

MSPO CERTIFICATION SUMMARY REPORT

HAP SENG PLANTATIONS (RIVER
ESTATES) SDN BHD

BUKIT MAS PALM OIL MILL

ANNUAL SURVEILLANCE 03

Remote Audit Date: 05/11/2020

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MSPO Certification Summary Report

Company Name: Hap Seng Plantations (River Estates Sdn Bhd)

Certifying Unit: Bukit Mas Palm Oil Mill

Client Number: 92-035

Audit Type: ASA 03

Mode of Audit: Remote



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Abbreviations

CHRA	Chemical Health Risk Assessment
CPO	Crude Palm Oil
CSR	Corporate Social Responsibility
DOE	Department of Environment
EFB	Empty Fruit Bunch
EIA	Environment Impact Assessment
FFB	Fresh Fruit Bunch
GMP	Good Milling Practices
GPS	Global Positioning System
ISO	International Standard Organisation
MPOB	Malaysian Palm Oil Board
MPOCC	Malaysia Palm Oil Certification Council
MSPO	Malaysia Sustainable Palm Oil
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 Sustainable Palm Oil
RTE	Rare, Threatened and Endangered Species
SA8000	Social Accountability 8000
SDS	Safety Data Sheet
SIA	Social Impact Assessment
SOP	Standard Operating Procedure
WHO	World Health Organization

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1. INTRODUCTION

Hap Seng Plantations (River Estates) Sdn Bhd has commissioned TUV NORD (Malaysia) Sdn Bhd to conduct Surveillance 03 audit for its palm oil mill according to MS 2530-4:2013 Part 4 General principles for palm oil mills.

1.1. Objective

The objective of this surveillance audit is to assess Bukit Mas Palm Oil Mill by an independent certification body with the aim for compliance of the standards.

1.2. Scope

The certification is based on the documentation established by Bukit Mas Palm Oil Mill.

The supporting documents provided to the audit team as well as information received by means of interviews and background investigation.

The documents and information are reviewed against the requirements and criteria based on MS 2530-4:2013 Part 4 General principles for palm oil mills. TUV NORD Malaysia has employed a risk-based approach in the audit, focusing on the identification of significant risks and reliability of the assessment and reporting.

The following references are used as part of the assessment; the compliance of the requirements of the guidelines applied are checked.

1. Malaysian Sustainable Palm Oil Part 4: General Principles for Palm Oil Mill audit guidance;
2. Palm Oil Supply Chain Traceability Requirements

1.3. Appointment and Qualification of team members

The audit team appointed consists of the team leader and 5 team members. The team contributes to the review of documents, assessment of the project activity and preparation of this report.

Qualification of the Trainee Lead Auditor: Khairul Anwar Bin Ismail.

Requirement	Qualifications
Post-secondary education, college or university diploma / degree in one of the following i) Agriculture; ii) Science & Technology (e.g. Environmental Sciences, Life Sciences, Geological Sciences, Natural Sciences,); iii) Engineering, Process Technology; iv) Energy Management, Quality Management; v) Social Sciences and/or Anthropology; vi) Business Management; or	Graduate in Agricultural Science

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Requirement	Qualifications
vii) Other relevant related fields	
At least five (5) years of work experience in the oil palm sector or related field in consultancy / auditing of similar industry or equivalent related to and as necessary for the certification process. (e.g., sustainability, palm oil management; agriculture, ecology; social science)	5 years working experience in oil palm plantations
Successfully completed MS 2530 series of standards training	Successfully completed MS 2530 series standards training.
Conducted at least three (3) MSPO or equivalent sustainability certification audits as Lead Auditor-in-training with a minimum of fifteen (15) man-days under the supervision of a qualified Lead Auditor for MSPO or equivalent sustainability certification schemes within the last two (2) years.	Qualified as auditor for MSPO scheme. Lead Auditor in training
Good Milling Practices. Palm oil milling working experience or auditing experience	Qualified and appointed as auditor.
Successfully completed Quality Management Systems (QMS) ISO9001 standard	Successfully completed IMS ISO 9001 Lead Auditor course.
Health and safety auditing on the mill processes and activities Or Successfully completed Occupational, Health & Safety Management System ISO 45001 standard	Successfully completed IMS ISO 45001 Lead Auditor course.
Workers welfare and social auditing experience or Successfully attended SA8000 or related social or ethical accountability codes	Successfully completed SA 8000 Basic training.
Environmental and ecological auditing or experience with mill processes and activities. or Successfully completed Environmental Management Systems ISO 14001 standard	Successfully completed IMS ISO 14001 Lead Auditor course.
Able to communicate in Bahasa Malaysia, English and / or any other local language.	Able to communicate in Bahasa Malaysia and English.

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Qualification of Team Members

Requirement	Assessor	Qualification	Compliance	
Post-secondary education, college or university diploma / degree in one of the following i) Agriculture; ii) Science & Technology (e.g. Environmental Sciences, Life Sciences, Geological Sciences, Natural Sciences,); iii) Engineering, Process Technology; iv) Energy Management, Quality Management; v) Social Sciences and/or Anthropology; vi) Business Management; or vii) Other relevant related fields	Muhammad Khairul Anuar Bin Azizul Hasan	Graduate in Applied Science (Major in Plantation and management).	Yes	
	Chan Shi Lie	Graduate in Technology Media (Major in Broadcasting)	Yes	
	Mohd Nur Amin Bin Mohd Halim	Graduate in Office Management & Technology.	Yes	
	Joseph Sim Siaw Seng	Graduate in Occupational Safety and Health Certificate	Yes	
	Jasmandy Bin Syahrul	Graduate in Plantation Management	Yes	
At least five (5) years of work experience in the oil palm sector or related field in consultancy / auditing of similar industry or equivalent related to and as necessary for the certification process. (e.g., sustainability, palm oil management; agriculture, ecology; social science)	Muhammad Khairul Anuar Bin Azizul Hasan	7 years working experience in palm oil estates.	Yes	
	Chan Shi Lie	6 years working experience in oil palm plantations.	Yes	
	Mohd Nur Amin Bin Mohd Halim	6 years 10 months of working experience in both upstream & downstream division on managing sustainability of oil palm industry.	Yes	
	Joseph Sim Siaw Seng	4 years working experience in oil palm plantations.	Yes	
	Jasmandy Bin Syahrul	9 years working experience in oil palm plantations.	Yes	
Successfully completed MPOCC endorsed lead auditor train	Muhammad Khairul Anuar Bin Azizul Hasan	Successfully completed MS2530 series of standard for Lead Auditors	Yes	
	Chan Shi Lie	Successfully completed MS2530 series of	Yes	

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Requirement	Assessor	Qualification	Compliance
		standard for Lead Auditors	
	Mohd Nur Amin Bin Mohd Halim	Successfully completed MS2530 series of standard for Lead Auditors	Yes
	Joseph Sim Siaw Seng	Successfully completed MS2530 series of standard for Lead Auditors	Yes
	Jasmandy Bin Syahrul	Successfully completed MS2530 series of standard for Lead Auditors	Yes
Conducted a minimum six (6) on-site audits for a total of at least 20 man-days of audit experience as an auditor-in-training under the direction and guidance of a qualified Lead Auditor for MSPO or equivalent sustainability certification schemes.	Muhammad Khairul Anuar Bin Azizul Hasan	Qualified and appointed as auditor for MS2530 Scheme.	Yes
	Chan Shi Lie	Qualified as auditor and Lead auditor for MS2530 scheme.	Yes
	Mohd Nur Amin Bin Mohd Halim	Qualified as auditor and Lead auditor for MS2530 scheme.	Yes
	Joseph Sim Siaw Seng	Qualified as auditor for MS2530 scheme.	Yes
	Jasmandy Bin Syahrul	Trainee auditor	Yes
Field working experience in the palm oil sector, or demonstrable equivalent	Muhammad Khairul Anuar Bin Azizul Hasan	7 years working experience in oil palm plantation.	Yes
	Chan Shi Lie	6 years working experience in oil palm plantations.	Yes
	Mohd Nur Amin Bin Mohd Halim	6 years 10 months of working experience in both upstream & downstream division on managing sustainability of oil palm industry.	Yes
	Joseph Sim Siaw Seng	4 years working experience in oil palm plantations.	Yes
	Jasmandy Bin Syahrul	9 years working experience in oil palm plantations.	Yes

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Requirement	Assessor	Qualification	Compliance
Good Milling Practices for example palm oil milling working experience or demonstrate equivalent.	Muhammad Khairul Anuar Bin Azizul Hasan	Qualified and appointed as auditor for MS2530 Scheme.	Yes
	Mohd Nur Amin Bin Mohd Halim	Qualified as auditor and Lead auditor for MS2530 scheme.	Yes
	Chan Shi Lie	Qualified as auditor and Lead auditor for MS2530 scheme.	Yes
	Joseph Sim Siaw Seng	Qualified as auditor for MS2530 scheme.	Yes
	Jasmandy Bin Syahrul	Trainee auditor	Yes
Successfully completed Quality Management Systems (QMS) ISO 9001 standard	Muhammad Khairul Anuar Bin Azizul Hasan	Successfully completed IMS ISO 9001 LA course.	Yes
	Chan Shi Lie	Successfully completed IMS ISO 9001 LA course.	Yes
	Mohd Nur Amin Bin Mohd Halim	Successfully completed IMS ISO 9001 LA course.	Yes
	Joseph Sim Siaw Seng	Successfully completed IMS ISO 9001 LA course.	Yes
	Jasmandy Bin Syahrul	Successfully completed IMS ISO 9001 LA course.	Yes
Health and safety auditing on the mill processes and activities Or Successfully completed Occupational, Health & Safety Management System ISO 45001 standard	Muhammad Khairul Anuar Bin Azizul Hasan	Successfully completed and ISO 45001 LA course.	Yes
	Chan Shi Lie	Successfully completed and ISO 45001 LA course.	Yes
	Mohd Nur Amin Bin Mohd Halim	Successfully completed and ISO 45001 LA course.	Yes
	Joseph Sim Siaw Seng	Successfully completed and ISO 45001 LA course.	Yes
	Jasmandy Bin Syahrul	Successfully completed and ISO 45001 LA course.	Yes
Workers welfare and social auditing experience	Muhammad Khairul Anuar Bin Azizul Hasan	Successfully completed SA 8000 Basic training	Yes

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Requirement	Assessor	Qualification	Compliance
or Successfully attended SA8000 or related social or ethical accountability codes	Chan Shi Lie	Successfully completed SA 8000 Basic training	Yes
	Mohd Nur Amin Bin Mohd Halim	Successfully completed SA 8000 Basic training	Yes
	Joseph Sim Siaw Seng	Successfully completed SA 8000 Basic training	Yes
	Jasmandy Bin Syahrul	Successfully completed SA 8000 Basic training	Yes
Environmental and ecological auditing or experience with mill processes and activities. or Successfully completed Environmental Management Systems ISO 14001 standard	Muhammad Khairul Anuar Bin Azizul Hasan	Successfully completed IMS ISO 9001, ISO 14001 and ISO 45001 LA course.	Yes
	Chan Shi Lie	Successfully completed IMS ISO 9001, ISO 14001 and ISO 45001 LA course.	Yes
	Mohd Nur Amin Bin Mohd Halim	Successfully completed IMS ISO 9001, ISO 14001 and ISO 45001 LA course.	Yes
	Joseph Sim Siaw Seng	Successfully completed IMS ISO 9001, ISO 14001 and ISO 45001 LA course.	Yes
	Jasmandy Bin Syahrul	Successfully completed IMS ISO 9001, ISO 14001 and ISO 45001 LA course.	Yes
Able to communicate in Bahasa Malaysia, English and / or any other local language.	Muhammad Khairul Anuar Bin Azizul Hasan	Bahasa Malaysia and English.	Yes
	Chan Shi Lie	Bahasa Malaysia, English and Mandarin.	Yes
	Mohd Nur Amin Bin Mohd Halim	Bahasa Malaysia, English	Yes
	Joseph Sim Siaw Seng	Bahasa Malaysia, English and Mandarin.	Yes
	Jasmandy Bin Syahrul	Bahasa Malaysia, English	Yes

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2. METHODOLOGY

The audit approach consists of the following steps:

- Appointment of team members;
- Contact client for relevant documentation according to the applicable MSPO standards;
- Audit planning;
- Background investigation, desk review of submitted documents;
- Assessment, inspections, interviews with operational personnel, stakeholders and its contractors; review of documentation;
- Reporting
- Resolution of non-conformance (NC) (if any)
- Draft audit reporting
- Technical review
- Final audit reporting
- Final approval, certification decision and issuance of certificate.

Annual Surveillance 03

Annual Surveillance 03 audit is conducted remotely on 05/11/2020 covers the following activities but not limited to below:

Remote:

- Confirmation of the appropriate interactive communication tools as describe in IAF MD4
- Virtual Review of documentation established but not limited to below
 - Policies
 - Mill location map
 - Land title(s) – for standalone mills
 - Standard Operating Procedures including Mill Operation Manual
 - Work Flow Charts
 - Management Plans
 - Operating licenses and approvals
 - Operating records
 - Training records
 - Applicable Legislation Documents
- Virtual inspection, observations and inspection of mill facilities and activities

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- Virtual interview operation personnel, operators for understanding for the work assigned;
- Reviewed revised and updated documentation established and implemented;
- Reports established;
- Work plans established;
- Review and closed out of non-conformance raised in last audit;
- Assessment reporting;

Remote Assessment

The audit of the mill is conducted according to the MS 2530-4: 2013 Part 4: General principles for palm oil mills.

The methodology for collection of objective evidences by means of virtual site inspection, observation of tasks and processes; interview workers and operation personnel; review of documentation and data. Checklists and questionnaires are used to guide the collection of information.

This remote audit is conducted in accordance to MPOCC Updated Circular (27 October 2020) Guidance on Remote Audits due to COVID-19 Pandemic on travelling restrictions.

The remote audit follow the IAF MD4:2018 and as guided by the ISO 9001 Auditing Practices Group Guidance on Remote Audits

The communication tool applied for remote audit are Zoom, WhatsApp and Telephone. The document review is based on the soft copy and photos format. The onsite inspection is based on photos and video format.

Non-conformance:

On the basis of the desk review, evidences presented during the audits as well as from the onsite visits non-conformance (NC) Major, Minor and Opportunity for Improvement (OFI) may be raised during the audit.

Major non-conformance shall be addressed and responded with 60 days from closing date of audit. For minor non-conformances and action plan to be submitted within 30 days from closing date of audit for review and acceptance. Implementation of Minor NC will be reviewed and verified during the next audit.

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3. ORGANISATION INFORMATION

Bukit Mas Palm Oil Mill is the subsidiary of Hap Seng Plantations (River Estates) Sdn Bhd located at Off 40km, Jalan Jeroco, Lahad Datu, Sabah, Malaysia

Bukit Mas CPO Mill met the Malaysia Palm Oil Board licensing requirements. The mill began operation in 15/04/1998 with an operating capacity of 45 MT per hour.

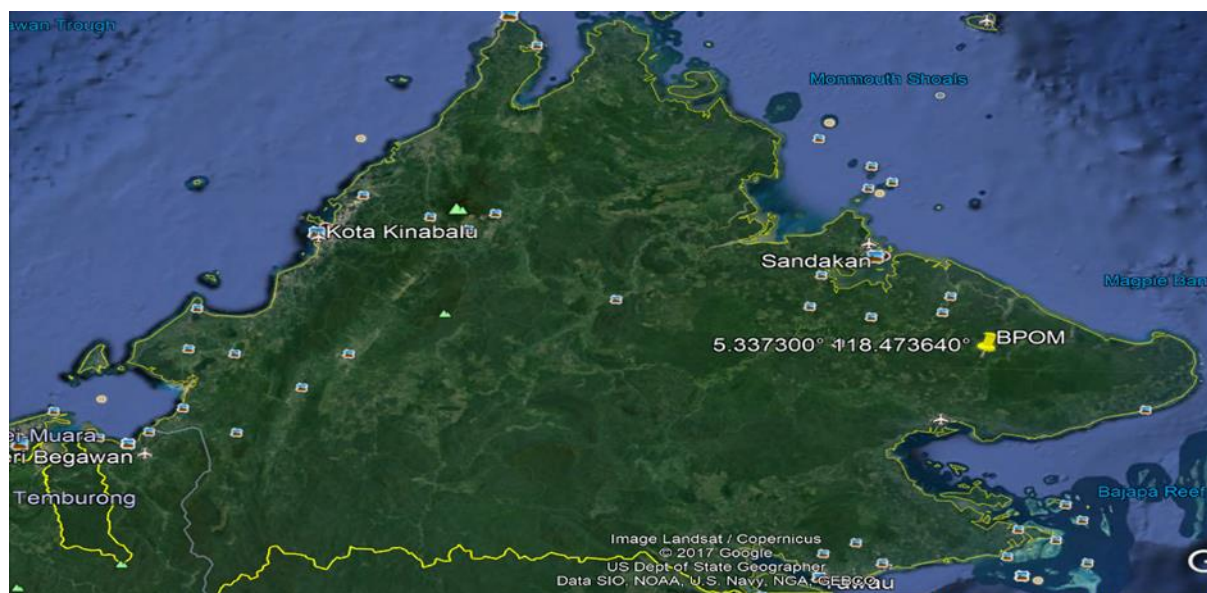
Name of Mill	Location	Coordinates
Bukit Mas POM	Off 40km, Jalan Jeroco, Lahad Datu, Sabah	N 5°20 14.28' E 118°28'25.104"

3.1. Production volume

Volume for the past year Jan 2019 to Dec 2019			Actual volumes Jan 2020 to Sep 2020			Projected volume Oct 2020 to Dec 2020		
FFB	CPO	PK	FFB	CPO	PK	FFB	CPO	PK
199,663.41	41,023.17	10,751.63	169,389.39	34,648.21	9,284.02	47,865.00	9,907.00	2,395.00

3.2. Mas of Mill Location

Figure 1



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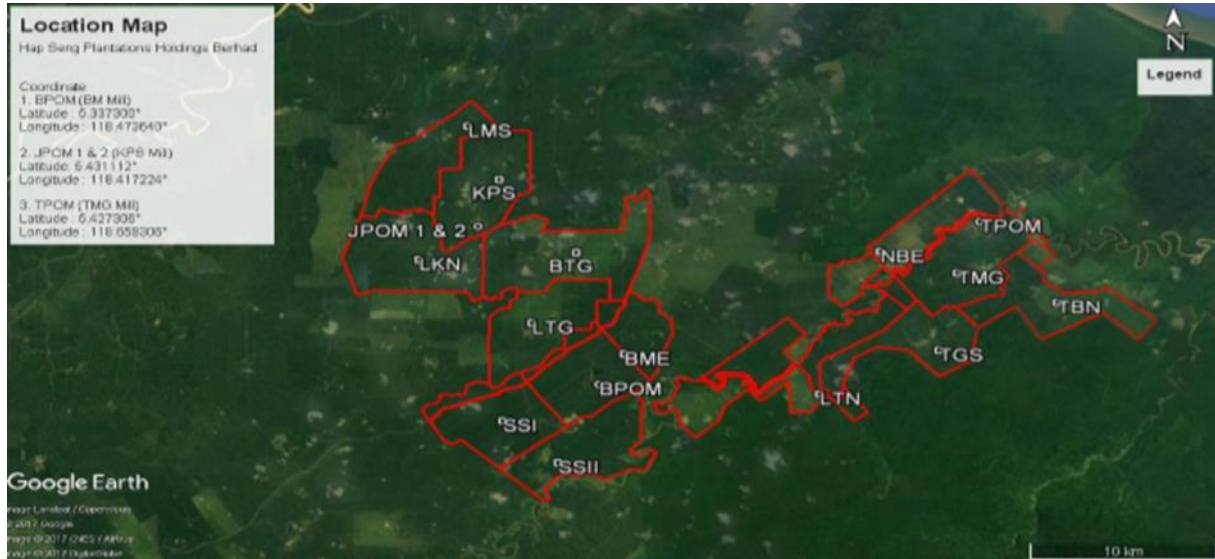
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Figure 2



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4. CERTIFICATION ASSESSMENT

4.1. Annual Surveillance 03

The objective of the audit is to assess the activities of the mill are in compliance with MS 2530-4: 2013 Part 4: General principles for palm oil mills.

4.1.1. Annual Surveillance 03 Audit:

Annual surveillance 03 audit is conducted on 05/11/2020.

During the last surveillance audit, there are 2 Major non-compliance and 4 Opportunities for Improvement (OFI) raised

During this audit, the major non-compliance raised in the last audit, the audit team has review by means of remotely inspection of mill, conduct interviews via telephone, review and verify documents that are established, corrected and implemented appropriately by the mill management. The corrective measures implemented could be verified as appropriate.

The major non-conformances raise during the audit are closed out by means of documents review that are establish, revised and implemented appropriately and preventive actions taken.

During the last surveillance audit, there are 0 Major, 0 Minor non - compliance and 3 Opportunities for Improvement (OFI) raised

For details of the assessment, refer summary of assessment for each indicator in section 4.3 of this report.

The number of audit findings raised in this audit refer to Section 4.6 of this audit report.

4.2. Stakeholders' Consultation

According to ACB – OPMC 4 Issue 2 dated 04/09/2020, Stakeholder Consultation Requirements Section 6: Consultation during audit, §6.1: During the stage 2 and recertification audit of the management unit, the CB shall carry out stakeholder consultation to ensure continued compliance with the requirements of the certification standards. However, stakeholders' consultation during surveillance audit may be limited to those stakeholders who have raised concerns, complaints or disputes prior to the audit.

The audit team leader has review the stakeholders' consultation feedback during the last surveillance audit and there are no concerns or complaints or disputes raised or any prior to this audit.

Therefore, there is no stakeholders consultation conducted for this surveillance audit

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4.3. Summary of Findings

Principle and Criteria Assessment Summary	
<p>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 where all criterions will be assessed. Evidences are sought for conformity with the MSPO 2530-4. The summary of the assessment can be seen below, where the "Findings/Comments" column reflects the findings in accordance with each indicator or evidences and when non conformity is found. Summary of the non-conformity can be found below</p>	

Principle 1: Management Commitment & responsibility		
Indicator	Summary of Assessment	Compliance
4.1.1.1	<p>BPOM adopted HSPHB group MSPO policy dated 01/10/2019 signed by Chief Executive Group Plantation and available in Bahasa Malaysia and English.</p> <p>During photo verification MSPO policy is publicly available at the mill notice board and company website.</p> <p>Briefing on the MSPO policy conducted on 04/07/2020 to the mill workers.</p> <p>During document review, MSPO briefing record conducted on 04/07/2020 is verified.</p> <p>During phone call interview with workers, they are aware of the MSPO policy.</p>	Yes
4.1.1.2	<p>BPOM adopted HSPHB group MSPO policy dated 01/10/2019 signed by Chief Executive Group Plantation.</p> <p>The policy states the company committed to continual improvement practice by harnessing its resources of people processes and technology in order to ensure the continuous production of oil palm products in a sustainable manner.</p>	Yes
4.1.2.1	<p>BPOM adopted HSPHB group Internal Audit procedure 'Flowchart for Internal Audit System & Management Review Report' updated on 10/07/2019.</p> <p>Internal audit conducted once a year and latest internal audit conducted on 08/01/2020 – 09/09/2020 which 5 findings raised.</p> <p>Example:</p> <p>Findings: Person in-charge for receive and respond the record request is not appointed.</p> <p>Correction: Appointment letter and job scope is issued to person in-charge</p> <p>Corrective action: Mill management will update the person in-charge if there are change in the mill organization.</p> <p>Status: Completed</p>	Yes

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Principle 1: Management Commitment & responsibility		
Indicator	Summary of Assessment	Compliance
	Review the appointment letter dated 17/02/2020 mill manager is the appointed person in-charge to receive and respond the request.	
4.1.2.2	<p>BPOM adopted HSPHB group Internal Audit procedure 'Flowchart for Internal Audit System & Management Review Report' updated on 10/07/2019.</p> <p>Internal audit identified the weak point, root cause, correction and corrective action plan.</p> <p>Example:</p> <p>Finding: Fire certificate is expired</p> <p>Root cause: Waiting from BOMBA visit</p> <p>Corrective action plan: Mill Management will annually update on fire certificate once obtained the approved certificate</p> <p>Status: Still waiting for BOMBA visit</p> <p>During document verification latest follow up with BOMBA dated 15/10/2020 by phone call.</p> <p>Results of the internal audit are documented.</p>	Yes
4.1.2.3	BPOM internal audit results are discussed during management review meeting on 25/02/2020.	Yes
4.1.3.1	<p>BPOM conduct the management review meeting on 25/02/2020 include internal audit result.</p> <p>The meeting conducted once a year after the internal audit conducted.</p> <p>The meeting agenda includes:</p> <ol style="list-style-type: none"> 1. Follow-up actions from earlier management review 2. Sustainability and adequacy of all SOP's 3. Sustainable agriculture policy 4. Results of internal & external audit 5. Changes in legal requirement of any compliance 6. Changes that could affect RSPO/ MSPO/ ISCC/ SCCS management system 7. Complaints/ Customer Feedback (Internal & External) 8. Accident & injury (LTA) 9. Environmental quality 10. Waste management 11. Energy usage performance 12. Process performance and product conformity 13. Status of Corrective Actions 	Yes

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Principle 1: Management Commitment & responsibility		
Indicator	Summary of Assessment	Compliance
	<p>14. Recommendation for Improvement</p> <p>15. Improvement of the effectiveness of the RSPO/ MSPO/ ISCC/ SCCS and management system</p> <p>16. Resources needed</p> <p>Example: Agenda no. 7: Complaints / Customer Feedback (Internal & External)</p> <p>Status: No complaint received from both internal and external stakeholders.</p>	
4.1.4.1	<p>BPOM established Continual Improvement Plan (CIP) updated on 30/04/2020 which includes topics on Social and Welfare, Pesticides, Environmental, Pollution and Emission, Waste Reduction and Safety and Health.</p> <p>CIP table includes improvement action, expected outcome, timeframe, review and monitor, location and responsibility.</p> <p>Example: Pollution and Emissions</p> <ul style="list-style-type: none"> • Improvement action: Annual training of SOP for each working unit • Expected outcome: Annual training conducted • Time-frame: Annually • Review and monitor: Training record of SOPs <p>Review on the annual training program for 2020 has includes training for each working station.</p> <p>Example:</p> <p>Work station: Workshop</p> <p>Date: 06/02/2020</p>	Yes
4.1.4.2	<p>BPOM adopted HSPHB group system to improve practices in line with new information and techniques or new industry standards and technology dated 08/01/2019.</p> <p>The system states, budget and training will be provided for any new technology implemented.</p>	Yes

Principle 2: Transparency		
Indicator	Summary of Assessment	Compliance
4.2.1.1	<p>BPOM adopted HSPSB group procedure for the Stakeholders Consultation Procedure – Group Level and Estate Level / Mill Level dated 30/11/2018.</p> <p>BPOM conducted in Mill Level - Joint Consultative Committee (JCC) meeting dated 21/02/2020 to communicate with internal stakeholders.</p>	Yes

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Principle 2: Transparency		
Indicator	Summary of Assessment	Compliance
	<p>The agenda includes:</p> <ul style="list-style-type: none"> • Pengenalan MSPO, RSPO & ISCC. • Pengenalan Polisi and Prosedur Syarikat. • Lain – lain hal. <p>Reviewed the BPOM JCC minute meeting has includes environmental, social, safety and COVID Pandemic.</p> <p>The meeting attended by mill managements and mill employees.</p>	
4.2.1.2	<p>BPOM adopted HSPSB group list of publicly available documents updated on 01/01/2020.</p> <p>Example of documents publicly available are:</p> <ul style="list-style-type: none"> • HSPHB Annual Report • Social Impact Assessment • Water Management Plan <p>Example of confidential documents are:</p> <ul style="list-style-type: none"> • Annual Budget • Business Plan <p>Remote photo verification confirmed the HSPHB Annual Report, Company Policies and Sustainability Report are publicly available at the mill notice board and company website.</p> <p>Phone call interview with mill engineer informed the Annual Budget and Business Plan are confidential documents and will be share to third party upon request and approval from top management.</p>	Yes
4.2.2.1	<p>BPOM adopted HSPSB group procedure for the Complaint & Grievances Procedure dated 31/3/2018 and “Memohon Maklumat Syarikat” procedure dated 01/01/2020.</p> <p>Reviewed on the Complaint & Grievances Logbook and “Permohonan Maklumat” Logbook, all the complaint, grievances and request are documented and resolve within 30 days.</p> <p>Complaint & Grievances Procedure and “Memohon Maklumat Syarikat” Procedure have been communicated to internal stakeholders and external stakeholders during the stakeholders consultation meeting dated 21/02/2020.</p>	Yes
4.2.2.2	<p>Remote documents reviewed on appointment letter confirmed BPOM Senior Mill Manager appointed as the person in-charge for communication and consultation.</p>	Yes
4.2.2.3	<p>BPOM established List of Stakeholders dated 01/09/2020 includes government agencies, NGOs, internal stakeholders, local villages, neighboring estates, suppliers and contractors.</p>	Yes

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Principle 2: Transparency		
Indicator	Summary of Assessment	Compliance
	<p>The grievances procedure included the timeframe for action to be taken within 30 days for both internal and external stakeholders.</p> <p>Remote document reviewed on the JCC minute meeting, no feedback from stakeholders.</p>	
4.2.3.1	<p>BPOM adopted HSPSB group procedure for Traceability as follows:</p> <ul style="list-style-type: none"> Chapter 3 "Delivery and Reception of CSFFB, In-House and Non-In-House FFB" updated 15/05/2019. Chapter 4 "Dispatch of CSPO and CSPK from the mill to the refinery/ bunk transit installation/ buyer's vessel" updated 15/05/2019. Chapter 5 "Monitoring of CSPO and CSPK Sales" updated 15/05/2019. <p>Example of documents for receiving FFB, delivery of CPO and PK are:</p> <ul style="list-style-type: none"> FFB Weighbridge Ticket from mill CPO & PK Delivery Notes from mill CPO & PK Weighbridge Ticket from mill Receiving Note of CPO & PK from refinery <p>Remote documents review on the records of FFB weighbridge ticket, CPO & PK delivery notes, weighbridge ticket from mill and receiving notes of PK & CPO from refinery confirmed the traceability system of BPOM is well maintained.</p> <p>Phone call interview with weighbridge clerks informed they understand the traceability procedure and well maintained.</p>	Yes
4.2.3.2	<p>BPOM adopted HSPSB group procedure for Traceability dated 15/05/2019.</p> <p>Internal audit conducted on 08/01/2020 to 09/01/2020 as a mechanism to inspect the traceability system.</p> <p>Reviewed on internal audit results, there are no findings raised on traceability.</p> <p>BPOM Senior Mill Manager monitors the traceability system on a monthly basis.</p>	Yes
4.2.3.3	<p>Remote document reviewed on appointment letter confirmed Senior Mill Manager appointed as the person in-charge for traceability.</p>	Yes
4.2.3.4	<p>BPOM maintains records of storage, sales and delivery on daily basis.</p> <p>Delivered palm products are traceable to contracts and crosscheck with delivery notes and weighbridge tickets issued from mill against weighbridge tickets from buyers.</p>	Yes

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Principle 2: Transparency		
Indicator	Summary of Assessment	Compliance
	<p>Reviewed of weighbridge ticket for FFB received, PK and CPO dispatch, the ticket date, ticket no., vehicle no., contract no., product and weight are included in the ticket.</p> <p>Phone call interview with weighbridge clerks informed all weighbridge tickets are kept in the mill office and kept for minimum of 5 years.</p>	

Principle 3: Compliance to legal requirements		
Indicator	Summary of Assessment	Compliance
4.3.1.1	<p>BPOM established List summary of licenses and permits with validity period.</p> <p>Example of the licenses and permits as below:</p> <ul style="list-style-type: none"> • MPOB license no: 500254304000, with validity until 31/03/2021. • 'Permit Barang Terkawal Berjadual' with validity until 02/07/2021. • 'Lesen Berniaga' with validity until 31/12/2020 <p>Reviewed and checked on the list of licenses and permits expiry date all are within the validity date.</p> <p>Further verification with actual photos of licenses and permits confirmed within the validity date.</p>	Yes
4.3.1.2	<p>BPOM established Legal Register updated on 13/05/2020.</p> <p>Example:</p> <ol style="list-style-type: none"> 1. FM (Noise Exposure) (Revocation) 2019 2. OSH (Noise Exposure) Regulation 2019 3. Social Security Organization Act 1969 (Act 4) - SOCSO Foreign Workers Coverage 4. Minimum Wages Order 2020 5. Prevention and Control of Infectious Disease Act 1988 (amendment 2020). 	Yes
4.3.1.3	<p>BPOM established Legal Register for estates and mills updated on 13/05/2020. The list includes 44 chapter of law or act applicable.</p> <p>The procedure "Mechanism For Tracking Any Changes In Law" dated 25/06/2015 is available.</p> <p>The list will be updated as and when new legislations are released.</p> <p>Example updated of laws and regulations:</p> <ol style="list-style-type: none"> 1. Workers Minimum Wages Order 2020 updated on 01/01/2020. 2. Prevention and Control of Infectious Disease Act 1988 (Amendment 2020) updated on 13/05/2020. 	Yes

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Principle 3: Compliance to legal requirements		
Indicator	Summary of Assessment	Compliance
	Phone call interview with assistant manager and workers informed they are aware of applicable laws and regulations.	
4.3.1.4	BPOM appoints Senior Mill Manager as person in charge to monitor on compliance and update changes of laws and regulations at mill.	Yes
4.3.2.1	BPOM is located within Bukit Mas estate, reviewed on estate map and land title verify the location of BPOM. Therefore does not diminish the land used rights of other users.	Yes
4.3.2.2	BPOM is located within Bukit Mas estate. Bukit Mas estate is owned by HSPHB with the land title is county lease of land tenure 99 years.	Yes
4.3.2.3	The land title include Bukit Mas estate map. BPOM established layout map of mill and located in Bukit Mas estate.	Yes
4.3.2.4	BPOM is located within Bukit Mas estate and does not border with other estates. Therefore no issue of land dispute or encroachment.	Yes
4.3.3.1	BPOM is located within the Bukit Mas estate. Thus, no encroachment of land.	Yes
4.3.3.2	BPOM is located within Bukit Mas estate. The estate map is review to confirm the mill location.	Yes
4.3.3.3	BPOM is located within Bukit Mas estate and no issue of land dispute or encroachment. Thus, no FPIC required.	Yes

Principle 4: Social Responsibility, health, safety and employment conditions		
Indicator	Summary of Assessment	Compliance
4.4.1.1	<p>BPOM established Social Impact Assessment (SIA) includes information from the survey and meeting feedback from the internal and external stakeholders.</p> <p>The SIA established for Sg Segama Group of Estates and Bukit Mas Palm Oil Mill updated on 01/03/2020</p> <p>The SIA report includes both positive and negative impacts and time frame for monitoring the completion</p> <p>The SIA will be reviewed once a year with feedback from the stakeholders.</p> <p>Example:</p> <p>Positive impacts: Selesa di tempat tinggal</p> <p>Action Plan: Continue to maintain welfare to workers community</p> <p>Photo review verify BPOM adopted best practices for living quarters, Document review, BPOM conduct housing inspection every 2 weeks with latest conducted on 29/10/2020</p>	Yes

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Principle 4: Social Responsibility, health, safety and employment conditions		
Indicator	Summary of Assessment	Compliance
4.4.2.1	<p>BPOM adopted Complaint and Grievance procedure document no.ref: HSPSB P1 1120 with latest reviewed on 31/03/2018. This procedure is applied to all estates and mills under HSPSB.</p> <p>The timeline describe in the procedure that complaint will be solve within 30 days from the date received.</p> <p>The procedure describe that the assistant manager should solve the complaint received within 2 days after the complaint received. While assistant manager is not authorized solve the complaint, the complaint will bring to manager to solve in 3 days.</p> <p>Photo review verify complaint forms available at mill office and security main gate.</p>	Yes
4.4.2.2	<p>BPOM established complaint form for Internal and External stakeholders.</p> <p>Review on complaint form verify no complaint lodged.</p>	Yes
4.4.2.3	<p>BPOM established complaint form for Internal and External stakeholders.</p> <p>Photo review verify the complaint form available at BPOM main office and security main gate.</p>	Yes
4.4.2.4	<p>BPOM conduct briefing on compliant procedure to staffs and workers conducted on 24/09/2020</p> <p>BPOM conduct briefing on compliant procedure to stakeholders dated on 21/02/2020. Stakeholders invited are the SK Litang and grocery shop.</p> <p>Phone call interviewed workers informed they are aware and understand on procedure to lodge complaint to the mill management.</p>	Yes
4.4.2.5	<p>BPOM established complaint log book for internal and external stakeholders.</p> <p>Document reviewed on complaint form, BPOM maintain the records for 2018 and 2019. Verify no complaint lodged from 2018 until the audit date.</p>	Yes
4.4.3.1	<p>BPOM has provide job opportunity to local communities by hiring workers, security guards, office staffs, drivers and storekeeper.</p> <p>Mill canteen operate by local communities.</p>	Yes
4.4.4.1	<p>BPOM adopted HSPHB group Safety and Health Policy dated 01/04/2015 signed by Chief Executive Group Plantation.</p> <p>The policy statement committed to ensure and promote a harmonious, safe and healthy work environment for all its employees.</p> <p>Remote pictorial verification confirmed Safety and Health Policy is available at mill notice board and company website.</p> <p>Remote documents reviewed on training record confirmed Safety and Health Policy briefing conducted to internal stakeholders during JCC Meeting dated 21/02/2020.</p>	Yes

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Principle 4: Social Responsibility, health, safety and employment conditions			
Indicator	Summary of Assessment	Compliance	
4.4.4.2	a	<p>Remote pictorial verification confirmed Safety and Health Policy is displayed at the mill, labor quarters and operational areas notice boards in dual languages Bahasa Malaysia and English.</p> <p>The Safety and Health Policy briefing conducted to internal stakeholders during JCC meeting dated 21/02/2020.</p> <p>Phone call interview with mill workers informed they understand and aware of company Health and Safety Policy.</p>	Yes
	b	<p>HIRARC is established for respective operation activities applicable to the mill based on the risk assessment table for BPOM and updated on 01/06/2020.</p> <p>The table with headings: Activity, Hazard, Risk and Effects, Initial Risk Assessment (Consequences, Likelihood, Risk Risking), Risk Control (Existing Control, PIC), Risk Assessment after Control (Consequences, Likelihood, Risk rating, Description) and Date Review.</p> <p>Example: Biogas Plant</p> <p>Activity: Cleaning / Maintenance MUW Tank</p> <p>Hazard: Confined Space</p> <p>Causes and Effect: Fatalities</p> <p>Existing Risk Control: SOP, Self-Contained Breathing Apparatus, gas tester, safety helmet, first aid kit, safety vest, safety harness, Confine Space Work Permit, ventilation fan, competent Authorized Gas Tester & Authorized Entrant & Standby Person.</p> <p>Likelihood, Severity & Risk Rating: L-4, S-4, R-16 high risk</p> <p>Recommended Control Measure: Refresher training for Issuance of Permit to Work, Confined Space SOP, authorized Gas Tester & Authorized Entrant & Standby Person.</p> <p>PIC, Due Date, Status: Executive In-charge Biogas Plant, 01/07/2020, Done.</p> <p>Remarks: One fatality occur on 07/05/2020</p> <p>Remote documents reviewed on training records confirmed biogas plant operators are briefed on the risk of maintenance or cleaning MUW Tank.</p> <p>Phone call interview with biogas plant operators informed they understand the risk of specific task.</p>	Yes
	c. i	<p>BPOM established Occupational Safety & Health Programme Year 2020 which includes the workplace inspection, training program and medical surveillance.</p> <p>Example of trainings conducted for safe work practices are:</p>	Yes

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Principle 4: Social Responsibility, health, safety and employment conditions		
Indicator	Summary of Assessment	Compliance
	<ul style="list-style-type: none"> Safe Standard Operating Procedure “SSOP Memasuki Ruang Terkurung” training conducted on 15/06/2020 to mill operators. “Pelan Tindakan Kecemasan” training conducted on 27/07/2020 to mill worker. <p>Phone call interview with mill operators informed they understand the safe work practices of their individual task.</p>	
c. ii	<p>Remote pictorial verification confirmed SDSs for chemicals and lubricants are available at mill office and storage facilities of chemicals, lubricants, boiler station, water treatment plant, kernel plant and workshop.</p> <p>Example:</p> <ul style="list-style-type: none"> Chemical Calcium Carbonate revision date 25/05/2017. <p>SDS available in dual language, English and Bahasa Malaysia.</p> <p>Remote pictorial verification confirmed chemicals and lubricants are in original label packaging and stored in proper storage facilities with sufficient ventilations.</p>	Yes
d	<p>BPOM established records of PPEs issuance and review on the records are maintained and updated.</p> <p>Type of PPE for activity in accordance to HIRARC and CHRA assessment is conducted on 14/05/2019.</p> <p>Example: Mixing Calcium Carbonate at Claybath</p> <p>PPE: Leather gloves, safety vest, safety helmet, dusk mask and safety boots.</p> <p>Phone call interview with mill operators informed they are provided with PPE such as earplug, safety shoes and safety helmet for general works.</p>	Yes
e	<p>BPOM adopted HSPHB group Safe Standard Operating Procedure (SSOP) ‘Pengendalian Bahan Kimia’ for all the mill operation activities that handling and storage of chemicals.</p> <p>SSOP “Pengendalian Bahan Kimia (WTP, Boiler & Lab)” briefed to mill workers on 24/09/2020.</p> <p>All chemical products are store in original label and packaging.</p>	Yes
f	<p>Remote documents reviewed on appointment letter confirmed BPOM Senior Mill Manager appointed as the person in-charge for safety and health.</p>	Yes
g	<p>Safety and Health Committee is established for BPOM represented by both management representatives and worker representatives.</p>	Yes

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Indicator	Summary of Assessment	Compliance
	<p>BPOM conducted Safety and Health Committee (SHC) meeting on a quarterly basis dated 09/03/2020, 27/06/2020 & 25/09/2020 respectively.</p> <p>Remote documents reviewed on minute meeting confirmed the agenda discuss in meeting are PPE usage, Covid-19 Pandemic, accident and injury records.</p>	
h	<p>BPOM established Emergency Response Procedure with list of emergency contact persons and emergency contact numbers and emergency evacuation plan.</p> <p>The Emergency Response Procedure and emergency contact details are displayed on the notice board at mill office.</p> <p>Emergency Response Procedure training conducted for mill workers dated 27/07/2020.</p> <p>Phone call interview mill workers informed they understand the emergency response plan.</p>	Yes
i	<p>BPOM assigned mill workers to attend the First Aid Training conducted by Malaysian Red Crescent Sandakan dated 07-08/03/2020.</p> <p>For example:</p> <ul style="list-style-type: none"> 7 employees attended the first aid training and appointed as first aider. <p>Remote pictorial verification confirmed the list of first aiders displayed at mill office notice boards.</p> <p>First aid kits available at workshop, stores and mill office manage by trained first aider.</p>	Yes
j	<p>BPOM established monthly Accident KPI to monitor the accidents and injuries record.</p> <p>Reviewed on the accident and injury record, there is one accident with 2 days medical leave and one fatality case reported until audit date and the records are well maintained.</p> <p>JKKP 6 form of the fatality case have been submitted to DOSH on 20/05/2020. DOSH issued one NOP and 3 NOI and all the notices issued are closed by BPOM management. All the corrective actions and preventive action have been taken by BPOM to prevent the accident happen again.</p> <p>Annual Accident Report for year 2019 submitted to DOSH dated 14/01/2020 with one accident case and one occupational disease (hearing impairment) case.</p> <p>Remote documents reviewed on training records and audiometric test report confirmed BPOM conducted "Road Safety, Hearing Conservation, High Conservation Value and Rare, Threatened & Endangered Species" to all the mill workers dated 11/06/2020 and</p>	Yes

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Principle 4: Social Responsibility, health, safety and employment conditions		
Indicator	Summary of Assessment	Compliance
	continuing the annual audiometric testing to workers who exposed to noise.	
4.4.5.1	<p>BPOM adopt Human Right Policy established by HSPHB dated 01/10/2016 signed by Chief Executive Group Plantation.</p> <p>Photo reviewed verify the policy publicly available at the notice board in both Bahasa Malaysia and English languages.</p> <p>Briefing on Human Rights Policy to stakeholder conducted on 21/02/2020. Stakeholders invited are representative SK Litang and representative grocery shop.</p> <p>Briefing on Human Rights Policy to staffs and workers conducted on 24/09/2020</p> <p>Agenda of meeting include MSPO introduction, company policies, social issues raised, complaint and grievance and question & answer</p> <p>Document review, verify no issue is raised related the human right during external stakeholders meeting dated 21/02/2020.</p> <p>Phone call interview workers informed they are aware and understand their right as workers.</p>	Yes
4.4.5.2	<p>BPOM adopted the Equal Opportunity Policy established by HSPHB dated 01/03/2019 signed by Chief Executive Group Plantation.</p> <p>The policy states HSPHB shall ensure the hiring, remuneration, access to training, promotion, termination or retirement will be implemented based on business needs, job requirements and individual qualifications regardless to race, religion, gender, ethnic origin, social class, caste, national origin, affiliation or any other distinguishing characteristic.</p> <p>Document review verify briefing record for Equal Opportunity Policy to staffs and workers conducted on 13/09/2020.</p> <p>Document review, no complaints records on discriminatory issue lodged from internal and external stakeholders as at audit date.</p> <p>Phone call interview workers inform no discrimination cases reported from their workplace.</p>	Yes
4.4.5.3	<p>BPOM adopted HSPHB contract agreement for workers in accordance with Sabah Labour Ordinance.</p> <p>Document review on contract agreement verify RM1,100 per month and RM42.31 per day. Pay slip review and verify daily rate comply with Minimum Wages Order 2018.</p> <p>The collective agreement are in Bahasa Malaysia language version and understand by the Indonesia mill operators.</p> <p>Briefing on wages and salary to staffs and workers conducted on 24/09/2020.</p> <p>Phone call interview with workers they are aware on the contract agreement signed.</p>	Yes

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Principle 4: Social Responsibility, health, safety and employment conditions		
Indicator	Summary of Assessment	Compliance
	<p>Phone call interview workers are aware on the contract agreement signed</p> <p>Phone call interview workers mutually agreed with daily rate as describe in the contract agreement.</p> <p>Document review pay slip, deduction on electricity and passport renewal made are in line with Deduction Permit from Jabatan Tenaga Kerja.</p>	
4.4.5.4	<p>BPOM engage contractor for transport for dispatch CPO and PK</p> <p>The transporter paid their drivers on monthly basis.</p> <p>Document review on payslip, contractor workers are paid based on fixed monthly rate agreeable by contractor and workers.</p>	Yes
4.4.5.5	<p>GPOM established workers list contain worker name, gender, date of birth, date joined, type of work, wages and period of employment.</p>	Yes
4.4.5.6	<p>BPOM adopt HSPHB contract agreement for workers and signed by workers and mill management.</p> <p>The contract agreement is in Bahasa Malaysia language which can be understand by worker.</p> <p>Verify the copy of contract agreement and signed the workers and mill management.</p> <p>Phone call interview with workers informed they are briefed on the contract terms and conditions and received a copy after signed.</p>	Yes
4.4.5.7	<p>BPOM established thumb print system used to record attendance of workers.</p> <p>Photo review verify working hours displayed at the notice board.</p> <p>Phone call interview workers inform they understand the working hours and overtime.</p> <p>Document review verify briefing record for working hour and overtime to workers conducted on 24/09/2020</p>	Yes
4.4.5.8	<p>BPOM established the working hour and break time as below.</p> <p>Office working hours:</p> <p>Working hours: 7:00 a.m – 4.00 p.m</p> <p>Rest hours: 12:00 p.m -1:00 p.m</p> <p>Shift:</p> <p>Morning shift: 7.00 a.m – 4.00 p.m</p> <p>Afternoon shift: 4.00 p.m – 12.00 p.m</p> <p>Rest hour: 1 hour for each shift.</p> <p>Review on pay slip, overtime rate of 1.5 for normal overtime and 2.0 for rest day overtime are comply with legal requirement..</p>	Yes

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Principle 4: Social Responsibility, health, safety and employment conditions		
Indicator	Summary of Assessment	Compliance
	Phone call interview workers feedback they understand the working hours and overtime.	
4.4.5.9	BPOM adopt HSPHB payslip as record to documents the wages and overtime of the workers. Review on payslip for September 2020, rate are RM42.31 per day paid to workers for holiday and sick leave as describe in contract agreement. Phone call interviewed verify, workers informed the salary paid in line with legal requirement.	Yes
4.4.5.10	BPOM provide benefits to workers such as medical care, SOCSO and incentives. Phone call interview workers informed they are provided with the benefits. .	Yes
4.4.5.11	BPOM adopted industry best practices for housing. Phone call interview workers informed they are provided with water tanks, electricity, chapel, surau, clinic, grocery store housing, electricity and water supply.	Yes
4.4.5.12	BPOM adopt HSPBH group Sexual Harassment, Violence and Abuse Policy dated 20/11/2017 signed by Chief Executive Group Plantation. BPOM established Gender Community consist of workers and staff representatives. Photo review verify the policy publicly available at mill notice board. Phone call interview female general workers informed they are aware on sexual harassment and violence policy implement at their workplace. They inform no related cases lodged. Document review verify briefing record of sexual harassment policy to workers conducted on 24/09/2020.	Yes
4.4.5.13	BPOM adopt HSPHB group Freedom Of Association And Right To Collective Bargaining policy dated 01/03/2019 signed by Chief Executive Group Plantation. The policy states HSPHB shall recognize and respects the rights of employees to join trade unions of their choice and bargain collectively subject to the provisions of relevant national legislation. Briefing on Freedom of Association and Foreign worker policies to staffs and workers conducted on 24/09/2020. Document review and phone call interview confirm no trade union form by workers at BPOM. JCC committee established to discuss on workers issues. JCC meeting conducted on 21/02/2020 involved management and worker representatives.	Yes

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Principle 4: Social Responsibility, health, safety and employment conditions		
Indicator	Summary of Assessment	Compliance
	<p>Meeting agenda discuss include company policies, safety and health, environment, housing hygiene, complaint discussion and other matter arise.</p> <p>Phone call interview workers informed they attended JCC meeting as workers representatives.</p>	
4.4.5.14	<p>BPOM adopt HSPHB group Child Labour Policy dated 02/01/2017 signed Chief Executive Group Plantation.</p> <p>Briefing on Child Labour Policy to staffs and workers conducted on 24/09/2020.</p> <p>Review on the workers list, verify the workers are above the minimum age of employment is based on passport and date of birth updated November 2020.</p>	Yes
4.4.6.1	<p>BPOM established annual training and briefing programme updated on October 2020 verified by the Mill Manager.</p> <p>Example of training conducted for 2020:</p> <ul style="list-style-type: none"> • Emergency Respond Plan dated 27/07/2020 • HCV & RTE dated 11/06/2020 • COVID-19 dated 04/07/2020 • Noise dated 11/06/2020 	Yes
4.4.6.2	<p>BPOM established training programme based on job description and work station of the workers.</p> <p>Example of the training conducted:</p> <ul style="list-style-type: none"> • Store attendant dated 20/06/2020 • Workshop apprentice dated 06/02/2020 • Welder dated 16/03/2020 	Yes
4.4.6.3	<p>BPOM established continuous training program for year 2020.</p> <p>Example:</p> <ul style="list-style-type: none"> • First Aid in November • Waste Management and MSPO briefing in December 	Yes

Principle 5: Environment, natural resources, biodiversity and ecosystem services		
Indicator	Summary of Assessment	Compliance
4.5.1.1	<p>BPOM adopted HSPHB group Environment Policy dated 15/11/2018 signed by Chief Executive Group Plantation.</p> <p>The policy describes:</p>	Yes

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Principle 5: Environment, natural resources, biodiversity and ecosystem services		
Indicator	Summary of Assessment	Compliance
	<ul style="list-style-type: none"> Establish appropriate infra structures and responsibility for environmental affairs within our organizations and carry out appropriate and routine assessment and reporting procedures on such matters. Complying with all relevant environmental legislation of the country. <p>Remotely review BPOM Environment Impact Assessment, Management Action Plans and Continuous Improvement Plans dated 01/03/2020. The EIA included the relevant environmental legislation of the country.</p> <p>Phone call Interviewed workers are aware and understand company environmental policy</p>	
4.5.1.2	a	Yes
	b	Yes

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Principle 5: Environment, natural resources, biodiversity and ecosystem services		
Indicator	Summary of Assessment	Compliance
	<p>6. Smoke emissions from mill stack and vehicles.</p> <p>7. Biogas Plant</p> <p>Example:</p> <p>Aspect : Scheduled Waste</p> <ol style="list-style-type: none"> SW 305 Lubricant SW 306 Hydraulic <p>Impact:</p> <ol style="list-style-type: none"> Indiscriminate throwing and spillages of spent oil causes pollution to soil and waterways. <p>Plan and monitoring programs:</p> <ol style="list-style-type: none"> All scheduled wastes are properly arranged inside the schedule waste store. Containment trays are used to contain any leaking oil during vehicle repair or servicing. <p>Continuous improvement plan</p> <ol style="list-style-type: none"> e-SWIS monitoring at monthly basis <p>Responsibility: Mill manager / mill assistant</p> <p>Timeframe: Established and continues monitored</p> <p>Remarks: Environmental Quality (Schedule Wastes) Regulation 2005</p> <p>Remotely reviewed the e-SWIS monitoring record photos for month of October 2020.</p> <p>Remote video observation confirmed the scheduled waste store is manage properly and all scheduled wastes are label and stored separately.</p>	
4.5.1.3	<p>BPOM Environmental Impact Assessment, Management Action Plan and Continuous Action Plan dated 01/03/2020 included list of activities, aspects, impacts towards environment, action plan and improvement plan.</p> <p>Example:</p> <p>Aspect: Scheduled Waste Production.</p> <p>Impacts: Indiscriminate throwing and spillages of spent oil causes pollution to soil and waterways.</p> <p>Action Plans: All scheduled wastes are properly arranged inside the schedule waste store, regular inspection of the schedule waste store and oil traps by the workshop supervisor. Cleaning is done whenever necessary</p> <p>Continuous Improvement Plan: e-SWIS monitoring at monthly basis.</p>	Yes

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Principle 5: Environment, natural resources, biodiversity and ecosystem services		
Indicator	Summary of Assessment	Compliance
	<p>Responsibility: Mill manager / mill assistant</p> <p>Timeframe: Established and continues monitored</p> <p>Remarks: Environmental Quality (Schedule Wastes) Regulation 2005</p> <p>Remotely reviewed the e-SWIS monitoring record for month of September 2020.</p> <p>Remote video observation confirmed the scheduled waste store are manage properly and all scheduled wastes are label and stored separately.</p>	
4.5.1.4	<p>BPOM established Environmental Impact Assessment, Management Action Plans and CIP include promote positive impact.</p> <p>Example:</p> <p>Environmental Aspect: Empty fruit bunch (EFB) (mill waste product) produced from the operations</p> <p>Environmental Impacts: Positive Impacts: Organic fertilizer for oil palm plantation</p> <p>Action Plans: Plans and monitoring programme: Regular delivery to nearest estate for application</p> <p>Continuous Improvement Plan: Estate to let Agronomist know on EFB applied and to reduce fertilizers accordingly on a yearly basis.</p> <p>Responsibility: Admin Manager</p> <p>Timeframe: Established and continually improvement</p> <p>Remotely reviewed the EFB delivery record to the Sungai Segama estate for month of November 2020.</p>	Yes
4.5.1.5	<p>BPOM training program is established on 02/01/2020 include environment training and policy.</p> <p>Example training:</p> <ul style="list-style-type: none"> • EIA awareness on water management conducted on 16/03/2020. • EIA awareness on Management and handling of mill waste conducted on 13/07/2020. <p>Phone call interview workers are aware and understand company environmental policy, water and chemical handling SOP and zero burning.</p>	Yes
4.5.1.6	<p>BPOM most recent environmental meeting conducted on 25/09/2020. According to records meeting will be held once every 3 months and involve the workers.</p> <p>Remotely reviewed the environmental minute meeting dated 25/09/2020</p>	Yes

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Certifying Unit: Bukit Mas Palm Oil Mill

Client Number: 92-035

Audit Type: ASA 03

Mode of Audit: Remote



Principle 5: Environment, natural resources, biodiversity and ecosystem services		
Indicator	Summary of Assessment	Compliance
	The basis of the meeting was to discuss mill activities that would affect the environmental and action to mitigate it.	
4.5.2.1	<p>BPOM established 5 years fossil fuel baseline from 2016 to 2020 for genset and transport.</p> <p>The volume of usage for year 2020 is compared with the baseline and found lower than baseline.</p> <p>Environmental impact Assessment, Management Action Plan and Continuous Action Plan dated 21/08/2020 included the fossil fuel management plan.</p> <p>Example:</p> <p>Source generated: Vehicle</p> <p>Fuel: Diesel</p> <p>Mitigation Measure: Regular servicing the vehicles for smooth running engine and proper maintenance of the vehicles parts</p> <p>Remotely reviewed the monthly vehicle maintenance record dated October 2020.</p>	Yes
4.5.2.2	<p>BPOM established the budget for diesel annual usage for 2020</p> <p>BPOM recorded the actual diesel consumption compared against the baseline.</p> <p>Remotely review the current actual usage for 2020 is below the baseline.</p> <p>Environmental impact Assessment, Management Action Plan and Continuous Action Plan dated 01/03/2020 included the fossil fuel management plan.</p> <p>Example:</p> <p>Source generated: Vehicle</p> <p>Fuel: Diesel</p> <p>Mitigation Measure: Regular Servicing the vehicle for smooth running engine and proper maintenance of the vehicles parts</p> <p>Remotely reviewed the monthly vehicle maintenance record updated November 2020.</p>	Yes
4.5.2.3	BPOM implement biogas plant to generate renewable electricity supplying to mill and estates to reduce usage of fossil fuel.	Yes

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Principle 5: Environment, natural resources, biodiversity and ecosystem services																		
Indicator	Summary of Assessment	Compliance																
4.5.3.1	<p>Remotely review the BPOM list of waste generated and management plan latest review on 17/08/2020.</p> <p>The table describe the type of wastes and sources as below;</p> <table border="1"> <thead> <tr> <th>Type of waste</th> <th>Source</th> </tr> </thead> <tbody> <tr> <td>Organic</td> <td>Housing, canteen</td> </tr> <tr> <td>Domestic</td> <td>Housing</td> </tr> <tr> <td>Digestive</td> <td>Office</td> </tr> <tr> <td>Maintenance oil</td> <td>Workshop</td> </tr> <tr> <td>Empty chemical container</td> <td>Chemical store</td> </tr> <tr> <td>Electrical</td> <td>House, office and mill workshop</td> </tr> <tr> <td>POME</td> <td>Mill</td> </tr> </tbody> </table>	Type of waste	Source	Organic	Housing, canteen	Domestic	Housing	Digestive	Office	Maintenance oil	Workshop	Empty chemical container	Chemical store	Electrical	House, office and mill workshop	POME	Mill	Yes
Type of waste	Source																	
Organic	Housing, canteen																	
Domestic	Housing																	
Digestive	Office																	
Maintenance oil	Workshop																	
Empty chemical container	Chemical store																	
Electrical	House, office and mill workshop																	
POME	Mill																	
4.5.3.2	<p>a</p> <p>BPOM established list of wastes and management plan.</p> <p>Example 1:</p> <p>Type of waste: Used Oil</p> <p>Source of waste: Workshop</p> <p>Pollutions: Seeping of oil into the ground can affect the quality of ground water</p> <p>Monitoring plan: Proper scheduled wastes management are conducted and authorized contractor is appointed for collection.</p> <p>PIC: Mill assistant</p> <p>Remotely reviewed the ESWIS monitoring record for month of October 2020.</p> <p>Example 2:</p> <p>Type of waste: Domestic wastes</p> <p>Source: Housing</p> <p>Pollutions: Waste generated can cause pollution to environment. Example, aerosol spray may affect the atmosphere.</p> <p>Monitoring plan: Disposal of domestic wastes at landfill area at weekly basis.</p> <p>PIC: Mill assistant</p> <p>Remotely reviewed the domestic waste monitoring record for month of October 2020.</p>	Yes																
	<p>b</p> <p>BPOM use kernel shell and fiber as boiler fuel.</p> <p>EFB, boiler ash and decanter cake are sent to the nearby estate as part of recycling programme as organic fertilizer.</p>	Yes																

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Principle 5: Environment, natural resources, biodiversity and ecosystem services		
Indicator	Summary of Assessment	Compliance
	Remotely review the EFB delivery record to Sungai Segama Estate for November 2020.	
4.5.3.3	<p>BPOM adopted HSPHB group SOP HSPHB/SSOP/25-19 Stor Bahan Kimia updated on 31/01/2019.</p> <p>The SOP describes storage, handlings and disposal of used chemicals containers.</p> <p>Example:</p> <p>Empty chemical containers from laboratory and water treatment plant.</p> <p>Action plan: Authorized contractor is appointed to collect scheduled wastes on regular basis. Storage of scheduled waste not more than 180 days and 20mt.</p> <p>Remotely review the scheduled waste record, the storage of scheduled waste not more than 180 days and 20mt</p> <p>Remotely review the consignment note for scheduled wastes from authorized contractor dated September 2020 for collection of SW 410, SW110, SW429, SW102 scheduled wastes.</p>	Yes
4.5.3.4	<p>BPOM domestic wastes are disposed at Bukit Mas Estate landfill.</p> <p>Sighted in the map the location of landfill is far from river / buffer zone area.</p>	Yes
4.5.4.1	<p>BPOM established Waste Management Plan dated 01/03/2020 include list of wastes generated and management plan has identified solid, liquid and gaseous waste.</p> <p>Example:</p> <p>Waste generated: Scrap metal</p> <p>Type of waste: Solid</p> <p>Disposal: Plain metal can be reuse for purpose of covering drainage</p> <p>Waste generated: POME</p> <p>Type of waste: Liquid</p> <p>Disposal: Discharge to land irrigation</p> <p>Waste generated: Genset – Smoke</p> <p>Type of waste: Gases</p> <p>Disposal: Regular servicing and maintenance</p> <p>GHG emission had been identify.</p> <p>Example:</p> <ol style="list-style-type: none"> 1. Diesel usage – CO 2. Power generator: CO, SoX, NoX 	Yes

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Principle 5: Environment, natural resources, biodiversity and ecosystem services		
Indicator	Summary of Assessment	Compliance
	3. POME: CH4	
4.5.4.2	<p>BPOM established Environmental Impact Assessment, Management Action Plan and Continuous Improvement Plans latest updated on 01/03/2020 include the environmental impact and its action taken to reduce identified significant pollutants and emissions.</p> <p>Example:</p> <p>Waste generated: POME</p> <p>Impact: Emission of greenhouse gas, methane at the rate of 1 tonne of POME equivalent to 12-15 M3 of methane gas at COD 25,000-30,000ppm.</p> <p>Mitigation measure / action plan: Construction of biogas plant to reduce the GHG emission</p> <p>Time frame: February 2020</p> <p>Review on submitted photos and video observed the BPOM biogas plant construction is completed.</p> <p>Phone interview with BPOM management feedback that BPOM biogas plant start operation in February 2020.</p>	Yes
4.5.4.3	<p>BPOM POME is treated using methane capturing system before final discharge to land irrigation.</p> <p>BPOM engage 3rd party consultant to conduct final discharge POME test on 20/09/2020.</p> <p>Mitigation action taken by BPOM was to apply final discharge of POME to land irrigation according to DOE discharge limits, where BOD below 100mg/l.</p> <p>Review on photos and video submitted observed the treated POME discharge to land irrigation.</p>	Yes
4.5.5.1	<p>a</p> <p>BPOM established Water Management Plan dated 21/03/2013 and latest update on 01/03/2020.</p> <p>The plan has identified source of water and water usage.</p> <p>Source of water: Water catchment pond</p> <p>Water usage: Mill processing activities</p> <p>Source of water: Water catchment pond and rain water</p> <p>Water usage: Domestic use</p> <p>Review on photos and videos of BPOM housing area observed each houses provided with water tanks.</p> <p>Interview with workers via phone called feedback they received treated water supply for daily used from BPOM water treatment plant.</p>	Yes

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Principle 5: Environment, natural resources, biodiversity and ecosystem services		
Indicator	Summary of Assessment	Compliance
	<p>b</p> <p>BPOM established Water Management Plan dated 21/03/2013 and latest update on 01/03/2020 describes that BPOM release POME through land irrigation.</p> <p>Final discharge of POME analysis result dated 20/09/2020 is review and the result met the DOE discharge limits.</p> <p>BPOM established performance monitoring Log Book for Effluent pond and land irrigation to monitor the effluent pond and final discharge of POME.</p> <p>BPOM flow meter log book for field irrigation is review. Latest flow meter reading is on 30/10/2020 to Bukit Mas estate.</p>	Yes
	<p>c</p> <p>BPOM established Water Management Plan dated 21/03/2013 and latest update on 01/03/2020 describes water monitoring as follow:</p> <ul style="list-style-type: none"> To record daily use of water on daily basis and summarize on month end. <p>Building & Premises inspection checklist dated 17/10/2020 is review.</p> <p>Rain harvesting is implemented at housing area.</p> <p>Review submitted photos and videos observed management provide each house with water tank for rain water storage</p>	Yes
4.5.5.2	<p>BPOM established Water Management Plan dated 21/03/2013 and latest update on 01/03/2020 describes as follows:</p> <ul style="list-style-type: none"> BPOM practiced discharge of POME through land irrigations Final discharge water quality test will be carry out by competent consultant. <p>BPOM discharge of POME effluent for land irrigation at Bukit Mas estate.</p> <p>POME final discharge water quality test result dated 20/09/2020 is reviewed and the result met the DOE discharge limits.</p> <p>EIA under CIP describes:</p> <ol style="list-style-type: none"> Monitoring of the POME discharge to the land irrigation Monitoring of watercourse on water quality index analysis. 	

Principle 6: Best Practices		
Indicator	Summary of Assessment	Compliance
4.6.1.1	<p>BPOM established list of SOPs for mill operations.</p> <p>The last review of SOP on 22/05/2019 and the latest review is on 31/01/2020.</p> <p>Example of SOPs are as follow;</p> <ul style="list-style-type: none"> Boiler station 	Yes

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Principle 6: Best Practices		
Indicator	Summary of Assessment	Compliance
	<ul style="list-style-type: none"> Engine room Press station Laboratory <p>Example of SOPs training conducted:</p> <ul style="list-style-type: none"> SOP for laboratory conducted on 22/06/2020 SOP for workshop operation conducted on 06/02/2020. <p>BPOM adopted General SOPs applicable for estates and mills updated on 06/10/2020.</p> <p>Example of updated General SOPs:</p> <ul style="list-style-type: none"> Infectious disease, pandemic, Covid-19 & natural disaster <p>Phone call interviewed with workers informed they are aware of mill SOPs and training has been carried out.</p> <p>Phone call interviewed with assistant manager and photo provided, the Infectious disease, pandemic, Covid-19 & natural disaster SOP is publicly displayed at mill notice board and guard house as guideline for internal and external stakeholders.</p>	
4.6.1.2	<p>BPOM implemented following best practices:</p> <p>Stack measurement for dust particulates and smoke emissions using CEMS an online monitoring system in accordance to DOE requirements.</p> <p>Emissions report dated 12/03/2020 for monitoring period 16/11/2019 reviewed.</p> <p>Review on certificate of effluent analysis for final discharge dated 20/09/2020 confirmed the BOD level is in accordance to DOE discharge limits.</p>	Yes
4.6.2.1	<p>BPOM established business plan 2020-2024.</p> <p>The budget includes crop estimated this year and forecast for the next 5 years.</p> <p>Example : Budget 2021</p> <p>Crop forecast, CPO forecast, PK forecast, OER forecast and KER forecast.</p> <p>The projection for operation and capex business plan year 2020-2024 is establish.</p> <p>Capital expenditure estimated for year 2021</p> <p>Installation of Electrostatic Precipitator at Boiler Station.</p>	Yes
4.6.3.1	<p>BPOM established Minor Job Contract agreement with transporter CPO & PK dated 25/09/2020, duly agreed and signed by both parties.</p>	Yes

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Principle 6: Best Practices		
Indicator	Summary of Assessment	Compliance
	The contract price is include in the contract agreement, duly agreed and signed by both parties.	
4.6.3.2	BPOM established Minor Job Contract agreement with transporter CPO & PK dated 25/09/2020, duly agreed and signed by both parties. The payments has been made on 26/10/2020 after completion of work. Further verification on contractor completion certificate of work confirmed the payment has been made in timely manner.	Yes
4.6.4.1	BPOM established Minor Job Contract agreement with transporter CPO & PK dated 25/09/2020, duly agreed and signed by both parties. The contract agreement include statement of contractor shall follow MSPO requirements. BPOM conducted briefing to the transporter on 05/03/2020. Training attendance, photos and training agenda are documented. Phone call interviewed with assistant manager and photo provided, the Infectious disease, pandemic, Covid-19 & natural disaster SOP is publicly displayed at mill notice board and guard house as precaution for internal and external stakeholders.	Yes
4.6.4.2	Remote document review confirmed contract agreement between CPO & PK transporter and BPOM dated 25/09/2020 is duly agreed and signed by both parties.	Yes
4.6.4.3	BPOM contract agreement for transportation CPO & PK dated 25/09/2020 stated in appendix 1 'Relevant sustainability certification body has access to contractor or operation if an audit is deemed necessary'.	Yes

4.4. Status of Non-Conformities Previously Identified

	The stage 1 audit findings of this system have been reviewed, in particular to assure appropriate corrections and corrective actions have been implemented to address the identified audit findings.
x	The last audit results of this system have been reviewed, in particular to assure appropriate corrections and corrective actions have implemented to address any nonconformity identified.
	The last audit results of this system have been reviewed, in particular to assure appropriate corrections and corrective actions have not been implemented effectively. The non-conformity will be re-raised.
	No non-conformity raised in previous audit.
<p><i>Note 1: If a minor non-conformity raised in last audit, is not closed out or repeated, the finding will be raised to a Major non-conformity.</i></p> <p><i>Note 2: All major and minor NCs raise in last audit are required to capture in this report together with the review of the non-compliance implementation.</i></p>	

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4.5. Detail of Audit Findings Identified during last audit

AUDIT OUTCOME		
During last Audit	2	MAJOR Non-Conformities
	0	MINOR Non-Conformities

Non Conformity Number <01>			
Indicator # and Description:	4.1.2.2 The internal audit procedures and audit results shall be documented and evaluated, followed by the identification of strengths and root causes of nonconformities, in order to implement the necessary corrective action.		
Location:	Bukit Mas Palm Oil Mill		
Description of Finding / Objective Evidence:			
Internal audit conducted on 09/01/2019 – 10/01/2019 did not identify finding on expiry of fire certificate.			
Classification	<input checked="" type="checkbox"/> Major	<input type="checkbox"/> Minor	
Raise by:	Ariff Bin Lokman	Date Raise:	28/09/2019
Deadline for implementation	27/11/2019		
Root Cause Analysis (by company):			
Expiry of the fire certificate was not identified during the Internal Audit due to action was taken by Bukit Mas Palm Oil Mill to renew the fire certificate and work in progress.			
Correction (by company):			
The expiry of fire certificate was immediately included as finding the Internal Audit Report during Post MSPO ASA 2/ISCC Re-Certification Audit Meeting conducted. (Attachment 1.1a & Attachment 1.1b)			
Corrective / Preventive Action (by company)			
Sustainability Executive will yearly cross-check accuracy of the Internal Audit findings done by Sustainability Team.			
Review of Correction & Corrective / Preventive Action			
Documents 1.1a and 1.1b submitted are reviewed to crosscheck against the corrective action of fire certificate is in progress and monitor until received (expected end 2019). Based on the evidence provided, it is sufficient to close the major NC. Further verification will be conducted in the next surveillance audit.			
Closed: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Site verification : <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
Name of Lead Auditor: Ariff Bin Lokman	Date of Closure: 12/11/2019		
Review of Implementation			
Internal audit conducted on 08/01/2020 – 09/01/2020 include the expiry of the fire certificate.			
Name of Trainee Lead Auditor: Khairul Anwar Bin Ismail	Date of Review: 07/11/2020		

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Non Conformity Number <02>	
Indicator # and Description:	4.1.4.2 The company should establish a system to improve practices in line with new information and techniques; and for disseminating this information throughout the workforce.
Location:	Bukit Mas Palm Oil Mill
Description of Finding / Objective Evidence:	
The mechanism to improve practices of new technology, new information and techniques is not establish.	
Classification	<input checked="" type="checkbox"/> Major <input type="checkbox"/> Minor
Raise by:	Ariff Bin Lokman Date Raise: 28/09/2019
Deadline for implementation	27/11/2019
Root Cause Analysis (by company):	
Lack of understanding on the MSPO requirement to establish mechanism to improve practices of new technology, new information and techniques.	
Correction (by company):	
The mechanism to improvement practices of new technology, new information and techniques was immediately establish. (Attachment 1.2a)	
Corrective / Preventive Action (by company)	
Mill Manager will monthly check and to ensure the established mechanism (To improve practices of new technology, new information and techniques) is implement accordingly.	
Review of Correction & Corrective / Preventive Action	
Review on the attachment 1.2a, Flow chart of action plan for new technology implementation dated October 2019 to handling the new technology or techniques. The evidence provided is sufficient to close the NC. Further verification will be conducted in the next surveillance audit.	
Closed: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Site verification : <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Name of Lead Auditor: Ariff Bin Lokman	Date of Closure: 12/11/2019
Review of Implementation	
The flowchart for new technology dated October 2019 is established and implemented.	
Name of Trainee Lead Auditor: Khairul Anwar Bin Ismail	Date of Review: 07/11/2020

4.6. Detail of Remote Audit Findings Identified during This Audit

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

REMOTE AUDIT OUTCOME

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During this remote audit,	0	MAJOR Non-Conformities
	0	MINOR Non-Conformities

Nr.	Indicator	Description	Location	Opportunity for Improvement
1.	4.4.4.2 (b)	The risks of all operations shall be assessed and documented	Oil Mill	BPOM may consider improve on risk control for noise hazard in HIRARC.
2.	4.4.4.2 (g)	The management shall conduct regular two-way communication with their employees where issues that affect their business such as those related to employee's safety, health and welfare are discussed openly. records from such meetings shall be kept and the concerns of the employees and any remedial actions taken shall be recorded	Office	BPOM may consider improve on the agenda in OSH meeting.
3.	4.4.6.3	A continuous training programme shall be planned and implemented to ensure that all employees are well trained in their job function and responsibility in accordance to the documented training procedure.	Office	BPOM may consider improve on training proggame for Biogas plant

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5. CONCLUSION

Hap Seng Plantations (River Estates) Sdn Bhd has commissioned TUV NORD (Malaysia) Sdn Bhd to conduct annual surveillance 03 audit for its Bukit Mas Palm Oil Mill according to MSPO 2530-4:2013 Part 4 General principles for palm oil mills.

From the review of the standard operating procedures, relevant forms, work flow charts established and implemented; the subsequent background investigation and interviews conducted during this surveillance audit have provided TUV NORD Malaysia with sufficient evidence on the fulfilment of the applied standard Principles & Criteria.

In conclusion the certified unit has been established, implemented and continued to improve in managing the estates are in line with the Principles & Criteria of the applied standards of MS 2530-4:2013. Part 4 General principles for palm oil mills.

As a result of this audit, the audit team confirms that:

Certified CPO January 2020 to September 2020:	34,648.21	mt
Certified PK January 2020 to September 2020:	9,284.02	mt
Projected CPO October 2020 to December 2020:	9,907.00	mt
Project PK October 2020 to December 2020:	2,395.00	mt

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6. RECOMMENDATION

The audit team conducted a process-based audit focussing on significant aspects/risks and objectives required by the standard(s). The audit methods used were interviews, observations, sampling of activities and review of documentation and records.

The structure of the audit was in accordance with the audit plan included in to this summary report.

The audit team concludes that the organisation has established and maintained its management system in line with the requirements of the standard(s) and demonstrated the ability of the system to achieve requirements for products and/or services within the scope and the organisation's policy and objectives.

Therefore the audit team recommends that, based on the results of this audit and the system's demonstrated state of development and maturity that this management system certification be

	Recommended for Certification
x	Recommended for Continuity of Certification
	Recommended for Suspension of Certification

Puchong, 31/12/2020

Khairul Anwar Bin Ismail
TUV NORD (Malaysia) Sdn Bhd
Trainee Team Leader

Puchong, 31/12/2020

Nur Amanina Zahir
TUV NORD (Malaysia) Sdn Bhd
Certifier / Approver

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Distribution / Confidentiality / Rights of ownership / Limitations / Responsibilities / Audit Objectives

This report is sent by the certification body to the members of the audit team and the audit representative of the organisation. All documents (such as this report) regarding the certification procedure are treated confidentially by the audit team and the certification body. This audit report remains the property of the certification body.

An audit is a procedure based on the principle of random sampling and cannot cover each detail of the management system. Therefore nonconformities or weaknesses may still exist which were not expressly mentioned by the auditors in the final meeting or in the audit report.

The responsibility for continuous effective operation of the management system always rests solely with the audited and certified organisation.

Salvo clause:

The audit report will be left to the organisation at the end of the audit - subject to approval by the certification body. The independent release process may cause modifications or additions. In these cases a modified revision will be sent to the audited organisation.

The objective (goal) of the audit is to establish compliance of the management system of the aforementioned organization with the requirements of the aforementioned standard in order to achieve or maintain certification through an independent and accredited certification body. Identification of possibilities to improve the management system can also be a component of the audit and is considered simply to be an enhancement; it does not constitute consultancy or advice with regard to the management system.

Annex / Enclosures

Annex /
corresponding audit documentation

- P&C Audit Report / Checklist(s)
- Audit Plan