



Report number: CUCRPT – Danish Energy Agency

Gap Analysis Report

Report submitted to: **Danish Energy Agency**

Location: United Plantations Berhad

(Jendarata Estate)

This report has been prepared in accordance with RSPO requirements for chemical handling and the information included is the result of a gap analysis of the estate as included in the scope of the assessment.

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Report number: CUCRPT – Danish Energy Agency

Contents

1. Scope of the Assessment.

- 1.1 National Interpretation used for the assessment.
- 1.2 Assessment type. (Estates).
- 1.3 Description of the supply base (estates).
 - 1.3.1 General Description.
 - 1.3.2 Location of the estate.
 - 1.3.3 Statistics of the estate.
- 1.4 Contact person.

2. Assessment Process

- 2.1 Certification body.
- 2.2 Qualifications of the assessor.
 - 2.2.1 Qualifications of the assessor
- 2.3 Assessment methodology.
 - 2.3.1 General overview.
 - 2.3.2 Assessment agenda including:
 - Assessment dates.
 - Sites visited.
 - Main activities.
- 2.4 Stakeholder consultation.
 - 2.4.1 Summary of how stakeholder consultation was organised.

3 Assessment Findings

- 3.1 Assessor's summary.
- 3.2 Summary of the findings by criteria.
- 3.3 Formal sign-off of the assessment findings.
 - 3.3.1 Acknowledgment of internal responsibility by the client.



Report number: CUCRPT – Danish Energy Agency

1. SCOPE OF THE ASSESSMENT.

1.1 National Interpretation used.

The management of the Palm Oil Estate which produce FFB were assessed for compliance against the RSPO criteria as interpreted and endorsed for Malaysia.

1.2 Assessment type.

Gap analysis of RSPO requirements for chemical handling at Jendarata estate owned by United Plantations Bhd.

RSPO

The Roundtable on Sustainable Palm Oil (RSPO) is a global, multi-stakeholder initiative on sustainable palm oil. Members of RSPO and participants in its activities come from many different backgrounds, including plantation companies, manufacturers and retailers of palm oil products, environmental NGOs and social NGOs and from many countries that produce or use palm oil. The principal objective of RSPO is “to promote the growth and use of sustainable palm oil through co-operation within the supply chain and open dialogue between its stakeholders”. The RSPO Principles and Criteria for Sustainable Palm Oil Production were adopted in November 2005. National Working Groups have now produced NI's for Malaysia, Indonesia and Papua New Guinea, and it is against the appropriate National Interpretation that an assessment is conducted.

There are 8 principles, 39 Criteria and 125 indicators in the RSPO P&C standard which is used to evaluate whether an oil palm plantation and palm oil mill is operating within the RSPO P&C standards. There are a total of 65 major indicators and 60 minor indicators.

Following are the major indicators:

- 1.1.1 Records of requests and responses must be maintained.
- 1.2.1 Land Titles/user rights
- 1.2.2 Safety and health plan
- 1.2.3 Plans and impact assessments relating to environmental and social impacts
- 1.2.4 Pollution prevention plans
- 1.2.5 Details of complaints or grievances
- 1.2.6 Negotiation procedure
- 1.2.7 Continuous improvement plans
- 2.1.1 Evidence of compliance with relevant legal Indicators
- 2.2.1 Evidence of legal ownership of the land including history of land tenure.
- 2.2.2 Growers must show that they comply with the terms of the land title.
- 2.3.1 Where lands are encumbered by customary rights, participatory mapping should be conducted to construct maps that show the extent of these rights.
- 2.3.2 Map of appropriate scale showing extent of claims under dispute.
- 3.1.1 Annual budget with a minimum 2 years of projection. Annual budget may include FFB yield/ha, OER, CPO yield/ha and cost of production that is not required to be publicly available.
- 4.1.1 Documented Standard Operating Procedures (SOP) for estates and mills
- 4.4.1 Protection of water courses and wetlands, including maintaining and restoring appropriate riparian buffer zones at or before replanting along all natural waterways within the estate. Riparian buffer zones: Reference to be made to relevant national regulations or guidelines from state authorities e.g. Department of Irrigation and Drainage (DID), whichever is more stringent.
- 4.4.2 No construction of bunds/weirs/dams across the main rivers or waterways passing through an estate.
- 4.4.3 Outgoing water into main natural waterways should be monitored at a frequency that reflects the estates and mills current activities which may have negative impacts (Cross reference to 5.1 and 8.1).
- 4.6.1 Written justification in Standard operating Procedures (SOP) of all agrochemicals use.
- 4.6.2 Pesticides selected for use are those officially registered under the Pesticides Act 1974 (Act 149) and the relevant provision (Section 53A); and in accordance with USECHH Regulations (2000). Reference shall also be made to CHRA (Chemical Health Risk Assessment)
- 4.6.3 Pesticides shall be stored in accordance to the Occupational Safety and Health Act 1994 (Act 514) and Regulations and Orders and Pesticides Act 1974 (Act 149) and Regulations.
- 4.6.4 All information regarding the chemicals and its usage, hazards, trade and generic names must be available in language understood by workers or explained carefully to them by a plantation management official at operating unit level.
- 4.6.5 Annual medical surveillance as per CHRA for plantation pesticide operators.
- 4.6.6 No work with pesticides for confirmed pregnant and breast-feeding women.
- 4.6.8 Documented justification of any aerial application of agrochemicals. No aerial spraying unless approved by relevant authorities.
- 4.7.1 Evidence of documented Occupational Safety Health (OSH) plan which is in compliance with OSH Act 1994 and Factory and Machinery Act 1967(Act 139).
- 4.7.2 Records should be kept of all accidents and periodically reviewed at quarterly intervals.



Report number: CUCRPT – Danish Energy Agency

- 4.7.3 Workers should be covered by accident insurance.
- 4.8.1 A training programme (appropriate to the scale of the organization) that includes regular assessment of training needs and documentation, including records of training for employees are kept.
- 5.1.1 Documented aspects and impacts risk assessment that is periodically reviewed and updated.
- 5.2.1 Identification and assessment of HCV habitats and protected areas within landholdings; and attempt assessments of HCV habitats and protected areas surrounding landholdings.
- 5.2.2 Management plan for HCV habitats (including ERTs) and their conservation.
- 5.3.1 Documented identification of all waste products and sources of pollution.
- 5.5.1 No evidence of open burning. Where controlled burning occurs, it is as prescribed by the Environmental Quality (Declared Activities) (Open Burning) Order 2003.
- 5.6.1 Documented plans to mitigate all polluting activities (Cross ref to C5.1.)
- 6.1.1 A documented social impact assessment including records of meetings.
- 6.2.1 Documented consultation and communication procedures.
- 6.3.1 Documentation of the process by which a dispute was resolved and the outcome. Records are to be kept for 3 years.
- 6.4.1 Establishment of a procedure for identifying legal and customary rights and a procedure for identifying people entitled to compensation.
- 6.5.1 Documentation of pay and conditions.
- 6.6.1 Documented minute of meetings with main trade unions or workers representatives.
- 6.7.1 Documentary evidence that minimum age Indicator is met.
- 6.8.1 A publicly available equal opportunities policy.
- 6.9.1 A policy on sexual harassment and violence and records of implementation.
- 6.9.2 A specific grievance mechanism is established.
- 6.10.1 Pricing mechanisms for FFB and inputs/services shall be documented.
- 7.1.1 An independent and participatory social and environmental impact assessment (SEIA) to be conducted and documented
- 7.2.1 Soil suitability maps or soil surveys adequate to establish the long-term suitability of land for oil palm cultivation should be available.
- 7.3.1 An HCV assessment, including stakeholder consultation, is conducted prior to any conversion.
- 7.3.2 No conversion of Environmentally Sensitive Areas (ESAs) to oil palm as per Peninsular Malaysia's National Physical Plan (NPP) and Sabah Forest Management Unit under the Sabah Forest Management License Agreement.
- 7.3.3 No new plantings on floodplains (reference to be made to State DID).
- 7.4.1 All new plantings should not be cultivated on land more than 300m above sea level and on land more than 25 degrees slope unless specified by local legislation
- 7.5.1 This activity should be integrated with the SEIA
- 7.6.1 Documented identification and assessment of legal and customary rights.
- 7.6.2 Establishment of a system for identifying people entitled to compensation.
- 7.6.3 This activity should be integrated with the SEIA required by C 7.1
- 7.6.4 Establishment of a system for calculating and distributing fair compensation (monetary or otherwise).
- 7.6.5 The process and outcome of any compensation claims should be documented and made publicly available.
- 7.7.1 No evidence of clearing by burning. This activity should be integrated with the SEIA required by C 7.1.
- 7.7.2 Evidence of approval for controlled burning, as per Environmental Quality. (Declared Activities) (Open Burning) Order 2003.
- 8.1.1 Demonstrate progressive improvement in Minimise use of certain pesticides
- 8.1.2 Demonstrate progressive improvement in Environmental impacts
- 8.1.3 Demonstrate progressive improvement in Maximizing recycling and minimizing waste or by-products generation. To work toward zero-waste
- 8.1.4 Demonstrate progressive improvement in Pollution prevention plans
- 8.1.5 Demonstrate progressive improvement in Social impacts

The full list of the RSPO P&C standard and details of the major and minor indicators can be found at www.rspo.org or at <http://www.rspo.org/sites/default/files/Malaysia-NI%28final%29.pdf>

The certificate.

The RSPO certificate is awarded to the company. The mills and suppliers are included in the assessment. All the FFB from the directly managed lands (or estates) shall be produced to certifiable standards. The company will develop and implement a plan to ensure that 100% of associated smallholders and out-growers are of certifiable standard within 3 years.

United Plantations Berhad was awarded RSPO P&C certificate on 21st August 2008. The certificate is valid for five years. There will be annual surveillance assessment throughout the certification validity period. During the main assessment and subsequent annual surveillance assessment there was no any major non conformance. The full assessment report can be found at www.rspo.org



Report number: CUCRPT – Danish Energy Agency

What is an RSPO audit?

It is a systematic, independent and documented process for obtaining audit evidence and evaluating it objectively to determine the extent to which principle and -criteria are fulfilled.

Auditors are seeking evidence as to how the management systems **comply** with the principles and criteria and that those management systems are being **implemented**.

An audit must be a positive experience for the auditee. The auditors have no pre-conceived expectations as to how the auditee must prepare their management systems to conform to the standard. It is the role of the Auditor to identify; not only how the management systems comply with the standard but also how those management systems are implemented.

An audit with RSPO P&C standard at United Plantation was first conducted in May 2008. There were 5 auditors involved in the assessment, going through all the 8 Principles and 125 indicators listed in the RSPO P&C standard. During the main audit at United Plantations Berhad there were five auditors involved and they spent a total of 21 man days on site. There were stakeholder meeting conducted on site and attended by stakeholders who are interested in the assessment. The full assessment report, auditors' details, audit findings and stakeholders' comments can be found in the RSPO website at www.rspo.org

Once the company is certified, the certificate is valid for five years and there will be an annual surveillance assessment to ensure that the management system and RSPO P&C is continuously implemented. During the last annual assessment, it is found that United Plantation is continuously complying with RSPO P&C. The full assessment report, auditors' details, audit findings and stakeholders' comments can be found in the RSPO website at www.rspo.org

RSPO Document review and interview with workers/stakeholders.

Unrestricted access to all management documents is given by the estates to the auditors to verify that the management systems comply with the RSPO P&C's. During the assessment, auditor will interview staff, workers and stakeholders to verify that the management systems are being implemented. Interview is conducted without the present of managers and management representatives. This is to allow the workers and stakeholders to give their feedback without any interruption by management representatives. Workers are asked about Training, H&S, Medical facility, check-up and treatment, work contracts, wages, child labour issues, housing and recreational facility, harassment policies, grievance and dispute settlement procedures, prompt payments and contribution by company towards community development. Female workers are interviewed in private to ensure that they can share any gender issues. Photographs are taken, if necessary, with the permission from the management. Workers and stakeholders are made aware of the assessment and during the first main assessment, there will be stakeholder meeting attended by internal and external stakeholders including NGOs, government representatives and regulatory bodies.

Are they aware that an audit is being conducted?

Sampling.

Assessments are conducted at a moment in time. Auditors are assess a sample of the properties owned by the company, at a moment in time. It may be that at the time of the surveillance assessment, the audit team might find non-compliance where compliance found during the first assessment.

Non-conformities.

There are 8 principles in RSPO P&C covering people, planet and profit. It is divided into major and minor indicators.

For any action there is an equal and opposite reaction! In auditing process, assessors seek **compliance** and positive evidence but in so doing there is a possibility that assessor find non-compliance! Non compliance is informed to the management representatives in advance when assessor suspects that non-conformity may be raised at the closing meeting. Assessor will also highlight good practice as the audit progresses.

During the assessment the management is told not to attempt to put into place an amended management system that they think will eliminate the need for the assessors to raise that particular non-conformity before the closing meeting. It may not be possible to write and grade observations until the end of the audit.

Major non-conformities.

It is not possible for the audit team to make a recommendation for certification of there is even a single major non-compliance raised during a main assessment.

Auditor would agree a time frame with the management to close out that Major NC and the lead auditor *may* have to return to carry out an on site evaluation – depending upon the nature and number of NC's.

(A major NC raised during a surveillance visit must be closed out within 60 days. Failure to do so will result in suspension of the certificate; followed three months later by withdrawal of the certificate if still open. A new main



Report number: CUCRPT – Danish Energy Agency

assessment will then be necessary to re-instate the certificate).

Minor non-conformities.

If there are consistent failures within a single principle, then the audit team may raise a major non-conformity covering that whole principle.

Minor non-conformities are usually closed out at the first surveillance visit. Failure to do so will result in the NC being elevated to a Major NC and three months given to close it out as above.

Auditors will be seeking evidence of compliance with the standard and at no time are they trying to catch out the auditee with their questions. During the audit they will raise issues that they consider will result in non-conformities to be presented at the closing meeting. They will be reviewing the effectiveness and implementation of your management systems and how they comply with the standard.

1.3 Description of the estate.

1.3.1 General description.

During this assessment, Jendarata estate own by United Plantations Bhd. were visited and assessed against RSPO requirement for chemical handling.

The estate is managed by a Senior Estate Manager and assisted by a number of assistant managers. This estate is fully planted with oil palm. Daily operations are arranged in the morning and safety briefing is given to the workers by the assistant managers. All the operational groups or gang in supervised by a full time supervisor called "mandor".

All the facilities for the workers such as housing, clinic, crèche, kindergarden, school, community hall, shop and other recreational facilities located within the estate. There is a town nearby the estate which is accessible to the workers. Majority of the workers have their own transport such car, motorcycle and bicycle. They are staying at the three room houses provided by the estate.

1.3.2 Location of the estates.

CU Code	Name of the estate	Location address.
PO1	Jendarata Estate	36009 Teluk Intan,Perak, Malaysia

1.3.3 Statistics of the supply base.

CU Code	Name of the estate	Area of oil palm (ha)	
		Immature	Mature
PO1	Jendarata Estate	5682.10	341.90

1.4 Contact person. (Danish Energy Agency)

Principle Contact person:	Ole Emmik Sorensen
Business address:	44, Amaliegade, DK – 1256 Copenhagen K.
Office telephone:	+45 33 92 67 00
Mobile telephone:	+45 25 37 56 76
Fax:	+45 33 11 47 43
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Web site:	www.ens.dk

1.5.3 Details of the assessment

Name of Client:	Danish Energy Agency
Date of the assessment	28 th September 2010
Date of the closing meeting	28 th September 2010
Assessment by	Control Union Certifications (Malaysia Office)
Address	Control Union (Malaysia) S/B , Persiaran Raja Muda Musa, Off Jalan Sg Berith, Teluk Gadong, 41100, Klang, Selangor. Malaysia.
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Lead Auditor (contact person)	A. Senniah



Report number: CUCRPT – Danish Energy Agency

2. ASSESSMENT PROCESS.

2.1 Certification Body.
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2.2 Qualifications of the assessor.		
RSPO REQUIREMENT	QUALIFICATIONS	Compliance
A minimum of post high school (post secondary school) training in either agriculture/forestry, environmental science or social sciences;	Post graduate qualification in human resource management with more than 10 years working experience in plantation.	Yes
At least 5 years professional experience in area of work relevant to the assessment (e.g., palm oil management; agriculture/forestry; ecology; social science);	More than 10 years working experience in plantation. Involved in RSPO auditing since April 2009. Fully trained in similar agriculture certification programmes such as RSPO P&C, RSPO SCCS, Global Gap, ISCC and GMP.	Yes
Training in the practical application of the RSPO criteria, and RSPO certification systems;	Involved in RSPO assessment since April 2009. Member of CUC RSPO audit team. Involved in audits conducted in Malaysia and Indonesia.	Yes
Successfully completion of an ISO 9000:19011 lead assessors course;	Completed ISO 9001:2008 lead auditor course in September 2009.	Yes
A supervised period of training in practical assessing against the RSPO criteria or similar sustainability standards, with a minimum of 15 days assessment experience and at least 3 assessments at different organisations.	Member of CUC RSPO audit team since April 2009. Involved in audits conducted in Malaysia and Indonesia since April 2009 in 8 different companies in Malaysia and Indonesia.	Yes
Fluent in main local languages and English.	Able to speak and fluent English, Bahasa Malaysia, Tamil and local dialects.	Yes
Good agricultural practices (GAP), integrated pest management (IPM), pesticide and fertilizer use.	More than 10 years working experience in Palm Oil plantation.	Yes
Health and Safety assessing on the farm and in processing facilities. (For example OHSAS 18001 or occupational. Health and Safety Assurance System).	Working experience in palm oil plantation. Involved in RSPO audits since April 2009. Team member in other certification standards such as Globalgap and GMP.	Yes
Workers welfare issues and social assessing experience. (For example with SA8000 or related social or ethical accountability codes).	Working experience in palm oil plantation. Involved in RSPO audits since April 2009. Team member in other certification standards such as Globalgap and GMP.	Yes
Environmental and ecological assessing. (For example experience with organic agriculture, ISO 14001 or environmental management systems).	Working experience in palm oil plantation. Involved in RSPO audits since April 2009. Team member in other certification standards such as Globalgap and GMP.	Yes



2.3 Assessment methodology.

2.3.1 General overview.

Sustainable palm oil production is comprised of legal, economically viable, environmentally appropriate and socially beneficial management and operations. This is delivered through the application of the principles and criteria, and the accompanying guidance. This report focusing on indicators and guidance for chemical handling. Indicators are specific pieces of objective evidence that must be in place to demonstrate or verify that the criterion is being met.

The assessment was carried out in conformity with the procedures as laid down in the CUC RSPO Procedure Manual and the program manual for the assessor and certifier. During the assessment the qualified CUC assessors used the RSPO standard as endorsed for the country in which the assessment took place and recorded their findings. This assessment is focusing only on issues related to chemical handling at Jendarata Estate. Jendarata estate was assessed throughout this exercise.

The assessment team includes one CUC assessor, three members representing Danish Energy Agency, one representative from Danish Ministry of the Environment and one representative from Danish Energy Management.

The opening meetings held at Unitata meeting room and subsequently the assessment team went to Jendarata estate. The assessment team visited the Jendarata Field office where all the RSPO documents related to herbicide and pesticide handling were shown and briefed by the Senior Manager. A total of 28 files were sited includes safety training programme, safe working procedure, chemical handling procedure, annual medical surveillance records of the pesticide and herbicide applicators, IPM records (census, beneficial plant records), pesticide register, permit from local regulatory bodies, inspection records by the government Department Of Safety and Health (DOSH), list of chemical applicators, PPE issuance and implementation and monitoring records, and other records related to safety and health.

Once the document inspection and verification is completed, the assessment team conducted field visit. During the field visit, herbicide spraying area visited. Male applicators were seen wearing complete PPE and supervised by fulltime supervisor. He was interviewed and he able to explain the emergency procedure and was carrying a first aid kit as per RSPO requirement which require first aid and first aider to be available at work site. He further explained that applicators are given break time and there is clean water supply and soap available on site to clean their hand and face.

Subsequently other operations visited were bagworm census exercise by female workers. Demonstration on how trunk injection is carried out and safety precautions taken, IPM establishment such as barn owl establishment, tunera and other beneficial plants establishment, pheromone traps and harvesting operation. During the visit to the harvesting area, female Indian workers were seen collecting loose fruits. Interview with them revealed that they are aware of safe working procedures.

Stakeholder consultation held during the assessment through meeting and interview with members of National Union of Plantation Workers (United Plantations Branch) and field workers. All the workers union members, the Perak state secretary and Chairman who attended this consultation confirmed that safety aspects during work is strictly enforced at Jendarata estate and United Plantations which includes PPE use and safe working procedure. They also stressed that there are no any herbicide or pesticide or any kind of poisoning has taken place in Jendarata estate or in UP. They highlighted that they are very unhappy with the report in media about pesticide poisoning incidents because there are no such incident in their work place.

Closing meeting held to share the assessment findings between the management of United Plantations Berhad, Jendarata Estate Manager and the assessment team.

Following the opening meeting the audit team conducted a field inspection of the estate which include:

- **Chemical stores.** Storage. MSDS leaflets. Herbicide mixing areas. PPE. Ventilation. Safe working environment Security.
- **Field inspections.** Herbicide application. Harvesting sites. P&D Census operation. SOP's. Ground cover. IPM. First aiders and boxes. Other field observations of operations.
- **Worker interviews.** OSH. First aid. Safety Awareness. Safe operating procedure.
- **Facilities.** Housing area and other facilities.
- **Documentation review.** Set of documents relates to RSPO P&C which focusing on chemical handling were sited and inspected at Jendarata estate.



Report number: CUCRPT – Danish Energy Agency

Document review for the estate:

We considered each and every applicable RSPO principle and criteria for the estate specially focusing on chemical handling. The estate executive was asked to ensure that all documents, procedures, maps and records referred to in the standard are available. The estate Senior Estate Manager then briefed the assessment team on the details of the documents. The list below is a summary of the records and management plans, policies and records related to chemical handling inspected during the assessment.

Verification.

Verification of implementation was done through field observations (application of chemicals, PPE implementation, safe operating procedures etc), chemical store inspections, chemical mixing area inspection, interview with workers and meeting with National Union of Plantation Workers (NUPW).

Sampling.

The assessment was conducted through a sampling of the area and documents available onsite. The audit team sought compliance by filed audits and by reviewing the following site specific information and records. (Documents related to Palm Oil Mill not sampled)

- 2.1 Evidence of compliance with relevant legal indicators. (for OSH matters to comply with DOSH regulation and requirements and monitored periodically by DOSH)
- 4.5 IPM plans. (The estate must implement IPM such as planting beneficial plants, pest incident census, rat census, barn owl implementation)
- 4.5 Pesticide toxicity records. (the active ingredients records)
- 4.6 Pesticide and herbicide records. (field records where pesticide and herbicides are used)
- 4.6 Disposal of agrochemical waste materials. (waste materials are disposed responsibly through authorised waste collector)
- 4.7 OSH plans. (Plans includes safety policy, training, medical surveillance, first aid kit at work site)
- 4.7 Accident records. (As per local regulation, reports to be submitted to DOSH)
- 4.7 OSH training records.
- 4.8 Training Plans.
- 8.0 Commitment to continual improvement in key areas. (Principle 8 of RSPO P&C requires each operating units to develop a plan to continuously improve their best practices.

2.3.2 Assessment agenda.

Date	Location /main sites	Main activities
27th Sept 2010	Perak	<ul style="list-style-type: none"> • Travelling to Perak.
28th Sept 2010	United Plantations	<p>Opening Meeting, Introduction by assessment team and United Plantations.</p> <p>Estate Assessment:</p> <ul style="list-style-type: none"> • Chemical stores. Storage. MSDS leaflets. Herbicide mixing areas. PPE. Ventilation. Security. • Field inspections. Herbicide application programmes. Safe working environment. Harvesting sites. SOP's. IPM. First aiders and boxes. Field observations of operations. • Worker interviews. OSH. First aid. Awareness. • Facilities. Visit to housing area. • Document inspection and assessment.
	United Plantations	<ul style="list-style-type: none"> • Closing meeting. • Assessment team shared their findings and views. Questions and answers.

2.4 Stakeholder consultation and interview.

2.4.1 Summary of how the stakeholder consultation was conducted.

Stakeholders mainly comprised by field workers, workers union representatives and Perak State Chairman and Secretary. The following questions were asked and their feedback recorded. The meeting was conducted in the local Tamil and Bahasa Malaysia language to ensure that they understand the purpose of the consultation and to allow them to express their feedback freely. All the UP management representative was asked to leave the meeting room and the consultation were conducted without their present as per RSPO requirement. This is to ensure that the workers comfortable and free to give their comments.



Report number: CUCRPT – Danish Energy Agency

<p>1. Do you have any remarks on the safe handling of chemicals in Jendarata estate? Answer: Chemicals are handled safely with the enforcement of PPE and safe working environment.</p> <p>2. What is your relation with the plantation being assessed? Answer: Worker's union members, secretary and chairman.</p> <p>3. Are there any plantation management practices that affect you and your health? Answer: No because we are given full and complete protective equipments for all kind of operations which approved by the DOSH. Medical surveillance conducted by doctor. Medical facility available at site. There are no issues.</p> <p>4. Do you consider any management is in conflict with the safe working environment? Answer: No</p> <p>5. Do you have any suggestions for management? Answer: Even before RSPO introduced, UP were having all the good practices. Our welfare and family welfare is well taken care. That is why you can see some of us has been working here for more than 10 years.</p> <p>6. Are you aware of any accidents related to chemical poisoning? Answer: No. If there is any we are the first one to confront the company. But we are confused and upset why there are reports that such case has happened here although there are no such incident.</p> <p>7. Are you aware of any cases where PPE is not implemented? Answer: No. The fulltime supervisor and executive always monitor the PPE usage in the field and PPE is given free.</p> <p>8. Are there any adverse effects on workers due to poor working condition in estate? Answer: In Jendarata and in all the UP estates welfare and working condition are very well taken care.</p> <p>9. Additional comments. Answer: We as the Worker's Union Representative would like to request any interested party to interview directly with us if they want to know about our working environment here.</p> <p>11. Do you have any comments that you would like to discuss in private with the assessment team and would you like to meet with them in future?</p> <p>12. Do you have any comments of the management's any other plantations that you are aware? Answer: Generally in Malaysia, safety of workers is given high priority. There is enforcement by government department.</p> <p>All the worker's union members, the Perak state secretary and Chairman who attended this consultation confirmed that safety aspects during work is strictly enforced at Jendarata estate and United Plantations which includes PPE use and safe working procedure. They also stressed that there are no any herbicide or pesticide or any kind of poisoning has taken place in Jendarata estate or in UP. They highlighted that they are very unhappy with the report in media about pesticide poisoning incidents because there are no such incident in their work place.</p> <p>The above stakeholder consultation was attended by women representative who are member of the divisional and Jendarata estate Gender/Women Committee. To comply with RSPO P&C major indicators 6.9.1 (A policy on sexual harassment and violence and records of implementation) and 6.9.2 (A specific grievance mechanism is established), each operating units have their own Gender/Women committee to address women issues such as training for women, create awareness about women's rights, counselling for women affected by any violence and to plan activities for women employees. The divisional committee reports to main estate committee which subsequently reports to main United Plantations Berhad's committee. It is important to stress that this Gender/Women committee is participated by women employees from the field workers, general workers and office women employees and staff. They are given the opportunity and freedom to raise any issue related to women and they are reporting to the chairwomen of main committee. During the above consultation, the Gender/Women committee representatives confirmed that they are treated equally and fairly by the management.</p>	
Number of persons attended/interviewed:	20



Report number: CUCRPT – Danish Energy Agency

3. ASSESSMENT FINDINGS.

3.1 Assessor's summary of the findings:

During the assessment, it is noted that the management of Jendarata is continuously implementing the RSPO P&C requirement specifically on issues related to pesticide and herbicide handling. Elimination of paraquat from their field operation was one of the major continuous improvements under principle 8.

The management with the assistance from the Research Centre continuously conducting trials to find alternate for monocrothopos. At the moment IPM is being stressed to partially assist in controlling the bagworm incidents. Planting of beneficial plants such as tunera, cassia, antignon and carambola is implemented extensively to attract predator insects which can control and eliminate bagworm. Monthly census and aerial census were carried out to detect any leaf eating pest incidents. Barn owl is implemented at the density of one box per 20hactare to assist in rat control. This helps in reducing and eliminating rat baiting.

During the visit to the pesticide and herbicide storage, it is noted that all the safety measures are implemented as per local regulation. Store well secured and locked, well ventilated and only authorised personnel's are allowed to enter. Safe handling procedures and signages are placed at the store to create safety awareness. PPE usage is implemented in the field and it is confirmed by the field workers and workers union representatives. During the field visit, herbicide spraying area visited. Male applicators were seen wearing complete PPE and supervised by fulltime supervisor. He was interviewed and he able to explain the emergency procedure and was carrying a first aid kit as per RSPO requirement which require first aid and first aider to be available at work site. He further explained that applicators are given break time and there is clean water supply and soap available on site to clean their hand and face.

3.2 Summary of the findings by criteria (related to chemical handling only)

Criteria	Findings and Comments:	Compliance
2.1	<ul style="list-style-type: none"> Compliance found with the law in area related to safety and compliance with government regulation which regularly monitored by Department of Occupational Safety and Health (DOSH). <p>Operating unit is given visited by DOSH officials and every visit is recorded in DOSH visit book. Comments in the book indicating compliance with DOSH regulation.</p>	Yes
4.1	<ul style="list-style-type: none"> The company has generic Standard Operating Procedure (SOP), which covers all the plantation activities which includes all the activities in the estate. Safe Operating Procedure is specifically addressing the safe working procedures for field operations. 	Yes
4.5	<ul style="list-style-type: none"> Documented and implemented IPM system is available. IPM is implemented. 	Yes
4.6	<ul style="list-style-type: none"> Written justification for all agrochemicals used available. All pesticides are officially registered. Good records of all pesticides used in accordance with RSPO requirements with details of area, quantity, date, type and details of workers applied. Records show that the agrochemicals used are appropriate and in accordance with product label recommendations for target species. Stores are well ventilated. Chemical stores with MSDS leaflets. First aid kit available at work site. Workers are trained in the use of agrochemicals and this training is recorded. Used containers and other waste materials are stored in a safe way and disposed of in accordance with laws and regulations through licensed and authorised waste collectors. WHO type 1a or 1b chemicals, such as paraquat has been eliminated completely. Stock records inspection and store visit confirms that there are no paraquat. It is also noted that paraquat is completely eliminated and replaced with glyphosate and glufosinate. Annual medical checkups for pesticide applicators are conducted and recorded. 	Yes



Report number: CUCRPT – Danish Energy Agency

4.7	<ul style="list-style-type: none"> • The company has an OSH plan, which is being implemented in all estate offices. • OSH committees are identified and responsible persons for safety programs are included in responsibility charts. • The company maintains records of all meetings with workers and minutes show that health, safety and welfare issues are included amongst other matters. • Worker accident insurance is in place and up to date. • Risk assessments include all identified areas of risk in the plantations with preventative measures and responsibilities. This risk assessment covered by CHRA assessment through DOSH approved assessors and HIRARC by the Safety Health Senior manager. • Accident and emergency procedures are included in the OHS plans and risk assessments. • Trained First aiders available at all sites. • First aid kits at all places of work available. • Training programmes available and implementation is recorded. <p>Accident records are maintained and reviewed at the OHS meetings.</p>	Yes
4.8:	<ul style="list-style-type: none"> • Training plans and records are in place as appropriate for all workers and staff. It is implemented as per programme and implementation records available with details of the training. 	Yes
8.1	<p>IPM is implemented extensively to control pest and indirectly resulted reduction in pesticide usage. All the operating units have increased the planted area of beneficial plants such as <i>tunera</i>, <i>cassia</i>, <i>antignon</i>, <i>carambola sp.</i> and <i>fox tail</i>. Effective establishment of beneficial plants to control leaf eating pest has helped the operating units to eliminate/reduce the use of methamidophos and warfrain. During the RSPO annual assessment it was noted that Paraquat is being reduced about 9% and is gradually replaced with glyphosate. Company also made commitment to completely eliminate the use of paraquat by January 2011 during the annual RSPO assessment. During this assessment by the Danish Energy Agency (Ministry of Climate and Energy), it is noted that there were no paraquat in the store and stock records shows that there are no paraquat. It is completely eliminated from Jendarata Estate during the assessment and company confirm that all the operating units is completely eliminating paraquat since 27th September 2010, which is earlier than the targeted date. This is one of the positive continuous improvements committed by the management since the first RSPO assessment and successfully implemented. SOPs¹ provided for reducing herbicide by inter row mowing/grass cutting which covers flat area. Selective and spot spraying to control herbicide usage and careful calibration carried out to ensure no wastage. No pesticide usage at the riparian zones, weeding by manually. IPM also includes barn owl establishment. All the operating units have increased the boxes and to ensure the owl population, monthly monitoring of owl occupancy is conducted. Fibre glass boxes are used. Rat bait is being eliminated.</p>	Yes



Report number: CUCRPT – Danish Energy Agency

3.5 Formal sign off of assessment findings.	
3.5.1 Acknowledgement of internal responsibility by the client.	
Comments:	
Name:	
Position:	
Signature:	
Date:	



Report number: CUCRPT – Danish Energy Agency

Abbreviations used.

BRC	British Retail Consortium
CHRA	Chemical Health Risk Assessment
CoC	Chain of Custody
CPO	Crude Palm Oil
CSR	Corporate Social Responsibility
CU	Control Union
CUC	Control Union Certification
DOSH	Department of Occupational Safety and Health
EU	European Union
FFB	Fresh Fruit Bunch
FSC	Forest Stewardship Council
GAP	Good Agriculture Practice
GMP	Good Manufacturing Practice
GTP	Good Trading Practice
HACCP	Hazard Analysis and Critical Control Point
HIRARC	Hazard Identification, Risk Assessment and Risk Control
IPM	Integrated Pest Management
ISCC	International Sustainable Carbon Certification
MSDS	Material Safety Data Sheet
NC	Non Conformity
NGO	Non Governmental Organisation
NIOSH	National Institute of Occupational Safety and Health
NUPW	National Union for Plantation Workers
OSH	Occupational Safety and Health
OSHAS	Occupational Safety and Health Assessment Scheme
P&C	Principle and Criteria
P&D	Pest and Disease
PPE	Personal Protective Equipment
R&D	Research and Development
RSPO	Roundtable on Sustainable Palm Oil
RSPO NI	Roundtable on Sustainable Palm Oil National Interpretation
RSPO P&C	Roundtable on Sustainable Palm Oil Principle and Criteria
RSPO SCCS	Roundtable on Sustainable Palm Oil Supply Chain Certification System
SOCSSO	Social Security Organisation
SOP	Standard Operating Procedure
UP	United Plantation
VMO	Visiting Medical Officer
WHO	World Health Organizations