TUV NORD (M) SDN BHD

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RSPO P&C SURVEILLANCE ASSESSMENT PUBLIC SUMMARY REPORT

Abedon Oil Mill Sdn Bhd and its supply bases

Date of assessment	15/07/2019 – 19/07/2019
Type of Assessment	ASA02

Company Name: Kretam Holdings Berhad

Certifying Unit: Abedon Oil Mill Sdn Bhd

Client Number: 92-028

Type of Audit: Annual Survelliance 02



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1 Scope

1.1 Organizational information / Contact person					
Name of Unit of certification	Abedon Oil Mill Sdn Bhd				
Principle Contact Person	Mr. Shim Thou Hung				
Business address	56KM, Jalan Lahad Datu-Sandakan, 90200 Kinabatangar Sabah				
Telephone Number	+6089-218999				
E-mail address	ths kretam@yahoo.com				
Web site	www.kretam.com				
Other certifications held:	MS 2530 and ISCC EU				

1.2 Certification Details					
RSPO membership number:	1-0189-15-000-00				
Parent company name (if applicable):	Kretam Holdings Berhad				
Certificate number:	500 92 028				
Date of assessment	15/07/2019 to 18/07/2019				
Date start of certificate	01/11/2017				
Date of expiry certificate	31/10/2022				
Current Certificate Validity (One Year)	31/10//2019				

1.3 Identity of Certification Unit

Abedon Oil Mill Sdn Bhd (AOM) and the supply bases are owned by Kretam Holdings Berhad (KHB) is located at Kolopis estate, Lahad Datu, Sabah, Malaysia is assessed against RSPO Certification Systems, RSPO P&C for Sustainable Palm Oil production version 2013, RSPO Malaysia National Interpretation version 2015 and RSPO SCC version 2014 on the date of audit.

Kretam Holdings Berhad (KHB) is a plantation organisation with operations in 3 regions namely Sandakan, Tawau and Lahad Datu, Sabah, Malaysia. There are 3 mills, one at each region and one refinery in Sandakan region.

The supply base of AOM consists of 2 internal owned estates namely Kolopis (Kolopis & Bumiwealth Divisions) and Tanaki (Tanaki, Segama and Inabong divisions).

The audit methodology is collection of objective evidences that include physical site inspections, observation of tasks and processes, interviews of staff, workers and their families, review of documentation and monitoring data. Checklists and questionnaires are used to guide for the collection of information. The comments, if any made by external stakeholders are taken into account in the assessment.

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Name of Mill	Location of mill	Coordinates	Mill Capacity Mt/H
Abedon Oil Mill	56KM, Jalan Lahad Datu- Sandakan, 90200 Kinabatangan, Sabah	05°18' 44" N; 117° 58' 44" E	30

Error! Reference source not found.: Map of Sabah.

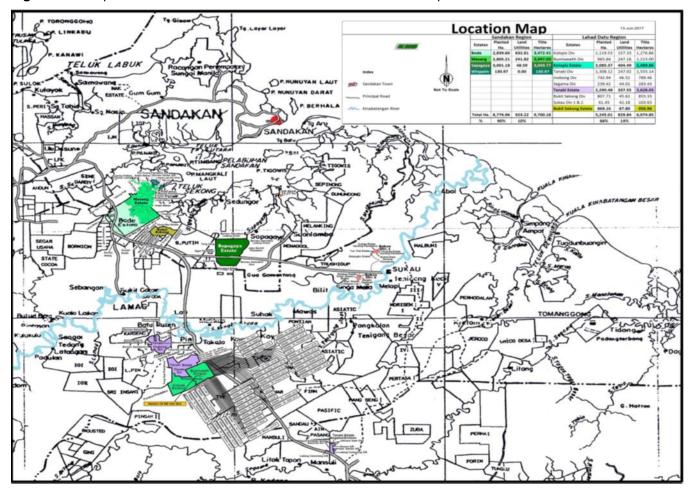


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Figure 1-2: Purple and Green Shades indicate location of Tanaki & Kolopis estates and Abedon Oil Mill



Name of Supply Base	Location of mill	Coordinates
Kolopis Estate	56KM, Jalan Lahad Datu-Sandakan, 90200 Kinabatangan, Sabah	117° 57' 24" E; 05° 17' 52" N
Tanaki Estate	56KM, Jalan Lahad Datu-Sandakan, 90200 Kinabatangan, Sabah	117° 56' 18" E; 05°1 9' 47" N

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1.4 Production Volume

Supply based	Projected \	/olume for No Oct 2019	ov 2018 to	Actual annual volumes** Nov 2018 to Oct 2019*		Projected volume for the next 12 months Nov 2019 to Oct 2020***			
	FFB	СРО	PK	FFB	СРО	PK	FFB	СРО	PK
Certified	77,940.94	16,133.77	3,507.34	74,905.98	14,344.015	3,536.083	75,028	15,783	3,686
Uncertified	78,000.00	14,904.00	3,240.00	70,673.16	13,624.919	3,465.884	78,630	16,276	3,538
Total	155,490.94	31,037.77	6,747.34	145,579.14	27,968.934	7,001.967	153,658	31,806	6,914

^{*}of certified products since date of last reporting period start from Nov 2018.

^{***} Data entered into palm trace account.

Certified FFB diverted to Syarikat Kretam Mill from Nov 2018 to June 2019	1,192.03 mt
Certified FFB received from Syarikat Kretam Mill	0

1.5 Description of Fruit Supply Base

The supply bases consists of 2 internal estates as show in table below are the certified source and independent smallholders as uncertified source. Refer table above for the amount of uncertified FFBs.

The list of uncertified source is made available for review to crosscheck the processed and projected volume.

Note: If the module is MB, please state the origin of the uncertified source. Additionally if there is scheme / associated smallholders that required to be stated.

Name of Plantation	Area ((На)	FFB Production	Projected FFB	
	Total*	Planted**	(ton/year) (August 2018 to	Production (ton/year)	
			July 2019)	(August 2019 to July 2020)	
Kolopis Estate	2,489.86	2,085.14	38,211.10	32,130.64	
Tanaki Estate	2,628.03	2,273.53	34,950.52	27,460.09	
Total FFB supplied to the mill (Plantations)			73,161.62	59,590.73	

^{*}includes productive and non-productive area (infrastructures, conservation, HCV, community use, set aside area etc.)

^{**}from current reporting time includes forecast for Nov. 2018 and Oct 2019.

^{**} Immature + Mature Area

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HCV & Conservation Area							
Name of Plantation Conservation Area HCV Area Total							
Kolopis Estate	150.24	0	150.24				
Tanaki Estate	127.49	0	127.49				
Total	277.73	0	277.73				

1.6 Date of Planting and Cycle

1.6.1 Planting program for each estate

Year	Kolopis	Tanaki
Year 1995		727.81
Year 1996	417.15	243.97
Year 1997	0	0
Year 1998	0	0
Year 1999	0	0
Year 2000		554.05
Year 2001	0	0
Year 2002	0	0
Year 2003	0	0
Year 2004	0	0
Year 2005	0	0
Year 2006	0	0
Year 2007	0	0
Year 2008	0	0
Year 2009	0	0
Year 2010	0	95.07
Year 2011	0	0
Year 2012	391.95	0
Year 2013	466.44	0

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Year 2014	0	0
Year 2015	261.14	0
Year 2016	0	39.52
Total Mature	1,536.68	1,660.42
Replant Year 2017 - Y3	0	47.32
Replant Year 2018 - Y2	0	565.79
Replant Year 2019 - Y1	548.46	0
Total Immature Replant	548.46	613.11
TOTAL OIL PALM	2,085.14	2,273.53

(Please highlight all new plantings after January 2010)

1.6.2 Replanting Program for Each Estate

Year of	Planted area (ha) in each estate		Total area to be replanted (ha)	
replanting	Kolopis	Tanaki		
2019	548.46	0	548.46	
2030	0	727.81	727.81	
2021	417.15	243.97	661.12	
2022	0	0	0	
2023	0	0	0	
TOTAL	965.61	971.78	1,937.39	

1.7 Progress of Associated Smallholders or Outgrowers Towards Compliance With Relevant Standards

No associated smallholders or outgrower included in Abedon Palm Oil Mill certification. Therefore, the three years progress is not applicable.

2 Minimum requirements for multiple management units

2.1 General

Organizations that have multiple management units, and/or a majority holding in and/or management control of more than one autonomous company growing oil palm, will be permitted to certify individual

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management units and/or subsidiary companies under certain conditions. A majority shareholding is defined as the largest shareholding; where the largest shareholdings are equal (e.g. 50/50) this applies to the organization that has management control. This process is permitted only if all of the following are complied with

Requirement	Finding / Compliance	Compliance
The parent organization or one of its majority owned and / or managed subsidiaries is member of RSPO.	The parent company Kretam Holdings Berhad is the ordinary member of RSPO. The membership number is 1-0189-15- 000-00	Yes
For groups with complex management structures the following are required: (a) A statement of the ultimate controlling shareholders and directors in the managing agency company/companies. (b) Ditto in respect of each of the operating groups. (c) Application for membership by the top asset owning company/companies. (d) Application for membership by the managing agency company/companies	This is not applicable since Kretam Holdings Berhad is single group.	Yes

If one of the above mentioned requirements is non-compliant, this leads to a major non-conformity.

The following requirements about a time bound plan (3.2) and requirements for uncertified management units and/ or holdings (3.3) are applicable if the registered RSPO member is the holding company or one of its subsidiaries and if one or more of these units are currently not yet RSPO P&C certified.

2.2 Requirements for time-bound plan			
Requirement	Finding/ Compliance	Compliance	
Time-bound plan for certifying all its management units and/or entities, including the units where the organization has management control and no or minor shareholding, is submitted to the CB during the initial certification audit. The time-bound plan should contain a current list of all estates and mills.	The current time bound plan of 3 years is still achievable based on the 1 st unit Syarikat Kretam Mill was certified in 2016. The time bound plan consist of one unit to be certified has been change to 2019 from last quarter 2018. The ACOP updated for delay in certification for Silimpopon unit to 2019	Yes	
As a minimum, all estates and mills shall be certified within five years after obtaining RSPO membership. Any new acquisitions shall be certified within a three-year timeframe. Any deviations	Kretam Holdings Bhd is an ordinary member of RSPO since 16/09/2015. The unit left to be certified is Silimpopon. The original schedule to be certified is 3 rd	Yes	

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2.2 Requirements for time-bound plan			
Requirement	Finding/ Compliance	Compliance	
from these maximum periods requires approval by the RSPO Secretariat.	quarter 2018. LUCA is approved. RaCP concept submitted and not approved yet. As per requirements, all units shall be certified 5 years from date of membership, the last date for Silimpopon to be certified will be before 15/09/2020. The revised certification date is in 2019 which is still within the 5 years period.		
What is the progress of this plan since the last audit? (if the last audit was done by another CB, the time-bound plan shall be accepted at the moment of first acceptance and only check continued appropriateness shall be checked).	The time bound plan is revised given the circumstances of the LUCA is approval by RSPO secretariat. RaCP concept submitted and not approved yet.	Yes	
Any revision to the time-bound plan or to the circumstances of the company shall cause the time-bound plan to be reviewed? Changes to the time bound plan are permitted only where the organization can demonstrate to the CB that they are justified. The requirements will also apply to any newly acquired subsidiary from the moment that the company is legally registered with the local notary or chamber of commerce (or equivalent);	The time bound plan is revised. Refer above justification.	Yes	
Where there are isolated lapses in implementation of a time-bound plan, a minor non-compliance shall be raised. Where there is evidence of fundamental failure to proceed with implementation of the plan, a major non-compliance shall be raised;	There is a delay in the certification for Silimpopon unit with justification as explained above. Therefore, no non-compliance raised in lieu for the change of time-bound plan with appropriate justification.	Yes	

When there are isolated lapses in implementation of the time-bound plan, a minor non-compliance is raised. When there is evidence of a systematic failure to proceed with implementation of the plan, a major non-compliance is raised.

2.3 Requirements for uncertified management units and/or holdings				
Units that remain uncertified this time are				
Requirement Finding/ Compliance Compliance				

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enhance HCVs in accordance with RSPO P&C criterion 7.3. Any new plantings since January 1st 2010 shall comply with the RSPO New Planting Procedure (NPP).	assessor to conduct HCV assessment, SEIA, LUCA and GHG emissions. LUCA is approved. RaCP concept submitted and not approved yet.	
Land conflicts, if any, are being resolved through a mutually agreed process, such as the RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 2.2, 6.4, 7.5 and 7.6;	No land conflicts since the land are state leased. Therefore criteria 6.4, 7.5 and 7.6 are not applicable.	Yes
Labour disputes, if any, are being resolved through a mutually agreed process, in accordance with RSPO criterion 6.3.	No labour disputes reported in accordance to RSPO criteria 6.3.	Yes
Legal non-compliance, if any, is being addressed through measures consistent with the requirements of RSPO P&C criterion 2.1;	No legal non-compliance detected in accordance to RSPO criteria 2.1 and 2.2.	Yes

Assessment of above mentioned requirements is based on the following approach:

- Positive assurance statement, which is based upon self-assessment (i.e. internal audit) by the organisation. This would require evidence of the self-assessment against each requirement.
- Targeted stakeholder consultation may be carried out by the certification body. If this has already been conducted by a certification body, other certification bodies may request the summary report through the organisation.
- If necessary, the certification body may decide on further stakeholder consultation or field inspection, assessing the risk of any non-compliance with the requirements by desktop study e.g. web check on relevant complaints..

For the requirements mentioned in the section, the approach to defining major and minor non-compliance can be applied from the relevant national interpretation. For example, if a non-compliance against a 'major indicator' in a non-certified holding/management unit is identified, the current certification assessment cannot proceed to a successful conclusion until that is addressed.

Failure to address any of the requirements may lead to certification suspension(s) (consistent with the RSPO Certification Systems document rules on non-compliance).

2.4 Progress against Ti	.4 Progress against Time-Bound Plan by Parent Company			
Name of Mill	Country	Unit of Supply based	Time-bound for certification (Year)	Certification Status
Silimpopon Oil Mill	Malaysia	2	2019	To be certified
Syarikat Kretam Mill Sdn Bhd	Malaysia	4	2016	Certified

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2.5 Summary Findings of Minimum requirements for multiple management units

No findings raised since the uncertified unit is in the progress status. RaCP concept is submitted and waiting for RSPO secretariat to approve.

3 Assessment Process

3.1 Certification Body

TUV NORD (Malaysia) Sdn Bhd is a certification, testing and inspection body for various type of industries.

TUV NORD (Malaysia) Sdn Bhd is member of TUV NORD GmbH an international German organisation conducting inspection, testing and certification.

TUV NORD (Malaysia) is accredited by ASI for RSPO P&C and RSPO SCC Certifications.

3.2 Qualifications Of The Assessment Team

3.2.1 Qualification of the Lead Auditor: Cheong, Chun Yuen (Robert)

Requirement	Qualifications
A minimum of post high school (post-secondary school) training in either agriculture/forestry, environmental science or social sciences;	Graduate in Business Administration. RSPO P&C, SCC, ISCC EU / PLUS & MSPO Lead auditor; Authorised ISCC EU / PLUS GHG & Land use change auditor; Senior assessor for carbon credits.
At least 5 years professional experience in area of work relevant to the assessment (e.g., palm oil management; agriculture/forestry; ecology; social science);	RSPO P&C, SCC, MSPO & ISCC EU / PLUS Lead auditor; Authorised ISCC EU / PLUS GHG & Land use change auditor; Senior assessor for carbon credits. 15 years in carbon credits, 7 years in ISCC, 5 years in MSPO and 5 years in RSPO auditing. Senior Assessor for World Bank Environment, Safety and Health program.
Training in the practical application of the RSPO criteria, and RSPO certification systems;	Successful completion of the RSPO P&C Lead Assessor Course (organised by Wild Asia, Kuala Lumpur, Malaysia: 24-28 November 2014) Successful completion of the RSPO SCC Auditor Course (Organised by David Ogg & Partners, Kuala Lumpur, Malaysia: 26-27 January 2015) Attended RSPO P&C and SCC refresher course (organised by David Ogg & Partner, Kuala Lumpur, Malaysia: 02/05/2019 t& 03/05/2019 and 06/11/2018

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Successfully completion of an ISO 9000:19011 lead assessors course;

Attended ISO 14001 in 2005, 2007 & 2018 and ISO 9001 in 1994, 2006 & 2015 auditor course.

MSPO Auditor course in 2014

7 years as ISCC Lead auditor for ISCC EU & PLUS, Land use change, GHG assessor; sustainability standards, with a minimum of 15 days assessment experience and at least 3 assessments at different organisations.

Attended ISO 14001 in 2005, 2007 & 2018 and ISO 9001 in 1994, 2006 & 2015 auditor course.

MSPO Auditor course in 2014

7 years as ISCC Lead auditor for ISCC EU & PLUS, Land use change, GHG assessor; 5 years as MSPO Lead Auditor; 5 years as RSPO Lead Auditor 15 years as Carbon Credits Senior assessor

3.2.2 Assessment Team Members

Requirement	Assessor	Qualification	Compliance
Field working experience in the palm oil sector, or demonstrable	Sheron Pui Ling Wui	RSPO & MSPO auditing experience	Yes
equivalent.	Zul Hairi bin Abu Hassan	9 years working experience in palm oil plantation and qualified as RSPO auditor.	Yes
	Khairul Anwar Bin Ismail (Trainee)	5 years working experience in oil palm related field.	Yes
Good Agricultural Practices (GAP), and Integrated Pest Management (IPM), pesticide and fertilizer use.	Sheron Pui Ling Wui	RSPO & MSPO auditing experience	Yes
	Zul Hairi bin Abu Hassan	9 years working experience in palm oil plantation.	Yes
	Khairul Anwar Bin Ismail (Trainee)	5 years working experience in oil palm related field.	Yes
Health and safety auditing on the farm and in processing facilities, for example ISO 45001 or Occupational, Health & Safety Assurance System.	Zul Hairi bin Abu Hassan	Attended ISO 45001:2018 Lead Auditor course	Yes
	Sheron Pui Ling Wui	Successfully completed MSPO LA course, RSPO P&C LA course, ISCC-EU course and ISO 45001 LA course	Yes
	Khairul Anwar Bin Ismail (Trainee)	Successfully completed IMS 9001,	Yes

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Requirement	Assessor	Qualification	Compliance
		14001 & 45001 Lead Auditor course	
Worker welfare issues and social auditing experience, for example with SA8000 or related social or ethical accountability codes.	Sheron Pui Ling Wui	Successfully completed SA 8000 Basic and auditor for RSPO and MSPO schemes.	Yes
	Zul Hairi bin Abu Hassan	Attended SA 8000 Basic program and qualified as RSPO / ISCC / MSPO sustainability auditor	Yes
	Khairul Anwar Bin Ismail (Trainee)	Successfully completed SA 8000 Basic and auditor for RSPO and MSPO schemes.	Yes
Environmental and ecological auditing, for example experience with organic agriculture, ISO 14001 or Environmental Management Systems (EMS).	Sheron Pui Ling Wui	Successfully completed EMS ISO 14001: 2015 Lead Auditor training and auditor for RSPO and MSPO schemes.	Yes
	Zul Hairi bin Abu Hassan	Attended ISO 14001 LA Auditor course	Yes
	Khairul Anwar Bin Ismail (Trainee)	Successfully completed IMS ISO 9001, 14001 and 45001	Yes
Fluency in the main languages relevant to the location where the specific assessment is taking place, including the languages of any potentially affected parties such as local communities.	Cheong, Chun Yuen (Robert); Zul Hairi bin Abu Hassan; Sheron, Pui Ling Wui and Khairul Anwar Bin Ismail.		Yes

3.3 Assessment Methodology

3.3.1 General overview

The assessment was carried out following the TUV NORD (Malaysia) RSPO P&C Certification Procedure. During the assessment the assessors used the RSPO standard as endorsed for the country in which the assessment took place and recorded their findings.

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3.3.2 Calculation of the Number of Production Units (N) to Sample for the Mill

 $N = 0.8\sqrt{Y}$, where "Y" is the number of units, with the result always to be rounded "up" to the next whole integer. Where only a sample of the supply base is assessed, units not previously assessed, or assessed earlier in the certification program, are to be preferred over those more recently assessed.

For the Mill, how many units form the production base?					
Owned estates (Y) $N = 0.8\sqrt{Y}$ Smallholders (Z) $N = 0.8\sqrt{Z}$					
2	2	0	0		

Explanation as to the selection of estates sampled: Abedon group has only 2 estates. Therefore, both estates are audited.

3.3.3 Assessment program

The audit schedule is as below.

Table 3-1 Audit Schedule

Master Data of Organisation				
Name of Organisation	Kretam Holdings Berhad			
Name of Certifying Unit	Abedon Oil Mill Sdn Bhd			
Address	Mile 56, Jalan Lahad Datu – Sandakan 91115 Lahad Datu, Sabah			
Contact	Mohd Masran Bin Hamzah			
E-Mail	masran@kretam.com			
Phone/Fax	+6089-218999			
Language	English and Bahasa Malaysia			
Scope Description	Production of FFB, CPO & PK and Management System for mill and estate			
Audit profile				
Standards	RSPO Principles & Criteria for Sustainable Palm Oil Production 2013; RSPO MY NI 2015; RSPO Supply Chain Certification 2014 revised 2017 for Mill			
Audit type	Annual Surveillance			
Surveillance Mode	ASA02			
Audit Team Leader	Cheong Chun Yuen, Robert (RC)			

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Audit team	Zulhairi Bin Abu Hassan (ZH)	Pui Ling Vui, Sheron (SP)
	Khairul Anuar Ismail (KI) - Trainee	
Observer / Monitoring	Nur Amanina Zahir - AZ	
Group Certification	NA	
Shift operation	Mill 2 shifts	

Audit Details	
Audit date	15/07/2019 to18/07/2019
Audit duration	4 days

	Date/ Time ¹⁾	Focus / Chapter / Standard Requirement	Subject	Auditor (Initials)	Contact ²⁾
1.	DAY 1: Monday 15/07/2019				
2.	7:30 to 8.30am		Opening Meeting at Abedon Sdn Bhd's Main Office (Kolopis Estate)	RC ZH SP KI AZ	
3.	08.30am to 12:00noon	2, 4, 6, 7	Kolopis Estate: Harvesting, Fertiliser, Chemical Spraying, interview of workers, Workers Quarters, landfill, Stores, Buffer zones, Clinic, Shops, Crecha	RC ZH SP KI AZ	
4.	12:00 to 1:00pm		Lunch	All	
5.	1:00 to 5.00pm	1, 2, 4, 5, 6, 8	Continue at Kolopis Estate: Document review: Land title, Maps, Acreage statement, Legal, environment, permits, licenses, medical records, Employment records, Social, training, IPM, Waste Disposal, Water Management, EAI, HCV, Complaints & Grievance, Accident records, Internal Audit, Risk Assessment, CIP, CHRA	RC ZH SP KI AZ	

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	Date/ Time ¹⁾	Focus / Chapter / Standard Requirement	Subject	Auditor (Initials)	Contact ²⁾
6.	5.00 to 5:30pm		Reporting and day wrap up	All	
7.	DAY 2: Tuesday 16/07/2019				
8.	7:30am to 12.00noon	4, 6	Tanaki Estate Harvesting, Fertiliser, Chemical Spraying, interview workers, Workers Quarters, buffer zones, landfill site, Workshop, Stores Clinic, shops, Crecha	RC ZH SP KI AZ	
9.	12:00 to 1:00pm		Lunch	All	
10.	1:30 to 5.00pm	1, 2, 4, 5, 6, 8	Continue at Tanaki Estate Document review: Legal, environment, permits, licenses, medical records, Employment records, social, training, IPM, Waste Disposal, Water Management plan, EAI, HCV, Complaints & Grievance, Accident records, Risk Assessment, CIP, Internal audit, CHRA	RC ZH SP KI AZ	
11.	5.00 to 5:30pm		Reporting and day wrap up	All	
12.	DAY 3: Wednesday 17/07/2019				
13.	7.30 to 7:40am		Abedon POM – Short opening introduction	RC ZH SP	
14.	7:45 to 9:00;am	4, 5, 6	Plant Tour Wastewater treatment, Landfill, stores, workshop, Mill operations, labour quarters	KI AZ	
15.	9:00 to 12noon	1, 2, 3, 4, 5, 6, 8	Documentation Legal, Permits, License, Test reports, Environment reports Employment, Social, Training Reords, Medical records, Water Management, Waste Disposal, CIP, Internal Audit, Financial, Risk Assessment, Management Review, CHRA		
16.	12:00 to 1:00pm		Lunch		

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	Date/ Time ¹⁾	Focus / Chapter / Standard Requirement	Subject	Auditor (Initials)	Contac	ct ²⁾
17.	1.00 to 5.00pm	1, 2, 3, 4, 5, 6, 8, SCC	Continue documentation as above SCC, Palm Trace, Palm GHG	RC ZH SP KI AZ		
18.	5.00 to 5:30pm		Reporting and day wrap up	All		
19.	DAY 4 Thursday 18/07/2019					
20.	7:30am to 12:00noon	1-8, SCC	Final review of documents – Estates & Mills	RC ZH		
21.	12:00 to 1.00pm		Lunch	SP		
22.	1:00 to 2:30pm		Auiditors time	KI AZ		
23.	3:00 to 3:30pm		Reporting & Closing Meeting			
24.	3:30pm		End of onsite			
1) from) from to modifications are possible					

Audit Details	
Audit date	15/07/2018 to18/07/2017
Audit duration	4.0 days

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Type of Audit: Annual Survelliance 02



4 Assessment Findings

4.1 RSPO Principle and sample of the Criteria Assessment Summary

The assessment team conducted a thorough assessment of each principle and criteria. Over the 5 years' period of the certificate cycle, there will be 4 annual surveillance audits all criterions will be assessed. Evidences were sought for conformity with the RSPO MY NI of both system and the implementation. The summary of the assessment can be seen below, where the "Findings/Comments" column reflects the findings in accordance with each criteria and indicator or evidences that were, and when non conformity was found, a summary of the non-conformity can be found below

Principle	Principle 1 : Commitment to Transparency				
Criterio	n By Audit	Summary of Assessment	Compliance		
1.1	1.1.1	KHB Lahad Datu region adopted the group SOP Stakeholder engagement / negotiation KHB/G/SOP-35 revision number 2 dated 05/05/2017.	Yes		
		KHB Lahad Datu region has updated the list of stakeholders dated 11/06/2019.			
		KHB Lahad Datu region adopted the group SOP Information Procedure, KHB-HR-07 revision 0 dated 01/06/2015			
		A flow chart is included in the SOP detailing the process and timelines to respond the request of information.			
		KHB Lahad Datu region stakeholders annual meeting dated 28/06/2019 was sighted and reviewed.			
	1.1.2	KHB Lahad Datu region adopted the group SOP Stakeholder engagement / negotiation KHB/G/SOP-35 revision 2 dated 05/05/2017.	Yes		
		The SOP outline the responsible person for providing information are the Estates and Mill Managers, Assistant Manager and Mill Engineer to respond to any request.			
		KHB Lahad Datu region adopted the group SOP Information Procedure, KHB-HR-07 revision 0 dated 01/06/2015			
		A flow chart is included in the SOP detailing the process, timelines to respond the request of information and responsible person of the respective locations.			
1.2	1.2.1	KHB Lahad Datu region adopted the group List of Documents and Transparency Status dated 3/06/2019.	Yes		
		The list of documents are publicly available at KHB group website and at Estates, Mill and main security guardhouse notice boards.			

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Principle	Principle 1 : Commitment to Transparency				
Criterio	n By Audit	Summary of Assessment	Compliance		
		Document such as land titles, company policies and procedures were available at the estates and mill sites.			
1.3	1.3.1	KHB Lahad Datu adopted the group Code of Conduct and Human Right Policy dated 03/01/2017 signed by Chief Executive Office.	Yes		
		The policy includes the following statements:			
		 committed to a high level of professionalism and integrity into our daily practices. 			
		 Prohibit all forms of corruption, bribery and fraudulent use of funds and resources. 			
		The policy is available in English and Bahasa Malaysia and displayed at the estates, mill and main security house.			
		Example:			
		Kolopis Estate			
		Training on Code of Ethical Conduct training conducted on 13/02/2019 and for contractor on 01/02/2019.			

Principl	Principle 2: Compliance with Applicable Laws and Regulations			
Criterio	Criterion by Audit Summary of Assessment		Compliance	
2.1	2.1.1	2.1.1 KHB Lahad Datu region established list of licences for the estates and mill operations.		
		Example:		
		MPOB Licences		
		Diesel and petrol storage licences		
		USECHH, OSH Act 1994		
		Minimum Wage regulation 2016		
		Copies of legal documents are made available at the estates and mill.		
	2.1.2	KHB Lahad Datu region adopted the group List of Laws, Regulations and Guidelines Description and latest updated on 01/08/2018	Yes	
		KHB Lahad Datu region adopted the group SOP Control of documents & records, doc no. KHB/G/SOP-32, rev.4, 04/05/2018.		
		Person In Charge is Human Resource & Sustainability Manager		

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Principle	Principle 2: Compliance with Applicable Laws and Regulations				
Criterio	n by Audit	Summary of Assessment	Compliance		
		Hard and soft copies are accessible by all personnel in the estates and mill offices			
	2.1.3	Internal audit conducted for estates on 18/06/2019 for Kolopis estate and 17/06/2019 for Tanaki and AOM on 19/06/2019 that includes compliance to legal requirements.	Yes		
		The internal report applies the RSPO documentation audit checklist 2017 sighted and reviewed against for any noncompliance.			
	2.1.4	KHB Lahad Datu region adopted the group SOP Mechanism for Implementation of Legal Requirements and System for Tracking Changes in The Law: KHB/G/SOP-36 revision 2 dated 09/02/2018.	Yes		
		The SOP includes a flowchart on the mechanism for implementation of legal requires and mechanism of tracking changes.			
		The form for removal and inclusion of new amendments was sighted and reviewed.			
		Example: Employment Insurance System Act 2017 ACT800.			
		The PIC is the Head of Research and Environmental Protection rom Sandakan region			
2.2	2.2.1	Individual land titles for each estate available at KHB Lahad Datu region plantation admin office and KHB HQ.	Yes		
		The lands are state leased as agricultural land with actual land use rights for agricultural activities and tenure of 99 years.			
		Example: Kolopis Division acquired in 1987 with lease expiring in 2085.			
		The land titles ae issued by Land Authority of Sabah state government.			
	2.2.2	Legal map showing boundary markers sighted in land title.	Yes		
		Physical boundary marker peg sighted during field visits with the GPS taken and crosschecked with the map.			
		KHB Lahad Datu region adopted the group SOP Boundary Marking / Demarcation: KHB/G/SOP-38 rev. 03 dated 09/03/2018.			
		The SOP describes method of implementation for estate boundary marking, demarcation and maintenance.			
		Maps are of scale 1:40,000 or 1:100,000.			
		There are no independent or associated smallholders in the certification and time bound plan.			

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Principle	Principle 2: Compliance with Applicable Laws and Regulations				
Criterio	n by Audit	Summary of Assessment	Compliance		
	2.2.3	KHB Lahad Datu region Kolop[is and Tanaki estates land titles are country leased with a tenure of 99 years issued by the Sabah State Land Authority.	Yes		
		There are no sub-leased lands in the estates divisions.			
		As of audit date the complaint and grievance log book is reviewed with no complaints or grievance received.			
	2.2.4	KHB Lahad Datu region Kolopis and Tanaki estates land titles are country leased with a tenure of 99 years issued by the Sabah State Land Authority.	Yes		
		There are no sub-leased lands in the estates divisions.			
		As of audit date the complaint and grievance log book is reviewed with no complaints or grievance received.			
		KHB Lahad Datu region adopted the group SOPs to manage any land conflict.			
		Example:			
		SOP: Guideline On Managing Land Conflict KHB/SOP/G 55 version 1 dated: 09/02/2018			
		SOP Complaints & Grievances KHB-HR-P05 rev 2 dated 01/08/2018			
	2.2.5	KHB Lahad Datu region land title are country leased issued by the Sabah State Land authority. As of audit date the complaint and grievance log book is reviewed with no complaints or grievance received. KHB Lahad Datu region adopted the group SOP KHB/SOP/G 55: Guideline On Managing Land Conflict rev 1 dated: 09/02/2018 to	Yes		
		resolve any disputes if occur.			
	2.2.6	KHB Lahad Datu region adopted the group Code of Conduct and Human Rights Policy dated 03/01/2017 with a statement "promote healthy, safe and harmonious working conditions".	Yes		
		Workers and stakeholders were interviewed that they could confirm KHB Lahad Datu region does not instigate violence or confrontation, intimidation and applies para-militaries to the work force and treat communities and workers fairly.			
2.3	2.3.1	KHB Lahad Datu adopted the group SOP Free Prior Informed Consent Doc. No. KHB/G/SOP-54 revision 1 dated 09/02/2018. The purpose of the SOP to provide guidance to affected parties and Company in having the FPIC implemented before proceed with any project.	Yes		

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Principle	Principle 2: Compliance with Applicable Laws and Regulations			
Criterio	n by Audit	Summary of Assessment	Compliance	
		KHB Lahad Datu region estates land titles are country leased issued by Sabah Land Authority.		
	000	There are no sub-leased land therefore, no maps available.		
	2.3.2	KHB Lahad Datu region estates land titles are country leased issued by Sabah Land Authority.	Yes	
		There are no sub-leased land, therefore, no FPIC conducted and no plans available.		
	2.3.3	KHB Lahad Datu region estates land titles are country leased issued by Sabah Land Authority.	Yes	
		There are no sub-leased land, therefore, no FPIC conducted and no maps available.		
	2.3.4	KHB Lahad Datu region estates land titles are country leased issued by Sabah Land Authority.	Yes	
		There are no sub-leased land, therefore no evidence available.		

Principle	Principle 3: Commitment to Long-Term Economic and Financial Viability				
Criterio	n by Audit	Summary of Assessment	Compliance		
3.1	3.1.1	KHB Lahad Datu region has established CAPEX business plan for year 2017 to 2023 that include: - Land area statement - Quality of planting materials - Crop projection = Fresh Fruit Bunches (FFB) yield trends - Mill extraction rates = Oil Extraction Rate (OER) trends - Cost of Production = cost per tonne of Crude Palm Oil (CPO) trends - Forecast prices - Financial indicators – profitability forecast (income vs cost) - Projected expansion (area, mill capacity, infrastructure, social amenities) - General strategy and allocation for environmental and social management	Yes		
		There are no scheme or independent smallholders included in the certification.			

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Principle 3: Commitment to Long-Term Economic and Financial Viability				
Criterio	n by Audit	Summary of Assessment	Compliance	
		There are no new areas for expansion or new planting. There were no peat soil in KHB Lahad Datu Region estates.		
	3.1.2	KHB Lahad Datu region has a Long Term Replanting Programme for year 2018 to 2023 established and included in the business plan.	Yes	
		There are no peat soil areas in KHB Lahad Datu region as confirmed during site visits and review of estate maps.		
		The business plan is updated annually normally during annual budget period. The persons responsible are the Senior Estate Manager Lahad Datu Region and Mill controller.		

Principle	Principle 4: Use of Appropriate Best Practices by Growers and Millers				
Criterio	n by Audit	Summary of Assessment	Compliance		
4.1	4.1.1	KHB Lahad Datu adopted the group SOPs established for estates and mill operations.	Yes		
		SOPs for harvesting, manuring, IPM, GAP, mill operations and supply chain.			
		All SOPs are available at estates and mill office. The SOPs are in both English and Bahasa Malaysia.			
		During interviewing of workers they could understand the SOPs for the activity they are working in the field.			
	4.1.2	KHB Lahad Datu region estates and mill has established master list for SOPs.	Yes		
		The history of revision no. and date listed in the SOPs for reference when was the last revision.			
		SOPs are in both Bahasa Malaysia and English.			
		SOP training records by estates and mill sighted.			
	4.1.3	Internal audit conducted on 18/06/2019 for Tanaki estate, on 17/06/2019 for Kolopis estate and 04/07/2019 for Abedon Oil Mill.	Minor NC1		
		The results of internal audit and corrective actions sighted.			
		Records of the monitoring reviewed.			
		Minor NC			
		SOP Water and River Contamination Handlings Doc. No. KHB/G/SOP-09 rev.04 dated 09/02/2018 is established to			

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Principle	Principle 4: Use of Appropriate Best Practices by Growers and Millers			
Criterio	n by Audit	Summary of Assessment	Compliance	
		monitor water source and river are the two protected area from any pollutions or water contamination that can harm to the human, livestock / animals and plants.		
		A monitoring checklist established did not include monitoring of points (b) and (c) in the description Monitoring.		
	4.1.4	Abedon Oil Mill established SOP Receiving of FFB Doc. No. AOM-WI-001rev. 0 dated 01/08/2017	Yes	
		Abedon Oil Mill established list of 3 rd party FFB suppliers. The list includes name, address and MPOB Licence of the suppliers.		
		A daily summary records on the volume and origins of the 3 rd party FFB suppliers were sighted and reviewed.		
		Daily and Monthly summary for November 2017 to July 2018 reviewed.		
		Quantity delivered cross-checked with delivery chit and weighbridge ticket and traceable.		
4.2	4.2.1	KHB Lahad Datu region adopted the SOP Soil Fertility monitoring, Doc no: KHB/G/SOP-39, rev no 3: dated 09/02/2018.	Yes	
		Soil fertility monitoring is essential to check the nutrient status in the soil. Soil test is required by the estates to fulfil or comply with the requirement in RSPO. There are two ways of soil fertility monitoring:		
		 Soil sampling / Test conducted in year 2016 by Boris Agri Services Sdn Bhd to determine the soil type in KHB Lahad Datu region. 		
		 Leaf sampling / Analysis conducted in year 2019 reported in Plantation Advisory visit report by thirds party Boris Soon dated 10/01/ 2019 for the proposed 2019 fertilizer 		
	4.2.2	Records fertilizer applied in accordance to plan is maintained.	Yes	
		The fertilizer program is link to the agronomist report for year 2019.		
		The record of fertilizer kg per palm and per tonne of FFB is capture in the in the application program.		
	4.2.3	KHB Lahad Datu region adopted the SOP Leaf sampling in page 93 of the group Planting Manual.	Yes	
		The records for tissue analysis conducted by external third party in January 2019 for fertilizer recommendation to be applied in year 2019 sighted and reviewed.		

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Criterion b	oy Audit	Summary of Assessment	Compliance
		The fertilizer program is reviewed and the application is based on the external agronomist recommendations.	
		Immature area fertilizer program adopt the group Planting Manual.	
4	1.2.4	KHB Lahad Datu region adopted SOP EFB, Compost, Decanter Cake and Decanter Solid Application, doc no: KHB/G/SOP-51, rev no: 1 dated 09/02/2018 for nutrient recycling strategy.	Yes
		The application base on recommendation and program by the estate management.	
		Example:	
		Kolopis estate established program for EFB application for immature area. Actual records reviewed	
		Composts are applied in both estates.	
		Treated POME is applied to blocks at Kolopis estate nearby to the mill.	
		Palm kernel shell and mesocarp fiber are combusted for steam and power generation.	
4.3 4	1.3.1	KHB Lahad Datu estates maps indicate there is no fragile soil. This could be observed during field visits.	Yes
		The soil type sampling conducted by external 3 rd party in March 2016 for all divisions of both Kolopis and Tanaki estates. The type soil is define in the report and there is no fragile soil.	
		Map scale range from 1:25,000 to 1:50,000.	
4	1.3.2	KHB Lahad Datu region adopted the group Planting Manual.	Yes
		Page 42 describes the terrace area and how to manage planting on terrace and slope:	
		The planting of LCC is recommended for planting at terrace area.	
		During site verification frond stacking applied to reduce soil erosion and LCC as cover crop.	
4	1.3.3	KHB Lahad Datu region estates adopted the SOP Road Maintenance doc no: KHB/G/SOP-40, rev no: 3 dated 09/02/2018.	Yes
		The road maintenance program for 2019 and financial budget sighted.	
		The monthly summary maintenance records as at Jun 2019 for both estates sighted and reviewed.	

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Principle	e 4: Use of	Appropriate Best Practices by Growers and Millers	
Criterio	n by Audit	Summary of Assessment	Compliance
	4.3.4	KHB Lahad Datu region estates have no peat soil based on review of estate maps and site verification.	Yes
	4.3.5	KHB Lahad Datu region estates have no peat soil. The estate maps are reviewed and site verification there are no peat soil. Therefore no drainability assessment required.	Yes
	4.3.6	KHB Lahad Datu region estates have no peat soil and problem soil, The estate maps is review and from site verification there are no fragile and problem soils.	Yes
4.4	4.4.1	KHB Lahad Datu region estates and mill established Water Management Plan dated 15/01/2018	Yes
		The plan identifies the water sources and process in controlling and managing water usage for operations and domestic.	
		Water test conducted for domestic water by third party laboratory that meets Malaysia Ministry of Health water quality parameters.	
		Usage of water by mill is monitor on the consumption to process per ton of FFB.	
		Rain Harvesting is practice at labour housing quarters and chemical pre-mix locations for general usage.	
	4.4.2	KHB Lahad Datu estates established maps to identify the buffer zone areas for monitoring that include water catchment area.	Yes
		SOP Buffer zone restrictions KHP/G/SOP-04 revision 05 dated 05/052017 topic 1 describes no fertiliser application and chemical spraying. Topic 2 workers could identify the sign boards and yellow marking on the palm.	
		Site inspection could confirm the marking on the palm and signage put up and the distance from the edge of the river or water catchment is approx. 22 m and compliance to the Sabah Water and Irrigation requirements.	
	4.4.3	Abedon Oil Mill wastewater treatment system is the traditional ponding system with a bacterium plant and several duckweed ponds installed to further improve the treatment to meet national discharged schedule.	Yes
		AOM established following to monitor the wastewater discharge limits	
		Bacterium Plant and Duckweed Pond operating manual, ver.1.2 dated 16/05/2017.	

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Principle	Principle 4: Use of Appropriate Best Practices by Growers and Millers			
Criterio	n by Audit	Summary of Assessment	Compliance	
		SOP Wastewater treatment system, doc no. AOM-PRC-BTC, rev.0, dated 01/02/2017.		
		SOP Land irrigation, doc no. AOM-PRC-FL1/SOP01, rev.0, dated 01/06/2017.		
		Wastewater analysis is conducted once a month in accordance to DOE requirements.		
		DOE license no.004521 discharged schedule valid from 01/07/2019 to 30/06/2020 for POME discharge reviewed.		
		Latest report no. 20180805/10A-10C dated 21/06/2019 for pH value, BOD, COD, ammonical nitrogen, total nitrogen, oil& grease, SS and TS.		
	4.4.4	Abedon Oil Mill established daily quality and report, document number: AOM-ADM-PRD/A01 to monitor mill daily water consumption.	Yes	
		Example: Report dated 30/06/2019.		
		The above report indicates the ratio of water per tonne of FFB processed.		
		Sighted Abedon Oil Mill water consumption monitoring from November 2018 until June 2019		
4.5	4.5.1	KHB Lahad Datu region estates adopted the SOP Integrated Pest Management doc. No. KHB/G/SOP-33 revision 05 dated 09/02/2018.	Yes	
		This SOP is mainly a guidance / procedure, method of implementation and review to maintaining balance in bio-diversity and avoid pest outbreak in plantations.		
		The procedure details in identifying, implementation, monitoring, biological control, pesticide use, IPM review, records and IPM training.		
		IPM plan 2019 established 02/01/2019 describe leaf eating pest, mammalian pest, Ganoderma disease.		
		The IPM programme include the use of non-chemical products to treat pest or diseases.		
		The other alternative apply to control pest.		
		Example: Dogs are used to catch rats rather than rat bating at Tanaki estate. This is a control programmed design to reduce rat population in field.		

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Principle	Principle 4: Use of Appropriate Best Practices by Growers and Millers			
Criterio	n by Audit	Summary of Assessment	Compliance	
		Planting beneficial plants to breed nature predators to reduce leaf eating pest.		
		Ganoderma treated by soil mounding to reduce chemical usage		
	4.5.2	KHB Lahad Datu region estates have conducted IPM training.	Yes	
		Example:		
		 Ganoderma census training dated 07/03/2019 to relevant workers involved in this activity. 		
		 Integrated Pest Management training dated 16/03/2019 to relevant workers involved in this activity. 		
4.6	4.6.1	KHB Lahad Datu region adopted the group Environmental Policy sign by Chief Executive Officer dated 02/01/2018.	Yes	
		The policy has a statement "All precautions are followed for safe use of agrochemicals in plantation and mill activities".		
		The estate has established the list of chemical register.		
		Examples: Triclopyr-Butotyl 32.1 %, Glyphosate Isopropylamine 41%, Metsulfuron Methyl 20%.		
	4.6.2	KHB Lahad Datu region estates established pesticide application program.	Yes	
		The records of pesticides application in the estate are available from Nov 2018 to July 2019.		
		The active ingredient % example:		
		Triclopyr-Butotyl 32.1 %, Glyphosate Isopropylamine 41%, Metsulfuron Methyl 20%.		
		LD 50 examples:		
		Glyphosate 5000 mg/kg, Activator 5000 mg/kg, Nu-MSM 20WG 5620 mg/kg, Arakus 1000 mg/kg.		
	4.6.3	KHB Lahad Datu region estates adopted the group SOP Integrated Pest Management, doc no: KHB/G/SOP-33, rev no: 5, dated 09/02/2018.	Yes	
		The SOP states:		
		No blanket spraying to the plantation vegetation to preserve the nature bio-diversity.		
		Bio-pesticides may be use when other controls fail or deemed unlikely to improve effective.		

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Principle	Principle 4: Use of Appropriate Best Practices by Growers and Millers			
Criterio	n by Audit	Summary of Assessment	Compliance	
		Use judiciously approved pesticide for control, to ensure that no prophylactic use of pesticides.		
	4.6.4	KHB Lahad Datu region estates has phase out usage of paraquat since 2017.	Yes	
		The inventories for both estates are cross-checked against the stores records and physical inspection there are no paraquat found.		
	4.6.5	KHB Lahad datu region adopted the SOP Chemical Handling, doc no: KHB/G/SOP-13, rev no: 5 dated 25/06/2018.	Yes	
		SOP describes how to handle pre-mixing before the chemical applied in estate.		
		Training for chemical handling sighted at Kolopis and Tanaki estate.		
		Workers understanding of the procedure to handle the chemical could be demonstrated during field interview		
		Appropriate PPEs are provided as per SOP and HIRARC for premix handlers.		
		Signage for no entry 24 hours after chemical application sighted during field inspection.		
	4.6.6.	KHB Lahad Datu region estates established SOP Chemical storing, doc no. KHB/G/SOP-16, rev.5 dated 09/02/2018.	Yes	
		All chemicals are stored in original packing and labelling, liquid are stored below power. Stores are kept tidy and clean and adopted the FIFO concept.		
		Spill kits are available at point of used.		
		Guidelines for chemical mixtures & chemical spraying rate 2019 sighted and reviewed.		
		Appropriate PPEs provided free of charge to all chemical handlers.		
		No evidence that defective pesticide containers are discriminately disposed.		
		Empty containers are reused for chemical spraying. No evidence for used of other purpose.		
	4.6.7	KHB Lahad Datu region adopted SOP Chemical Handling, doc no: KHB/G/SOP-13, rev no: 5 dated 25/06/2018.	Yes	
		The SOP describes how to handle the pre-mix before the chemical applied in the field		
		Appropriate PPEs and training provided to pesticides handler.		

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Principle 4: Use of Appropriate Best Practices by Growers and Millers			
Criterion	by Audit	Summary of Assessment	Compliance
		Signage sighted at location where chemical spraying activity is ongoing to inform no entry for the next 24 hours.	
_		Workers understanding no entry to the block for 24 hours after chemical application activity.	
_	4.6.8	KHB Lahad Datu region estates do not apply aerial spraying for chemicals application.	Yes
	4.6.9	KHB Lahad Datu region estates established annual training program to enhance the knowledge of workers.	Yes
		Example Training conducted on 15/02/2019 for Kolopis estate and on: 27/06/2019 for Tanaki estate.	
		During the field interview, workers informed they have received training for chemical handling.	
	4.6.10	KHB Lahad Datu region adopted SOP Chemical Handling, doc no. KHB/G/SOP-13, rev.3 dated 04/10/2016.	
		SOP describes all defective empty containers are to be rinsed 3 times, punctured and disposed by licensed collector.	
		Training conducted:	
		Empty Container Rinsing dated 16/04/2019 at Kolopis estate.	
		Waste disposal dated 11/02/2019 at Tanaki estate.	
_		Recycle / reused / reduced dated 20/08/2019 at AOM.	
	4.6.11	According to Occupational safety and health Act 1994.	Yes
		Regulation 27 Health surveillance programme no. 3 describe shall include medical surveillance conducted at intervals of not more than twelve months or at such shorter intervals as determines by the occupational health doctor or an occupational safety and health officer who is also a medical practitioner.	
		KHB Lahad Datu region estates chemical handlers have annual medical examination that include blood tests to ensure the workers are medically fit to carry out the task,	
		Medical surveillance report issued by the external clinic reviewed with all chemical handlers are medically fit.	
		The CHRA report conducted by an external approved CHRA assessor conducted in 2018 and valid for 5 years.	
		AOM established SOP hearing conservative programme, doc no: AOM-ADM-OSH/SOP-26, date effective: 20/05/2018 describe to sustain noise-monitoring activity and recover hearing impaired	

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Principle	e 4: Use of	Appropriate Best Practices by Growers and Millers	
Criterio	n by Audit	Summary of Assessment	Compliance
		employees who are affected after personal noise monitoring (base on updated positive noise exposure monitoring report) through organized performance monitoring according to machinery and Factory Act (Noise) Regulations 1989.	
		AOM conducted annual audiometry test 28/06/2019 for all mill operation workers and personnel.	
	4.6.12	KHB Lahad Datu region adopted the group Social Policy dated 03/01/2017. A statement in the policy "ensure women are allowed to breastfeed up to nine months before resuming chemical spraying or usage tasks and tgiven specific break times to enable effective breastfeeding".	Yes
		The policy is publicly available in both English and Bahasa Malaysia at the estates and mill notice boards.	
		The list of workers and job distribution as at June 2019 there is no pregnant and breastfeeding women workers.	
		During site interview, the interviewed women workers informed they are not allowed to handle pesticides when they are pregnant. This is counter verified by interviewing the clinic nurse who confirmed women workers will be assigned to a different job task when they are pregnant.	
4.7	4.7.1	KHB Lahad Datu region adopted the group Safety and Health Policy dated 01/04/2019 signed by the Chief Executive Officer.	Yes
		The policy is in both Malay and English and publicly available at KHB website and at mill and estates notice boards	
		The policy includes following statement:	
		Provide safe and healthy working conditions where practical for prevention of work related injury and ill health	
		Document and implement health and safety plan covering all activities and its effectiveness are monitored	
		The OSH plan include:	
		Transport, Hazard Reporting, permit to Work, Health Surveillance, Emergency Response Plan and Preparedness, Building and House Keeping, Safety and Health Audit.	
		The structure of the plan adopts ILO Convention 184 as guidance.	
	4.7.2	KHB Lahad Datu region established OSH Risk Assessment Rating and HIRARC records are available.	Yes

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Principle 4: Use of Appropriate Best Practices by Growers and Millers			
Criterion by Audit	Summary of Assessment	Compliance	
	The risk assessment covers all activities and processes at the estates and mill.		
	Any accident occur the risk will be reviewed and update accordingly.		
	As of audit date, there were no accidents or LTI reported at the mill.		
	There are several injuries or LTI reported at the estates and the risk were re-evaluated when a LTI has more than 4 days of medical leave. This is in accordance to the OSMP risk table of consequences, severity and risk level established.		
	According to the OSMP, a risk assessment to be conducted for near miss incidents according to DOSH legal requirements. The form JKKP6 will be used for the reporting.		
4.7.3	Health and Safety Briefing / Training Program conducted during morning muster at estate and toolbox talk at mill.	OBS2	
	Employee responsibilities under occupational safety and health act (OSHA) 1994 dated 09/01/2019		
	PPE Training dated 07/05/2019		
	OSH training programs conducted by competent staff / Safety Coordinator.		
	PPE issued based on the nature of workers job task.		
	PPE Issue Records / PPE Disposal Records verified		
	Verified through physical observation during site interviews and morning roll call records.		
4.7.4	KHB group has appointed an OSHA officer and supported by an OSHA Executive.	Yes	
	The estates / mill managers and assistant managers are the site Safety Chairman and Safety Coordinator respectively.		
	H&S Meeting conducted on quarterly basis according to DOSH requirement for operation with more than 40 personnel. Latest meeting held on 29/06/2018 for Kolopis Estate, on 29/03/2018 for Tanaki estate and on 18/06/2019 for AOM.		
	LTIs are reported in the OSH Meeting and recorded.		
4.7.5	KHB Lahad Datu region adopted the following group SOPs.	Yes	
	SOP KHB/G/SOP-26/S&H-35: Accident Procedure dated: 03/11/2016		

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Principle 4: Use of Appropriate Best Practices by Growers and Millers			
Criterion by Audit	Summary of Assessment	Compliance	
	SOP KHB/G/SOP-26/S&H-36: Emergency Plan Procedure dated: 03/11/2016		
	SOP Accident, dangerous occurrence, occupational poisoning and occupational dieses report doc. No: AOM-ADM-OSH/SOP-07 revision 0 dated 01/01/2017		
	SOP KHB/G/SOP-26/S&H-31: Fire Drill and Emergency Evacuation dated: 03/11/2016		
	SOP KHB/G/SOP-26/S&H-25: Chemical Spillage dated: 03/11/2016		
	When an accidents occur will be investigated and action will be taken to prevent recurrence.		
	Laporan Sasatan Kemalagan / Insiden Bahagian submitted to DOSH sighted and reviewed for the year 2018.		
	Injuries records are available on each respective estate and mill.		
	Assigned team leaders (mandore) and field supervisors are trained in First Aid at the respective estate conducted 10/08/2018 by estate clinic dresser.		
	First Aid Kits Distribution Record sighted at estates clinics.		
	First Aid Kits are adequately stocked and checked once every 2 months by the estate dresser.		
	Field injuries records are available at respective estates clinics and offices. Minor Injuries are recorded in the first aid kit booklet.		
4.7.6	KHB Lahad Datu region all workers both foreign and locals are covered by SOCSO in accordance to the legal requirements as from 01/01/2019.	Yes	
	All workers and staff received medical treatment at Kolopis and Tanaki estate clinic whilst the workers at Segama division received medical treatment at the nearby government clinic.		
	All medical treatments are free of charge or paid by the company		
	Any major injuries that required hospitalisation will be covered under SOCSO.		
	Chemical handling workers are required to have an annual medical surveillance to ensure they are medically fit to perform the job task.		
	All mill operators will undergo an annual audiometry test to ensure they are medically fit to work at high noise areas		

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Principle	Principle 4: Use of Appropriate Best Practices by Growers and Millers		
Criterio	n by Audit	Summary of Assessment	Compliance
	4.7.7	KHB Lahad Datu region established LTI in accordance to national regulation for reporting of any near-missed, death or injuries that hae more than 4 days of medical leave on an annual basis.	Yes
		During the audit at both Kolopis and Tanaki estates, there are LTIs. The LTIs records were reviewed.	
		There were no LTI for Abedon mill since the last audit in November 2018 until audit date in July 2019.	
4.8	4.8.1	KHB Lahad Datu region established training schedule for year 2019 for SOPs, policies, safety and health.	Yes
		Training matrix is established with the list of training, for the whole year	
		All the training records include training materials, attendance sheet and pictures.	
		Example of training conducted:	
		Employee SOP induction conducted on 08/01/2019.	
		 Confined Space Safety & Operational conducted 01/02/2019. 	
	4.8.2	KHB Lahad Datu region estates and mill established training calendar for year 2019 for SOPs, safety and health, social and environment.	Yes
		The record of individual workers attended training is maintained at the estate and mill offices.	

Principle 5: Environmental Responsibility and Conservation of Natural Resources and Biodiversity			
Criterio	n by Audit	Summary of Assessment	Compliance
5.1	5.1.1	KHB Lahad Datu region has conducted Environmental impact assessment for the replanting program of both Kolopis and Tanaki estates is according to the Sabah Environmental Impact Assessment (EIA) Guidelines Oil Palm Plantation Development.	Yes
		The EIA was conducted by external consultant dated Jan 2013.	
		Environmental monitoring and compliance audit conducted by 3 rd party report dated May 2019 with the monitoring parameters are in accordance to the EIA "Surat Akujanji dated 16/04/2013. No noncompliance found in the audit.	

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Principle 5: Environmental Responsibility and Conservation of Natural Resources and Biodiversity			
Criterion by Audit	Summary of Assessment	Compliance	
	The estates established EAIA and environmental management plan year 2019 dated 28/12/2018.		
	The objective of the plan is to improve company policies, objectives and targets, knowledge about the environmental aspects and significant environmental impacts associated with its activities, products or services is important. This can ensure that the significant environmental impacts associated with these aspects are taken into account in review of environmental objectives and setting of any action plan.		
	 An environmental aspect refers to an element of an organization's activities, which can have a beneficial or adverse effect on the environment. 		
	 For example, it could involve a discharge, an emission, consumption or reuse of a material, or noise. An impact refers to the change which takes place in the environment as a result of the aspect. Examples of impacts might include contamination of water or depletion of a natural resource. 		
	 A risk evaluation and mitigation table is included in the plan listing each activity aspect and impact using the severity, probability and quantity risk assessment to obtain the ranking whether it is significance to the environment. Mitigation or improvement plan to reduce the risk of the impact. 		
	There are no new development for buildings, improvement in mill process in AOM. Therefore, no EIA of EAIA conducted.		
	AOM has establish EMP 2019 dated 04/01/2019 to identify environmental impacts for continuous improvement.		
	The monthly monitoring records for the estates and mill are reviewed.		
5.1.2	KHB Lahad Datu region has established EAIA and Environment Management Plan year 2019 dated 28/12/2018 covering both estates and mill.	Yes	
	The management plan includes a risk evaluation and mitigation table is included in the plan listing each activity aspect and impact using the severity, probability and quantity risk assessment to obtain the ranking whether it is significance to the environment. Mitigation or improvement plan to reduce the risk of the impact.		
	In addition, CIP is included in the plan aimed to prevent and reduce pollutant, waste products release and to reduce chemicals		

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Criterion by Audit	Summary of Assessment	Compliance
	comprising pesticide or fertilizer that are released from the estate, POME and EFB generated by the mill.	· · · · · · · · · · · · · · · · · · ·
	The EMP list down the type of scheduled waste, source of wastes and method of control.	
	The monitoring plan that include timeline for both the estates and mill sighted and reviewed.	
	Environment meeting held quarterly with the latest on 25/06/2019.	
	AOM EMP section 5 describe environmental risk assessment on activities that could cause impact to the environment. In the table a scoring for severity, quantity, probability and ranking for each aspect of the activity.	
	AOM latest environmental meeting on 18/06/2019 discussing on topics effluent, emissions and waste that cause impact to the environment.	
5.13	KHB Lahad Datu region established EAIA and EMP included a monitoring protocol for mill and plantation activities and its effect to the environment, a worksheet of EAIA Monitoring Checklist and Pollution Monitoring for physical and document inspection is included. The worksheet and form is prepared for guideline during inspection and checking the documents.	Minor NC2
	The plan was last updated on 28/12/2018.	
	According to the legal requirements in compliance to Environmental Protection Department to be carried out once in every 4 months. In this aspect, an Environmental monitoring and compliance audit conducted in May 2019 covering all areas of the estates and mill such as but not limited to monitoring of water quality, signage for boundary and buffer zones, roadside drainage to channel runoff, signboards for riparian reserves, no disposal of oil into waterways, etc.	
	No operational changes for the past year.	
	Effectiveness of mitigation measures verified.	
	AOM EMP section 6 describes environmental aspect and impact monitoring for both negative and positive impacts with targets, timeline and status.	
	Example: Oil clarification	
	Prevent discharge oil & grease into water course	
	Continuous monitoring	

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Principle 5: Environmental Responsibility and Conservation of Natural Resources and Biodiversity			
Criterio	n by Audit	Summary of Assessment	Compliance
		Checking monthly	
		Sighted monitoring records for latest inspection on 16/07/2019	
		Minor NC2	
		A monitoring protocol established in the EAIA and Environmental Management Plan to monitor aspect and impact Land Preparation during Replanting. However, the monitoring protocol did not include the monitoring of aspect, impact, mitigation and continuous program for replanted area.	
5.2	5.2.1	There are no HCV areas in KHB Lahad Datu Region.	Yes
		Wildlife such birds, reptiles, Mammalia are found within the estates site are identified in the baseline biodiversity and assessment planning dated March 2017, latest review on 10/01/2018.	
		The list of wildlife are according to the Sabah List of Endangered Animals, reptiles, Insect and Mammals.	
		There are some birds species sighted by the consultant for plantation report dated Jan 2019 are compared with the monitoring sightings at each estate.	
	5.2.2	Wildlife are sighted in KHB Lahad Datu region estates and mill vicinityies according to the baseline biodiversity and assessment planning dated 31/03/2017.	Yes
		There are no RTE found at the estates and mill wastewater location.	
		The estates and mill is required to monitor the type of birds and animals sighted in the estate and mill.	
		Records of monitoring were sighted and reviewed	
	5.2.3	KHB Lahad Datu adopted the group Sustainability Policy dated 03/01/2017 includes a statement "ensure protection of RTE living in HCV areas.	Yes
		The policy is made available in both English and Bahasa Malaysia at the estates and mill notice boards.	
		The policy is made aware through morning muster call and training in the estates and mill	
		Wildlife are sighted in the areas of operation of Tanaki and Kolopis estates according to the baseline biodiversity and assessment planning dated 31/03/2017 reviewed on 10/01/2018	
		There are no RTE found in Kolopis and Tanaki estates and the mill wastewater location.	

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Principle 5: Environmental Responsibility and Conservation of Natural Resources and Biodiversity			
Criterion by Audit	Summary of Assessment	Compliance	
	The estates and mill is required to monitor the type of birds and animals sighted in the estate and mill.		
	Records of monitoring for 4 th Quarter 2018 and 1 st Quarter 2019 sighted and reviewed.		
	Estate: Wild fowl, snakes, birds, etc		
	AOM wildlife monitoring records sighted for Jan to July 2019		
	Sighted wild ducks, snake, iguana, kingfisher, wild cat, squirrel, anteater, wild fowl,		
	There is no wildlife – human conflict found during interview of workers.		
	There are signboards for wildlife species found within the estates and mill compounds. Interviewed workers they are aware of the wildlife in and around the estates and mill.		
	Disciplinary action shall be in accordance to the Sabah Wildlife Conservation Enactment 1997.		
	No disciplinary measures taken as of audit date, no report of any hunting, collected or harmed any wildlife species		
5.2.4	A monitoring plan is included in the baseline biodiversity assessment and planning dated 31/03/2017 and reviewed on 10/01/2018.	Yes	
	The management plan monitored unplanted area, steep terrain, water catchment and water reservoir, river and riparian.		
	The task area and monitoring frequency is either weekly, monthly, quarterly or yearly.		
	Example:		
	Biodiversity Monitoring Weekly Checklist for monthly June 2019 Kolopis – Bumiwealth Division at water catchment area for following:		
	Sign of fertiliser application		
	Sign of open burning		
	Sign of Weed spraying		
	Sign of rubbish dumping		
5.2.5	There are no HCV areas identified within Tanaki and Kolopis estates divisions.	Yes	

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Criterio	n by Audit	Summary of Assessment	Compliance
		This could be confirmed during onsite inspection and review of estate maps.	
5.3	5.3.1	KHB Lahad Datu region estates established Waste Management program included in EAIA and EMP year 2019	Yes
		The list of waste products and sources stated in the plan.	
		Waste identification and disposal method – waste generated, source, location, disposal method, responsibility is stated in the waste management plan.	
		Example of waste identified in the estates:	
		Workshop: Used engine oil, Metal Waste, fronds, etc.,	
		Abedon Oil Mill established waste management plan dated 22/02/2019 to ensure wastes are manage in environmentally manner and at the same time complying with Department of Environmental (DOE) of Malaysia regulations and orders as well as creating sustainable palm oil industry practices.	
		The plan has waste management hierarchy	
		identification of waste source	
		waste reduction	
		reuse or recycle	
		safe disposal	
		The list of waste are identified with the source generated.	
		Example of waste generated:	
		POME, Boiler Ash, used battery, etc.,	
	5.3.2	Kolopis Estate established chemical inventory for each type of chemicals used.	Yes
		Example: Inventory for Glyphosate empty containers sighted	
		Used chemical containers are triple rinsed and either re-used for chemical mixing or disposed by licenced scheduled waste collector.	
		Example: Consignment note B005428 dated 12/07/2019 for disposed containers SW 49 and SW305 for used engine oil by licensed contractor.	
		Tanaki estate:	
		Inventory for Glyphosate empty containers sighted	

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Principle 5: Environmental Responsibility and Conservation of Natural Resources and Biodiversity			
Criterio	n by Audit	Summary of Assessment	Compliance
		Used chemical containers are triple rinsed and either re-used for chemical mixing or disposed by licenced scheduled waste collector.	
		Example: Consignment note B005439 dated 12/07/2019 for SW 409 for empty containers and B005433 dated 12/07/2019 for SW305 used engine oil through licensed contractor.	
		Abedon Oil Mill	
		Sighted disposed of electrical waste SW110 via consignment note B005443 dated 13/07/2019 andused lubricate oil SW305 consignment note B005441 dated 13/07/2019.	
		The eswis is crosscheck on the inventory of scheduled waste.	
		Sighted records of empty chemical containers return to chemical supplier dated 03/07/2019	
	5.3.3.	KHB Lahad Datu region estates and mill established waste management plan 2019 to manage wastes generated.	Yes
		The plan includes:	
		Identification of waste, source and type, disposal method, reused, recycle or reduced.	
		All scheduled wastes are disposed by registered wastes collector with Department of Environmental prior to be disposed.	
5.4	5.4.1	Abedon Oil Mill established energy fuel efficiency improvement plan dated 08/01/2018	Yes
		Monthly statistic records for power generation and diesel consumption for estates and mill for period Nov 2018 to Jun 2019 sighted.	
		Contractors who carry out any sub-contracts activities are inducted at site before commencement of services on efficient usage of fuel.	
5.5	5.5.1	KHB Lahad Datu region adopted the group Zero Burning Policy dated 11/01/2016 as per Malaysian Law A1102 ACT and Environmental Quality Act 2001.	Yes
		The policy states shall be no open burning of any kind except where deemed necessary with prior approval of relevant authorities.	
		KHB Lahad Datu region adopted the group planting manual states chipping and windowing allowed for replanting activities.	
	5.5.2	There is no evidence of burning found during visit to replanting area.	Yes

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Principle 5: Environmental Responsibility and Conservation of Natural Resources and Biodiversity			
Criterio	n by Audit	Summary of Assessment	Compliance
		Field observation that palm are chipped and the practise is in accordance to the planting manual.	
		Inspection at the domestic landfill could observed there is no sign of open burning.	
5.6	5.6.1	KHB Lahad Datu region data are captured in GHG Calculation & Environmental Management Plan	Yes
		An Energy Efficiency Improvement Plan is implemented to reduce diesel consumption. Other pollutants are managed based on DOE guideline.	
		POME effluent is measured by flowmeter and quantity is read and recorded daily.	
		Assessment conducted and captured in register of polluting activities and in the Environment risk assessment that include smoke emission, POME, noise, generation of waste, etc.	
		Stack Monitoring Reports and Quarterly Effluent Report submit to for Department of Environment are reviewed.	
	5.6.2	KHB Lahad Datu region pollutants and GHG emissions are captured in GHG Calculation & Environmental Management Plan	Yes
		The waste management plan for both the mill and estates include the identification of waste source, type of waste, wastes reduction plan, wastes reuse or recycle plan, wastes treatment and disposal and waste monitoring method.	
		POME is treated using the traditional ponding system. A bacterium system is implemented to further treat the POME before final discharge for field application.	
	5.6.3	Daily monitoring of smoke density for boiler operation with results comply regulatory requirements. Smoke density monitoring for period Nov 2018 to June 2019 comply DOE requirements. Monitoring results are reported on-line to DOE.	Yes
		The type of GHG emissions are generally methane, carbon monoxide, nitrate oxide and land use change.	
		The PalamGHG version 3.0 calculator is applied to capture the data for reporting and monitoring.	

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•	Principle 6: Responsible Consideration of Employees and of Individuals and Communities by Growers and Millers			
Criterio	n by Audit	Summary of Assessment	Compliance	
6.1	6.1.1	KHB Lahad Datu region las conducted SIA for negative and positive impacts on May / June 2017. The review is conducted on June 2019 with the next review in May 2021.	Yes	
		The objectives of the assessment are:		
		Identifying all possible social impacts on individuals, communities and parties affected by estates operations.		
		2. Overcoming negative impacts and promoting positive impacts identified in the assessment with time bound management action plans.		
		To further enhance bilateral relationship and goodwill between the estate management and its existing stakeholders.		
		The study includes the following:		
		Land Use of the estates		
		2. Ethnic group within the estates and mill		
		3. Population and Gender Distribution		
		4. Working Class Distribution		
		5. Age Profile and Working Experience		
		6. Amenities		
		7. Health Characteristics		
		8. Economic characteristics		
		9. Housing		
		The study includes surrounding estates and neighbours.		
	6.1.2	KHB Lahad Datu region SIA study includes both internal and external stakeholders.	Yes	
		Interview and meeting records are maintain at estates and mill.		
		The interview process use specific questionnaires covering topics:		
		Access and use rights;		
		Economic livelihoods (e.g. paid employment) and working conditions;		
		Subsistence activities;		
		Cultural and religious values;		

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Principle 6: Responsible Consideration of Employees and of Individuals and Communities by Growers and Millers			
Criterio	n by Audit	Summary of Assessment	Compliance
		Health and education facilities;	
		 Other community values, resulting from changes are captured in the social risk assessment plan. 	
		The results of the assessment identified 10 common impacts of positive and negative for the estates and mill to establish monitoring program to promote positive impacts and mitigate negative impacts.	
	6.1.3	KHB Lahad Datu region SIA study includes both positive and negative impacts with timeline, responsible person for implementation and mitigation measures.	Yes
	6.1.4	KHB Lahad Datu region conducts SIA monitoring plan review annually. The last review was on June 2019 for mill and estates.	Yes
		The plan includes a time frame for each activity. The update of the activities is either completed, on-going process or the time frame stated.	
		The review process includes both internal and external stakeholders.	
		The estates and mill plans are reviewed to crosscheck on those completed, on-going and assign time frame to complete.	
	6.1.5	Smallholders are not included in Abedon Oil Mill certification	Yes
		However, the smallholders are part of the stakeholders for input of information to the SIA study.	
6.2	6.2.1	KHB Lahad Datu region adopted the group SOP Communication and Consultation Doc. No. KHB-HR-P08 revision 01 dated 01/08/2018.	Yes
		KHB Lahad Datu region established list of stakeholders updated on 11/06/2019 that includes government agencies, local communities, schools, NGOs, contractors and smallholders.	
		The external stakeholders are briefed on the SOP and complaint mechanism during annual stakeholders' consultation.	
	6.2.2	KHB Lahad Datu region adopted the group SOP Communication and Consultation where the estates and mill managers are the responsible person.	Yes
		The external stakeholders are informed during the annual stakeholders meeting.	

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Principle 6: Responsible Consideration of Employees and of Individuals and Communities by Growers and Millers			
Criterio	n by Audit	Summary of Assessment	Compliance
	6.2.3	KHB Lahad Datu region established list of stakeholders and updated on 11/06/2019.	Yes
		The latest stakeholder meeting conducted on 28/06/2019.	
		The meeting acts as a platform for stakeholders to communicate with the Lahad Datu region management on any matters and request of information.	
6.3	6.3.1	KHB Lahad Datu region adopted the group SOP Complaint and Grievance Doc. No. KHB-HR-P05 revision 02 dated 01/08/2018.	Yes
		The SOP includes a flow chart to address different type of complaints and the PIC is either the Estate or Mill Managers, Human Resource Manager or Director.	
		Each step of the flowchart has a timeline to address the complaint on a timely manner.	
		Interview workers understood of the complaint system and where to obtain the form.	
	6.3.2	KHB Lahad Datu region adopted the group SOP Complaint and Grievance Doc. No. KHB-HR-P05 revision 02 dated 01/08/2018.	Yes
		The SOP includes a flow chart to address different type of complaints.	
		Each step of the flowchart has a timeline to address the complaint on a timely manner including informing the complaint on the progress of resolving the issues.	
6.4	6.4.1	KHB Lahad Datu region estates land are country leased land titles issued by Sabah Land Authority.	Yes
		Therefore, no compensation paid.	
	6.4.2	KHB Lahad Datu region has established SOP KHB/SOP/G 55: Guideline On Managing Land Conflict dated: 01/07/2017 and SOP KHB/G/SOP 54: Free Prior Informed Consent (FPIC) dated: 01/07/2017 to manage calculating and distributing fair compensation as and when required.	Yes
		There are no issues on the land acquired since the land titles are issued by Sabah Land Authority.	
	6.4.3	The estates land in KHB Lahad Datu region are country leased land and land tittles are issued by the Sabah Land Authority. There are no land issues therefore, no records on compensation claims.	Yes

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	Principle 6: Responsible Consideration of Employees and of Individuals and Communities by Growers and Millers			
Criterion by Audit Summary of As		Summary of Assessment	Compliance	
6.5	6.5.1	KHB Lahad Datu region estates and mill workers are either daily paid or piece rated by job tasks. The pay rate is stated in the work agreement and payment not later than 7 th of each month.	MAJ NC 3	
		The employment conditions are listed in the worker agreement.		
		Payslip is provided to each worker that indicate the wage earned for the month.		
		The wage paid is based on the Minimum Wage Order (MWO) 2018 RM1,100/month or RM42.30/day. Piece rates are calculated based tasks, duly discussed with workers and agreed.		
	6.5.2	KHB Lahad Datu group adopted the group 'kontrak pekerjaan' or workers contract, document number KHB-HR-P04/R01 revision 1 revision dated 01/01/2018.	Yes	
		The work contract is in both English and Bahasa Malaysia and duly signed by the workers in language understood by them.		
		The worker contract states the employment conditions, such as but not limited to:		
		Job description		
		Date of commence work.		
		Benefits		
		Housing		
		Overtime; leave pay, sick pay.		
		Insurance coverage.		
		Wage – daily or piece rated.		
		The employment conditions are in accordance to Sabah Labour Ordinance (Sabah Cap. 67) and Minimum Wage Order 2018.		
		The payslip of interviewed workers are verified with the contracts on the wage and conditions stated in the work contract.,		
		There are no complaints on pay and work conditions by the interviewed workers and crosschecked in the grievance record book.		
	6.5.3	KHB Lahad Datu region provides adequate housing to all staff and workers with electricity, clean water, medical, educational and welfare amenities including the direct family dependents.	Yes	

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Principle 6: Responsible Consideration of Employees and of Individuals and Communities by Growers and Millers			
Criterio	n by Audit	Summary of Assessment	Compliance
		Recreation facilities, schools for foreign children, clinics, crèche, gardening areas and other amenities sighted during site inspection such as field, volleyball area, clinic, crèche, CLC school for Indonesian children and government school for both primary and secondary education nearby the estate for local workers children. During site interview, the workers advice that they are provided with housing, medical service and amenities and confirmed costs for housing, water and electricity are not imposed on them.	
	6.5.4	KHD Lahad Datu provides sundry shop facilities in the estates and take efforts to monitor the sold items are affordable for the workers. This is confirmed through interview with shop owner.	Yes
		Memo sighted regarding estate shop pricing as at 08/07/2019 for varieties of food items available such as chicken, noodle, rice, red onions, beverages,	
		In addition, designation area for workers to do farming.	
		There is no negative feedback regarding the price of food items from the shop through workers interview.	
6.6	6.6.1	KHB Lahad Datu region adopted the group Code of Conduct & Human Right Policy dated 03/01/2017 that include a statement "Respect the right of freedom of association".	Yes
		KHB Lahad Datu region adopted the group Foreign worker policy dated 01/04/2019 states respect the right of freedom of association.	
		The policy is in English and Bahasa Malaysia and publicly available at estates, mill and main security notice boards.	
		The policy is briefed to workers. Example mill conducted company policies training dated 21/06/2019.	
		There is no restriction of formation of union association in Sabah provided the law is adhere too.	
	6.6.2	There is no trade union established in KHB Lahad Datu region for the estates and mill.	Yes
		This is confirmed by workers during interview.	
		A Joint Consultative Committee is established by the estates and mill as a two-way communication structure between the management and workers.	

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Principle 6: Responsible Consideration of Employees and of Individuals and Communities by Growers and Millers				
Criterio	n by Audit	Summary of Assessment	Compliance	
6.7	6.7.1	KHB Lahad Datu region adopted the Sabah Labour Ordinance as guideline for minimum age hiring of not less than 18 years based on date of birth at time of hiring.	Yes	
		List of workers established is reviewed on the date of birth and date of join to crosscheck no workers below age of 18 years and no child labour hired.		
		Interviewing of workers understood child labour is not allowed.		
6.8	6.8.1	KHB Lahad Datu region adopted the group Code of Conduct & Human Right Policy dated 03/01/2017 with a statement "Provide fair and equal opportunities for all employees".	Yes	
		The policy is in both English and Bahasa Malaysia made publicly available at estates, mill and main security notice boards.		
		During interview workers informed there are no discrimination in the work place.		
	6.8.2	The interviewed workers informed there no discrimination practices by KHB Lahad Datu region estates and mill. They are treated fairly by the company.	Yes	
		The complaint and grievance logbook is reviewed and found no discrimination complaint from workers and external 3 rd parties.		
	6.8.3	KHB Lahad Datu region estates and mill maintained records of all workers, staffs, executives and managers including medical history.	Yes	
		The personal files are sampled to crosscheck on the records maintained in the file such as date of join, passport details, age, date of birth, country of residence, etc.,		
		KHB Lahad Datu region adopted the group Code of Conduct & Human Right Policy dated 03/01/2017 to provide fair and equal employment opportunities for all employees.		
		KHB group Recruitment of Foreign Worker Procedure KHB-HR-P04 rev 1 dated 01/08/2018 and foreign worker policy illustrates hiring based on medical fitness.		
		During site interview, there is no complaint received regarding unequal treatment between local and foreign workers and between females and males.		
6.9	6.9.1	KHB Lahad Datu region adopted the group Sexual Harassment Policy dated 07/01/2015.	Yes	

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	Principle 6: Responsible Consideration of Employees and of Individuals and Communities by Growers and Millers			
Criterio	Criterion by Audit Summary of Assessment		Compliance	
		The policy states "The company is committed to providing a working environment which is conducive, safe and free from sexual harassment.		
		The policy is publicly available and displayed at estates, mill and main security guardhouse.		
	6.9.2	KHB Lahad Datu region adopted the group Social Policy dated 15/04/2019 that include a statement "Protect the productive rights of women" in both English and Bahasa Malaysia.		
		The policy is publicly available and displayed at the estates, mill and main security guardhouse.		
		Interviewed workers could confirm briefing are provided to them.		
	6.9.3	KHB Lahad Datu region adopted the group Social Policy dated 15/04/2019 that include a statement "Maintain as far as possible the confidentiality of whistle blower" in both English and Bahasa Malaysia.		
		The policy is publicly available and displayed at the estates, mill and main security guardhouse.		
		KHB Lahad Datu region adopted the group SOP Compliant and Grievance Doc. No. KHB-HR-P05 rev 2 dated 01/08/2018.		
		The procedure has a flow chart describing the different type of complaint & grievance reporting structure, timelines, person incharge to manage the complaint or grievance.		
		The SOP include a paragraph RSPO Complaints System When the resolution from the arbitration panel is not found mutually, the complaint can be brought to the RSPO Complaints System at RSPO website, www.rspo.org.		
6.10	6.10.1	Abedon Oil Mill established SOP for FFB Price Calculation Form Doc. No. AOM-ADM-PNC/F01 rev. 0 dated 01/07/2018 on the FFB pricing formula in both English and Bahasa Malaysia and display at the weighbridge counter.	Yes	
		The pricing is calculated based on daily MPOB CPO pricing.		
		The pricing equation includes the relevant taxes, costs, OER, KER to determine the FFB price to be paid to independent smallholders.		
		There are no complaints received from independent smallholders during stakeholders' consultation, therefore no records available.		

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Principle 6: Responsible Consideration of Employees and of Individuals and Communities by Growers and Millers				
Criterio	n by Audit	Summary of Assessment	Compliance	
	6.10.2	Abedon Oil Mill has established SOP FFB Price Calculation Form Doc. No. AOM-ADM-PNC/F01 rev. 0 dated 01/07/2018 on the FFB pricing formula in both English and Bahasa Malaysia and display at the weighbridge counter.		
		The pricing is calculated based on daily MPOB CPO pricing.		
		The pricing equation includes the relevant taxes, costs, OER, KER to determine the FFB price to be paid to independent smallholders or traders.		
		A copy of the FFB pricing mechanism is made available to each independent smallholders.		
		Abedon Oil Mill conduct External Stakeholders meeting on 28/06/2019 includes FFB pricing mechanism.		
	6.10.3	There are no formal contractual agreements between Abedon Oil Mill and the independent smallholders or traders.		
		The agreement between both parties are verbal. The smallholders or traders are free to sell their FFBs to any mills.		
	6.10.4	Abedon Oil Mill has established SOP for FFB Price Calculation Form Doc. No. AOM-ADM-PNC/F01 rev. 0 dated 01/07/2018 on the FFB pricing formula in both English and Bahasa Malaysia and display at the weighbridge.		
		Payment for smallholders are paid on monthly basis whenever the invoices are submitted within the accounting period of the month.		
		Interviewed independent smallholders indicate there is no delay or withholding of payment.		
6.11	6.11.1	KHB Lahad Datu region contributes and provide employment opportunities to the communities around its vicinity for contribution to local development.		
	6.11.2	There are no scheme smallholders or independent smallholders included in the certification. Therefore, not applicable	s Yes	
6.12	6.12.1	KHB Lahad Datu region adopted the group Code of Conduct & Human Rights Policy dated 03/01/2017.	uct &	
		The policy has a statement "Comply with all relevant laws and regulation concern to labour and human rights.		
		KHB Lahad Datu region adopts the group Foreign Worker Policy dated 01/04/2019 states foreign workers should enter into employment voluntarily and freely, without the threat of penalty.		

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	Principle 6: Responsible Consideration of Employees and of Individuals and Communities by Growers and Millers			
Criterio	Criterion by Audit Summary of Assessment		Compliance	
	KHB Lahad Datu region adopted the group SOP Recruitment of Foreign Workers' Doc. No. KHB-HR-P04, revision 3 dated 01/04/2019.			
	In the procedure, a flow chart states the hiring process and the human resources department at the HQ is responsible for the hiring process.			
		KHB Lahad Datu region adopted the group Passport Safekeeping Form Doc. No. KHB-HR-P03/F01 revision 2 revision dated 01/09/2018 for workers who would like the company to safe keep their passport and they could access whenever they required.		
		Grievance record review and interview confirmed no any form of force or trafficked labour practice in estate or mill.		
		Interviewed workers confirmed they are able to access to their passport without hindrances at anytime when they opt to safe keep their passports at estates and mill offices.		
	6.12.2 KHB Lahad Datu region adopted the group Social Policy dated 15/04/2019 that include a statement "Prohibits any form of forced or trafficked labour".		Yes	
	Each of new worker signed an employment agreement the include relevant information such as work rate, holidays pay, overtime pay and rest day, etc.			
		During interview of workers they confirmed they have a copy of the employment agreement and no contract substitution.		
	6.12.3	KHB Lahad Datu region adopted group Foreign Worker Policy dated 01/04/2019 states no discrimination based on ethinic origin, caste	Yes	
	KHB Lahad Datu region adopted the following group SOPs:			
		SOP Recruitment of Foreign Worker Procedure KHB-HR-P04, revision 3 dated 01/04/2019 to manage employment of foreign workers.		
		SOP Passport keeping procedure KHB-HR-P03 rev no. 1 dated 01/08/2018.		
		Estate workers and mill operators are interviewed that there is no indication of discrimination and contract substitution. They could confirmed an induction briefing provided on company policies, wages, OSH, housing rules, any deduction, etc.		

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•	Principle 6: Responsible Consideration of Employees and of Individuals and Communities by Growers and Millers			
Criterion by Audit		Summary of Assessment	Compliance	
6.13	6.13.1	KHB Lahad Datu region adopted the group Code of Conduct and Human Rights policy dated 03/01/2017 signed by Chief Executive Officer.		
		The policy has a statement that The company committed to developing an organisation culture that will exhibit the highest standard of ethical conduct and respect human rights.		
		The grievance records from Estates and Mill reviewed and interview of workers there are no cases on human rights violation.		
	6.13.2	KHB Lahad Datu region adopted the group Social policy dated 15/04/2019.	dated Yes	
The policy has a statement "To ensure no young person or child shall be, or be required or permitted to be, engaged in any employment other those that allowed by laws.				
		List of workers for all estates and mill reviewed. From site observation and interview of workers there are no children workers.		

Principle	Principle 7: Responsible Development of New Plantings			
Criterio	n by Audit	Summary of Assessment	Compliance	
7.1	7.1.1	There are no new plantings observed within the estates. Therefore, no SEIA conducted.		
	7.1.2	There are no new plantings observed within the estates. Therefore, no SEIA conducted to establish management plan and operational procedures.		
	7.1.3	There are no outgrowers or smallholders being developed by Abedon group.	Yes	
7.2	7.2.1	There are no new plantings observed within the estates. Estates maps and acreage statement are reviewed. Therefore, no soil maps established.	Yes	
	7.2.2	There are no new plantings observed within the estates. Estates maps and acreage statement are reviewed. Therefore, no topographic information established.	Yes	
7.3	7.3.1	There are no new plantings observed within the estates. Estates maps and acreage statement are reviewed. Therefore, no HCV assessment required.		

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Principl	Principle 7: Responsible Development of New Plantings			
Criterio	n by Audit	Summary of Assessment	Compliance	
	7.3.2	There are no new plantings observed within the estates. Estates maps and acreage statement are reviewed. Therefore, no HCV assessment is required.		
	7.3.3 There are no new plantings observed within the estates. Estates maps and acreage statement are reviewed. Therefore, no management action plan established		Yes	
	7.3.4	There are no new plantings observed within the estates. Estates maps and acreage statement are reviewed. Therefore, no consultation action plan established.	Yes	
	7.3.5	There are no new plantings observed within the estates. Estates maps and acreage statement are reviewed. Therefore, no maps established to identify marginal and fragile soils, including excessive gradients and peat soils.		
7.4	7.4.1	There are no new plantings observed within the estates. Estates maps and acreage statement are reviewed. Therefore, no maps established to identify marginal and fragile soils including excessive gradients and peat soils.		
	7.4.2	There are no new plantings observed within the estates. Estates maps and acreage statement are reviewed. Therefore, no plans established for planting on fragile and marginal soils.	Yes	
7.5	7.5.1	There are no new plantings observed within the estates. Estates maps and acreage statement are reviewed. Therefore, no records of FPIC esrablished.		
7.6	7.6.1	There are no new plantings observed within the estates. Estates maps and acreage statement are reviewed. Therefore, no documents available.		
	7.6.2	There are no new plantings observed within the estates. Estates maps and acreage statement are reviewed. There is no new subleased land, therefore no compensation paid.	Yes	
	7.6.3	There are no new plantings observed within the estates. Estates maps and acreage statement are reviewed. There is no new country leased or sub-leased land, therefore no payment made.	Yes	
	7.6.4	There are no new plantings observed within the estates. Estates maps and acreage statement are reviewed. Therefore, no documents established.	Yes	
	7.6.5	There are no new plantings observed within the estates. Estates maps and acreage statement are reviewed. Therefore, no documents established.	Yes	

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Principle	Principle 7: Responsible Development of New Plantings			
Criterion by Audit		Summary of Assessment	Compliance	
	7.6.6	There are no new plantings observed within the estates. Estates maps and acreage statement are reviewed. Therefore, no documents established.		
7.7	7.7.1	There are no new plantings observed within the estates. Estates maps and acreage statement are reviewed KHB group has a zero burning commitment statement in Environmental Policy dated 02/01/2018		
	7.7.2	There are no new plantings observed within the estates. Estates maps and acreage statement are reviewed KHB group has a zero burning commitment statement in Environmental Policy dated 02/01/2018	Yes	
7.8	7.8.1	There are no new plantings observed within the estates. Estates maps and acreage statement are reviewed. Therefore no GHG assessment conducted	atement are reviewed. Therefore no GHG	
	7.8.2	There are no new plantings observed within the estates. Estates maps and acreage statement are reviewed. Assessment plans will be established as and when required for new development or new planting occur.	Yes	

Principle	Principle 8: Commitment to Continuous Improvement in Key Areas of Activity			
Criterion by Audit		Summary of Assessment	Compliance	
8.1	8.1.1	KHB, Abedon Lahad Datu has established Continual Improvement Program separately for estates and mill. The estate CIP last reviewed on 28/06/2018 and the mill on 31/07/2018. The mill CIP action plan for improvement of the following key areas: Environmental Impacts; Social impacts Waste reduction; Pollution and emissions reduction Health & Safety	Yes	
		Legal ComplianceRSPO SCC		

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Energy Efficiency

The timeframe for realising the objectives are split into short term (1 to 2 years), medium term (3 to 8 years) and long term (greater than 8 years). The short term objectives are readily achievable, provide limited returns but have low risk of failure

The estates CIP action plan for improvement of the following key areas.

- Pesticides;
- Environmental Impacts;
- Social impacts
- Waste reduction;
- Pollution and emissions

The timeframe for realising the objectives are split into short term (1 to 2 years), medium term (3 to 8 years) and long term (greater than 8 years). The short term objectives are readily achievable, provide limited returns but have low risk of failure

4.2 Stakeholder Consultation

4.2.1 Summary

The stakeholders consultation invitation letters dated 22/06/2018 are sent to 39 organisations and individuals including 3 NGOs inviting them to provide feedback and comments on Abedon Oil Mill and supply bases activities. Below is the list of stakeholders invited for feedback and comments.

There is no physical stakeholders' consultation conducted for this surveillance audit.

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4.2.2 List of contacted stakeholders

Table 4-1 List of Stakeholders

No	Organisation	Name
1	Embassy of the Philippines (Tawau Office) Consulate	
2	Indonesian Consulate General in Kota Kinabalu, Malaysia	Consulate
3	Malaysian Nature Society	
4	Sabah Wetlands Conservation Society	
5	Jabatan Keselamatan dan Kesihatan Pekerjaan Cawangan Sandakan	Mr. Ahmad Al-Bakri B. Ahmad Bistari
6	Jabatan Alam Sekitar Cawangan Sandakan, Kementerian Sumber Asli dan Alam Sekitar Malaysia,	Mr. Aliudin Atat
7	Jabatan Hidupan Liar Daerah Kinabatangan	Mr. Jon Bin Taraan
8	Jabatan Bomba dan Penyelamat Kinabatangan	Mr. Ramtey Fred / Ketua Balai
9	Jabatan Perhutanan Daerah Kinabatangan	Hj. Abdul Samah Sapri
10	Jabatan Tenaga Kerja Kinabatangan	Mr. Mansor Yahya
11	MPOB Cawangan Sandakan	Hj. Khairuddin Bin Mohamad / Mr. Iskandar / Mr. Abdul Farah
12	Klinik Kesihatan Batu Putih / KKM, Kinabatangan	Dr. Muhammad Fahrul Razi Bin Mohd. Khaironi
13	Jabatan Haiwan Lahad Datu	Mr. Anthony Daniel
14	Jabatan Imigresen Malaysia Lahad Datu	Ms. Rosie Maharan / Mr. Ibrahim Bin Tamsil
15	Environmental Protection Department, Sandakan	Mr. Jomius Joseph
16	Sabah Environmental Protection Association (SEPA), Kota Kinabalu	Dr. Lanash Thanda / Ms. Julia Hwong
17	WWF Malaysia (Sabah), Kota Kinabalu	Mr. Max Donysius
18	Wild Asia, Kuala Lumpur	Mr. Hassan Bin Abdul
19	Borneo Elephant Sanctuary, Kinabatangan	Jibius Dausip / Aideh Joumin
20	The East Malaysia Planters' Association, Sandakan	Chung Shook Lin (Secretary)

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21	Ketua Kg. Paris I, II, III, Kinabatangan	Mr. Mislin Bin Bakir
22	SK Paris 3 Kinabatangan, Lahad Datu	Norsmah Binti Chawa (Guru Besar) / Zainudin Bin Ahmad (PK-1)
23	Boustead Emastulin Sdn Bhd, Kinabatangan	Samsul Bahari /Mohd Safwan B. Omar
24	Tung Hap Enterprises Sdn Bhd	Abu Suffian Teppo
25	Polyprestige Sdn Bhd, Lahad Datu	Mr. Yap Nyuk Kiong
26	Sawijaya Sdn Bhd, Tawau	Mr. Jasni
27	KLK Primier Oils, Sandakan	Mr. Fong
28	Santi Contractor, Lahad Datu	Hasanuddin
29	Lo Nyuk Kiong Contractor, Sandakan	Lo Nyuk Kiong
30	Sabah Veterinary Supplies, Kota Kinabalu	Dr. Edwin Bosi / Jacqualine
31	Abedon Enviro Sdn Bhd, Kinabatagan	Mr. Romla
32	Klinik Layong, Kinabatangan	Dr. K. Srinivasarajoo
33	Klinik Mansor, Sandakan	Dr. Ahmad Mansor B. Osir
34	Mansur Palado, Kg. Sri Takala	Burhan Mansur
35	Abdullah Bin Ambotuo, Kinabatangan	Abdullah Bin Ambotuo
36	Misnah Binti Ambang, Kinabatangan	Misnah Binti Ambang
37	Nordia Binti Katutu, Lahad Datu	Nordia Binti Katutu
38	Noraima Binti Tamma, Sandakan	Noraima Binti Tamma
39	Sarip Bin Amir, Lahad Datu	Sarip Bin Amir

4.3 Issues Raised By Stakeholders

Appreciation received:

No appreciation received from the stakeholders

Feedback revived:

WWF has responded requesting for estates maps and forwarded to Abedon estate personnel to respond.

Complaints received:

There are no complaints received from the stakeholders

Audit team findings:

There are no feedback from stakeholders to be address except the email from WWF.

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Company response and proposed action to be taken:

There are no complaint raised by stakeholders, except the email from WWF.

4.4 Summary Of Green House Gases

Description	tCO₂e/tProduct
CPO	1.26
PK	1.26

Extraction	tCO₂e/tProduct
OER	18.8
KER	4.74

Land Use	На
OP Planted Area	4,364.33
OP Planted on peat	0
Conservation (forested)	277.73
Conservation (non-forested)	0
Total	4,642.06

Production	t/yr
FFB Processed	161,038.33
CPO Produced	30,270.246

Summary of Field Emission and Sink

Description	Own			Group			3 rd Party			Total tCO ₂ e
Description	tCO₂e	tCO₂e/ha	tCO₂e/tFF B	tCO₂e	tCO₂e/ha	tCO₂e/tFF B	tCO₂e	tCO₂e/ha	tCO₂e/tFF B	
Land conversion	43,104.87	9.88	0.62	0	0	0	0	0	0	43,104.87
CO2 emission from fertiliser	1,093.65	0.25	0.02	0	0	0	0	0	0	1,093.65
N2O emission	2,293.59	0.53	0.03	0	0	0	0	0	0	2,293.59
Fuel consumption	1087.85	0.25	0.02	0	0	0	0	0	0	1087.85
Peat Oxidation	0	0	0	0	0	0	0	0	0	0
Crop sequestratio n	-40,857.7	-9.36	-0.58	0	0	0	0	0	0	-40,857.7
Sequestratio n in conservatio n area	-2,546.78	-0.58	-0.04	0	0	0	0	0	0	-2,546.78
Total	4,175.46	0.96	0.06	0	0	0	10,941.17	0	0	15,116.63

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Summary of Mill Emission and Credit

Description	tCO ₂ e	tCO₂e/tFFB
POME	31,566.24	0.2
Fuel Consumption	940.17	0.01
Grid Electricity Utilisation	0	0
Exports of Excess Electricity to Housing & Grid	0	0
Sale of PKS	0	0
Sale of EFB	0	0
Total	32,506.41	0.20

Palm Oil Mill Effluent (POME) Treatment		
Divert to Compost	1.75%	
Divert to anaerobic diversion	98.25%	

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

4.5 Summary of Green House Gases

The PalmGHG version 3.0 was applied as the calculator. All data in the calculator are traceable to the records available at the estates and mill offices. The reporting period is calendar year 2018.

4.6 New Planting GHG Summary Reporting

There is no new planting at KHB Lahad Datu region. Therefore, no GHGs to be reported.

4.7 Noteworthy Positive Components and Identified Non Conformances

4.7.1 Details of noteworthy positive components

- 1. Information at notice board at Kolopis estate in languages of the foreign workers.
- 2. Good maintenance of boundary markers with appropriate GPS coordinates
- 3. Pictorial diagram display at muster ground
- 4. Abedon mill support smallholders for fertiliser purchasing
- 5. Good windrow method for chipped palms
- 6. Good cover ground at immature area

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4.7.2 Status of non-conformities identified in last audit

This section gives an overview of actions taken to close out non-conformities raised during the previous audit.

<note; all minor raise previously are required to be capture in this report together with the closing of the non-compliance>

Audit outcome during last audit					
Major NC 4					
Minor NC	1				
Observations 2					

		_				
	Non Conformity Number < 1 >					
RSPO Indicator	2.1.3: A mechanism for ensuring c	ompliance shall be implemented.				
Location	Abedon Oil Mill					
Description of F	Finding/Objective Evidence:					
stated in the Sab 1. The contro 2. The contro						
Classification		Minor				
Date Raised	16/08/2018	Deadline for implementation	n 15/11/2018			
Raised by:	Mohamad Norhisham Bin Mohd Salle	1				
Root cause Ana	alysis (<i>by company</i>):					
1. Overtime of	worker normally is below 104 hours pe	r month.				
2. There was n	o issue raise by labour department (J7	K) in previous checking.				
	3. The event of security guard exceed 104 hours is due to one of the security guard taking long leave and others security guard had to cover his shift.					
Corrective action planned (by company):						
1. Mill manage	. Mill management with Human Resource Department will work out with JTK for any action needed.					
 Application of overtime limit extension is submitted to JTK for approval at 07/09/2018 Vacancy memo have been published to hire an additional security guard. (3 months' timeframe) 						
Preventive Action (by company):						

1. Overtime sheet have included month to date overtime column to monitor total overtime in a month for

every worker.

Review of corrective/preventive action

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	Non Conformity Number	<1>			
1.	The application form dated 03/09/2018 submitted to JTK for application of overtime exceeding 104 hours per month was reviewed. JTK has acknowledge received of the form dated 07/09/2018 for application of 130 hours for a period of 1 year. The approval will be reviewed in the next audit.				
2.	The vacancy memo dated 06/09/2018 for hiring of addition security guard was sighted and display at the mill notice board.				
3.	A new overtime control sheet was established to monitor overtime of workers was sighted and implemented. The mechanism will further review in the next audit for the effective implementation				
Clo	Closed: ☐ Yes ☐ No Site verification: ☐ Yes ☐ No				
Lea	Lead Auditor Date of closure:				
Ch	eong, Chun Yuen (Robert)	13/09/2018			
Re	view of Implementation				
1.	Approval overtime permit from JTK with validity from 13/11/2018 to 12/11/2020				
2.	No new recruitment of security guard				
3.	3. Monthly overtime monitoring schedule is implemented.				
Au	Auditor Date of review:				
She	Sheron, Pui Ling Wui 17/07/2019				

Non Conformity Number < 2 >				
RSPO Indicator	4.1.1 (M): Standard Operating Procedures (SOPs) for estates and mills shall be documented			
Location	Kolopis and Tanaki Estates			
Description of Finding/Objective Evidence:				

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Non Conformity Number < 2 >

Refer CIP date reviewed: 28/06/2018, section Legal Compliance and Transparency – Plantations item 73, Improvement action:

To legalised the existing foreign workers (casual workers) with no proper document including the Indonesian and Philippine workers that have been recruited by Estates.

The Estates will establish name list of the existing casual workers for both Indonesian and Philippine and forward to Human Resource Department for legalization.

Liaise with HRD to apply for quota with Immigration Department.

Review & Monitor:

The list of all casual workers to be legalised including the Indonesian and Filipino workers by 31 Dec 2018.

(To refer recruitment of foreign worker Procedure flow chart dated: 01/08/2017) page 5

The SOP Recruitment of Foreign Workers Doc. No. KHB-HR-P04 rev 2 dated 01/08/2018 page 5 that includes the flow chart for hiring process. However, the monitoring plan to monitor the progress of the status of the legalising process is not establish and implemented to demonstrate at which stage the legalising process is at.

Classification		Minor	
Date Raised	16/08/2018	Deadline for implementation	15/11/2018
Raised by:	Cheong, Chun Yuen (Robert)		

Root cause Analysis (by company):

- 1. The foreign workers (casual workers) with no proper document including the Indonesian and Philippines workers were identified by the Estate for legalization from time to time.
- 2. Flow chart for hiring / legalization process has been establish and the progress is monitored by Estate Admin Department. (refer SOP Recruitment of Foreign Workers KHB-HR-P04)
- 3. However, a checklist was not establish as a mechanism to monitor the progress at each stage.

Corrective action planned (by company):

- 1. A monitoring checklist to monitor the legalization flow chart and the progress taken step by step which include Timeframe, PIC and the Current Status will be established.
- 2. Each workers who failed to get passport after the 6 month period will be terminated with 1 month notice.
- 3. The monitoring checklist and summary will be discuss during the monthly management meeting.

Preventive Action (by company):

1. The company will endeavor not to hire any undocumented workers unless under humanity ground in which the undocumented workers will be registered to HRD for documentation for legalization process within 14 days.

Review of corrective/preventive action

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		Non Conformi	ity Nuı	mber < 2 >		
reviewed. through a	 The monitoring checklist was reviewed that include the timeframe to monitor each of the activity was reviewed. The latest activity "Submit Passport Application to Consulate of Indonesia / Philippines through agency" was submitted on 10/08/2018 to the agency for processing is stated in progress. This will be further review in the next audit. 					
to the flow	2. The preventative action will be review in the next audit for the effective implementation for compliance to the flow chart stated in the established SOP Recruitment of Foreign Workers Doc. No. KHB-HR P04 rev 2 dated 01/08/2018 page 5					
Closed: X	es [No		Site verification : X	es No	
Lead Auditor				Date of closure:		
Cheong, Chun	Yue	n (Robert)		13/09/2018		
Review of imp	lem	entation				
		is review and crosscheck on the ubmission and responds input f			onitoring that include	
hired earli	There are no hiring of workers without valid documents based on review of documents. Those hired earlier and unable to obtain passport are terminated in accordance to the SOP for hiring of foreign workers. The list of workers terminated are crosscheck with the termination letters issued.					
Auditor				Date of Review:		
Sheron Pui Ling	Sheron Pui Ling Wui 17/07/2019					
		Non Conformi	ity Nuı	mber < 3 >		
RSPO Indicato	r	6.5.1 (M): Documentation of pa	ay and	conditions shall be availa	ble.	
Location		Kolopis and Tanaki Estates				
Description of	Fin	ding/Objective Evidence:				
During rev entitlemen		of the LTI of Kolopis office, it wa	s foun	d 3 workers were not paid	I for the medical leave	
2. A chemical sprayer at Tanaki estate performs overtime to collect loose fruits during day-off was not paid according to the terms and conditions stated in the work contract for overtime.						
		pickers at Kolopis estate who poditions stated in the work contra			t paid according to the	
Classification	\boxtimes	Major		Minor		
Date Raised	16	5/08/2018	Dead	line for implementation	15/11/2018	
Raised by:	Cł	neong, Chun Yuen (Robert)				

Root cause Analysis (by company):

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Non Conformity Number < 3 >

- 1. The payment for the sick leave entitlement overlooked by the staff in-charge.
- 2. The sprayer at Tanaki estate which performs overtime to collect loose fruits during day-off were paid in piece rated instead of overtime rate.
- 3. The loose fruit pickers were paid in piece rated instead of overtime rate.

Corrective action planned (by company):

- 1. Any medical leave issued by HA or Doctor must be known to the manager in-charge for payment.
- 2. The payment for any job performs outside their job scope on day-off will be paid overtime accordingly.

Preventive Action (by company):

- 1. Executive or HODs must acknowledge the medical leave form HA or Doctor.
- 2. All overtime request form must be approved by Executive in-charge before allowing any work to be done and after completion of the job.

Review of corrective/preventive action

- 1. The sick leave for the 3 workers were paid. Payment documents were sighted with the amount received by the workers.
- 2. Overtime payment to the workers in Tanaki and Kolopis estates were sighted and the back pay amount is calculated in accordance to the Sabah Labour Ordinance.
- 3. The overtime request form established was review and the effective implementation will be review in the next audit.
- 4. The medical leave acknowledgement by the executive and HOD will be reviewed for effective implementation in the next audit.

Closed: ⊠ Yes □ No	Site verification : X Yes No			
Lead Auditor	Date of closure:			
Cheong, Chun Yuen (Robert) 13/09/2018				
Review of implementation				
Medical leave payment is review for recent injury cases and are paid according to the daily wage of Minimum Wage Regulations 2018.				
Overtime wages are paid according to work incurred on the day of work. Wage slips are review and could confirm paid accordingly.				
Lead Auditor & Auditor	Date of review:			
Cheong, Chun Yuen (Robert) / Sheron Pui Ling Wui 16/07/2019				

Non Conformity Number < 4 >			
RSPO Indicator	6.12.1 (M): There shall be evidence that no forms of forced or trafficked labour are used.		

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Non Conformity Number < 4 >				
Location	Abedon oil mill, Tanaki and Kolopis extates			
Description of F	inding/Objective Evidence:			
	ew of workers' they could confirm the pa for safekeeping to avoid been lost or sto		ort is handover voluntarily to	the estate or
	declarations signed or thumb-print by the on it. This does not demonstrate the dor.			
In addition, the co	ompany is required to demonstrate a coperation and they could easily obtain			
Classification	⊠ Major		Minor	
Date Raised 2	23/08/2018	Dea	dline for implementation	22/11/2018
Raised by:	Cheong, Chun Yuen (Roebrt)			
	ysis (<i>by company</i>):			
	form was prepared with company letter haration is made on voluntarily basis by the			nat the
Corrective action	n planned <i>(by company)</i> :			
1. The passport	will be given back to all workers. (Revise	ed SC	OP)	
Preventive Actio	n (<i>by company</i>):			
The workers are f	ree to decide how and where they want t	heir	passports to be kept. They o	can either:
a) Keep their pa	ssports themselves;			
	ssports kept by the management, to which	ch wo	orkers have free access thro	ugh
	ctive/preventive action			
The revised SOP Passport Safekeeping Procedure Doc. No. KHB.HR-PO3 rev 1.0 dated 01/09/2018 was reviewed that include a flow chart in managing the safekeeping of passport who wants to submit to the office on his / her own free will.				
Briefing were provided to all workers in all estates and divisions on 27/08/2018, 28/08/2018, 30/08/2018 and JCC meeting held to discuss with the workers representative on 24/08/2018 and 25/08/2018 The worker will register in the established record book stating the name, passport number and thumb-print. To obtain the passport, the worker will register in the record.				
With the above corrective action, preventive action and the implementation of the revised SOP, briefing provided and a register logbook implemented, the NC is consider closed effectively.				
Closed: Xes	Closed: ☐ Yes ☐ No ☐ Site verification: ☐ Yes ☐ No			
Lead Auditor			Date of closure:	
Cheong, Chun Yu	uen (Robert)		13/09/2018	

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	Non Conformity Number < 5 >						
RS	PO Indicato	r	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).				
Lo	cation		Mill and Tanaki Estate				
De	scription of	Fin	ding/Objective Evidence:				
	The following were found during the walk around.Separate waste bins were installed for plastics, paper and glass. Plastics and other waste type were found the paper waste bin at the mill workshop.					ther waste type were	
2.	Ashes wer	e fo	ound at the outer going drain nea	r to th	e ash pit.		
3.	Domestic	was	tes were found in the recycle bin	at the	e mill compound.		
4.	Oil was for	und	at the oil trap located at the gens	set ho	use in new housi	ng area o	f Tanaki Estate.
Cla	ssification		Major	\boxtimes	Minor		
Dat	e Raised	16	/08/2018	Corr	ective Action Da	ate:	15/11/2018
Rai	sed by:	Cr	neong, Chun Yuen (Robert) / Zul	Hairi I	Hassan		
Ro	ot cause An	aly	sis (by company):				
1.	The awaren	ess	of separating waste is not enoug	gh am	ong workers and	housing i	resident.
2.	Before audit water drain.		ere was heavy raining at mill con	npoun	nd which cause flu	shing of	ash from ash pit to
3.			all rain water will be catch by the m. Thus, water will accumulate in				
Со	rrective acti	on	planned <i>(by company)</i> :				
1.	Briefing /Training will be conduct to all employee and resident to enhance their recycle knowledge and awareness.					ecycle knowledge	
2.	The design	of a	sh pit will be review to prevent flu	ushing	g of rainwater.		
3.	The rain gut	ter	will be diverted to avoid flooding	the oi	l trap.		
Preventive Action (by company):							
1. Signage with picture will be install to increase awareness on seperating waste.							
2. The ash pit area will install a roofing to prevent rain water flushing the ash from the ash pit to water drain.							
3. Recollect the trapped oil in the oil trap pit and established monitoring of oil trap to prevent leakage and spillage of black oil in all oil trap location.							
Review of corrective/preventive action							
The corrective action and preventative action is acceptable. The implementation will be review in the next audit before NC could be close effectively.							
Clo	sed: 🗌 Ye	s D	√ No		Site verification	:	s 🖂 No

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Non Conformity Number < 5 >			
Lead Auditor	Date of review:		
Cheong, Chun Yuen (Robert)	13/09/2018		

Review of implementation

- 1. Signage are sighted for waste separation at housing compound, workshop and landfill areas. The respective bins are inspected to confirm the type of wastes in the bins.
- 2. The ash pit has been improved to prevent ash been flush down the drains
- 3. Waste bins are inspected and no domestic wastes found in recycle bins.
- 4. Oil trap in Tanaki estate are working in good condition with no oil traces found.

Lead Auditor & Auditor	Date of review:
Cheong, Chun Yuen (Robert) / Sheron Pui Ling Wui	17/09/2019

	Obs	servation < 1 >			
RSPO Indicator	4.7.2: 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 issues. All precautions attached to products shall be properly observed and applied to the workers.				
Location	Abedon Mill				
Description of Fir	nding / Objective Evidence	:			
The risk assessme	The risk assessment at the EFB transfer area could be improved				
Raised by:		Date Raised:			
Cheong, Chun Yue	Cheong, Chun Yuen (Robert) 16/08/2018				
Corrective Action	:				
1. HIRARC on EF	B area will be reassess to i	nclude all possible occurrence of accident.			
2. Chain will be install around the perimeter of the EFB shed area to prevent any worker walk in the area.					
3. Briefing/ Training will be conduct to the workers regarding the new assess HIRARC.					
Review of corrective action					
The implementation of the corrective action plan will be review in the next audit.					
Lead Auditor					
Cheong, Chun Yuen (Robert) 13/09/2018					
Review of implem	Review of implementation				

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Observation < 1 >				
The HIRARC chart is updated on the risk control and mitigation for the EFB transfer and conveyer area. Proper signage implemented at work location. Therefore, closed.				
Lead Auditor Date closed out:				
Cheong, Chun Yuen (Robert)	17/09/2019			

	Obs	servation < 2 >		
RSPO Indicator	4.7.3 (M): 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.			
Location	Abedon Mill			
Description of Fin	ding / Objective Evidence	:		
Dark glass or dark	googles could be consider f	or operators at boiler furnace operation.		
Raised by: Cheon	g Chun Yuen (Robert)	Date Raised: 16/08/2018		
Corrective Action	:			
1. Dark glass or o	lark googles could be consid	der for operators at boiler furnace operation.		
2. HIRARC will be	e review for the potential haz	zard involve in boiler furnace operation.		
3. Appropriate PF	PE will be given to the boiler	worker for the furnace operation.		
Review of correct	ive action			
The implementation	n of the correction action pla	an will be review in the next audit.		
Lead Auditor		Date Reviewed:		
Cheong, Chun Yue	Cheong, Chun Yuen (Robert) 13/09/2018			
Review of implementation				
The HIRARC chart is updated on the risk control and mitigation for the boiler furnace operation. Therefore, closed.				
Lead Auditor:		Date closed out:		
Cheong, Chun Yue	Cheong, Chun Yuen (Robert) 17/09/2019			

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4.7.3 Status of non-conformities identified in this audit

This section gives an overview of non-conformities raised during this audit.

If a minor non-conformity raised at the last audit, is not closed out, this will be raised to a Major non-conformity and the certificate holder is given 60 days to close out.

Audit Outcome for this audit				
During this audit,	0 MAJOR Non-Conformities			
	2	MINOR Non-Conformities		

	Non Conformity	Number < 1 >		
RSPO Indicator	4.1.3: Records of monitoring and any actions taken shall be maintained and available as appropriate.			
Location	All estates			
Description of Fir	nding/Objective Evidence:			
SOP Water and River Contamination Handlings Doc. No. KHB/G/SOP-09 rev.04 dated 09/02/2018 is established to monitor water source and river are the two protected area from any pollutions or water contamination that can harm to the human, livestock / animals and plants. A monitoring checklist established did not include monitoring of points (b) and (c) in the description Monitoring.				
Classification	☐ Major	⊠ Mino	r	
Raise by:	ise by: Cheong, Chun Yuen (Robert) Date Raise: 18/07/2019			
Deadline for implementation Next surveillance audit				
Deadinie for impr	ementation	TACKE SULFCING		
•	ementation rsis (<i>by company</i>):	TYOKE SULVEING		

Corrective action planned (by company):

- 1. To include and revise the current monitoring checklist used on monitoring the Buffer Zone & Riparian Area to include the monitoring visually on any changes of the water colour or sign of pollution eg. Dead fish or shrimp as well as the monitoring of the smell of the water.
- 2. To update the Biodiversity Assessment and Planning for Unplanted area, water catchment area and buffer zones management plan

Preventive Action (by company):

Any review in future for the Management Plan/ monitoring checklist should be in line with related SOPs.

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	Non Conforn	nity Nu	mber < 1 >			
Review of correct	ive/preventive action					
	on plan to include the 2 addition he addition 2 parameters. There			monitoring checklist is		
To further assess in	n next surveillance audit for effec	ctive im	plementation.			
Closed: ⊠ Yes □] No	Site ve	erification : 🗌 Yes 🛛 No	ı		
Lead Auditor:		Date o	Date of closure:			
Cheong, Chun Yue	n (Robert	11/08/2019				
Review of Implem	entation for Minor NC (where a	applica	ble)			
Name of Lead Aud	ditor / Auditor:	Date	of Review:			
		• •				
DODO la l'astan	Non Conforn	nity Nu	mber < 2 >			
RSPO indicator	5.1.3: 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.					
Location	All estates					
Description of Fin	ding/Objective Evidence:					
impact for Land F	col established in the EAIA and Preparation during Replanting.	Howev	er, the monitoring protoco	ol did not include the		
Classification	☐ Major		Minor			
Raise by:	Cheong, Chun Yuen (Robert)		Date Raise: 18/07/2019	1		
Deadline for imple	Deadline for implementation Next surveillance audit					
Root cause Analysis (by company):						
The monitoring protocol to monitor the aspect, impact, mitigation and continuous program for newly replanted area was not clearly defined in the EAIA and Environmental Management Plan						
Corrective action	planned <i>(by company)</i> :					
-	nvironmental Impact Assessme to include the aspect, impact, mi					
Preventive Action	(by company):					

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Non Conformity Number < 2 >				
To comply all recommendations and comments from Environmental Monitoring and Compliance Audit Report on Re-planting area by the external consultant.				
Review of corrective/preventive action				
The action plan taken to update the Environmental Impact Assessment and Action Plan in the EAIA and Environmental Management Plan is review for the monitoring protocol is sufficient to close the NC.				
Further review in next audit for effective implementation.				
Closed: ⊠ Yes □ No	Site verification : ☐ Yes ☒ No			
Lead Auditor:	Date of closure:			
Cheong, Chun Yuen (Robert)	11/08/2019			
Review of Implementation for Minor NC (where applicable)				
NA				
Name of Lead Auditor / Auditor:	Date of Review:			

Nr.	Indicator	Location	Opportunity for Improvement
1	4.7.1	Estates & Mill	The OSMP could be improve on:
			Classification of LTI and method to determine the rating
			Risk assessment review guidelines
2	5.2.4	Estates & Mill	The management could improve the management monitoring plan on identified wildlife presence with an annual biodiversity inspection.
			The birds, repitles and mammals sighted at the mill effluent ponds as feedback to impprove the management monitoring plan.
3	5.3.3	Estates	The management could further improve on the noise barrier of genset buildings located nearby to housing and creche.
4	5.4.1	Mill	The energy efficiency plan could be improve to include the monitoring activities

5 RSPO Supply Chain Certification

The palm mill mentioned in the scope of the audit was audited against the requirements of the following:

- RSPO Supply Chain Certification Systems November 2014 (revised June 2017)
- RSPO Supply Chain Certification Standard November 2014 (revised June 2017)

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RSPO SCC System Document Requirement						
Requirement	Comment	Compliance				
5.3.7 The CB shall review the management documentation of the applicant to ensure that all elements fully meet the requirements of the RSPO Supply Chain Certification Standard. The certification body shall clarify any issues or areas of concern with the operation seeking or holding certification. Internal audits shall be fully planned and underway before certification is awarded.	Abedon Oil Mill established and implemented SOPs and manual.	Yes				
	Example:					
	Receiving of Sustainable FFB Doc. AOM-WI-001 rev 0 dated 01/008/2017					
	Processing of FFB Doc. No. AOM-PRC-PRD rev. 0 dated 01/02/2017					
	Handling of CPO & PK Final Dispatch Doc. No: AOM-ADM-LBT rev o dated 01/02/2017					
	Despatch Sustainable Product CCPO, CSPK) Doc. AOM-Wi-002 Rev 0, dated 01/08/2017					
	RSPO SCC Manual doc no. AOM-ADM-SCCS-001 rev 1 dated 01/05/2018.					
	RSPO General Chain of Custody doc no. AOM-ADM-SCCS-002 rev 1 dated 01/05/2018					
	Mass Balance system established to monitor certified and uncertified FFB					
	Internal audit conducted on 26/06/2019 and management review conducted on 09/07/2019 to review the results of the last internal audit.					
	No findings raised during the internal audit.					
5.3.8 The certification body shall review whether the organizational systems, the management systems and the operational systems, including any documented policies and procedures of the operation seeking or holding certification, are sufficient and adequately implemented to meet the intent and requirements of the RSPO Supply Chain Certification Standard. In cases where an operation seeking certification outsources activities to independent third parties, the auditor or CB	Abedon Oil Mill established and implemented SOPs and Manual to manage the mill operations and SCC.	Yes				
	Example:					
	Receiving of Sustainable FFB Doc. AOM-WI-001 rev 0 dated 01/008/2017					
	Processing of FFB Doc. No. AOM-PRC-PRD rev. 0 dated 01/02/2017					
	Handling of CPO & PK Final Despatch Doc. No: AOM-ADM-LBT rev o dated 01/02/2017					

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will assess whether a visit to the subcontractor is required. If the outsourced contractor holds RSPO certification, then it does not require an additional audit. RSPO	Despatch Sustainable Product CSCPO and CSPK, Doc. AOM-WI-002 Rev 0, dated 01/08/2017	
·	RSPO SCC Manual doc no. AOM-ADM-SCCS-001 rev 1 dated 01/05/2018.	
	RSPO General Chain of Custody doc no. AOM-ADM-SCCS-002 rev 1 dated 01/05/2018	
	Mass Balance system established to monitor certified and uncertified FFB	
	There are no outsourcing activities for the mills operations.	
5.3.9 The CB shall verify compliance of all outsourced activities (as specified in the RSPO SCC Standard) conducted by subcontractors engaged by an organization seeking or holding certification with the intent and requirements of the RSPO Supply Chain Certification Standard.	There are no outsourcing activities for the mill operations.	Yes
5.3.10 The certification audit shall review pertinent RSPO Supply Chain records relating to the receipt, processing and supply of certified oil palm products.	There are no outsourcing activities for the mill operations.	Yes
5.8 Control of claim	Abedon Oil Milll make claim on MB for CPO and PK at mill level.	Yes
5.8.1 Certification audit, surveillance procedures, and Book and Claim audits shall include provision for ensuring compliance with RSPO requirements for the control of claims, as detailed in RSPO Rules on Market Communication and Claims. If multiple Supply Chain models are used in parallel, a sample of claims relating to the use of RSPO Certified Sustainable oil palm products shall be checked.	No logo usage claimed by Abedon Oil Mill	

5.0 General chain of custody requirements for the supply chain		
Requirement	Comment	Compliance
5.1 Applicability of the general chain of custody requirements for the supply chain		

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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.	Crude Palm Oil and Palm Kernel produced by Abedon Oil Mill Sdn Bhd is owned by Kretam Holdings Berhad.	Yes
5.1.2. Traders and distributors require a license obtained from RSPO to sell RSPO certified product but do not themselves require certification. When selling RSPO certified product a licensed trader and/or distributor must pass on the certification number of the product manufacturer and the applicable supply chain model.	Abedon Oil Mill is not a trader and distributor.	Yes
If the organization only trades and distributes they only need a license obtained from RSPO to sell RSPO certified product but do not themselves require certification. The names of the traders / distributors should be checked on the website.		
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	Kretam Holdings Berhad RSPO membership registration no. 1-0189-15-000-00 is an Ordinary Member	Yes
on the RSPO IT platform. Evidence collected should be at minimum, Membership number and Palm Trace ID.	Palm Trace ID No: RSPO_PO1000003828	
5.1.4. Processing aids do not need to be included within an organization's scope of certification.	No processing aid used in production.	Yes
Same applies for non-food related processing aids. Processing Aids are:		
a. Substances that are added to a food during the processing of such food but are removed in some manner from the food before it is packaged in its finished form.		
b. Substances that are added to a food during processing, are converted into constituents normally present in the		

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 food, and do not significantly increase the amount of the constituents naturally found in food. c. Substances that are added to a food for their technical or functional effect in the processing but are present in the finished food at insignificant levels and do not have any technical or functional effect in that food. 		
5.2 Supply chain model:		
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 done in the following order: Identity Preserved -> Segregated -> Mass Balance.	Abedon Oil Mill Sdn Bhd applies MB model for both CPO & PK.	Yes
5.2.2 The site can use one (1) or a combination of supply chain models (e.g. Identity Preserved, Segregated, Mass Balance) as audited and certified by the CB.	Abedon Oil Mill Sdn Bhd applies MB model for both CPO & PK.	Yes
Certificate holder must comply to each supply chain model module that is applicable to the operations of the certificate holders.		
5.3 Documented procedures		
5.3.1. The site shall have written procedures elements of the applicable supply chain mode		
Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements.	Abedon Oil Mill established and implemented SOPs. Example:	Yes
	RSPO SCC Manual doc no. AOM-ADM-SCCS-001 rev 1 dated 01/05/2018.	
	RSPO General Chain of Custody doc no. AOM-ADM-SCCS-002 rev 1 dated 01/05/2018	
 Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records). 	Training records for SCCs Critical Control Points including RSPO SCCs requirements conducted on 22/04/2019 is reviewed	Yes

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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.	The mill manager is responsible for the implementation and monitoring on RSPO Supply Chain Certification Program and Job Description includes RSPO SCC compliance.	Yes
5.3.2 The site shall have a written procedure organization;	e to conduct annual internal audit to determ	ine whether the
conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.	SOP for SCC Internal Audit Doc. No. AOM-AMD-SCCS-004 rev. 0 dated 01/02/2017 to provide guideline to conduct RSPO SCC Audit to all process related to RSPO SCCS element in Abedon Oil Mill	Yes
effectively implements and maintains the standard requirements within its organization. This applies to all supply chain actors, including single site. Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non-conformities shall be subject to management review at least annually. The organization must be able to maintain the internal audit records and reports.	Internal audit conducted on 26/06/2019 to ensure compliance to RSPO SCC requirements.	Yes
5.4 Purchasing and goods in		
5.4.1 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:		
The name and address of the buyer;	Abedon Oil Mill and address stated in weighbridge ticket for delivery of FFBs from internal estates and 3 rd party suppliers.	Yes
The name and address of the seller;	Abedon internal estates or 3 rd party suppliers name and location stated in delivery note and weighbridge ticket issued by Abedon Oil Mill	Yes

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The loading or shipment / delivery date;	Delivery date stated in DN issued by estate and WB ticket issued by Abedon	Yes
	Oil Mill Example:	
	·	
	FFB Delivery from Tanaki Estate – ISegama Division Delivery Docket No. 01703 dated 11/06/2019	
	Abedon Oil Mill WB ticket No: FFB19008695W dated 11/06/2019	
The date on which the documents were issued;	Date of issued stated in delivery note issued by estate and WB ticket issued by Abedon Oil Mill	Yes
	Example:	
	FFB Delivery from Kolopis Estate – Bumiwealth Division Delivery Docket No. 09055 dated 03/02/2019	
	Abedon Oil Mill WB ticket No: FFB19001545W dated 03/02/2019	
A description of the product, including the applicable supply chain model	Abedon Oil Mill WB ticket states the supply chain model MB	Yes
(Identity Preserved, Segregated or Mass Balance or the approved	Example:	
abbreviations);	Abedon Oil Mill WB ticket No: FFB19001545W dated 03/02/2019 stated RSPO-MB	
The quantity of the products delivered;	Quantity of FFB delivered stated in Abedon Oil Mill WB ticket since there is no weighbridge in the estate.	Yes
	Example:	
	Abedon Oil Mill WB ticket No: FFB19001545W dated 03/02/2019 nett weight 6,180kg.	
Any related transport documentation;	The delivery docket issued by the internal estate.	Yes
Supply Chain certificate number of the seller;	No certified FFBs purchase. Certified FFBs supplied by internal estates.	Yes
A unique identification number;	Delivery Docket issued by estate	Yes
	Example:	

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	Delivery Docket No. 01703 stated in Abedon Oil Mill WB ticket.	
Information must 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).	FFBs supplied by the internal estates. Estate delivery docket and Abedon Oil Mill Weighbridge ticket is the delivery document. Therefore, no announcement and confirmation required.	Yes
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 of shipments. Refer to section 5.7.1 of this document for further guidance.	FFBs delivered by the internal estates. Therefore, no announcement is required.	Yes
A check of the validity of the Supply Chain Certification of suppliers is required for all sites that are SC Certified sites on the RSPO website (www.rspo.org) at least annually or through the RSPO IT Platform by confirmation of (shipping) announcements.	NA. The certification is for mill and supply bases.	Yes
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.	NA. Abedon Oil Mill is not a trader or distributor.	Yes
Shipping announcements cannot be confirmed in the Palm Trace system if the supplier is not certified. Anyone between the mill and refinery who confirm transactions in Palm Trace do not need to verify their supplier list. However, the fact that shipping announcements/announcements need to be confirmed should be mentioned in their procedures. Also - traders operating		

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between mills and refiners confirm transactions in Palm Trace.		
5.4.2. The site shall have a mechanism in place for handling non-conforming material and/or documents.	Abedon Oil Mill establish SOP Control of Non-Conformance Material / Product or Documentation Doc. No. AOM-ADM-NCM rev. 0 dated 01/03/2018.	Yes
	Paragraph 5.1.1 lack of documentations has documentation error and/or without valid license / certificate shall categorized as non-conforming material	
5.5 Outsourcing activities		
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 mill cannot outsource processing activities like refining or crushing. This requirement is not applicable to outsourced storage facilities where the management of the oil palm product(s) and instructions for tank	Abedon Oil Mill outsourced logistics road tankers for CPO and PK delivery. Abedon Oil Mill established Outsourced Activities (CPO & PK) SOP AOM-ADM-SCCS-006 rev. 0 dated 01/03/2018 describes the control mechanism on outsourcing activities that physically handle CPO & PK of Abedon Oil Mill that only covers transportation activities of CPO & PK of Abedon Oil Mill by approved third parties logistics transporters.	Yes
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;	Abedon Oil Mill takes legal ownership of the CPO and PK until the delivery received by buyer.	Yes
b) The site has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the	Abedon Oil Mill has agreement / contract with the approved outsourced logistics transporter. Example:	Yes
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.	Agreement of trucks and tankers for carriage of CPK and PK with Juita Baru Sdn Bhd dated 06/03/2019	

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c) The site has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.	Outsourced Activities (CPO & PK) SOP AOM-ADM-SCCS-006 rev. 0 dated 01/03/2018.	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	Included in the agreement	Yes	
5.5.3. The site shall record the names and contact details of all contractors used for the processing or production of RSPO certified materials.	NA. No outsourcing activities for processing or production of RSPO certified materials	Yes	
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 production of RSPO certified materials.	NA. No outsourcing activities for processing or production of RSPO certified materials	Yes	
5.6 Sales and goods out			
5.6.1. The supplying site shall ensure that the is made available in document form:	5.6.1. The supplying site shall ensure that the following minimum information for RSPO certified products is made available in document form:		
The name and address of the buyer;	Name and address of buyer stated in shipping document.	Yes	
	Example:		
	Green Edible Oil Sdn Bhd		
	Mile 3.4, Jalan Ulu Sibuga. Kuala Seguntor, Sandakan, Sabah, Malaysia		
The name and address of the seller;	Abedon Oil Mill is the seller with the name and address stated in the delivery note and weighbridge ticket.	Yes	
The loading or shipment / delivery date;	Included in weighbridge ticket	Yes	
	Example:		
	WB ticket issued by Abedon Oil Mill dated 13/11/2018		

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The date on which the documents were	Stated in weighbridge tickets.	Yes
issued;	Example:	100
	WB ticket issued by Abedon Oil Mill dated	
	13/11/2018	
A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations: IP, SG, MB, RSPO may add to the supply chain models and abbreviations. All other descriptions are not allowed);	Module stated in weighbridge ticket and invoice as MB	Yes
The quantity of the products delivered;	Stated in weighbridge ticket.	Yes
	Example:	
	Abedon oil Mill WB ticket no. 068586	
	Net wt:33.340 kg	
Any related transport documentation;	Tax Invoice	Yes
Supply chain certificate number;	P&C certificate no. 500 92 028	Yes
A unique identification number.	Buyer contract number	Yes
	Example:	
	Green Edible Oil Sdn Bhd contract no: GEO/WLK-EL/213/1I/18	
Information must 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). 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 5.4 and 5.7.1 of this document for further guidance. Objective	Shipping announcement and confirmation have been crosschecked for each transactions through the PalmTrace.	Yes
document for further guidance. Objective evidence needed for all data in this section.		
5.7 Registration of transactions		

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5.7.1 Supply chain actors who: Are mills, traders, crushers and refineries; and take legal ownership and / or physically handle RSPO Certified Sustainable oil palm products that are available in the yield scheme of the RSPO IT Platform (Figure 2 and 3, refer Annex 1) shall register their transaction in the RSPO IT platform and confirm upon receipt where applicable. 5.7.2 The involved supply chain actors mentice.	Abedon Oil Mill Palm Trace Member ID: RSPO_PO1000003828 All physical shipments for CPO and PK are announced through the Palm Trace.	Yes
Platform: 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.	Shipping announcements are announced through the Palm Trace. The Palm Trace platform is crosschecked on the announcement.	Yes
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.	Transactions are made through the palm trace. The transactions are crosschecked on the traded volume, buyer name, contract listed in the IT platform.	Yes
Remove: RSPO certified volumes sold under other scheme or as conventional, or in case of underproduction, loss or damage shall be removed.	No certified volume sold under other schemes.	Yes
Confirm: Acknowledge the purchase of RSPO certified volume by confirming Shipping Announcements / Announcements.	Buyers acknowledge purchase of RSPO certified volume and confirmed through the Palm Trace. The Palm Trace platform is crosschecked on the transactions acknowledgement.	Yes
5.8 Training		
5.8.1. The organization shall have a defined training plan on RSPO Supply Chain Standards requirements, which is subject to	SCC training plan for year 2019 revised on 15/04/2019 is established.	Yes

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on-going review and is supported by records of the training provided to staff.		
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 system. Training shall be specific and relevant to the task(s) performed.	Training records for SCCs Critical Control Points conducted on 22/04/2019 is reviewed.	Yes
5.9 Record keeping		
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 requirements.	Abedon Oil Mill maintain and archive Daily Production Record: FFB received; CPO dispatch on daily, weekly, monthly and aggregated annual basis.	Yes
5.9.2. Retention times for all records and reports shall be a minimum of two (2) years and must comply with legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock.	Abedon Oil Mill RSPO Supply Chain Module Doc no. AOM-ADM -SCCS-003 rev 0 dated 01/05/2018 states records are archived for 3 years	Yes
5.9.3 The organization must 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.	FFBs are supplied by internal estates from Nov 2019 to Oct 2019: 74,905.98 mt (Include projected volume for Jul to Oct 2019). Certified CPO Volume sold to buyers from Nov 2018 to Oct 2019: 14,344.015 mt (Include projected volume for Jul to Oct 2019). Certified PK sold to buyers from Nov 2018 to Oct 2019: 3,536.083 mt (Include	Yes
	projected volume for Jul to Oct 2019).	
5.10 Conversion factors5.10.1. Where applicable a conversion rate	Budgeted Conversion rate for all mills	Yes
must 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 must be based upon past experience, documented and applied consistently.	CPO: 20.7% PK: 4.5%	1 62
Guidance on conversion rates is published on the RSPO website (www.rspo.org).		

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RSPO Rules for Physical Transition of Oleochemicals and its Derivatives. This is relevant for derivatives of Palm Oil and Palm Kernel Oil, as used in the oleochemical and personal care industries. Check data of actual figures versus estimated using conversion rates. 5.10.2. Conversion rates shall be periodically updated to ensure accuracy against actual performance or industry average if appropriate.	Actual conversion rates CPO: 19.5% PK: 5.11%	Yes
5.11 Claims 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 communications and claims.	As described in the SOP General Chain of Custody Doc no. AOM-ADM-SCCS-002 rev 1 dated 01/05/2018 Abedon Oil Mill does not make any product claim other than the product name which includes the model MB 100% claims of RSPO certified module	Yes
5.12 Complaints	MB at mill and delivery level. In compliance with the RSPO rules on communications and claims.	
5.12.1. The organization shall have in place and maintain documented procedures for collecting and resolving stakeholder complaints.	Abedon Oil Mill established and implemented Complaints & Grievance Procedure Doc no. KHB-HR-P05 rev 2 dated 01/08/2018 to handle complaints and grievances No complaints and grievance received for	Yes
5.13 Management review	current license period.	
5.13.1. The organization is required to hold management reviews annually at planned intervals appropriate to the scale and nature of the activities undertaken.	Management review conducted on 09/07/2019 to review the results of the internal audit. MNC:	MNC1
	During review of the management review meeting minutes, the requirements for indicator 5.13.1 and 5.13.2 are not addressed in the meeting	

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5.13.2. The input to management review shall include information on:					
Results of internal audits covering RSPO Supply Chain Certification Standard.	MNC 1				
	During review of the management review meeting minutes, the requirements for indicator 5.13.1 and 5.13.2 are not addressed in the meeting				
Customer feedback	Customer feedback topic is not discussed in management review meeting.	No			
Process performance and product conformity	Topic is not discussed in management review meeting.	No			
Status of preventive and corrective actions	Topic is not discussed in management review meeting.	No			
Follow-up actions from management reviews	Topic is not discussed in management review meeting.	No			
Changes that could affect the management system	Topic is not discussed in management review meeting.	No			
Recommendations for improvement	Topic is not discussed in management review meeting.	No			
5.13.3. The output from the management review shall include any decisions and actions related to:					
Improvement of the effectiveness of the management system and its processes There is no recommendation for improvement for the production and management system. No					
Resource needs.	No requirements for new resources identified in the management review	No			

Module E – CPO Mills: Mass Balance					
Requirement	Comment	Compliance			
1. Definition					
E.1.1. Certification for CPO mills is necessary to verify the volumes of	The model is applied for this surveillance audit is MB Module E.	Yes			
certified and uncertified FFB entering the mill and volume sales of RSPO certified producers. A mill may be taking delivery of FFB from uncertified growers, in addition	The FFBs supplied are from both RSPO certified internal estates and uncertified 3 rd party smallholders or collection center.				

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to those from its own certified land base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as	The certified CPO and PK claim volumes is crosschecked with the palm trace against production volume.	
МВ	A mass balance system is established to monitor both certified and uncertified products from incoming FFBs and to outgoing CPO and PK.	
E.2 Explanation		
E.2.1. The estimated tonnage of CPO and PK products that could potentially be	Projected tonnage of CPO (Nov 2019 – Oct 2020): 15,783.20	Yes
produced by the certified mill must be recorded by the CB in the public summary of the P&C certification report.	Projected tonnage of PK (Nov 2019 – Oct 2020: 3,686.05	
For an independent mill, the estimated tonnage of CPO and PK products must 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.		
E.2.2. The mill must also meet all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization (RSPO IT platform or book and claim).	The mill is under the Kretam Holdings Berhad Palm Trace, RSPO IT platform for the trading of the CSPO & CSPK and in compliance of the registration and reporting requirements.	Yes
E.3 Documented procedures		
	es and/or work instructions to ensure the implots. This shall include at minimum the following	
a) Complete and up to date procedures covering the implementation of all the elements in these requirements;	Abedon Oil Mill established operating procedures covering all elements of the requirements.	Yes
	Example:	
	RSPO SCC Manual doc no. AOM-ADM-SCCS-001 rev 1 dated 01/05/2018.	

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	RSPO General Chain of Custody doc no. AOM-ADM-SCCS-002 rev 1 dated 01/05/2018	
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 is the appointed person who has the overall responsibility and authority in operating the oil mill to meet RSPO SCC compliance for CSPO and CSPK.	Yes
E.3.2. The site shall have documented procedures for receiving and processing certified and non-certified FFBs.	Abedon Oil Mill SOP for receiving and processing certified FFBs from internal estates and external 3 rd parties.	Yes
	Example:	
	SOP FFB weighing AOM-ADM-WB/SOP-01 rev 0 dated 01/02/2017.	
E.4 Purchasing and goods in		
E.4.1. The site shall verify and document the volumes of certified and non-certified FFBs received.	All certified and uncertified FFBs sources and quantities are fully traceable to a daily, weekly, monthly and annual accumulated volume. All data are updated daily and kept in the computer server.	Yes
E.4.2. The site shall inform the CB immediately if there is a projected overproduction of certified tonnage.	System to deal with the overproduction case and mechanism to inform CB is described in the SCC manual AOM-ADM-SCCS-001 rev. 1.0 dated 01/05/2018 section 5.5	Yes
E.5 Record keeping		
E.5.1. a) The site shall record and balance all	Records of receiving certified FFB are archived and well maintained.	Yes
receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or	All certified FFBs sources and quantities are traceable to a daily, weekly, monthly and yearly.	
a three-monthly basis.	Delivered volume of certified FFBs from each estate and sales documents of certified CPO and PK can be retrieved easily for traceability crosschecking	

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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.	Records of certified FFB received are archived and well maintained. Weight of certified FFB from each estate and sales documents of certified CPO can be retrieved easily for traceability cross-checking	Yes
C) The site can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three months. However, a site is allowed to sell short. (i.e product can be sold before it is in stock.)	A mass balance template is established for monitoring of stocks movement on a quarterly basis. Stocks at the end of each quarter remains positive. There is no short sell reported for this license period.	Yes

Audit Outcome of this audit for SCC		
MAJOR Non-Conformities	1	

Non Conformity Number < 1 >				
RSPO Indicato	RSPO Indicator 5.13: The organization is required to hold management reviews annually at planned intervals appropriate to the scale and nature of the activities undertaken.			
Location	Mill			
Description of	Finding/Objective Evidence:			
During review of not addressed in	the management review meeting the meeting.	g minutes, the requirements for in	ndicator 5.13.1 and 5.13.2 are	
Classification				
Date Raised	18/07/2019	Deadline for implementation	17/10/2019	
Raised by: Cheong Chun Yuen (Robert)				
Root cause Analysis (by company):				
Date Raised 18/07/2019 Deadline for implementation 17/10/2019 Raised by: Cheong Chun Yuen (Robert)				

Previous management review meeting minutes did not address the indicator 5.13.1 and 5.12.2 due to lack of understanding in management review meeting requirements.

Corrective action planned (by company):

- 1) Organized SCCS management review training by Mr Kenneth (trained SCCS personnel) with all the training material from Mr Hamid (Sustainable Executives) to Abedon Mill traceability and SCC team. (23rd July 2019)
- 2) Conduct Management Review after the refresher training with all the criteria and indicators discussed during the meeting. (24th July 2019)

Preventive Action (by company):

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	Non Conformity Number < 1 >				
1)	 SCC training will conduct every year to refresh the knowledge of Abedon mill traceability and SCC team. 				
2)	Management review will conduct according to the SC	C requirement manners			
Review	v of corrective/preventive action				
	management review meeting is conducted on 24/07/2 or 5.13.1 and 5.13.2. Therefore, the NC is closed.	2019 has address include the requirements for			
Closed	d: ⊠ Yes □ No	Site verification : ☐ Yes ⊠ No			
Lead A	Auditor:	Date of closure:			
Cheong, Chun Yuen (Robert) 11/08/2019					
Supply chain model for which the mill applies:					
☐ Ider	☐ Identity preserved				

5.1 Supply Chain Declaration

Mor	Monthly Records of Certified FFB, CPO and PK since Last Audit					
No	Month-Year	Certified FFB Bases (MT)	Certified CPO (MT)	Certified PK (MT)		
1	Nov 2018	6,996.62	1,267.257	333.931		
2	Dec 2018	6,941.46	1,316.940	347.200		
3	Jan 2019	6,535.60	1,225.047	337.534		
4	Feb 2019	6,010.09	1,166.269	313.720		
5	Mar 2019	6,811.48	1,320.307	368.179		
6	Apr 2019	6,041.91	1,264.819	277.057		
7	May 2019	6,449.54	1,262.554	318.435		
8	June 2019	5,621.28	941.822	217.027		
9	Jul 2019	6,995.56	1,395.124	295.610		
10	Aug 2019	4,600.00	920.000	211.600		
11	Sept 2019	5,200.00	1,029.600	239.200		
12	Oct 2019	5,200.00	1,029.600	239.200		
	TOTAL	73,403.54	14,139.339	3,544.349		

Note: * Aug to Oct 2019 are projected volume

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Mor	Monthly Records of Un-Certified FFB, CPO and PK since Last Audit					
No	Month-Year	nth-Year Un-Certified FFB Bases Un-Certified CPO (MT)		Un-Certified PK (MT)		
1	Nov 2018	8,238.610	1,579.046	413.684		
2	Dec 2018	10,679.20	2,027.082	533.156		
3	Jan 2019	10,292.58	1,925.255	526.607		
4	Feb 2019	4,961.43	961.130	259.325		
5	Mar 2019	5,372.63	1,036.967	289.676		
6	Apr 2019	5,205.27	1,088.192	277.057		
7	May 2019	4,649.83	914.227	230.886		
8	June 2019	3,663.61	663.020	152.493		
9	Jul 2019	3.110.04	624.990	139.799		
10	Aug 2019	2,100.00	420.000	98.600		
11	Sept 2019	3,000.00	594.000	138.000		
12	Oct 2019	3,000.00	594.000	138.000		
	TOTAL	64,273.200	12,427.909	3,195.263		

Note: * Aug to Oct 2019 are projected volume

Records of Certified CPO & PK Sold under Palm Trace since Last Audit, if any

If this is the 1st Main Assessment, the figures used are from the last 12 months.

If this is an Annual Surveillance Assessment, the figures are current license period.

No	Buyers Name	Palm Trace ID No	Certified FFB	Certified CPO (MT) Sold	Certified PK (MT) Sold
1	Green Edible	RSPO_PO1000003828	0	10,470	
2	Buyer L	RSPO_PO1000003828	0	1,599	2211.89
3	Buyer K	RSPO_PO1000003828	0		502.33

Note: Trading is from Nov 2018 to July 2019

Records of Certified CPO & PK Sold Under Other Scheme since Last Audit, if any

If this is the 1st Main Assessment, the figures are from the last 12 months.

If this is an Annual Surveillance Assessment, the figures are current license period.

No	Buyers Name	Scheme Name	Certified CPO (MT) Sold	Certified PK (MT) Sold
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1	NA	NA	NA	NA

6 Certification Decision

6.1 Date of Next Surveillance Visit

The next surveillance audit is schedule within 8-12 months from certification date.

5.2 Date of Closing Non-Conformities		
All major NCs closed on	NA	
All minor NCs action plan reviewed on	11/08/2019	
All minor NCs for previous audit closed on	18/07/2019	

6.3 Formal Sign-Off Of Assessment Findings		
Certification Decision Date:		
Certifier name:		

The undersigned, being the Certifier, confirmed that the information and conclusion stated in this report have been prepared in good manner and the certification decision has been based upon the information stated. It is herewith the decision for the certified complex is in line with the applicable standard and system documents.

The audit was conducted based on a sampling basis, where understandably the limitation of this will result of any non-compliance that may not be detected in this audit that may arise in future audits.

Signature:

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Annex 2: List of Abbreviations

List of Abbreviations		
AOM	Abedon Oil Mill	
CPO	Crude Palm Oil	
DOE	Department of Environment	
EFB	Empty Fruit Bunch	
EIA	Environment Impact Assessment	
FFB	Fresh Fruit Bunch	
GAP	Good Agricultural Practices	
GMP	Good Milling Practice	
HCV	High Conservation Value	
IPM	Integrated Pest Management	
MSDS	Material Safety Data Sheet	
NC	Non Conformity	
OSH	Occupational Safety and Health	
P&C	Principle and Criteria	
PK	Palm Kernel	
POME	Palm Oil Mill Effluent	
PPE	Personal Protective Equipment	
RSPO	Roundtable on Sustainable Palm Oil	
RSPO NI	Roundtable on Sustainable Palm Oil National Interpretation	
RTE	Rare, Threatened and Endangered species	
SIA	Social Impact Assessment	
SOCSO	Social Security Organisation	
SOP	Standard Operating Procedure	
MT	Metric Tonnes	
WHO	World Health Organization	