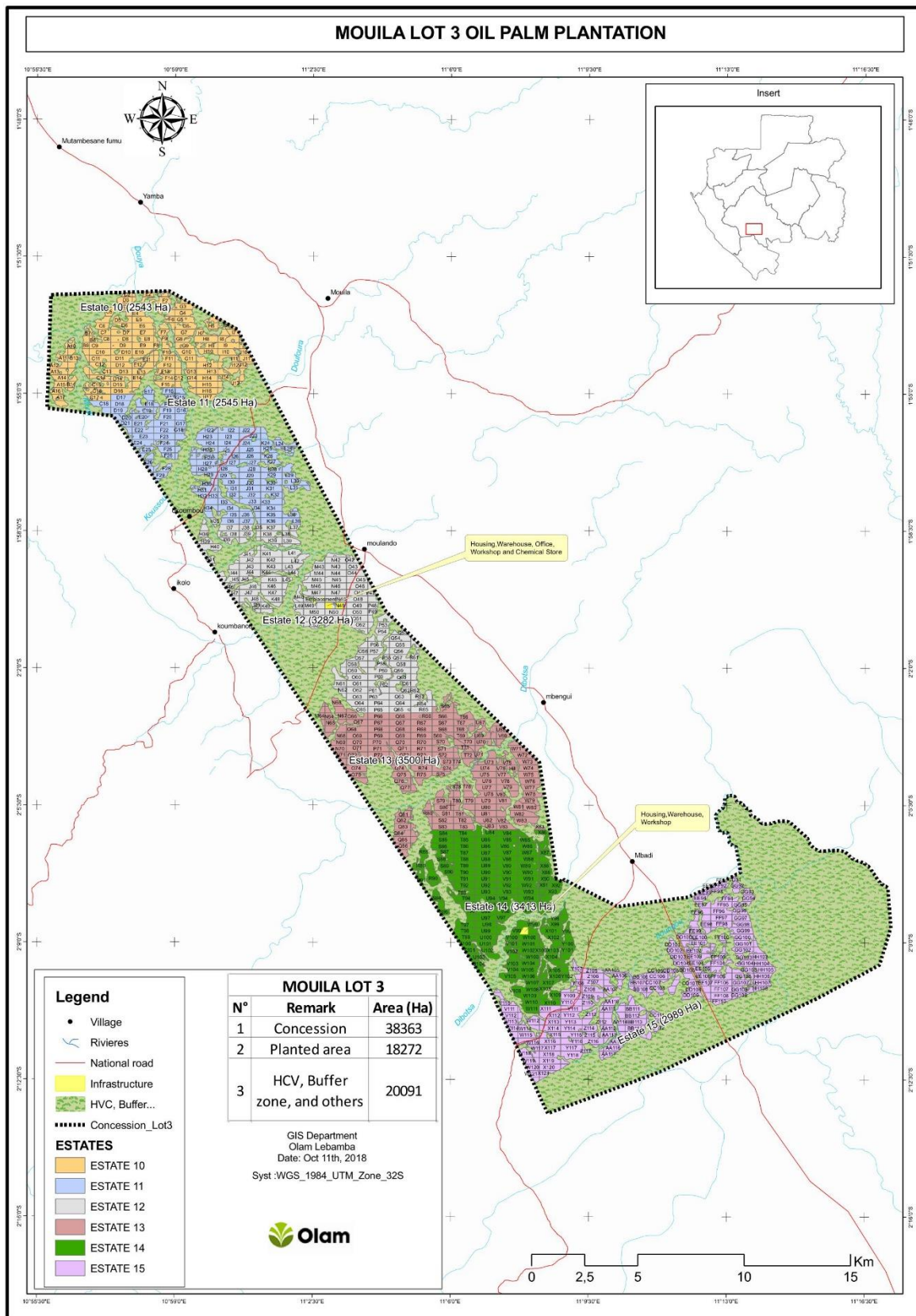


## Appendix F: Location Map of Bilala Palm Oil Mill and Supply bases



# Appendix G: Estate Field Map





**Appendix H: List of Smallholder Sampled – Not Applicable**



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#### Appendix I: List of Abbreviations

a.i	Active Ingredient
BOD	Biochemical Oxygen Demand
CB	Certification Bodies
CHRA	Chemical Health Risk Assessment
COD	Chemical Oxygen Demand
CPO	Crude Palm Oil
CSPO	Certified Sustainable Palm Oil
CSPKO	Certified Sustainable Palm Kernel Oil
EFB	Empty Fruit Bunch
EHS	Environmental, Health and Safety
EIA	Environmental Impact Assessment
EMS	Environmental Management System
FFB	Fresh Fruit Bunch
FPIC	Free, Prior, Informed and Consent
GAP	Good Agricultural Practice
GHG	Greenhouse Gas
GMP	Good Manufacturing Practice
GPS	Global Positioning System
HCV	High Conservation Value
IPM	Integrated Pest Management
IP	Identity Preserved
IS - CSPO	Independent Smallholder Certified Sustainable Palm Oil
IS – CSPKO	Independent Smallholder Certified Sustainable Palm Kernel Oil
IS – CSPKE	Independent Smallholder Certified Sustainable Palm Kernel Expeller
ISCC	International Sustainable Carbon Certification
LD50	Lethal Dose for 50 sample
MB	Mass Balance
MSDS	Material Safety Data Sheet
MT	Metric Tonnes
OER	Oil Extraction Rate
OSH	Occupational Safety and Health
PK	Palm Kernel
PKO	Palm Kernel Oil
POM	Palm Oil Mill
POME	Palm Oil Mill Effluent
PPE	Personal Protective Equipment
RSPO	Roundtable on Sustainable Palm Oil
P&C	Principles & Criteria
RTE	Rare, Threatened or Endangered species
SCCS	Supply Chain Certification Standard
SEIA	Social & Environmental Impact Assessment
SIA	Social Impact Assessment
SOP	Standard Operating Procedure