

**MONG RETHYTHY INVESTMENT
CAMBODIA OIL PALM CO. LTD. (MRICOP)**

RSPO Membership No: 1-0109-11-000-00

PLANTATION MANAGEMENT UNIT
**MRICOP Grouping Palm Oil Mills &
Estates**

Choeung Kor Commune, Prey Nop District,
Sihanouk Province, Cambodia



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Assessment Report

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(188296-W)

Report No.: R9280/12-8 Mong Reththy Investment Cambodia Oil Palm Co. Ltd.
(MRICOP) Annual Surveillance Assessment ASA-01

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ANNUAL SURVEILLANCE ASSESSMENT

PUBLIC SUMMARY REPORT

MONG RETHTHY INVESTMENT CAMBODIA OIL PALM CO. LTD. (MRICOP)

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PLANTATION MANAGEMENT UNIT
MRICOP Grouping Palm Oil Mills & Estates
Choeung Kor Commune, Prey Nop District, Sihanouk Province,
Cambodia

Certificate No:

Issued date:

Expiry date:

RSPO 928088

15 Aug 2017

14 Aug 2022

Assessment Type

Re-Certification

Annual Surveillance Assessment (ASA-01)

Annual Surveillance Assessment (ASA-02)

Annual Surveillance Assessment (ASA-03)

Annual Surveillance Assessment (ASA-04)

Assessment Dates

19-23 Jun 2017

18-22 Jun 2018

Intertek Certification International Sdn Bhd

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1.0 SCOPE OF ASSESSMENT

1.1 Introduction

This Annual Surveillance Assessment ASA-01 was conducted on the Plantation Management Unit (PMU), Mong Reththy Cambodia Oil Palm Co. Ltd. (hereafter abbreviated as MRICOP), from **18-22 Jun 2018**, to assess if the organization's operations of the mill and its supply bases were in compliance against the **RSPO Principles and Criteria (Apr 2013)**, **Cambodian Local Indicators (2014)** and the **RSPO Supply Chain Certification Standard (Jun 2017)** for Palm Oil Mill.

The plantation management unit (PMU) or management unit of MRICOP Grouping comprises of two (2) palm oil mills and a common supply base of four (4) estates. The eligibility of the Multiple Mill Certification of MRICOP Grouping was confirmed by the RSPO Secretariat on 21 Mar 2015.

1.2 Location (address, GPS and map) of palm oil mill and estates

MRICOP Grouping comprises of two (2) palm oil mills; viz;(a) Monorum POM and (b) Anlong Kropeu POM and four (4) estates as indicated in Table 1 below, which includes the addresses and GPS locations of the mill and estates. The location maps are provided in **Appendix C**.

Table 1: Address of Palm Oil Mill, Estates and GPS Location

Name	Address	GPS Reference	
		Latitude	Longitude
Monorum Palm Oil Mill Capacity: 30 MT/hour	Mong Reththy Investment Cambodia Oil Palm Co. Ltd., National Road 4, Monorum, Cheung Kor, Prey Nop, Preah Sihanouk Province, Cambodia.	10° 54' 33.7" N	103° 50' 04.2" E
Anlong Kropeu Palm Oil Mill Capacity: 45 MT/hour	MRT-TCC Sugar Investment Co. Ltd., National Road 4, Anlong Kropeu, Cheung Kor, Prey Nop, Preah Sihanouk Province, Cambodia.	10° 57' 59.3" N	103° 54' 12.7" E
Estate A (Tapoa)	National Road 4, Sangkat Cheung Kor, Khan Prey Nop, Preah Sihanouk Province, Kingdom of Cambodia.	10° 48' 59.7" N	103° 47' 46.9" E
Estate B (Svay)	National Road 4, Sangkat Cheung Kor, Khan Prey Nop, Preah Sihanouk Province, Kingdom of Cambodia.	10° 52' 08.2" N	103° 51' 19.2" E
Estate C (Anlong Kropeu)	National Road 4, Sangkat Cheung Kor, Khan Prey Nop, Preah Sihanouk Province, Kingdom of Cambodia.	10° 57' 58.7" N	103° 54' 02.0" E
Estate D (Kirivon)	National Road 4, Kirivon, Stoeng Chhay, Prey Nop, Preah Sihanouk Province, Cambodia.	10° 57' 58.4" N	103° 54' 01.9" E

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1.3 Description of Supply Base (fruit sources)

The supply base, i.e. FFB sources to the 2 mills under the MRICOP Grouping are entirely from the 4 common supplying estates as mentioned above.

Estate A and Estate B are owned by MRICOP whilst Estate C is managed by MRICOP but owned by MRT-TCC Sugar Investment Co., Ltd (MTSI). MTSI's shareholders are the Thai Charoen Corporation Group (TCC) Group and Mong Reththy Group (MRT) on a 75% and 25% ownership basis. Both MRICOP and MTSI are under the joint ownership of MRT Group and TCC Group.

FFB supply from Estate A and Estate B (under MRICOP) had commenced since year 2000, whilst supply from Estate C had commenced since year 2011. The necessary documentation and public notification under the RSPO New Planting Procedures for the extension of plantation development and supply from Estate C was submitted to RSPO on 15 May 2012 and was approved without any issues forthwith for the previous surveillance assessments. Further extension of scope was conducted as part of surveillance assessment ASA-02 (last cycle) for the increase in planted hectareage due to additional ongoing New Planting at Estate C. Public notification under the RSPO New Planting Procedures for the extension of plantation development of Estate C was submitted to RSPO on 06 Jun 2014 and was approved without any issues. The large Estate C was subsequently divided into two estates, viz; a smaller Estate C and a new Estate D (Kirivon) and this change was found to be in compliance during the surveillance assessment ASA-04 (last cycle).

The supply base i.e. FFB sources to the POM PMU are from the abovementioned 4 estates only. Verification done on site during this Assessment confirmed that there were no outgrowers / independent suppliers / smallholders involved in the supply of FFB to the said PMU.

Details of the planted hectareage at MRICOP are as shown in Table 2 below.

Table 2: Estate Area Summary

Estate	Area Summary (ha) – Year 2017		Area Summary (ha) – Year 2018	
	Certified (Titled) Area	Planted Area	Certified (Titled) Area	Planted Area
Estate A (Tapoa)	4,956.70	4,073.68	4,956.70	4,073.68
Estate B (Svay)	5,153.41	4,333.07	5,153.41	4,333.07
Estate C (Anlong Kropeu)	5,339.70	4,252.36	5,339.70	4,252.36
Estate D (Kirivon)	5,130.39	3,876.43	5,130.39	3,896.50
Total:	20,580.20	16,535.54	20,580.20	16,555.61

Notes:

1. This Assessment covered the overall land use for oil palm plantation areas, and the identified Conservation areas including HCV areas marked out at the estates.
2. The estates sampled for this Assessment have been selected based on their potential risks on social, environmental and biodiversity issues such as their proximity to forest reserves, hill sides, riparian zones and high conservation value areas.
3. The slight increase of 20.07 ha in planted area for Estate D for year 2018 over the previous year is due to the infilling with new oil palms in Jul 2017 and planted area re-adjustment for year 2018.

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1.4 Year of Plantings and Cycle

The 4 estates have been developed beginning from 1997 and are still in the 1st cycle of planting. The age profile is as shown in Table 3.

Table 3: Age Profile of Planted Oil Palm - Year 2018

Estate Name	Year of Planting	Cycle of Planting	Mature OP (ha) – Above 3 years	Immature OP (ha) – 3 years & below	Total (ha)
Estate A (Tapoa)	1997-2008, 2010	1 st	4,073.68	0.00	4,073.68
Estate B (Svay)	1997-2012, 2016	1 st	4,295.95	37.12	4,333.07
Estate C (Anlong Kropeu)	2008-2010, 2011-2012, 2014-2016	1 st	4,172.80	79.56	4,252.36
Estate D (Kirivon)	2010-2013, 2014-2015. 2017	1 st	3,622.57	273.93	3,896.50
		Total	16,165	390.61	16,555.61

1.5 Summary of Land Use, Conservation and HCV Areas

The summary of Land Use, Conservation and HCV Areas as identified in MRICOP during this Annual Surveillance Assessment is as shown in Table 4 below:

Table 4: Conservation and HCV Areas

#	Statement of Land Use (Ha) - Estate A, B, C and D	Year 2017 Hectarage – Ha	Year 2018 Hectarage – Ha
1	Planted Area (ha) – Oil Palm	16,535.54	16,555.61
	- Mature	14,717.93	16,165.00
	- Immature	1,817.61	390.61
2	Conservation Area (ha)		
	- comprising buffer zones along small streams, hilly areas, swampy and unplanted areas	3,199.36	3,199.36
3	HCV Area (ha)		
	- comprising buffer zones near forest reserves, water catchments, burial & religious sites	2.45	2.45

Notes:

- Significant portions of the land have been occupied by the local villagers and communities, for more than 5 years, which were left unplanted and maintained as such.
- Conservation areas are principally water bodies such as natural and dug up ponds and buffer zones along river tributaries and streams.
- The small HCV area is a Khmer soldiers' burial site in Estate C.

1.6 Other Certifications Held and Use of RSPO Trademarks

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MRICOP PMU currently has no other certifications. The RSPO's trademarks and logo are not being used by the PMU audited. Instructions for use were provided and acknowledged by the PMU through a signed Memorandum of commitment agreeing to adhere to the latest "RSPO Rules on Communications & Claims".

1.7 Organizational Information / Contact Person

Name: Mr. Sunchai Choongan
 Designation: Deputy Managing Director – MRICOP / MTSI
 Full Address: Mong Reththy Investment Cambodia Oil Palm Co. Ltd
 #52, St. 598 Sangkat Boeung Kak II, Khan Toul Kork, Phnom Penh, Cambodia.
 Tel: (855-85) 903 551
 Fax: 855-23-216 496
 Email: -

1.8 Tonnages Verified for Certification

1.8.1 The breakdown of all the tonnages of FFB from the supply base to the 2 POMs respectively based on the reporting period for FY Jul 2016 / Jun 2017 are as follows:

Table 5A: Total FFB tonnages for Monorum Mill (Jan – Dec 2017)

#	Estate /Supplier	FFB Processed (MT)	Main Receiving Mill	Certified By
1.	Estate A (Tapoa)	57,950.48	Monorum POM	Intertek
2.	Estate B (Svay)	33,771.42	Monorum POM	Intertek
3.	Estate C (Anlong Kropeu)	7,841.55	Monorum POM	Intertek
4.	Estate D (Kirivon)	4,018.57	Monorum POM	Intertek
	Total	103,582.02		

Table 5B: Total FFB tonnages for Anlong Kropeu Mill (Jan – Dec 2017)

#	Estate /Supplier	FFB Processed (MT)	Main Receiving Mill	Certified By
1.	Estate A (Tapoa)	18,181.30	Anlong Kropeu POM	Intertek
2.	Estate B (Svay)	29,813.87	Anlong Kropeu POM	Intertek
3.	Estate C (Anlong Kropeu)	37,029.27	Anlong Kropeu POM	Intertek
4.	Estate D (Kirivon)	22,523.60	Anlong Kropeu POM	Intertek
	Total	107,548.04		

1.8.2. Total annual certified tonnages of FFB supplied to the MRICOP POMs during the previous assessment period, current assessment period and next projected period are as follows:

Table 6: Annual Tonnages of FFB

Estate / Supplier	FFB Processed in Year 2017 Actual		FFB Processed for Year 2018 Actual + Projected		FFB Processed for Year 2019 Projected	
	MT	%	MT	%	MT	%
Estates A, B, C & D to	103,582	49.06	51,688	24.10	53,510	20.0

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Monorum POM - Certified						
Estates A, B, C & D to Anlong Kropeu POM - Certified	107,548	50.94	162,786	75.90	214,040	80.0
Other External Supplier – Uncertified	0	0	0	0	0	0
Total	211,130	100	214,474	100	267,550	100
SCCS Module for POM	IP		IP		IP	

1.8.3 The annual certified tonnages of CPO and PK production at the respective Mills from the supply base as assessed during the previous assessment period, current assessment period and next projected period are as per the Tables below:

Table 7A: Annual Certified Tonnages of CPO and PK - Monorum Mill

POM	Year 2017 (Actual)		Year 2018 (Actual + Projected)		Year 2019 (Projected)	
Total Certified FFB Processed (MT)	103,582		51,688		53,510	
Total Certified CPO Production (MT)	20,024	OER: 19.33%	10,020	OER: 19.39%	10,488	OER: 19.60%
Total Certified PK Production (MT)	4,926	KER: 4.76%	2,274	KER: 4.40%	2,461	KER: 4.60%

Table 7B: Annual Certified Tonnages of CPO and PK - Anlong Kropeu Mill

POM	Year 2017 (Actual)		Year 2018 (Actual + Projected)		Year 2019 (Projected)	
Total Certified FFB Processed (MT)	107,548		162,786		214,040	
Total Certified CPO Production (MT)	20,748	OER: 19.29%	32,017	OER: 19.67%	42,219	OER: 19.72%
Total Certified PK Production (MT)	3,423	KER: 3.18%	7,377	KER: 4.53%	10,113	KER: 4.72%

1.9 Time Bound Plan and Multiple Management Units

At present, there are no other management units owned under MRICOP.

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1.10 Abbreviations Used

CB	Certification Body	KER	Kernel Extraction Rate
CLI	Cambodian Local Indicators	LTA	Lost Time Accidents
CHRA	Chemical Health & Risk Assessment	MRICOP	Mong Reththy Investment Cambodia Oil Palm Co. Ltd.
CPO	Crude Palm Oil	MSDS	Material Safety Data Sheets
CSDS	Chemical Safety Data Sheets	MTCS	Malaysia Timber Certification Scheme
CSPO	Certified Sustainable Palm Oil	MTSI	MRT-TCC Sugar Investment Pte. Ltd
CSPK	Certified Sustainable Palm Kernel	NCR	Non-Conformance Report
EFB	Empty Fruit Bunch	NGO	Non-Government Organization
EHS	Environmental Health & Safety	OER	Oil Extraction Rate
EIA	Environmental Impact Assessment	OHS	Occupational Health & Safety
ETP	Effluent Treatment Plant	PEFC	Programme for the Endorsement of Forest Certification
FFB	Fresh Fruit Bunch	PK	Palm Kernel
GAP	Good Agriculture Practice	PMU	Plantation Management Unit
HCV	High Conservation Values	POM	Palm Oil Mill
Intertek	Intertek Certification International Sdn Bhd	POME	Palm Oil Mill Effluent
IPM	Integrated Pest Management	PPE	Personal Protective Equipment
ISCC	International Sustainability & Carbon Certification	SCCS	Supply Chain Certification Standard
IUCN	International Union for Conservation of Nature	SOP	Standard Operating Procedures

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2.0 ASSESSMENT PROCESS

2.1 Assessment Methodology, Plan and Site Visits

Since **16 May 2018**, Intertek has initiated public communications and notifications and invited the relevant stakeholders before the assessment to provide feedback and comments on their concern (if any) on MRICOP regarding the environmental, biodiversity, community development and other relevant issues.

The Assessment team conducted the current assessment on **18–22 Jun 2018**, in which all the 4 estates of MRICOP, namely Estate A, B, C and D as well as the two (2) palm oil mills, viz; Monorum POM and Anlong Kropeu POM, were assessed for compliance against the RSPO requirements. The sampling design applied for the assessment include the mill and a minimum sample of x estates, where $x = (0.8\sqrt{y}) \times (z)$, where y is the number of estates and where z is the multiplier defined by the risk assessment. A medium risk multiplier of $z=1.2$ is set for this PMU due to some potential risks in relation to social, environmental and biodiversity factors.

During the on-site assessment, relevant documents and records, including Standard Operating Procedures (SOP), management plans, hectareage development, FFB, CPO and PK production, oil palm age profile, operational controls and measures, operational data and records, training records, etc. were reviewed and verified for compliance. The Assessment team using the process approach auditing technique covered the palm oil mill and estate operations, agricultural practices, pest management, pesticide and fertilizer application, occupational health and safety, social accountability, environment and other requirements. Stakeholders' interviews were conducted during the assessment and feedback obtained as part of information and evidence gathering. (See section 2.5 Process of stakeholder consultation).

MRICOP Palm Oil Mills were assessed against the requirements for the Identity Preserved (IP) Module as specified in RSPO Supply Chain Certification Standard (SCCS) for CPO mill. This part of the assessment covered the implementation of documented procedures, verification of processing and traceability of FFB into CPO and PK, and availability of records to demonstrate compliance against all the elements of the **Identity Preserved (IP) Module** in accordance with the RSPO Supply Chain Certification Standard (SCCS) requirements. Verified activities and checked items for the SCCS of the POM are reported in **section.3.1.1**.

After completion of the on-site field assessment, Intertek also performed the evaluation of conformity against the RSPO Certification System requirements for CB. The assessment report, findings and associated documents were evaluated through an independent review by the Intertek Internal Technical Reviewer/Panel and also submitted to another independent External Peer Reviewer for comments prior to the approval of this report and final decision on the certification by Intertek.

The details of the Assessment Plan (actual on-site) are provided in **Appendix B**.

2.2 Date of next scheduled visit

The next scheduled visit will be the Annual Surveillance Assessment (ASA-01) which will be carried out within the 9 to 12-months period from the date of initial issuance of the certificate.

2.3 Qualifications of the Lead Assessor and Assessment Team

Competency details of the Lead Assessor and Assessment Team are given in **Appendix A**.

2.4 Certification Body

Intertek Certification International Sdn Bhd is part of the Intertek Group, which is a worldwide technical services organization dedicated to reducing clients' risks by providing technical inspection services, management system certification in quality, environmental, occupational safety & health and product certification, RSPO SCC, ISCC, Marine Sustainability Chain-of-Custody, MTCS and PEFC Chain-of Custody certification in applicable industry sectors including the agricultural and forestry sectors. Intertek operates globally providing clients with a wide-ranging technical inspection expertise and access to thousands of skilled specialists worldwide. Intertek Group's certification business is ranked in the top 10 worldwide, and is available globally offering certification across a wide range of industries.

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2.5 Process of stakeholder consultation

Stakeholder consultations began with notification of the upcoming assessment through the websites of RSPO, KLK and Intertek. E-mails were sent to applicable stakeholders including government agencies, NGOs and local communities. E-mails and telephone enquiries were made prior to the actual assessment and stakeholder's response and feedback received were followed up accordingly.

During the assessment, stakeholders were interviewed and their feedbacks were recorded. Among the stakeholders consulted were workers, trade union leaders, women representatives; local community leaders, representatives of government departments / agencies, NGOs, suppliers and contractors.

Details on stakeholders' feedback, PMU response and Intertek verification / comments are provided in **section 3.3**.

Among the list of key stakeholders consulted are the following:

Government Ministries / Agencies (by emails)

1. Ministry of Agriculture, Forestry & Fisheries
2. Ministry of Mines & Energy
3. Ministry of Women Affairs
4. The Cambodian National Council for Women (CNCW)
5. Ministry of Environment
6. Ministry of Labour & Vocational Training
7. Ministry of Economy & Finance
8. Ministry of Water resource and Meteorology
9. Department of Forestry, Cambodia
10. Department of Wildlife & Biodiversity, Cambodia
11. Department of Immigration
12. Council for Agriculture and Rural Development (CARD)
13. Provincial Governor of Sihanoukville

NGOs (by emails)

1. Association of Protection Development for Cambodia Environment (APDCE)
2. Cambodian Farmer Economic Development (CFED)
3. Cambodian Human Rights and Development Association (ADHOC)
4. Cambodian League for the Promotion & Defence of Human Rights (LICADHO)
5. Cambodian Sanitation and Recycling Organization (CSARO)
6. Centre d'Etude et de Développement Agricole Cambodgien (CEDAC) Cambodia
7. Conservation International (CI) Cambodia
8. Cooperation for Development of Cambodia (Co-DeC)
9. Culture and Environment Preservation Association (CEPA)
10. Development and Partnership in Action (DPA)
11. Fisheries Action Coalition Team (FACT)
12. Gender and Development for Cambodia (GAD/C)
13. Human Resource and Rural Economic Development Organization (Hurredo)
14. Human Rights Vigilance of Cambodia (Vigilance)
15. Indigenous Community Support Organization (ICSO)
16. Khmer Farmers Association (KFA)
17. Khmer Institute for National Development (KIND)
18. Legal Aid of Cambodia (LAC)
19. NGO Committee on the Rights of the Child (NGO-CRC)
20. NGO Forum of Cambodia
21. Organization for Assistance of Children and Rural Women (CWARO)
22. Urban Poor Women Development (UPWD)
23. Wildlife Alliance Cambodia
24. World Wide Fund (WWF) Cambodia (Phnom Penh)
25. Wildlife Conservations Society (WCS) Cambodia



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Others interviewed during on-site assessment

1. Gender Committee Members
2. Workers representatives
3. Commune Heads
4. Village Heads
5. School Principals
6. Clinic doctors
7. Suppliers / Contractors
8. Contractors (for field workers)

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3.0 ASSESSMENT FINDINGS

3.1 Summary of Findings

Principle 1: Commitment to transparency

Criteria 1.1		
Growers and millers provide adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.		
Indicators	Findings and Objective Evidence	Compliance
1.1.1 There shall be evidence that growers and millers provide adequate information upon request for information on (environmental, social and/or legal) issues relevant to RSPO Criteria to relevant stakeholders for effective participation in decision making. Minor Compliance	Documented procedure SOP-GA-020 dated 29 Apr 2017 Rev 02 established and implemented for providing such information to relevant stakeholders upon request. For the period Jul 2017 to Jun 2018, requests for 5 visits to the mills and estates were recorded. As at the period of assessment, there were no additional requests for information from stakeholders for this PMU. Date of public notification of this assessment of the PMU was made on 16 May 2018.	Complied
1.1.2 Records of requests for information and responses shall be maintained. Major Compliance	The PMU maintained an updated list dated 14 Jun 2018 of internal stakeholders, external stakeholders, government departments/agencies, consultants, contractors, suppliers, transporters, etc. Stakeholders' consultation held with records of stakeholders' feedback (positive and negative), and management action plan recorded.	Complied
Criteria 1.2		
Management documents are publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes.		
Indicators	Findings and Objective Evidence	Compliance
1.2.1 Management documents that are made available to the public shall include, but are not necessarily limited to: Major Compliance	The PMU had established and maintained documented information of land titles, health and safety plan, plans and impact assessments relating to environment and social impacts, pollution prevention plans, details of complaints and grievances; negotiation procedures and continuous improvement plan that are available to the public and also for internal reference. MRICOP website https://www.mricop.com.kh has a transparency statement that the various types of mandatory documents are publicly available.	Complied
<ul style="list-style-type: none"> • Land titles/user rights (Criterion 2.2); 	Copies of the land titles maintained at the Mill and Estates verified to be in order. The Corporate Office kept the original copies.	Complied
<ul style="list-style-type: none"> • Occupational health and safety plans (Criterion 4.7); Major Compliance	Detailed documented plan of OSH was reviewed and updated for the mills and estates. The Risk Assessment (Hazard Identification, Analysis and Risk Control) had included controls implemented at the mills and estates.	Complied

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	<p>Accident and Emergency Procedure SOP-GA-021 dated 29 Apr 2017 Rev 02 documented and implemented.</p> <p>OSH Policy and Plans were implemented and included activities such as:</p> <ul style="list-style-type: none"> - OSH/ESG (Environment, Social, Gender Sub-committee meetings held 4x per year). - Safe Work Practices / Safe Job Procedures. - PPE at mills and estates. - Health medical check-up (annual). - Emergency preparedness. - First Aid training. - Fire extinguisher. - Ambulance services. 	
<p>• Plans and impact assessments relating to environmental and social impacts (Criteria 5.1, 6.1, 7.1 and 7.8); Major Compliance</p>	<p>Environmental and Social Impacts Assessment (EIA and SIA) for Monorum POM, Estate A, B and C carried out in Nov 2011 by Green Consultancy Group and documented. Additional EIA for the Anlong Kropeu POM was carried in May 2014 by the same consultant.</p> <p>Environmental Impacts Assessment and Social Impacts Assessment for the mills and MRICOP Plantation Estates A, B, C & D, including Central Workshop & Health Dispensary were annually reviewed for year 2018 (latest review of EIA on 11 Jun 2018 and SIA on 13 Jun 2018). Management Action Plans, Monitoring and Continuous Improvement Program covering Estates A, B, C and D, including Central Workshop & Health Dispensary were identified, implemented and monitored.</p>	<p style="text-align: center;">Complied</p>
<p>• HCV documentation summary (Criteria 5.2 and 7.3); Major Compliance</p>	<p>Based on the SEIA survey and evaluation, there is only a small HCV area at this PMU, which is the Khmer soldiers' burial site in Estate D and the community forest outside the boundary of Estate C.</p> <p>The New Planting area in Estate C did not contain any HCV as reported by the Environmental/HCV consultant report dated Mar 2012.</p> <p>Annual review of Management and Monitoring Plan of HCV area carried out on 13 Jun 2018.</p> <p>It is verified during current assessment on site that there is no change to the HCV area.</p>	<p style="text-align: center;">Complied</p>
<p>• Pollution prevention and reduction plans (Criterion 5.6); Major Compliance</p>	<p>Pollution Prevention Plan for the mills and MRICOP Plantation Estates A, B, C & D, including Central Workshop & Health Dispensary were reviewed on 11 Jun 2017.</p> <p>Key pollutants such as discharge to water ways, emissions to air, contamination to land, and noise pollution were identified.</p> <p>Management Action Plans, Monitoring and Continuous Improvement Program for pollution prevention identified, implemented and monitored.</p> <p>Documented pollution prevention and reduction plans include measures for pollution control, pesticides</p>	<p style="text-align: center;">Complied</p>

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	reduction, plantation waste management, schedule wastes and domestic wastes disposal, reuse and recycling.	
<ul style="list-style-type: none"> • Details of complaints and grievances (Criterion 6.3); Major Compliance	<p>Complaints and grievances process flowchart and its details are defined in SOP-GA-019 Rev 01 dated 29 Apr 2017.</p> <p>MRICOP has included the necessary details for handling complaints and grievance.</p> <p>For the period Jul 2017 to Jun 2018, there was no complaint received.</p>	Complied
<ul style="list-style-type: none"> • Negotiation procedures (Criterion 6.4); Major Compliance	<p>Negotiation process flowchart and its details are defined in SOP-GA-022 Rev 02 dated 29 Apr 2017.</p> <p>MRICOP has applied the process for land acquisition and compensation for the land bought from the villagers in Estate C that complied with FPIC requirements.</p>	Complied
<ul style="list-style-type: none"> • Continual improvement plans (Criterion 8.1); Major Compliance	<p>The PMU has identified and implemented Continuous Improvement Plans for the mills and estates.</p>	Complied
<ul style="list-style-type: none"> • Public summary of certification assessment report; Major Compliance	<p>Public summary of certification assessment reports are available in the company website. These reports may be available from the company upon request.</p>	Complied
<ul style="list-style-type: none"> • Human Rights Policy (Criterion 6.13). Major Compliance	<p>SOP-GA-025 Rev 01 dated 23 May 2016 on Code of Ethical Conduct and Human Rights. The Human Rights Policy has been communicated to all levels of the workforce and operations. Copies of the policy found to be displayed at prominent locations in the mills and estates.</p>	Complied
Criteria 1.3 Growers and millers commit to ethical conduct in all business operations and transactions.		
Indicators	Findings and Objective Evidence	Compliance
1.3.1 There shall be a written policy committing to a code of ethical conduct and integrity in all operations and transactions, which shall be documented and communicated to all levels of the workforce and operations. Minor Compliance	<p>The Policy of commitment to a Code of Ethical Conduct and Integrity was documented and signed on 06 May 2016 by the MRT-TCC JV President, Mr. Surat Poobankerdpol. The policy was communicated to all levels of the workforce and operations. Copies of the policy found to be displayed at prominent locations in the mills and estates.</p>	Complied

Principle 2: Compliance with applicable laws and regulations

Criteria 2.1 There is compliance with all applicable local, national and ratified international laws and regulations.		
Indicators	Findings and Objective Evidence	Compliance
2.1.1 Evidence of compliance with relevant legal requirements shall be available. Major Compliance	<p>Compliance with land titles and user rights for Estate A and Estate B evidenced by the Land Concession Contract dated 09/01/1996 between the Cambodian Ministry of Agriculture, Fishery and Forest (AFF) and MRICOP for a period of 70 years (commencing from year 1997) with use of the lands for agriculture.</p> <p>Land ownership of Estate C and Estate D freehold lands for agriculture use evidenced by a purchase document</p>	Complied

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	<p>dated 27/07/2011. Additional lands in Estate C acquired in 2014 complied with FPIC requirements.</p> <p>Environmental and Social Impact Assessments confirmed activities to be in compliance with laws and sub decrees related to environment and social issues. Licenses and permits for operations are valid and displayed at the Monorum POM and Anlong Kropeu POM.</p> <p>A list of applicable laws and sub decrees is available and reviewed on 18 May 2018 for updates by Mr. Sok Chyvo (Admin. Manager). No change in laws for the period Jul 2017 to May 2018.</p> <p>Based on the site observations, interviews and records checking at the field and mill, there were evidences of compliance with the applicable local, national laws and legal requirements detailed in the Cambodia Local Indicators.</p> <p>Cambodia is listed by the United Nations as under the 'Least Developed Country' – LDC status and is exempted from full compliance with the applicable ratified International Conventions.</p>	
<p>2.1.2 A documented system, which includes written information on legal requirements, shall be maintained. Minor Compliance</p>	<p>The listing of all the relevant laws applicable included the international laws and conventions ratified by the Cambodian government are documented in the Summary of Laws and Regulations.</p>	Complied
<p>2.1.3 A mechanism for ensuring compliance shall be implemented. Minor Compliance</p>	<p>The PMU has established a documented system explaining the mechanism for identifying, determining, reviewing and updating applicable legal and other requirements that the PMU has subscribed (Document Ref. rev 06 "Mechanism for Implementation of Legal Requirements and System for Tracking Changes in the Law).</p> <p>Monitoring of compliance by departments and RSPO Sustainability Core Team.</p> <p>Operating licenses and permits were displayed, renewed and evidenced to be valid. Statutory returns were settled and receipts filed were sighted.</p> <p>Based on the site observations, interviews and records updated, the system used is appropriately tracking the operations at the PMU.</p>	Complied
<p>2.1.4 A system for tracking any changes in the law shall be implemented. Minor Compliance</p>	<p>Monitoring of changes to the applicable laws and regulations carried out through periodical review in accordance with the documented procedure/mechanism and last review carried out on 18 May 2018.</p>	Complied
<p>Criteria 2.2 The right to use the land is demonstrated, and is not legitimately contested by local people who can demonstrate that they have legal, customary or user rights.</p>		
Indicators	Findings and Objective Evidence	Compliance
<p>2.2.1 Documents showing legal ownership or lease, history of land tenure (confirmation from community leaders based on history of customary land tenure, recognised Native Customary Right (NCR) land) and the</p>	<p>Legal ownership of the land and land tenure for Estate A and Estate B evidenced by the Land Concession Contract between the Cambodian Ministry of Agriculture, Fishery and Forest (AFF) and MRICOP dated 09/01/1996 for a period of 70 years with use of the lands</p>	Complied

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<p>actual legal use of the land shall be available. Major Compliance</p>	<p>for agriculture. Legal ownership of Estate C freehold land for agriculture use evidenced by a purchase document dated 27/07/2011. Estate C was previously cultivated with sugarcane. Estate D is the result of the division of the large Estate C into a smaller Estate C and a new Estate D (Kirivon). There is no current land dispute in the PMU.</p>	
<p>2.2.2 There is evidence that physical markers are located and visibly maintained along the legal boundaries adjacent to state land, NCR land and reserves. Minor Compliance</p>	<p>Verified that there has been no change to the stated land titles and designated use for agricultural use. Boundary stones including other markers such as roads and trenches were found to be visually maintained and were within the perimeters as indicated in the land concession/title. The audit team verified that no planting was done beyond the legal boundary. Legal boundary markers identified in a location map were sighted and maintained along the perimeters of estate lands which were mapped with a differential Global Positioning System (GPS).</p>	Complied
<p>2.2.3 Where there are or have been disputes, additional proof of legal acquisition of title and evidence that fair compensation has been made to previous owners and occupants shall be available, and that these have been accepted with free, prior and informed consent (FPIC). Minor Compliance</p>	<p>The mechanism to resolve any land conflict is established and in place (General Negotiation Procedure SOP-GA-22 Rev 02 dated 29 Apr 2017). The PMU had initiated negotiation and compensation process to resolve some land compensation claims with villagers at Estate C in year 2013 and year 2014. There was evidence of satisfactory resolution of the claims as reported in the previous assessments. Verified that there is currently no land dispute requiring any compensation claim.</p>	Complied
<p>2.2.4 There shall be an absence of significant land conflict, unless requirements for acceptable conflict resolution processes (see Criteria 6.3 and 6.4) are implemented and accepted by the parties involved. Major Compliance</p>	<p>Confirmed that there is no current land conflict.</p>	Complied
<p>2.2.5 For any conflict or dispute over the land, the extent of the disputed area shall be mapped out in a participatory way with involvement of affected parties (including neighbouring communities and relevant authorities where applicable). Minor Compliance</p>	<p>The process of participatory mapping was seen in the resolution of the claims as reported in previous assessments.</p>	Complied
<p>2.2.6 To avoid escalation of conflict, there shall be no evidence that oil palm operations have instigated violence in maintaining peace and order in their current and planned operations. Major Compliance</p>	<p>There was no instigated violence seen in the resolution of the claims reported in previous assessments.</p>	Complied
<p>Criteria 2.3 Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent.</p>		
<p>Indicators</p>	<p>Findings and Objective Evidence</p>	<p>Compliance</p>

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<p>2.3.1 Maps of an appropriate scale showing the extent of recognised legal, customary or user rights (Criteria 2.2, 7.5 and 7.6) shall be developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities).</p> <p>Major Compliance</p>	<p>There are no customary lands in the concession areas (Estate A and Estate B) and legally owned land (Estate C and D). Cultivation of oil palm in these lands has not diminished any legal rights of villagers either.</p> <p>There is currently no land dispute requiring compensation claim.</p>	<p>Complied</p>
<p>2.3.2 Copies of negotiated agreements detailing the process of free, prior and informed consent (FPIC) (Criteria 2.2, 7.5 and 7.6) shall be available and shall include:</p> <p>a) Evidence that a plan has been developed through consultation and discussion with all affected groups in the communities, and that information has been provided to all affected groups, including information on the steps that shall be taken to involve them in decision making;</p> <p>b) Evidence that the company has respected communities' decisions to give or withhold their consent to the operation at the time that this decision was taken;</p> <p>c) Evidence that the legal, economic, environmental and social implications for permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal status of their land at the expiry of the company's title, concession or lease on the land.</p> <p>Minor Compliance</p>	<p>There is currently no land dispute and as such this process is not applicable in this assessment.</p>	<p>Not applicable</p>
<p>2.3.3 All relevant information shall be available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements.</p> <p>Minor Compliance</p>	<p>There is currently no land dispute and as such this process is not applicable in this assessment.</p>	<p>Not applicable</p>
<p>2.3.4 Evidence shall be available to show that communities are represented through institutions or representatives of their own choosing, including legal counsel.</p> <p>Major Compliance</p>	<p>There is currently no land dispute and as such this process is not applicable in this assessment.</p>	<p>Not applicable</p>

Principle 3: Commitment to long-term economic and financial viability

<p>Criteria 3.1 There is an implemented management plan that aims to achieve long-term economic and financial viability.</p>		
Indicators	Findings and Objective Evidence	Compliance
<p>3.1.1 A business or management plan (minimum three years) shall be documented that includes, where appropriate, a business case for scheme smallholders.</p>	<p>Verified that presently, there is only one PMU owned by MRICOP.</p> <p>Currently the MRICOP Grouping comprise of 2 POMs and 4 common supply base estates (Estate A, B, C and D) which still meet the requirements of Multiple Management</p>	<p>Complied</p>

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Major Compliance	<p>Units of RSPO Certification Systems Standard. There are no scheme smallholders in the supply base to the PMU.</p> <p>The Management cum Business Plans has documented details of the 5-years Cash Flow Budgets for year 2018 to 2022 covering the mills and estates.</p> <p>The management plans included items such as the planted areas, areas for harvesting, FFB harvesting (MT FFB/ha), CPO production, %OER, PK production, %KER, revenue, direct costs, indirect costs, net profit, development costs and net cash flow.</p> <p>Mill operational budget/cost include production, maintenance and renewal of permits.</p> <p>Estate operational budget/cost include labour, transport, agrochemicals, fertilizers and other costs documented for operations such as spraying, slashing, weeding, drainage, manuring mulching, pruning, pest disease control, roads and bridges construction and maintenance. New planting, Immature and Mature estate areas upkeep cost/ha and Harvesting cost/mt were also documented.</p> <p>The budget also provided for annual social and environmental programs.</p>	
<p>3.1.2 An annual replanting programme projected for a minimum of five years (but longer where necessary to reflect the management of fragile soils, see Criterion 4.3), with yearly review, shall be available.</p> <p>Minor Compliance</p>	<p>Annual replanting programme had been projected up to year 2022 subject to yearly review.</p> <p>Currently, no replanting is required as the first planting started in year 1997.</p>	Complied

Principle 4: Use of appropriate best practices by growers and millers

Criteria 4.1		
Operating procedures are appropriately documented, consistently implemented and monitored.		
Indicators	Findings and Objective Evidence	Compliance
<p>4.1.1 Standard Operating Procedures (SOPs) for estates and mills shall be documented.</p> <p>Major Compliance</p>	The estates and mills had the relevant Standard Operating Procedures and these are verified to be in order.	Complied
<p>4.1.2 A mechanism to check consistent implementation of procedures shall be in place.</p> <p>Minor Compliance</p>	The mechanism to check the implementation of SOPs was available. Records had been kept by the staff concerned for each operation to monitor the procedure and progress of work, and these records were verified by the Manager regularly.	Complied
<p>4.1.3 Records of monitoring and any actions taken shall be maintained and available, as appropriate.</p> <p>Minor Compliance</p>	The records of monitoring and the actions taken had been maintained at both the mills and supplying estates. These records had been verified to be satisfactory.	Complied
<p>4.1.4 The mill shall record the origins of all third-party sourced Fresh Fruit Bunches (FFB).</p> <p>Major Compliance</p>	Records of the FFB crop is verified to be only from the group estates.	Complied
Criteria 4.2		
Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.		

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Indicators	Findings and Objective Evidence	Compliance
<p>4.2.1 There shall be evidence that good agriculture practices, as contained in Standard Operating Procedures (SOPs), are followed to manage soil fertility to a level that ensures optimal and sustained yield, where possible. Minor Compliance</p>	<p>GAP for minimization of soil erosion and maintenance of soil fertility is maintained via the frond stacking and fertilizer application as per the recommendations provided by Prince of Songkla University, Songkla, Thailand.</p>	Complied
<p>4.2.2 Records of fertiliser inputs shall be maintained. Minor Compliance</p>	<p>Fertiliser applications were carried out in accordance with the Fertiliser Application Programme. Records of such activities had been verified to be in order. At Estate A and Estate B, adequate wooden planks should be provided to ensure that the fertilizer bags are not directly in contact with the cement floor of the fertilizer stores. Hence, an Observation was raised in both estates.</p>	OBS# CBK-01
<p>4.2.3 There shall be evidence of periodic tissue and soil sampling to monitor changes in nutrient status. Minor Compliance</p>	<p>Leaf sampling and analysis had been carried out annually to determine the nutrient levels for fertilizer recommendations that aimed to sustain the long term soil fertility and nutrient efficiency The most recent analysis of the leaf samples were carried out at Estate B on 25 April 2018 by the Central Analytical Center, Faculty of Natural Resources, Prince of Songkla University, Thailand. Soil survey and analysis for the Estate A had been carried out on 25 April 2016 by Agricultural Technical Service from Phnom Penh.</p>	Complied
<p>4.2.4 A nutrient recycling strategy shall be in place, and may include use of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), and palm residues after replanting. Minor Compliance</p>	<p>EFB had been applied around the immature palm at the Estate C and D.</p>	Complied
<p>Criteria 4.3 Practices minimise and control erosion and degradation of soils.</p>		
Indicators	Findings and Objective Evidence	Compliance
<p>4.3.1 Maps of any fragile/marginal soils shall be available. Major Compliance</p>	<p>Soil maps had shown some fragile soil at Estate C in Div. C2 and C3 (about 75 ha). The fragile soil areas are considered to be minimal against the overall size of the planted areas of the estates. Mitigating measures such as planting of leguminous cover crop, application of EFB, stacking of fronds, and fertilizer applications had been planned and carried out as and when applicable to improve the soil conditions.</p>	Complied
<p>4.3.2 A management strategy shall be in place for plantings on slopes between 9 and 25 degrees unless specified otherwise by the company's SOP. Minor Compliance</p>	<p>Planting terraces had been constructed on land with on Estate C. Estate A's topography was generally flat and therefore no terrace was required in these estates. There was no soil erosion noted during the visit.</p>	Complied
<p>4.3.3 A road maintenance programme shall be in place. Minor Compliance</p>	<p>Road maintenance programme and work done records had been verified to be in order. The condition of the estates is generally satisfactory.</p>	Complied

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<p>4.3.4 Subsidence of peat soils shall be minimised and monitored. A documented water and ground cover management programme shall be in place. Major Compliance</p>	<p>There was no peat soil in the estates. This had been confirmed during field visit. Thus this is not applicable.</p>	<p>Not applicable</p>
<p>4.3.5 Drainability assessments where necessary will be conducted prior to replanting on peat to determine the long-term viability of the necessary drainage for oil palm growing. Minor Compliance</p>	<p>As above.</p>	<p>Not applicable</p>
<p>4.3.6 A management strategy shall be in place for other fragile and problem soils (e.g. podzols and acid sulphate soils). Minor Compliance</p>	<p>There are no problematic soils on Estates as verified during field inspection and visit. Fron stacking and fertilizer application based on foliar analysis were carried out to maintain the soil fertility.</p>	<p>Complied</p>
<p>Criteria 4.4 Practices maintain the quality and availability of surface and ground water.</p>		
<p>Indicators</p>	<p>Findings and Objective Evidence</p>	<p>Compliance</p>
<p>4.4.1 An implemented water management plan shall be in place. Minor Compliance</p>	<p>Water management plan was in place and verified to be in order.</p>	<p>Complied</p>
<p>4.4.2 Protection of water courses and wetlands, including maintaining and restoring appropriate riparian and other buffer zones (refer to national best practice and national guidelines) shall be demonstrated. Major Compliance</p>	<p>Buffer zones which were marked at the estates were maintained with no application of agrochemicals for the protection of the water courses.</p>	<p>Complied</p>
<p>4.4.3 Appropriate treatment of mill effluent to required levels and regular monitoring of discharge quality, shall be in compliance with national regulations (Criteria 2.1 and 5.6). Minor Compliance</p>	<p>In Anlong Kropeu Palm Oil Mill, effluent samples were taken at the final discharge points of the effluent pond. Samples were drawn for analysis in March and May 2018. Results of BOD level had ranged between 85 to 95 ppm, up till May 2018. Effluent is discharged to irrigation canals within Estates C and D.</p>	<p>Complied</p>
<p>4.4.4 Mill water use per tonne of Fresh Fruit Bunches (FFB) (see Criterion 5.6) shall be monitored. Minor Compliance</p>	<p>The usage of water at the Mills are monitored monthly. In Monorum Mill, monitoring of water usage in the mill averaged at 4.38 m³/tonne FFB till May 2018. In Anlong Kropeu Mill, the water consumption was averaging at 1.92 m³/tonne FFB in 2017. Water consumption for Jan-May 2018 is at 2.06 m³/tonne FFB.</p>	<p>Complied</p>
<p>Criteria 4.5 Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management techniques.</p>		
<p>Indicators</p>	<p>Findings and Objective Evidence</p>	<p>Compliance</p>
<p>4.5.1 Implementation of Integrated Pest Management (IPM) plans shall be monitored. Major Compliance</p>	<p>Records for the planting and monitoring of beneficial plants such as Cassia cobanensis, Antigonon leptopus, Tunera subulata and their respective locations on the field maps were available.</p>	<p>Complied</p>

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	<p>The treatments carried out when rodent-damaged FFB had exceeded acceptable level were found to be effective.</p> <p>Records showed rhinoceros beetles were caught manually in 2017 and that up to May 2018, there was no rhinoceros beetles caught.</p> <p>There was no bagworm infestation recorded.</p>	
<p>4.5.2 Training of those involved in IPM implementation shall be demonstrated. Minor Compliance</p>	<p>Training records for personnel on IPM implementation were available and was verified on-site to be satisfactory during field assessment.</p>	<p>Complied</p>
<p>Criteria 4.6 Pesticides are used in ways that do not endanger health or the environment.</p>		
<p>Indicators</p>	<p>Findings and Objective Evidence</p>	<p>Compliance</p>
<p>4.6.1 Justification of all pesticides used shall be demonstrated. The use of selective products that are specific to the target pest, weed or disease and which have minimal effect on non-target species shall be used where available. Major Compliance</p>	<p>Written justification for glyphosate and Garlon & other chemicals found in “Justification of Agro-chemical Uses” had been reviewed on 11/6/2018 by Estate Manager and approved by Plantation Director on 12/6/2018 and found acceptable.</p>	<p>Complied</p>
<p>4.6.2 Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) shall be provided. Major Compliance</p>	<p>Records of pesticides and their active ingredients used, LD50, area treated, amount of a.i. applied per ha, and number of applications had been maintained and kept since 2011. Verified that records of monitoring were satisfactorily.</p>	<p>Complied</p>
<p>4.6.3 Any use of pesticides shall be minimised as part of a plan, and in accordance with Integrated Pest Management (IPM) plans. There shall be no prophylactic use of pesticides, except in specific situations identified in industry’s Best Practice. Major Compliance</p>	<p>It had been the policy of the estates to minimize the use of pesticides in accordance with integrated pest management. No prophylactic use of pesticides had been carried out at the estates for the period concerned.</p>	<p>Complied</p>
<p>4.6.4 Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, are not used, except in specific situations identified in industry’s Best Practice. The use of such pesticides shall be minimised and eliminated as part of a plan, and shall only be used in exceptional circumstances. 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). Minor Compliance</p>	<p>It is the policy of the group to discontinue the use of Paraquat since Feb 2012. Verified that this policy has been adhered to on-site.</p>	<p>Complied</p>
<p>4.6.5 Pesticides shall only be handled, used or applied by persons who have completed the necessary training and shall always be applied in accordance with the product label. Appropriate</p>	<p>All pesticide operators had been given training on the handling and application of the pesticides. Appropriate safety and application equipment had been provided and used by the operators.</p>	<p>Complied</p>

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<p>safety and application equipment shall be provided and used. All precautions attached to the products shall be properly observed, applied, and understood by workers (see Criterion 4.7).</p> <p>Major Compliance</p>	<p>All precautions attached to the products had been observed, applied, and understood by the workers.</p> <p>Programme and training records had been verified to be satisfactory.</p>	
<p>4.6.6 Storage of all pesticides shall be according to recognised best practices. All pesticide containers shall be properly disposed of and not used for other purposes (see Criterion 5.3). Pesticides shall be stored in accordance to the Occupational Safety and Health Act 1994 (Act 514) and Regulations and Orders, Pesticides Act 1974 (Act 149) and Regulations.</p> <p>Major Compliance</p>	<p>Storage of pesticides found to be in accordance with the Occupational Safety and Health Laws and Regulations and local laws on pesticides control.</p> <p>Proper poison label (skull and crossed bones symbol) was used to label the pesticide containers and thus the previous observation (OBS# CBK-01) was addressed by the Management.</p> <p>Emergency shower and eye wash station was available and ready for use. First aid kit and fire extinguishers were available.</p>	Complied
<p>4.6.7 Application of pesticides shall be by proven methods that minimise risk and impacts.</p> <p>Minor Compliance</p>	<p>Pesticides had been applied using the proven methods (Best Management Practices) that minimize risk and impacts.</p>	Complied
<p>4.6.8 Pesticides shall be applied aerially only where there is documented justification. Communities shall be informed of impending aerial pesticide applications with all relevant information within reasonable time prior to application.</p> <p>Major Compliance</p>	<p>The Management does not use aerial application of pesticides. This practice has been adhered.</p>	Complied
<p>4.6.9 Evidence of continual training to enhance knowledge and skills of employees and associated smallholders on pesticide handling shall be demonstrated or made available. (see Criterion 4.8).</p> <p>Minor Compliance</p>	<p>Periodic training on pesticide handling had been carried out. Material Safety Data Sheets for the pesticides were available in the stores.</p>	Complied
<p>4.6.10 Proper disposal of waste material, according to procedures that are fully understood by workers and managers shall be demonstrated (see Criterion 5.3).</p> <p>Minor Compliance</p>	<p>Drums had been punctured with holes at bottom and kept in the store.</p> <p>Some of the 20 litre drums were reused for holding diluted chemical mixture for spraying.</p> <p>The used containers for hazardous chemicals are kept in the store until the relevant authority provides a guideline on the procedure for disposal.</p>	Complied
<p>4.6.11 Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, shall be demonstrated.</p> <p>Major Compliance</p>	<p>Pesticides worker were sent for medical surveillance in February and May 2018.</p> <p>The medical results as obtained from the clinics had indicated that all the workers were fit to perform their respective work.</p>	Complied
<p>4.6.12 No work with pesticides shall be undertaken by pregnant or breast-feeding women.</p> <p>Major Compliance</p>	<p>Verified from records and through interviews with female field workers that no pregnant or breast-feeding woman had been offered work which required her to handle hazardous chemicals.</p>	Complied
<p>Criteria 4.7 An occupational health and safety plan is documented, effectively communicated and implemented.</p>		

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Indicators	Findings and Objective Evidence	Compliance
<p>The occupational health and safety plan shall cover the following:</p> <p>4.7.1 An occupational health and safety policy shall be in place. An occupational health and safety plan covering all activities shall be documented and implemented, and its effectiveness monitored.</p> <p>Major Compliance</p>	<p>Occupational Safety and Health (OSH) plan in compliance with OSH Act and Factory Machinery Act was documented and implemented.</p> <p>OSH policy was clearly displayed at POM and in estates office. Workers had demonstrated awareness towards occupational safety and health policy.</p> <p>POM & its estates established their accident reporting KPI, and incident monitoring implemented.</p> <p>Procedures and actions documented and implemented on the issues concerned.</p> <p>Training programmes for year 2087 were implemented. Records of training on safe working practices for workers involved in pesticides spray, use of fire extinguishers, awareness & understanding of MSDS/CSDS, First Aid boxes were sighted at both POM & estates.</p> <p>Appropriate PPE (safety boots, safety helmets, rubber boots, cartridge masks, safety goggles, gloves) verified to be provided. Ear protective device put on by workers working at engine rooms of POM.</p> <p>The workers had undergone medical checks annually and were all found to be fit for work.</p> <p>Companies had provided the appropriate PPE at the place of work to cover all potentially hazardous operations such as pesticides application, and harvesting and fertilizer applications.</p> <p>The Safety & Health officer was responsible for overall in charge of safety and health planning, operation & coordination.</p> <p>Adequate fire extinguisher are located at strategic locations, at the Mills, Estates offices and housing areas.</p> <p>First Aid Kits and equipment were available at POM, estates and at worksite. Samples of First Aid boxes were checked and contents found to be complete and in usable order at Estate A and Estate C, where harvesting and weed slashing activities were observed during field visit.</p> <p>The management had taken action to address the previous non-compliance and hence the NC# CBK-01 was closed effectively.</p>	<p>Complied</p>
<p>4.7.2 All operations where health and safety is an issue shall be risk assessed, and procedures and actions shall be documented and implemented to address the identified issues. All precautions attached to products shall be properly observed and applied to the workers.</p> <p>Major Compliance</p>	<p>Risk assessment carried out on all operations where health and safety is an issue (e.g. noise exposure, pesticides/chemicals exposure, accident, fire).</p> <p>All operations had been risk assessed, documented and implemented.</p> <p>The workers were observed to have worn the required PPE and during interview were able to confirm that PPE was provided to them by the estate management.</p> <p>At Monorom and Anlong Kropou Palm Oil Mills:</p>	<p>OBS# CBK-02</p>

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	<p>The risk assessment relating to working at heights, flocculation tanks at water treatment plant, noise mapping results should be updated. An Observation was raised.</p>	
<p>4.7.3 All workers involved in the operation shall be adequately trained in safe working practices (see Criterion 4.8). Adequate and appropriate protective equipment shall be available to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, and land preparation, harvesting and, if it is used, burning. Major Compliance</p>	<p>Training programme had been carried out. All workers involved had been adequately trained on the safe working practices for the respective field work. Appropriate PPE had been provided to all workers at the place of work to cover all potentially hazardous operations.</p>	<p>Complied.</p>
<p>4.7.4 The responsible person/persons shall be identified. There shall be records of regular meetings between the responsible person/s and workers. Concerns of all parties about health, safety and welfare shall be discussed at these meetings, and any issues raised shall be recorded. Major Compliance</p>	<p>Regular OSH meetings between responsible persons and the workers had been carried out at the Mills and Estates at quarterly intervals and meeting records were maintained. Issues raised were followed up and these were verified.</p>	<p>Complied</p>
<p>4.7.5 Accident and emergency procedures shall exist and instructions shall be clearly understood by all workers. Accident procedures shall be available in the appropriate language of the workforce. Assigned operatives trained in First Aid should be present in both field and other operations, and first aid equipment shall be available at worksites. Records of all accidents shall be kept and periodically reviewed. Minor Compliance</p>	<p>Accident and emergency procedures had been written and briefed to staff, workers, contractors and visitors. Workers trained in First Aid were present in the mill and field operations. The items and contents were regularly checked and topped up when needed. Records of checking were available and maintained. Records on all accidents had been verified to be maintained satisfactorily. Review on accident cases had been carried out during quarterly meeting of the Environment, Safety, & Health (ESH) However, non-compliance (NC# CBK-01) was raised for the following: (1) At Anlong Kropeu Palm Oil Mill (I) There was accident that had occurred during repair and maintenance of the recovery station in the Anlong Kropeu Mill on 5 May 2018 when the hand of a cleaner got caught in the machine. This accident was reported, investigated and follow up actions were proposed and time frame for implementation was recommended. The lost time due to this accident was reported to be 50 hours. a) There was no evidence that reassessment of the risk for the Sterilizer operation was conducted. b) There was no evidence of follow up training session provided to the workers on new control measure to prevent recurrence of the accident. c) The cleaner who was involved in the accident was not trained or authorised to perform repair and maintenance work on the steriliser.</p>	<p>Major NC# CBK-01 (upgraded)</p>

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	<p>(II) The fire extinguisher near the water treatment plant showed that it required recharge. There was no evidence that the readiness of the fire extinguishers was monitored</p> <p>The fire hose located near the water treatment plant was leaking and without a nozzle.</p> <p>At Estate B</p> <p>The lost time due the accident involving worker (Hoy Rathana) on 7 March 2018 was reported to be 72 hours. However, there was no evidence that a risk re-assessment was conducted.</p> <p>(2) At Monorom Palm Oil Mill, risk Assessment reviewed on 26/4/2018 had included reassessment of previous accident when the rope for pulling the cage came loose and hit the worker. It was recorded in the risk re-assessment that additional control measure included was to always stand away from path of rope while pulling cage.</p> <p>However, SOP-CM-022 Machinery Safety had not included this additional control measure.</p> <p>Since at the previous assessment (Re-cert 2017), a Minor NC# CBK-01 and an Observation OBS# CBK-02) have been raised against this same indicator, the NC is now upgraded to Major NC as the corrective action taken is considered to be not effectively implemented.</p>	
<p>4.7.6 All workers shall be provided with medical care, and covered by accident insurance. Minor Compliance</p>	<p>Medical care had been provided to all the workers via the estate clinics. Local workers are covered by National Social Security Fund (NSSF) and Healthcare and Accident insurance is covered under Prevoir Insurance which is valid till Mar 2019.</p>	<p>Complied</p>
<p>4.7.7 Occupational injuries shall be recorded using Lost Time Accident (LTA) metrics. Minor Compliance</p>	<p>The Mill and estates had recorded the occupational injuries using the Lost Time Accident metrics.</p>	<p>Complied</p>
<p>Criteria 4.8 All staff, workers, smallholders and contract workers are appropriately trained.</p>		
<p>Indicators</p>	<p>Findings and Objective Evidence</p>	<p>Compliance</p>
<p>4.8.1 A formal training programme shall be in place that covers all aspects of the RSPO Principles and Criteria, and that includes regular assessments of training needs and documentation of the programme. Major Compliance</p>	<p>A formal training programme on all aspects of RSPO Principles and Criteria was established and implemented. Training for various categories of office management, operations and sustainability team members with regards to their roles and duties were reviewed and acceptable.</p>	<p>Complied</p>
<p>4.8.2 Records of training for each employee shall be maintained. Minor Compliance</p>	<p>Records for training attended by individual employees including refresher briefing /training for field workers were verified to be updated and maintained.</p>	<p>Complied</p>

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Principle 5: Environmental responsibility and conservation of natural resources and biodiversity

Criteria 5.1		
Aspects of plantation and mill management, including replanting, that have environmental impacts are identified, and plans to mitigate the negative impacts and promote the positive ones are made, implemented and monitored, to demonstrate continual improvement.		
Indicators	Findings and Objective Evidence	Compliance
<p>5.1.1 An environmental impact assessment (EIA) shall be documented. Major Compliance</p>	<p>EIA and SIA for the mills and estates carried out by Green Consultancy Group (SEIA Report for Estate A & Estate B dated Nov 2011 and SEIA Report for Estate C dated May 2014).</p> <p>Contents of the EIA report had included the following matters:</p> <ul style="list-style-type: none"> • The laws related to environment and pollution. • Positive and negative impacts of aspects were assessed with mitigation plans. • The soils with geology and parent materials were documented. • The polluting activities with direct impact on water bodies and air. <p>The wildlife, flora and fauna and its classification of rare, threatened and endangered species (RTE) potentially existing in and around the vicinity of the extended areas.</p> <p>Environmental Impacts Assessment and Social Impacts Assessment for the mills and estates were documented and annually reviewed.</p> <p>Management Action Plans, Monitoring and Continuous Improvement Program covering Estates A, B, C and D, including Central Workshop & Health Dispensary were identified, implemented and monitored.</p>	<p>Complied</p>
<p>5.1.2 Where the identification of impacts requires changes in current practices, in order to mitigate negative effects, a timetable for change shall be developed and implemented within a comprehensive action plan. The action plan shall identify the responsible person/persons. Minor Compliance</p>	<p>The environmental aspects and impacts have been identified at the mills and estates.</p> <p>Environmental Management Action Plans and Monitoring Plans have been identified, implemented and monitored at the mills and estates. The plans were sufficiently comprehensive and persons responsible (i.e. the respective Mill Managers and Estate Managers) were identified.</p>	<p>Complied</p>
<p>5.1.3 This plan shall incorporate a monitoring protocol, adaptive to operational changes, which shall be implemented to monitor the effectiveness of the mitigation measures. The plan shall be reviewed as a minimum every two years to reflect the results of monitoring and where there are operational changes that may have positive and negative environmental impacts. Minor Compliance</p>	<p>The documented environmental plans and monitoring of operational changes were reviewed on an annual basis. Implementation on the effectiveness of mitigation measures was also reviewed.</p> <p>Environmental Impacts Assessment, Management Action Plans, Monitoring and Continuous Improvement Program for the Monorum POM and Anlong Kropeu POM reviewed by the Technical & Engineering Manager on 01 May 2018.</p> <p>Environmental Impacts Assessment, Management Action Plans, Monitoring and Continuous Improvement Program for the Estates A, B, C and D, including Central Workshop & Health Dispensary has been documented since Nov 2011 and latest review by the respective Estate Managers on 11 Jun 2018.</p>	

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	<p>Details of daily operational activities and its aspects of negative and positive impacts including pruning, fertilizing, pesticide spraying, waste disposal, road maintenance and environmental emissions were made available. Action plans and recommendations in order to mitigate negative effects and promote positive ones such as sewage, landfills and conservation activities applicable to the entire mills and estates were monitored. Monitoring of air quality emissions from the stack discharge was carried out for both mills.</p> <p>Location: Monorum POM</p> <p>According to the Environmental Action Plan (p13) for Monorum POM, the discharge of POME into the stream only when sample taken and analyzed found to meet the standard requirements for various parameters. Noted that for the sample dated 18 May 2018, the analysis results dated 24 May 2018 from Food and Chemical Services stated the following parameters as not complying with the standard requirements:</p> <table style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: left;"><u>Parameter:</u></th> <th style="text-align: center;"><u>Result</u></th> <th style="text-align: center;"><u>Requirement</u></th> </tr> </thead> <tbody> <tr> <td>Ammoniacal Nitrogen (mg/L)</td> <td style="text-align: center;">28</td> <td style="text-align: center;">< 7 mg/L</td> </tr> <tr> <td>Total Dissolved Solid (mg/L)</td> <td style="text-align: center;">3200</td> <td style="text-align: center;">< 2000 mg/L</td> </tr> <tr> <td>Chemical Oxygen Demand (mg/L)</td> <td style="text-align: center;">155</td> <td style="text-align: center;">< 100 mg/L</td> </tr> </tbody> </table> <p>Location: Anlong Kropeu POM</p> <p>According to the Environmental Action Plan (p14) for Anlong Kropeu POM, the discharge of POME into the stream only when sample taken and analyzed found to meet the standard requirements for various parameters. Noted that for the sample dated 18 May 2018, the analysis results dated 24 May 2018 from Food and Chemical Services stated the following parameters as not complying with the standard requirements:</p> <table style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: left;"><u>Parameter:</u></th> <th style="text-align: center;"><u>Result</u></th> <th style="text-align: center;"><u>Requirement</u></th> </tr> </thead> <tbody> <tr> <td>Ammoniacal Nitrogen (mg/L)</td> <td style="text-align: center;">59</td> <td style="text-align: center;">< 7 mg/L</td> </tr> <tr> <td>Total Dissolved Solid (mg/L)</td> <td style="text-align: center;">3600</td> <td style="text-align: center;">< 2000 mg/L</td> </tr> <tr> <td>Chemical Oxygen Demand (mg/L)</td> <td style="text-align: center;">270</td> <td style="text-align: center;">< 100 mg/L</td> </tr> </tbody> </table> <p>There was no evidence of a review of the analysis results by a responsible person to detect non-compliance results and identification of further action.</p>	<u>Parameter:</u>	<u>Result</u>	<u>Requirement</u>	Ammoniacal Nitrogen (mg/L)	28	< 7 mg/L	Total Dissolved Solid (mg/L)	3200	< 2000 mg/L	Chemical Oxygen Demand (mg/L)	155	< 100 mg/L	<u>Parameter:</u>	<u>Result</u>	<u>Requirement</u>	Ammoniacal Nitrogen (mg/L)	59	< 7 mg/L	Total Dissolved Solid (mg/L)	3600	< 2000 mg/L	Chemical Oxygen Demand (mg/L)	270	< 100 mg/L	<p>Minor NC# OCL-01</p>
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<p>Criteria 5.2 The status of rare, threatened or endangered species and other High Conservation Value habitats, if any, that exist in the plantation or that could be affected by plantation or mill management, shall be identified and operations managed to best ensure that they are maintained and/or enhanced.</p>																										
Indicators	Findings and Objective Evidence	Compliance																								
<p>5.2.1 Information shall be collated in a High Conservation Value (HCV) assessment that includes both the planted area itself and relevant wider landscape-level considerations (such as wildlife corridors). Major Compliance</p>	<p>HCV assessment carried out by an RSPO approved HCV consultant, Environ Logic Consultancy and report dated Mar 2012. The HCV assessment made was in accordance with the recommended RSPO-'HCVF Toolkit'. Conservation and HCV areas were identified at the mills and estates with estimated size/ hectareage indicated. There was only a small HCV area at this</p>	Complied																								

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	<p>PMU, which is the Khmer soldiers' burial site located inside Estate D. The community forest (for villagers to collect fire woods) is located outside the boundary of Estate C.</p> <p>The annual review of Conservation and HCV areas was carried out and documented on 13 Jun 2017.</p> <p>It is verified during current assessment on site that there is no change to the HCV area.</p>	
<p>5.2.2 Where rare, threatened or endangered (RTE) species, or HCVs, are present or are affected by plantation or mill operations, appropriate measures that are expected to maintain and/or enhance them shall be implemented through an action plan. Major Compliance</p>	<p>Action plans had included the monitoring and control of any illegal hunting, fishing or collecting activities.</p> <p>Signboards for conservation areas, buffer zones and signages that prohibit hunting, fishing and water polluting activities were verified on-site and found to have been satisfactorily maintained. Signage placed at the border of the community forest located outside the boundary of Estate C.</p>	Complied
<p>5.2.3 There shall be a programme to regularly educate the workforce about the status of these RTE species, and appropriate disciplinary measures shall be instituted in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect or kill these species. Minor Compliance</p>	<p>The estates management has undertaken appropriate measures to control any illegal or inappropriate hunting, fishing or collecting activities within the estates.</p> <p>'Conservation Zone' signages and "no hunting" policy were prominently displayed and verified to be maintained during field visit.</p> <p>Awareness programs carried out to educate the workforce about the status of RTE species carried out and the latest training was on 13 Feb 2018. Records (training content, attendance list and photos) on the training program were maintained.</p> <p>Corrective action taken on previous assessment (Re-cert 2017) Minor NC# SH-01 verified to be effectively implemented.</p>	Complied
<p>5.2.4 Where an action plan has been created there shall be ongoing monitoring:</p> <ul style="list-style-type: none"> • The status of HCV and RTE species that are affected by plantation or mill operations shall be documented and reported; • Outcomes of monitoring shall be fed back into the action plan. <p>Minor Compliance</p>	<p>Environmental Management & Monitoring Plan had included monitoring at the Conservation & HCV areas for potential RTE such as rare species of birds (as per the list of MAFF 2007) in the concession areas of Estates A and C & D, e.g. Siamese Fireback and Chestnut-Headed Partridge and wildlife such as the nocturnal Slow Loris (under the IUCN list).</p> <p>Regular patrols within the PMU estates, i.e. at least once monthly, had been carried out by the Estate Executives or Assistant Managers to monitor the Conservation / buffer zone areas and RTE species, and the reporting was done on an ad-hoc basis.</p> <p>Regular patrols within the POM and estates were carried out to monitor the status of conservation / buffer zone areas and RTE species. Findings (e.g. wildlife sighting or evidence of any encroachment) recorded by the respective Estate Executives.</p> <p>Corrective action taken on previous assessment (Re-cert 2017) Major NC# SH-01 verified to be effectively implemented.</p>	Complied
<p>5.2.5 Where HCV set-asides with existing rights of local communities have been identified, there shall be evidence of a negotiated agreement that optimally</p>	<p>It is verified that there has been no instance of HCV set-aside that conflicts with the rights of local communities at the PMU. Thus negotiated agreement of such nature is not required.</p>	Complied

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safeguards both the HCVs and these rights. Minor Compliance	The Local Community forest at Cheung Ka Lo village is located some 20 km away from the PMU Estate C.	
Criteria 5.3 Waste is reduced, recycled, re-used and disposed of in an environmentally and socially responsible manner.		
Indicators	Findings and Objective Evidence	Compliance
5.3.1 All waste products and sources of pollution shall be identified and documented. Major Compliance	Documentation on the identification of all the waste products such as scheduled waste, domestic waste , clinical waste and recyclable waste such as metal, plastic, mill waste and polluting materials, e.g. EFB, POME, stack emissions and boiler ashes were maintained and monitored at the PMU. Segregation of wastes, i.e. general wastes and scheduled wastes, was verified to be satisfactory. Proper storage areas were identified for the storage of the recyclable wastes.	Complied
5.3.2 All chemicals and their containers shall be disposed of responsibly. Major Compliance	The management has identified the listing of all the types of wastes at the mills and estates. Scheduled wastes such as used engine and filter oils were kept separately in a schedule waste store. A record is kept on the quantity of used oil stored at the waste store. Rags and empty filters were also stored in the same scheduled waste store. Used vehicle batteries were kept in a separate store. Empty pesticide containers were kept in another store. The empty fertilizer bags were stored separately. Empty fertilizer bags were reused for the collection of loose fruits. Workshops were noted to be using drip trays (oil spillage containment pits) at the time of changing of oil. It has been verified that scheduled wastes were not mixed with domestic wastes.	Complied
5.3.3 A waste management and disposal plan to avoid or reduce pollution shall be documented and implemented. Minor Compliance	Waste Management Plan for the Monorum POM and Anlong Kropeu POM reviewed by the Technical & Engineering Manager on 01 May 2018. Waste Management Plan for the Estates A, B, C and D, including Central Workshop & Health Dispensary reviewed by the respective Estate Managers on 11 Jun 2018. Controls for the storage and disposal of items under scheduled or hazardous wastes have been adequately implemented. Waste disposal contractors are monitored. Currently, the local Cambodian laws have no specific requirements for disposal of scheduled wastes, (including used High Density Polyethylene – HDPE, pesticide containers) for the plantation sectors. Recycling of crop residues / biomass, i.e. EFB and POME had been implemented. Management EFB application plans and progress reports were verified to be satisfactory. At both mills, POME is also applied directly to the nearby fields.	Complied

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	Landfills for the estates were found to be satisfactorily managed, fenced, and the sites were located away from water bodies. Methods of disposal e.g. landfill locations /size and recycling methods or methods for reduction of pollution were documented and monitored.	
Criteria 5.4 Efficiency of fossil fuel use and the use of renewable energy is optimised.		
Indicators	Findings and Objective Evidence	Compliance
<p>5.4.1 A plan for improving efficiency of the use of fossil fuels and to optimise renewable energy shall be in place and monitored.</p> <p>Minor Compliance</p>	<p>The use of energy in palm oil mill and line site was monitored monthly to compare the energy usage against the production of CPO. Electricity generation was through steam turbine and boiler where palm fiber and PK shells were used as renewable energy/fuel.</p> <p>Monthly records of energy consumption of non-renewable and renewable fuel per metric tonne of palm product at the POMs were available.</p> <p>It was verified that energy usage was monitored and data compiled at the POMs for comparison and control.</p> <p>Usage of electricity, diesel and water was tabulated and made available during the audit monitored on a monthly basis.</p> <p>At the estates, diesel consumption per metric ton FFB was also monitored on a monthly basis.</p>	Complied
Criteria 5.5 Use of fire for preparing land or replanting is avoided, except in specific situations as identified in the ASEAN guidelines or other regional best practice.		
Indicators	Findings and Objective Evidence	Compliance
<p>5.5.1 There shall be no land preparation by burning, other than in specific situations as identified in the 'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003, or comparable guidelines in other regions.</p> <p>Major Compliance</p>	<p>The 'No Open Burning' policy established by MRICOP PMU established since 2011 has been maintained at the mill and estates. The management has suitable firefighting plans, equipment and facilities for new planting areas. Fire prevention belts are prepared during drought season along the boundaries. Fire trucks with water pumps and engines remained on standby in case of any incidence of fire outbreak.</p> <p>The management continues to maintain support for any fire control of surrounding and neighboring villagers, when needed or requested.</p>	Complied
<p>5.5.2 Where fire has been used for preparing land for replanting, there shall be evidence of prior approval of the controlled burning as specified in 'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003, or comparable guidelines in other regions.</p> <p>Minor Compliance</p>	<p>The PMU has adhered to the 'zero burning' policy.</p> <p>There was no replanting at the estates.</p> <p>There was no evidence of any burning of domestic waste at the housing line sites and at the sanitary landfills of the estates during on site field assessment.</p>	Complied
Criteria 5.6 Plans to reduce pollution and emissions, including greenhouse gases, are developed, implemented and monitored.		
Indicators	Findings and Objective Evidence	Compliance
<p>5.6.1 An assessment of all polluting activities shall be conducted, including gaseous emissions, particulate/soot emissions and effluent (see Criterion 4.4).</p>	<p>The PMU had reviewed the environmental impact assessment on potential pollution to air, water and contamination on land on an annual basis. The latest</p>	Complied

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<p>Major Compliance</p>	<p>Environmental Impact Assessment and Management Action Plans were reviewed on 11 Jun 2018. POME treatment, monitoring and land application is monitored and records maintained.</p>	
<p>5.6.2 Significant pollutants and greenhouse gas (GHG) emissions shall be identified, and plans to reduce or minimise them implemented. Major Compliance</p>	<p>Significant pollutants and greenhouse gas (GHG) emissions were identified, e.g. POME, diesel / fuel, fertilizer and pesticide usage have been documented and maintained at the PMU. Plans to reduce or minimise them were available and progressively implemented. Pollution Mitigation Plan complete with all identified polluting activity has been prepared in accordance with local regulations and sub-decree. Sources of pollution included stack emissions, boiler ash and run off and control measures needed were identified. Latest report on air emission monitoring at the mills was on 31 May 2018. Observation: It was noted that the emission air quality report for sample dated 31 May 2018 at Monorum POM did not include a test for dust particle emission. It was verified that the POME is treated in the aerobic, anaerobic ponds prior to final discharge point. Water samples were regularly taken at the mills and estates and tested by Government recognised external lab at Phnom Penh. Analysis reports are reviewed by respective mill and estate managers. Records are maintained and verified on-site to be satisfactory.</p>	<p>OBs# OCL-02</p>
<p>5.6.3 A monitoring system shall be in place, with regular reporting on progress for these significant pollutants and emissions from estate and mill operations, using appropriate tools. Minor Compliance</p>	<p>The monitoring system for significant pollutants was implemented and data compiled and to be reviewed on a monthly basis by the respective mill and estate managers. Location: Estate B and Estate C It was found that the standard BOD limit of < 30 mg/L was exceeded in the following water sampling and analysis for May 2018: (1) Estate B: BOD results for streams at Div B1, Div B3 and Div. B4 ranged from 40 to 59 mg/L. (2) Estate C: BOD results for streams at Div C1 and Div. C3 were 60 and 71 mg/L respectively. There was no evidence of a review of the analysis results by a responsible person to detect non-compliance results and identification of further action. (Note: The upper limit specified by Cambodian Government was 500 ppm for land application and 80 ppm for discharge to water way). The PMU had implemented the RSPO PalmGHG tool (ver. 3.0.1) and submitted the PalmGHG Summary Report to RSPO Secretariat via email on 21 Apr 2018.</p>	<p>Minor NC# OCL-02</p>

Principle 6: Responsible consideration of employees and of individuals and communities affected by growers and millers

Criteria 6.1

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Aspects of plantation and mill management that have social impacts, including replanting, are identified in a participatory way, and plans to mitigate the negative impacts and promote the positive ones are made, implemented and monitored, to demonstrate continual improvement.		
Indicators	Findings and Objective Evidence	Compliance
<p>6.1.1 A social impact assessment (SIA) including records of meetings shall be documented.</p> <p>Major Compliance</p>	<p>The MRICOP group Social Impact Assessment for the Mills and Estates was reviewed on 13 June 2018.</p> <p>It is noted that the reviewed SIA has incorporated the recommendations submitted by the external consultant from Green Consultancy Group Ltd in year 2011. There was an additional and separate SIA for Estate D report in 2014.</p> <p>The annual meetings for both internal and external stakeholder consultations were minuted and available for verification.</p>	Complied
<p>6.1.2 There shall be evidence that the assessment has been done with the participation of affected parties.</p> <p>Major Compliance</p>	<p>Participation of affected parties was evidence with documented participant lists and photographs of meetings held.</p> <p>The participants had included both internal and external stakeholders such as representatives of permanent employees and contract workers, representatives from contractors, suppliers, local communities and government agencies.</p>	Complied
<p>6.1.3 Plans for avoidance or mitigation of negative impacts and promotion of the positive ones, and monitoring of impacts identified, shall be developed in consultation with the affected parties, documented and timetabled, including responsibilities for implementation.</p> <p>Major Compliance</p>	<p>The SIA Implementation and Monitoring Plan for 2018 was reviewed and revised to promote the positive impacts and to mitigate the negative ones. The respective Mills and Estate managers of affected areas are responsible for implementation and monitoring of the plan.</p> <p>The feedback and comments from stakeholders during consultation sessions in 2018 were recorded and actions needed were considered by the Management with planning and progressively followed up.</p> <p>Thus previous year (2017) Major NC# JMD-01 was effectively implemented and closed.</p>	Complied
<p>6.1.4 The plans shall be reviewed as a minimum once every two years and updated as necessary, in those cases where the review has concluded that changes should be made to current practices. There shall be evidence that the review includes the participation of affected parties.</p> <p>Minor Compliance</p>	<p>SIA management plan was reviewed annually and additional stakeholder consultations were held in May 2018 with affected parties and necessary changes were updated. Implementation on the resulting programs was ongoing and monitored at defined intervals as evidenced during audit.</p>	Complied
<p>6.1.5 Particular attention shall be paid to the impacts of smallholder schemes (where the plantation includes such a scheme).</p> <p>Minor Compliance</p>	<p>Verified that there were no Oil Palm smallholders in the PMU.</p>	Not applicable
<p>Criteria 6.2</p> <p>There are open and transparent methods for communication and consultation between growers and/or millers, local communities and other affected or interested parties.</p>		
Indicators	Findings and Objective Evidence	Compliance
<p>6.2.1 Consultation and communication procedures shall be documented.</p>	<p>The established General Negotiation Procedure - SOP GA 022 dated Jan 2012 is still currently in use.</p>	Complied

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<p>Major Compliance</p>	<p>MRICOP also declares its commitment to RSPO transparency requirements by providing a page with instructions on how stakeholders could communicate their concerns directly: http://www.mricop.com.kh/index.php/link/rspo-certification-project</p>	
<p>6.2.2 A management official responsible for these issues shall be nominated. Minor Compliance</p>	<p>The organizational structure presented shows the HR & Admin. Manager: Saranchai Ounviset, as the nominated person for the whole PMU with regards to social related issues. Letter of appointment were signed by Mr. Sumate Pratumswan, MD dated 01 Feb 2017. At the estates and mill level, these issues are under the responsibility of the respective managers. Interviews done verified that they understand their specific roles and responsibilities and were actively involved in the implementations needed.</p>	<p style="text-align: center;">Complied</p>
<p>6.2.3 A list of stakeholders, records of all communication, including confirmation of receipt and that efforts are made to ensure understanding by affected parties, and records of actions taken in response to input from stakeholders, shall be maintained. Minor Compliance</p>	<p>List of stakeholders for the whole PMU is sighted which include all relevant parties, e.g. Government agencies – local Environmental officials, Hospital doctors, Village commune heads, Sundry shop operators, Cattle owners and Contractors. Changes were updated such as new Chief of Tanney commune, Mr Ok Savoem in 2018.</p>	<p style="text-align: center;">Complied</p>
<p>Criteria 6.3 There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties.</p>		
<p>Indicators</p>	<p>Findings and Objective Evidence</p>	<p>Compliance</p>
<p>6.3.1 The system, open to all affected parties, shall resolve disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants and whistleblowers, where requested. Major Compliance</p>	<p>The PMU has an established and documented system for dealing with complaints and grievances. SOP for Complaints/Grievances [SOP-GA-019] is available. Feedbacks for improvement as raised during the stakeholders consultations in year 2018 were recorded in the minutes. Suggestion box are maintained and available in front of the respective Mill & Estate offices. There has been no disputes and whistle blowing incident reported for the previous year.</p>	<p style="text-align: center;">Complied</p>
<p>6.3.2 Documentation of both the process by which a dispute was resolved and the outcome shall be available. Major Compliance</p>	<p>The general complaints received were noted to include maintenance needed workers housing quarters, road conditions and temporary water supply to the nearby villages. Complaints such as for leaking sinks and blocked drainages are managed by respective managers in charge and the maintenance unit. Records and photographs of maintenance works completed were maintained.</p>	<p style="text-align: center;">Complied</p>
<p>Criteria 6.4 Any negotiations concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.</p>		
<p>Indicators</p>	<p>Findings and Objective Evidence</p>	<p>Compliance</p>

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<p>6.4.1 A procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, shall be in place.</p> <p>Major Compliance</p>	<p>The organization has a documented policy on compensation management PC-GA-024 as reported during the Main Assessment in 2012.</p> <p>The procedure provides the process for identifying legal and customary rights and for identifying people entitled to compensation.</p> <p>Based on interview with stakeholders from nearby villagers, it was verified that there was no new land acquisition and compensation issues.</p>	<p style="text-align: center;">Complied</p>
<p>6.4.2 A procedure for calculating and distributing fair compensation (monetary or otherwise) shall be established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. This procedure shall take into account: gender differences in the power to claim rights, ownership and access to land; differences of transmigrants and long-established communities; and differences in ethnic groups' proof of legal versus communal ownership of land.</p> <p>Minor Compliance</p>	<p>There is a documented procedure for calculating and distributing compensation, i.e. Land compensation and Negotiation procedure Flow chart, i.e. LC-NP-FC-002/14 dated 19 Jun 2014 signed by GM & VP – Agriculture/Oil Palm is noted to be maintained.</p>	<p style="text-align: center;">Complied</p>
<p>6.4.3 The process and outcome of any negotiated agreements and compensation claims shall be documented, with evidence of the participation of affected parties, and made publicly available.</p> <p>Major Compliance</p>	<p>The records of past negotiation process and the outcomes as documented in the minutes of meeting and evident in photographs were maintained. Verified that there are no new issues of such nature during present audit.</p>	<p style="text-align: center;">Complied</p>
<p>Criteria 6.5 Pay and conditions for employees and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages.</p>		
<p>Indicators</p>	<p>Findings and Objective Evidence</p>	<p>Compliance</p>
<p>6.5.1 Documentation of pay and conditions shall be available.</p> <p>Major Compliance</p>	<p>Pay and conditions are clearly documented in the Employment Contracts (in Khmer language) which was explained, understood and signed by the employees and the organization upon acceptance of work.</p> <p>This applies to all workers i.e. basic, semi-skilled and skilled. Reviews of pay statements verified to have contained all necessary information and can easily be understood by the workers, e.g. type and rate of works completed, days offered, days worked, days absent, total deduction, etc.</p> <p>A review of some field workers' pay slips showed that the calculation of pay is clearly itemised, for example:</p> <ul style="list-style-type: none"> - Normal day field work wage [Daily Rated or Piece Rated] - Normal working day overtime - Working rest day - Overtime for working rest day - Working public holiday 	<p style="text-align: center;">Complied</p>

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	<ul style="list-style-type: none"> - Overtime for working public holiday - Sick and annual leave pay - Maternity leave <p>Confirmed understanding by both permanent and contract workers during sampling interview with some workers.</p>	
<p>6.5.2 Labour laws, union agreements or direct contracts of employment detailing payments and conditions of employment (e.g. working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc.) shall be available in the languages understood by the workers or explained carefully to them by a management official.</p> <p>Major Compliance</p>	<p>Review of the employment contracts revealed detailed conditions in Khmer language which include the following employment details:</p> <ul style="list-style-type: none"> - job position - basic pay and overtime - working hours - work expectations - termination terms - Food allowance <p>Interviews with women general workers confirmed their knowledge entitlement for two months maternity leave. The case of paid maternity leave was verified e.g. Mdm Prom Sophea during interview and pay slips verification.</p> <p>Public holiday pay with attendance incentive scheme where workers will get extra pay with full attendance for every 10 days. Workers who absent before or after public holidays are not eligible for the incentive pay [or in this case equivalent to public holiday pay] as they are considered as violating their employment contract with the management.</p> <p>The contract of agreement for services of contractors and contract workers for the harvesting of FFB was available at the Estates.</p> <p>Documentation detailing the conditions of employment for the contract harvesters were clear and understood by the contractors and workers.</p> <p>Thus previous year (2017): Major NC# JMD-02 was effectively addressed, implemented and closed.</p>	<p style="text-align: center;">Complied</p>
<p>6.5.3 Growers and millers shall provide adequate housing, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible.</p> <p>Minor Compliance</p>	<p>Day-care centre was established in the linesite with sufficient number of trained caretakers.</p> <p>Workers entitlement for daily rice allocation which the PMU changed to a lump sum payment of USD45/month paid at the end of the each month was verified to be satisfactorily implemented.</p> <p>There was evidence of rubbish collection at the housing / linesites being done once a week.</p> <p>Fire extinguishers were available and strategically placed at the linesites which were inspected to be functioning for emergency use.</p> <p>However, noncompliance was issued as follows:</p> <p>Location: Estate B, Estate C & Monorum Mill At the housing blocks for workers there were still domestic rubbish such as empty plastic containers (for lubricants) found thrown around. Large Waste bins were provided but not properly used.</p> <p>Estate B: Several vacant units of housing blocks</p>	<p style="text-align: center;">Major NC# AL-01</p>

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	<p>were not adequately maintained as old furniture and miscellaneous items were still lying around.</p> <p>Estate B & C: The contractor workers makeshift housing were not adequate and also rubbish were scattered all over including at the drains.</p> <p>At primary school (Anlong Krapeu), the temporary housing for the teacher was noted to be in a classroom which should not be permitted. Broken glass was on doors are noted to be a potential safety hazard to the school children. Broken toilet doors were not repaired. Overall maintenance is not satisfactory.</p> <p>This NC is now upgraded to Major status as previous year NC (2017) was issued and action taken to date is considered to be not effective.</p>	
<p>6.5.4 Growers and millers shall make demonstrable efforts to monitor and where able, improve workers' access to adequate, sufficient and affordable food.</p> <p>Minor Compliance</p>	<p>Site assessments and interviews verified that workers could easily obtain their daily sundry supplies from stalls and mini-markets operated by workers' dependents in the housing sites or at the nearby villages. Some workers make weekly visit to the nearest town by own or private transport whenever necessary. Access to adequate, sufficient and affordable food is confirmed. However, an observation was issued as follows:</p> <p>Location - Health Dispensary: It is noted that records and data are compiled by the Nursing Assistants and submitted to Admin / HR for review. However the analysis of data can be improved for more proactive / preventive action such as on the cases of 'abdominal pains'.</p>	<p>OBS# AL-01</p>
<p>Criteria 6.6 The employer respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.</p>		
<p>Indicators</p>	<p>Findings and Objective Evidence</p>	<p>Compliance</p>
<p>6.6.1 A published statement in local languages recognising freedom of association shall be available.</p> <p>Major Compliance</p>	<p>The documented social policy that recognizes freedom of association in both English and Khmer languages as endorsed by the VP of Plantations in Apr 2012 is maintained.</p> <p>The organization acknowledges the freedom of association in the documented social policy which is displayed publicly at strategic locations of the Mill and Estate Offices.</p>	<p>Complied</p>
<p>6.6.2 Minutes of meetings with main trade unions or workers representatives shall be documented.</p> <p>Minor Compliance</p>	<p>Interviews with staff and workers confirmed there are no trade unions. Collective communications are held through their worker representatives under the Employee and Gender representatives meetings which are held every 4 months.</p> <p>Latest meeting was conducted for Environment, Safety & Gender (OSH-ESG) on: 26 Mar 2018. Minutes of such meetings are maintained. Records show that the</p>	<p>Complied</p>

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	employee delegate is registered with the governing authorities.	
Criteria 6.7 Children are not employed or exploited.		
Indicators	Findings and Objective Evidence	Compliance
<p>6.7.1 There shall be documentary evidence that minimum age requirements are met.</p> <p>Major Compliance</p>	<p>The PMU has a policy of not employing child labour (persons below 18 years) in accordance with Article 181 of the Labour Law (May 2016).</p> <p>The age of new hires was verified against their birth dates in their application form and school certificates. Verified through interviews at the respective estates that the minimum age requirements of the workers were met.</p>	Complied
Criteria 6.8 Any form of discrimination based on race, caste, national origin, religion, disability, gender, sexual orientation, union membership, political affiliation, or age, is prohibited.		
Indicators	Findings and Objective Evidence	Compliance
<p>6.8.1 A publicly available equal opportunities policy including identification of relevant/affected groups in the local environment shall be documented.</p> <p>Major Compliance</p>	<p>The commitment to equal opportunities is evident in the publicly displayed Social Policy in the mill and estate offices. The policy clearly states its prohibition of any discrimination based on race, religion, gender, disability, sexual orientation, age or political affiliation.</p>	Complied
<p>6.8.2 Evidence shall be provided that employees and groups including local communities, women, and migrant workers have not been discriminated against.</p> <p>Major Compliance</p>	<p>Based on interviews with both male and female workers as well as and verification with pay statements, it was confirmed the implementation of equal pay for same job or no discrimination practices between male and female workers.</p>	Complied
<p>6.8.3 It shall be demonstrated that recruitment selection, hiring and promotion where relevant are based on skills, capabilities, qualities, and medical fitness necessary for the jobs available.</p> <p>Minor Compliance</p>	<p>The SOP for the recruitment and hiring of staff and workers is available and maintained. The Management has taken into consideration the needs for technical qualifications / experience and related skills during new recruitment selection, hiring and promotion exercises. This process was noted to be satisfactorily done.</p>	Complied
Criteria 6.9 There is no harassment or abuse in the work place, and reproductive rights are protected.		
Indicators	Findings and Objective Evidence	Compliance
<p>6.9.1 A policy to prevent sexual and all other forms of harassment and violence shall be implemented and communicated to all levels of the workforce.</p> <p>Major Compliance</p>	<p>The policy to prevent sexual harassment and all forms of harassment is clearly stated in the documented social policy. The commitment to provide a work environment that is free from any sexual harassment and violence against any of the workforce is verified in interviews with female field workers and workers at the main office who confirmed that they were satisfied with the present work conditions.</p> <p>Interviews with the Social & Gender Committee staff and workers revealed briefing on harassment issue, general understanding issues such as sexual harassment, in the workplace and the mechanism to report an alleged harassment or violence.</p> <p>Latest Gender Committee meetings and briefings were conducted on: 24 Mar 2018 for Estates and 12 May 2018 for Mills.</p>	Complied

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<p>6.9.2 A policy to protect the reproductive rights of all, especially of women, shall be implemented and communicated to all levels of the workforce.</p> <p>Major Compliance</p>	<p>The policy to protect the reproductive rights and rights to have a family of the workers especially women is stated in the Social Policy and communicated. Interviews conducted confirmed that pregnant worker if known, will be given proper attention and work considerations.</p>	Complied
<p>6.9.3 A specific grievance mechanism which respects anonymity and protects complainants where requested shall be established, implemented, and communicated to all levels of the workforce.</p> <p>Minor Compliance</p>	<p>A specific grievance mechanism is established and documented in SOP GA-019.</p> <p>Communication and understanding of employees were verified through interviews. The commitment to manage grievance among employees is implemented.</p> <p>Observation issued: Location: Estates A, B, C & D: The mechanism for obtaining feedback (including any grievance) can be improved to include smaller group sessions with simplified question and answer requests as briefings presently done were noted to be in big groups which does not allow for any anonymity for feedback or complaints.</p>	OBS# AL-02
<p>Criteria 6.10 Growers and millers deal fairly and transparently with smallholders and other local businesses.</p>		
Indicators	Findings and Objective Evidence	Compliance
<p>6.10.1 Current and past prices paid for Fresh Fruit Bunches (FFB) shall be publicly available.</p> <p>Minor Compliance</p>	<p>It is verified that there are has been no production or purchases of any FFB from any external growers. Thus this is not applicable.</p>	Not applicable
<p>6.10.2 Evidence shall be available that growers/millers have explained FFB pricing, and pricing mechanisms for FFB and inputs/services shall be documented (where these are under the control of the mill or plantation).</p> <p>Major Compliance</p>	<p>It is verified that there are has been no production or purchases of any FFB from any external growers. Thus this is not applicable.</p>	Not applicable
<p>6.10.3 Evidence shall be available that all parties understand the contractual agreements they enter into, and that contracts are fair, legal and transparent.</p> <p>Minor Compliance</p>	<p>Based on employee contracts and meeting minutes (between MRICOP managements and employees), it is evident that all parties understand the contractual agreements they enter into, and that contracts are fair, legal and transparent.</p> <p>Interviews with parties concerned confirmed that business practices with local businesses are conducted in a fair and transparent manner. The contractors are monitored during work in progress to follow safety requirements.</p>	Complied
<p>6.10.4 Agreed payments shall be made in a timely manner.</p> <p>Minor Compliance</p>	<p>Interviews with the contractors reported that payments are received in timely manner and they have not encountered any problems with payment so far.</p>	Complied
<p>Criteria 6.11 Growers and millers contribute to local sustainable development where appropriate.</p>		
Indicators	Findings and Objective Evidence	Compliance

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<p>6.11.1 Contributions to local development that are based on the results of consultation with local communities shall be demonstrated.</p> <p>Minor Compliance</p>	<p>Contributions to local development are based on the results of consultation with local communities as documented in the updated SIA for year 2018.</p> <p>The following are the social, local development and contributions planned and progressively completed:</p> <ol style="list-style-type: none"> 1. Repair of stretches of laterite road for villagers in the vicinity of the PMU. 2. Assisting the villagers in the vicinity of the PMU with transportation for burial ceremony. 3. Permission to nearby villages to use the landfill to manage their domestic waste 4. Free provision of 50 kg of rice and 200 litres of diesel per month to the Anlong Kropeu temple. 5. Provision of free regular food to extremely poor villagers. 6. Progressive completion of electricity supply from main grid to workers housing quarters. 7. Organising of community rubbish clean up at housing and shop areas. 8. Providing big rubbish bins at strategic points and ongoing briefings to local community to keep environment clean. 	<p>Complied</p>
<p>6.11.2 Where there are scheme smallholders, there shall be evidence that efforts and/or resources have been allocated to improve smallholder productivity.</p> <p>Minor Compliance</p>	<p>It was verified that there was no smallholder scheme program at the PMU.</p>	<p>Not applicable</p>
<p>Criteria 6.12 No forms of forced or trafficked labour are used.</p>		
<p>Indicators</p>	<p>Findings and Objective Evidence</p>	<p>Compliance</p>
<p>6.12.1 There shall be evidence that no forms of forced or trafficked labour are used.</p> <p>Major Compliance</p>	<p>The employment contracts maintained at the estate offices confirmed that all workers were recruited in accordance with the legal requirements of Cambodia (Cambodian Labour Law 1997).</p> <p>The workers are mainly from the neighbouring villages within the province of Sihanouk. Interviews with field workers confirmed that there were no forced or trafficked labour. Mill workers confirmed that they could opt not to do over-time work if so desired.</p>	<p>Complied</p>
<p>6.12.2 Where applicable, it shall be demonstrated that no contract substitution has occurred.</p> <p>Minor Compliance</p>	<p>There was no evidence of contract substitution and this was confirmed from interviews with workers.</p>	<p>Complied</p>
<p>6.12.3 Where temporary or foreign workers are employed, a special labour policy and procedures shall be established and implemented.</p> <p>Major Compliance</p>	<p>There is no requirement for any special labour policy as no foreign workers are employed.</p>	<p>Not applicable</p>
<p>Criteria 6.13 Growers and millers respect human rights.</p>		
<p>Indicators</p>	<p>Findings and Objective Evidence</p>	<p>Compliance</p>

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<p>6.13.1 A policy to respect human rights shall be documented and communicated to all levels of the workforce and operations (see Criteria 1.2 and 2.1).</p> <p>Major Compliance</p>	<p>The documented policy stating human rights and ethical conduct and integrity established was communicated to all employees. Confirmed during sampled workers interviews during current audit.</p>	<p style="text-align: center;">Complied</p>
<p>6.13.2 As long as children of plantation workers are not secured a right to go to government school, the plantation companies should engage in a process to secure the children of the plantation workers access to education as a moral obligation</p> <p>Minor Compliance</p>	<p>All local children are eligible to be enrolled in the local government schools. Interviews and records show that school-going children (6 years and above) of staff and workers are all enrolled in the 8 government schools which are nearest to their homes.</p> <p>Interviews done with primary school heads confirmed that the students come from the estates and mills and school attendance and performance is monitored.</p>	<p style="text-align: center;">Complied</p>

Principle 7: Responsible development of new plantings

To date the PMU has not carried any new plantings after Nov 2005 which may be applicable under requirements of the RSPO New Planting Procedure.

The requirements of Principle 7 were verified to be 'Not applicable' to this PMU during this assessment.

It was verified during current on-site assessment that the PMU has declared and submitted its Land Use Change details for analysis for its plantings since Nov 2005 as per the calculations specified in the RSPO PalmGHG Version 3.0.1. The record of submission made to the RSPO Secretariat for the current year was done on 21 Apr 2018.

See Summary of Net GHG Emissions submitted by MRICOP POMs in the Tables below.

Based on the details provided in the record of submission, it is also verified that there is no potential liability under the RSPO Remediation and Compensation Procedure at this PMU.

SUMMARY OF NET GHG EMISSIONS

All information and data below as submitted by MRICOP was verified against the retrieved summary report generated through ***PalmGHG Calculator Version 3.0.1***.

Monorum CPO Mill

GHG Table 1: Summary of Net GHG Emissions (Jan-Dec 2017)

Emissions per Product	tCO ₂ e/tProduct
CPO	2.36
PK	2.36

Production	t/year
FFB processed	103,582.03
CPO Produced	20,024.48

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Extraction	%
OER	19.33
KER	4.76

GHG Table 2: Summary of Net GHG Emissions

Land use	ha
OP planted area	16,535.54
OP planted on peat	-
Conservation (forested)	-
Conservation (non-forested)	2,429.97
Total	

GHG Table 3: Summary of Field Emissions and Sinks

	Own Crop		Group		3rd Party		Total	
	tCO ₂ e	tCO ₂ e/ha	tCO ₂ e	tCO ₂ e/ha	tCO ₂ e	tCO ₂ e/ha	tCO ₂ e	tCO ₂ e/ha
Emissions								
Land Conversion	69,923.1	13.38	28,525.54	21.45	-	-	98,448.64	34.83
CO ₂ Emissions from Fertiliser	5,638.5	1.04	1,379.78	1.04	-	-	7,018.28	2.08
N ₂ O Emissions	5,200.17	0.93	1,119.81	0.84	-	-	6,319.98	1.77
Fuel Consumption	792.52	0.15	174.34	0.13	-	-	966.86	0.28
Peat Oxidation	-	-	-	-	-	-	-	-
Sinks								
Crop Sequestration	(50,574.93)	(9.36)	(12,451.31)	(9.36)	-	-	(63,026.24)	(18.72)
Conservation Sequestration	-	-	-	-	-	-	-	-
Total	30,979.36	6.14	18,748.16	14.09	-	-	49,727.52	20.23

GHG Table 4a: Summary of Mill Emissions and Credits

	tCO ₂ e	tCo ₂ e/t FFB
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Emissions		
POME	8,334.84	0.08
Fuel Consumption	380.13	-
Grid Electricity Utilisation	1,232.65	0.01
Credits		
Export of Excess Electricity to Grid and Housing	(27.76)	-
Sales of PKS	(763.2)	(0.01)
Sales of EFB	-	-
Total	9,156.65	0.09

GHG Table 4b: Palm Oil Mill Effluent (POME) Treatment

Divert to compost	0%
Divert to anaerobic digestion	100%

GHG Table 4c: POME Diverted to Anaerobic Digestion

Divert to anaerobic pond	100%
Divert to methane capture (flaring)	0%
Divert to methane capture (electricity generation)	0%

Anlong Kropeu CPO Mill

GHG Table 1: Summary of Net GHG Emissions (Jan-Dec 2017)

Emissions per Product	tCO ₂ e/tProduct
CPO	5.22
PK	5.22

Production	t/year
FFB processed	107,548.04
CPO Produced	20,748.48

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Extraction	%
OER	19.29
KER	3.18

GHG Table 2: Summary of Net GHG Emissions

Land use	ha
OP planted area	16,535.54
OP planted on peat	-
Conservation (forested)	-
Conservation (non-forested)	2,429.97
Total	

GHG Table 3: Summary of Field Emissions and Sinks

	Own Crop		Group		3rd Party		Total	
	tCO ₂ e	tCO ₂ e/ha	tCO ₂ e	tCO ₂ e/ha	tCO ₂ e	tCO ₂ e/ha	tCO ₂ e	tCO ₂ e/ha
Emissions								
Land Conversion	145,818.98	21.45	45,524.78	13.38	-	-	191,343.76	34.83
CO ₂ Emissions from Fertiliser	7,127.65	1.05	3,142.4	1.04	-	-	10,270.05	2.09
N ₂ O Emissions	6,305.14	0.91	2,586.99	0.86	-	-	8,892.13	1.77
Fuel Consumption	873.9	0.13	498.25	0.15	-	-	1,372.15	0.28
Peat Oxidation	-	-	-	-	-	-	-	-
Sinks								
Crop Sequestration	(63,647.14)	(9.36)	(28,127.94)	(9.36)	-	-	(91,775.08)	(18.72)
Conservation Sequestration	-	-	-	-	-	-		
Total	96,478.53	14.18	20,624.48	6.07	-	-	117,103.01	20.25

GHG Table 4a: Summary of Mill Emissions and Credits

	tCO ₂ e	tCo ₂ e/tFFB
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Emissions		
POME	8,334.84	0.08
Fuel Consumption	982.92	0.01
Grid Electricity Utilisation	-	-
Credits		
Export of Excess Electricity to Grid and Housing	-	-
Sales of PKS	(254.19)	-
Sales of EFB	-	-
Total	9,063.57	0.08

GHG Table 4b: Palm Oil Mill Effluent (POME) Treatment

Divert to compost	0%
Divert to anaerobic digestion	100%

GHG Table 4c: POME Diverted to Anaerobic Digestion

Divert to anaerobic pond	100%
Divert to methane capture (flaring)	0%
Divert to methane capture (electricity generation)	0%

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Principle 8: Commitment to continual improvement in key areas of activity

Criteria 8.1		
Growers and millers regularly monitor and review their activities, and develop and implement action plans that allow demonstrable continual improvement in key operations.		
Indicators	Findings and Objective Evidence	Compliance
<p>8.1.1 The action plan for continual improvement shall be implemented, based on a consideration of the main social and environmental impacts and opportunities of the grower/mill, and shall include a range of Indicators covered by these Principles and Criteria.</p> <p>As a minimum, these shall include, but are not necessarily be limited to:</p> <ul style="list-style-type: none"> • Reduction in use of pesticides(Criterion 4.6); • Environmental impacts (Criteria 4.3, 5.1 and 5.2); • Waste reduction (Criterion 5.3); • Pollution and greenhouse gas (GHG) emissions (Criteria 5.6 and 7.8); • Social impacts (Criterion 6.1); • Encourage optimising the yield of the supply base. <p>Major Compliance</p>	<p>Continual Improvement Plans established, implemented and monitored for the Mills and Estates include the following:</p> <p><u>Monorum POM</u></p> <ol style="list-style-type: none"> 1. Clean all drains for spillage around CPO storage. 2. Increase raw water for mill processing during the long dry season by increasing the depth of water reservoir area for water storage to 135,000 m³. <p><u>Anlong Kropou POM</u></p> <ol style="list-style-type: none"> 1. Improving performance of Effluent Treatment Plant (ETP) - reactivate anaerobic ponds 1 & 2. 2. Construction of drains and bunds to channel mill waste to ETP at location of fiber and decanter. 3. Construct oil trap at designated locations around the mill, 4. To install emission monitoring of stack of boiler. 5. To install boiler smoke emission sampling and testing. 6. To connect power from the mill to Estate C accommodation. 7. Increase raw water for mill processing during the long dry season by increasing the depth of water reservoir area for water storage to 800,000 m³ <p><u>Estates A, B, C & D</u></p> <ol style="list-style-type: none"> 1. Reduction in use of certain chemicals (glyphosate) by alternative means: <ul style="list-style-type: none"> - use of manual / roto slashings to reduce weeds, - no application of agro-chemicals during rainy season, - calibration of spraying equipment, - training workers carrying out spraying work, - enhancement of IPM program, 2. Environment impacts <ul style="list-style-type: none"> - improve signage and maintain river riparian and buffer zone. 3. Waste reduction – recycling and minimizing <ul style="list-style-type: none"> - improve the disposal of domestic waste, - improve the disposal of empty chemical containers, empty fertilizer bags and used planting bags, <p>Continual improvements with social impact include the following:</p> <p>Snake bite / First Aid Awareness Training for local community.</p> <ol style="list-style-type: none"> 1. Annual Refresher Training on OSH / First Aid by Nursing assistants for workers and community. 2. Free transport for children to and from schools located in villages nearby the PMU. 3. Improved learning facilities at the Day Care Centre on proper wildlife posters and TV shows. 4. Planting of Napier grass at boundaries of estates for grazing by cattle/buffalo from the villages. 	<p>Complied</p>



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	<p>5. Repairing the damages on rural schools as well as building new teachers' quarters.</p> <p>6. Socialization with academic institutes and other interested organizations on the oil palm plantation operations and palm oil processing (In year 2018 to date, visits from 3 institutes/organizations.</p>	
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3.1.1 Supply Chain Certification Standards Findings - on CPO Mill

The Supply Chain model applied at the two CPO mills at MRICOP during this assessment is Module D – CPO Mills: Identity Preserved (IP).

Details of findings are as follows:

5. General chain of custody requirements for the supply chain		
	Findings and Objective Evidence	Compliance
5.1 Applicability of the general chain of custody requirements for the supply chain		
5.1.1 Legal ownership and physical handling of RSPO Certified Sustainable oil palm products at a location under the control of the organization including outsourced contractors.	Yes	Complied
5.1.2 Trader and/or distributor shall pass on the certification number of the product manufacturer and the applicable supply chain model.	Not applicable	Complied
5.1.3 Member of the RSPO and shall register on the RSPO IT platform.	Yes	Complied
5.1.4 Processing aids do not need to be included within an organization's scope of certification.	No processing aids	Complied
5.2 Supply chain model		
5.2.1 Same supply chain model as its supplier	Identity Preserved (IP)	Complied
5.2.2 Combination of supply chain models	Only IP	Complied
5.3 Documented procedures		
5.3.1 Written procedures and/or work instructions	Yes	Complied
5.3.2 Internal audit procedure and internal audit conducted to determine compliance.	Yes	Complied
5.4 Purchasing and goods in		
5.4.1 Purchases of RSPO certified oil palm products with all the specified information.	Yes	Complied
5.4.2 Mechanism for handling non-conforming oil palm products and/or documents.	Yes	Complied
5.5 Outsourcing activities		
5.5.1 Outsourcing of activities	Not applicable	Complied
5.5.2 Outsourcing within the scope of its RSPO SC certificate	Not applicable	Complied
5.5.3 Names and contact details of all contractors used for the processing or physical handling of RSPO certified oil palm products.	Not applicable	Complied
5.5.4 Names and contact details of new contractor used for the processing or physical handling of RSPO certified oil palm products.	Not applicable	Complied
5.6 Sales and goods out		
5.6.1 Sales of RSPO certified oil palm products with all the specified information.	Yes	Complied
5.7 Registration of transactions		
5.7.1 Transaction registered in the RSPO IT platform and confirmed upon receipt.	Yes	Complied
5.7.2 RSPO IT Platform: Shipping Announcement, Traceability, Confirming Shipping Announcements.	Yes	Complied
5.8 Training		
5.8.1 Training plan on RSPO SC Standards requirements and records of the training.	Yes	Complied
5.8.2 Appropriate training shall be provided	Yes	Complied
5.9 Record keeping		
5.9.1 Accurate, complete, up-to-date and accessible records and reports maintained.	Yes	Complied
5.9.2 Retention times for all record and reports.	Yes	Complied
5.9.3 Volume purchased (input) and claimed (output) over a period of twelve (12) months.	Yes	Complied
5.10 Conversion factors		

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5.10.1 Conversion rate shall be applied to provide a reliable estimate for the amount of certified output available from the associated inputs.	Yes	Complied
5.10.2 Conversion rates shall be periodically updated.	Yes	Complied
5.11 Claims		
5.11.1 Claims shall be in compliance with the RSPO Rules on Market Communications and Claims.	Yes	Complied
5.12 Complaints		
5.12.1. Documented procedures for collecting and resolving stakeholder complaints.	Yes	Complied
5.13 Management review		
5.13.1 Appropriate frequency of management review.	Yes	Complied
5.13.2 All the specified inputs for the management review.	Yes	Complied
5.13.3 All the specified outputs from the management review.	Yes	Complied

Model D – CPO Mills: Identity Preserved (IP)

D.1 Definition

Indicators	Findings and Objective Evidence	Compliance
<p>D.1.1</p> <p>A mill is deemed to be Identity Preserved (IP) if the FFB used by the mill are sourced from its own supply base certified to the RSPO Principles and Criteria (RSPO P&C).</p> <p>Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own certified land base. If a mill processes certified and uncertified FFB without physically separating the material then only Module E is applicable.</p>	<p>The two CPO mills under the MRICOP Grouping, viz; Monorum POM (old mill) and Anlong Kroupeu POM (new mill) verified to only process FFB from their common supply base, i.e. the 4 estates A, B, C and D (see Section 1.3).</p> <p>It was verified that there was no sources of FFB from any outgrowers or independent suppliers / smallholders.</p> <p>The two CPO Mills under the MRICOP Grouping are therefore applying the Identity Preserved (IP) model.</p>	Complied

D.2 Explanation

Indicators	Findings and Objective Evidence	Compliance
<p>D.2.1</p> <p>The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill must be recorded by the certification body (CB) in the public summary of the P&C certification report.</p> <p>This figure represents the total volume of certified palm oil product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.</p>	<p>The estimated tonnage of CPO and PK products that could potentially be produced by the POM is recorded in this Assessment Report.</p> <p>This figure represents the total volume of certified palm oil product (CPO and PK) that the certified mill is allowed to deliver in a year.</p> <p>The actual tonnage produced has been recorded in each assessment report (see Section 1.8.3 Tables 7A & 7B).</p>	Complied
<p>D.2.2</p> <p>The mill must also meet all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization (RSPO IT platform or book and claim).</p>	<p>The POMs verified to have met all registration and reporting requirements for the appropriate supply chain through the RSPO Supply Chain managing organization (RSPO IT platform).</p>	Complied

D.3 Documented procedures

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<p>D.3.1 The site shall have written procedures and/or work instructions to ensure the implementation of all the elements specified in these requirements. This shall include at minimum the following:</p>	<p>Documented procedure for IP Module is SC-033 Rev No. 4 (05 Jul 2017) The procedure covered the implementation of all elements of IP Model. Corrective action on previous assessment (Re-cert 2017) Major NC# OCL-01 verified to be effectively implemented.</p>	<p>Complied</p>
<p>a) Complete and up to date procedures covering the implementation of all the elements in these requirements</p>	<p>The documented procedure and its implementation confirmed to have complied with all the specified requirements of Identity Preserved (IP) Model D that include controlling the FFB receipt, processing, sales, CPO and PK dispatch, and records keeping.</p>	<p>Complied</p>
<p>b) The role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the site's procedures for the implementation of this standard.</p>	<p>The Mill Manager / Technical & Engineering Manager, i.e. Mr. Vong Pharith has the overall responsibility and authority for implementation and compliance with the documented Supply Chain Procedure at the Monorum Mill and Anlong Kropeu Mill. The Organization Chart of both POMs and job responsibilities of employees have been suitably documented. He and other relevant staff under his charge demonstrated competence, skill and knowledge of the RSPO Supply Chain Certification Standard - Model D requirements and its implementation. Interviews of the relevant staff confirmed their knowledge of the RSPO Supply Chain Certification requirements for the respective areas of operations. Corrective action on previous assessment (Re-cert 2017) Major NC# OCL-02 verified to be effectively implemented.</p>	<p>Complied</p>
<p>D.3.2 The facility shall have documented procedures for receiving and processing certified and non-certified FFBs.</p>	<p>For the year 2017, the POMs received and processed FFB from the 4 estates only. The POMs did not receive any non-certified FFB from other sources or suppliers. All supplies of FFB were subjected to verification of documents and quality checks by weighbridge personnel.</p>	<p>Complied</p>
<p>D.4 Purchasing and goods in</p>		
<p>Indicators</p>	<p>Findings and Objective Evidence</p>	<p>Compliance</p>
<p>D.4.1 The facility shall verify and document the tonnages and sources of certified and non-certified FFBs received.</p>	<p>The Mills had respectively maintained records of tonnages and supply source of FFB from the respective estates at the weighbridge stations, in the delivery chits and weighbridge tickets on a daily basis. On a monthly basis these figures are reported to the MRT-TCC (JV) Head Office at Phnom Penh. It is verified that there were no non-certified FFBs.</p>	<p>Complied</p>
<p>D.4.2 The facility shall inform the CB immediately if there is a projected overproduction of certified tonnage.</p>	<p>Both mills monitor all FFB received, CPO and PK production. The PMU has an internal monitoring and reporting mechanism for advising the CB of production variations such as projected overproduction situation, when such issue arises. So far, there is no projected overproduction.</p>	<p>Complied</p>
<p>D.5 Record keeping</p>		
<p>Indicators</p>	<p>Findings and Objective Evidence</p>	<p>Compliance</p>
<p>D.5.1 The site shall record and balance all receipts of RSPO certified FFB and</p>	<p>The records and reports are available from the computerized system. Also, hard copies of records and reports are properly filed and readily accessible. Inspection of records and reports at the mills confirmed these were accurate, complete and updated daily.</p>	<p>Complied</p>

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deliveries of RSPO certified CPO and PK on a three-monthly basis.	As per the SOP, the records and reports are archived and stored in the Mill Office for a minimum period of 5 years. The weighbridge tickets for delivery of CPO and PK indicated the products as certified IP Model for the Monorum POM and Anlong Kropeu POM. Transaction documents and bookkeeping of FFB, CPO and PK are done daily and monthly summary submitted to Head Office. A tonnage balance recording system that shows FFB deliveries, CPO and PK production and dispatch is balanced every 3 months.	
D.6 Processing		
Indicators	Findings and Objective Evidence	Compliance
D.6.1 The site shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept segregated from non-certified material including during transport and storage.	Confirmed from records that the mills only received and processed certified FFB from its own estates. The processing facilities have established and implemented a clear procedure and mechanism for the IP model. Review and on-site verification confirmed that the mechanism was implemented and in compliance with the module requirements at the both mills, including transport and storage.	Complied
D.6.2 The objective is for 100 % segregated material to be reached.	Documents and records provided documented evidence that the FFB receipt and processed, and CPO and PK produced are traceable to 100% certified material. The product type and supply chain module indicated as CSPO/IP and CSPK/IP on relevant documents.	Complied

3.1.2 Status on Supply Chain on POM:

Based on the documents and records presented during the on-site verifications made, it is concluded that the **MRICOP Grouping Mills, viz; Monorum Mill and Anlong Kropeu Mill** have been able to comply with the requirements of the RSPO SCCS under the 'IP' module and are thus eligible for 'IP' trading for their palm products for year 2017/2018.

3.1.3 Monitoring of CSPO and CSPK Traded:

The trading of the CSPO via RSPO PalmTrace was monitored by the MRICOP Grouping. The records maintained relied on internal communications of the trading done by the MRT-TCC HQ on the CSPO delivered to a European destination. The volumes of CSPO and CSPK traded as verified during assessment are as follows:

A) Under Monorum POM	CPO (MT)	PK (MT)
Last year's (Projected) – Certified volume (RSPO Certified)	12,000	2,600
(1) Last year's Actual sold volume (RSPO Certified)	4502	1473
(2) Last year's Actual sold volume *(Other Schemes Certified)	0	0
(3) Last Year's Actual sold volume **Conventional	7000	1000
Total for Last Year's volume – Actual (1+2+3)	11,502	2,473
New (Projected) Certified Volume (RSPO Certified)	10,488	2,461

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B) Under Anlong Kropeu POM	CPO (MT)	PK (MT)
Last year's (Projected) – Certified volume (RSPO Certified)	43,000	10,500
(1) Last year's Actual sold volume (RSPO Certified)	0	9,149
(2) Last year's Actual sold volume *(Other Schemes Certified)	0	0
(3) Last Year's Actual sold volume **Conventional	37355	0
Total for Last Year's volume – Actual (1+2+3)	37,355	9,149
New (Projected) Certified Volume (RSPO Certified)	42,219	10,113

Notes:

* There are no other Schemes Certified for MRICOP.

** Remaining volumes traded are not claimed under 'Certified' and traded as 'Conventional' volume for non-European destinations

3.2 Status of Identified Noncompliance and Corrective Actions, Observations and Positive Elements.

The status of the Noncompliances (NCR) and Observations (OBS) identified against the RSPO P&C and Cambodian Local Indicators is as per the details below:

Assessment Type	Year	Noncompliance (NCR)	Observations (OBS)	Follow up status
Re-certification Assessment	2017	6 Major & 3 Minor	6	Actions taken on the NCRs verified to be effective during ASA-01.
Annual Surveillance Assessment (ASA-01)	2018	2 Major & 2 Minor	6	Next Surveillance Assessment

3.2.1 Year 2017 Re-certification Assessment: 6 Major NCRs

NCR	RSPO P&C / CLI Indicator	Details of NCR
Major NC# CBK-01	4.7.2	<p>Date issued: 23/06/2017</p> <p>Nonconformance: Monorum Mill</p> <ol style="list-style-type: none"> During visit to the Mechanical Workshop at the Monorum Mill, it was observed that the mechanics were not using eye protection equipment (e.g. safety glasses or goggles) when operating lathe machine, grinding metal and assisting in welding operation. The control measure defined in the Risk Assessment for Workshop was to use protective goggle. The procedure for Laboratory stated there shall be an emergency shower at the Laboratory but there was no emergency shower available. At the chemical store of the Laboratory, some pages of the safety data sheets (e.g. for Nalco 356, Isopropanol, Sodium Hydroxide, petroleum ether) were not legible. There was no safety barrier around the generator set which was set up outside the gen-set room at the mill.

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		<p><u>Estate A</u> One of the control measures (as defined in the Risk Assessment) for preventing injury to harvesters is to wear gloves. However, during visit to Block B, it was observed that 2 harvesters were not wearing gloves.</p> <p><u>Estate C</u> At the Central Store in Estate C, Chemical Safety Data Sheets (CSDS) were available. However, it was found that these CSDS were in English. On interviewing the workers at the store, these workers confirmed that they could not understand the content of the CSDS and that they were illiterate in the English Language.</p> <p>Root Cause and Corrective Action (s): As the Management, we have acknowledged the noncompliance (NC) raised by the concerned assessor. However, we are going to take immediate actions to correct these through implementing strictly good management practices on the safe working conditions at the workplace from now onwards.</p> <p><u>Monorum Mill</u></p> <ol style="list-style-type: none"> 1. The mill manager, shift manager and supervisor will do the routine safety guidelines at workplace as below: <ol style="list-style-type: none"> i. Conduct a proper awareness training on the safe work at the workplace for each working station at least once a year; ii. Making sure that PPE are sufficiently provided to staff and workers according to the risk assessment; iii. Before starting working shift, do the safety briefing at least 5 – 10 minutes. During doing this, manager and/or supervisor must check attendance and PPE. If anyone found not wearing proper PPE, he/she is not allowed to work; and that manager and/or supervisor shall make sure that PPE is provided to him/her before allowing them work iv. Manager and/or supervisor shall regularly monitor the proper usage of PPE during working. 2. Mill manager must immediately look for proper place at the Laboratory to install the emergency shower right away. He also ensures that availability of water for the emergency shower must be existed all the time. 3. Mill manager must ensure that the chemical safety data sheets (CSDS) for Nalco 356, Isopropanol, Sodium Hydroxide, petroleum ether and others at the chemical store are translated into the local language that can be readable and understandable by operators. CSDS shall be properly hung at each type of chemical stored in the store. 4. Since the generator set is temporarily deployed at the mill, then the safety barrier shall be placed around with the proper signage written “DANGER! AUTHORIZED STAFF ONLY”. After placing the safety barrier around the generator set, the awareness training to all staff and workers shall be immediately conducted. <p><u>Estate A</u> Estate A manager must take immediate actions as followings: <ol style="list-style-type: none"> i. Providing gloves to harvesters as stated in the risk assessment; ii. Awareness training on using PPE like gloves shall be conducted for harvesters. </p> <p><u>Estate C</u> The Stock Controller for the Central Warehouse in Estate C must do the followings: <ol style="list-style-type: none"> i. Translate all the chemical safety data sheet for all applicable chemicals in the store to be in local language; and ii. Once again, refresh the awareness training on CSDS; then </p>
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		<p>iii. Make sure that each CSDS is properly placed at each type of chemical in the store.</p>		
		<p>Verification (Corrective Action):</p> <p>On-site verification carried out confirmed the following:</p> <ol style="list-style-type: none"> 1. OSH Master Plan developed and implemented with at least one Training on Job OSH for each station in the mill. Workshop OSH Training conducted on 08/07/2017 evidenced by training attendance list and photo. 2. Emergency shower installed on 09/07/2017 as evidenced by training attendance list and photo and verified by site visit. 3. Verified on site that Material Safety Data Sheet (MSDS) are in order and training on 12/07/2017 evidenced by attendance list and photo. 4. Safety barrier placed around the generator set as evidenced by training attendance list on 05/07/2017 and photo. Verified on site that the generator set is no longer in use and had been removed (as it was for temporary use due to boiler problem). <p>Estate A; List of PPE distribution dated 27/06/2017 and evidenced by photo of training. Observation and interview carried out on-site confirmed the usage of PPE. Estate C: Verified on site that CSDS had been translated into local language and available.</p> <p>The corrective actions satisfactorily addressed the non-conformance.</p>		
		<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 70%;">NC status verified by auditor: Closed by OCL</td> <td style="width: 30%;">Date closed: 19/07/2017</td> </tr> </table>	NC status verified by auditor: Closed by OCL	Date closed: 19/07/2017
NC status verified by auditor: Closed by OCL	Date closed: 19/07/2017			
		<p>Verification (for effectiveness): In ASA-01: Verified that the implementation of corrective action is effective.</p>		
		<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 70%;">NC status verified by auditor: CBK</td> <td style="width: 30%;">Date verified: 22/06/2018</td> </tr> </table>	NC status verified by auditor: CBK	Date verified: 22/06/2018
NC status verified by auditor: CBK	Date verified: 22/06/2018			

NCR	RSPO P&C / CLI Indicator	Details of NCR
Major NC# JMD-01	6.1.3	<p>Date issued: 23/06/2017</p> <p>Nonconformance:</p> <p>During ASA-04 Assessment (year 2016), an Observation reference OBS# JMD-01 was raised on the Mills and Estate B and Estate D as follows:</p> <p>“Mitigation Plan for 2016 is available for the whole PMU. However, comments from stakeholders in the 2016 consultation session were not included”</p> <p>During this Re-Certification Assessment, follow-up verification was carried out on the observation. It was found that the latest Stakeholders Consultation in Mar 2017, the Mitigation Plan did not include the stakeholders’ feedback and action taken on the specific problem regarding villagers’ buffalo/cattle grazing in the plantation areas.</p>

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		<p>Root Cause and Corrective Action(s):</p> <p>The HR department cooperated with concerned departments like Plantation, Land and Property Protection and R&D departments are reviewing the Mitigation Plan stated in the Social Impact Assessment for MRICOP/MTSI Plantation (please refer to the document lately revised) and add the issue of oil palm damaged by cattle/buffaloes resulted from the annual stakeholder consultancy meeting held on 22nd March 2017 into it. Therefore, from now on the company Management is going to respond to the cattle/buffaloes grazing into oil palm areas by</p> <ul style="list-style-type: none"> i. Completing the fencing at the strategic areas as soon as possible; ii. Working with chiefs of villages and communes to organize the gathering at the village location to meet directly with villagers and updating the issues of oil palms damaged by cattle/buffaloes and the company's proposed mitigation measures like providing grass material and technical advisory to those want to plant for feeding their cattle/buffaloes, and progress of legal actions against those who still allow their cattle/buffaloes to damage the oil palms; and iii. Following up the progress of the court's proceedings on filing the legal lawsuits against the concerned cattle/buffalo owners. 		
		<p>Verification (Corrective Action):</p> <p>On-site verification carried out confirmed the following: Revised SIA dated 18/07/2017 included the stakeholders' feedback and mitigation for the problem of buffalo/cattle grazing in the plantation areas. The corrective action satisfactorily addressed the non-conformance.</p>		
		<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 70%;">NC status verified by auditor: Closed by OCL</td> <td style="width: 30%;">Date closed: 19/07/2017</td> </tr> </table>	NC status verified by auditor: Closed by OCL	Date closed: 19/07/2017
NC status verified by auditor: Closed by OCL	Date closed: 19/07/2017			
		<p>Verification (for effectiveness): In ASA-01: Verified that the implementation of corrective action is effective.</p>		
		<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 70%;">NC status verified by auditor: AL</td> <td style="width: 30%;">Date verified: 22/06/2018</td> </tr> </table>	NC status verified by auditor: AL	Date verified: 22/06/2018
NC status verified by auditor: AL	Date verified: 22/06/2018			

NCR	RSPO P&C / CLI Indicator	Details of NCR
Major NC# JMD-02	6.5.2	Date issued: 23/06/2017
		<p>Nonconformance: Estate A and Estate C engaged the services of contractors for the harvesting of FFB with contract agreement. These subcontractors then employed contract workers for the harvesting. However, there is no documentation available detailing the conditions of employment for the contract harvesters. Although Cambodian Labour Law allows working without contract agreement, the RSPO P&C requires contract agreement between the contractors and the contract workers.</p>

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		<p>Root Cause and Corrective Action(s):</p> <p>The company's current practice is to do the contract agreement only with the harvesting contractor; but the payment method for the harvesters is not made between the harvesting contractors and the harvesters, instead the company pays directly to individual harvester.</p> <p>However, if the current practice does not fulfill the RSPO P&C requirements, then the company's Management decided to work with all harvesting contractors to make sure that all harvesting workers must have contract agreement detailing about the employment conditions with their contractors for Estate A, Estate C and other Estates as well from now onwards. Few samples of contract agreement are enclosed for evidence.</p>		
		<p>Verification (Corrective Action):</p> <p>On-site verification carried out confirmed the following: Contract agreements found to be available for all the harvesters. Verified from on-site interview of harvesters that the contract agreements are satisfactory. The corrective action satisfactorily addressed the non-conformance.</p>		
		<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 70%;">NC status verified by auditor: Closed by OCL</td> <td style="width: 30%;">Date closed: 19/07/2017</td> </tr> </table>	NC status verified by auditor: Closed by OCL	Date closed: 19/07/2017
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NC status verified by auditor: AL	Date verified: 22/06/2018			

NCR	RSPO P&C / CLI Indicator	Details of NCR
Major NC# OCL-01	Supply Chain D.3.1	Date issued: 23/06/2017
		<p>Nonconformance:</p> <p>Documented procedure for IP (Identity Preserved) Module is SC-033 Rev No. 3 (May 2017). The procedure covered the implementation of all elements of IP Module.</p> <p>However, para 5.0 of the above documented procedure incorrectly stated the CSPO as SG (Segregation) and MB (Mass Balance). Also in para 7.1.2, it incorrectly stated stamping with SG rubber stamp.</p>
		<p>Root Cause and Corrective Action(s):</p> <p>The Mill Manager must take immediate action to revise the standard operating procedure (SOP) on Supply Chain Requirement Applicable to MRICOP/MTSI Mills with code no. SC-033 Rev no. 3 (May 2017) and then get the authorized Management for the final approval.</p> <p>The supporting evidence of revising the SOP is enclosed for the verification.</p>
		<p>Verification (Corrective Action):</p> <p>On-site verification carried out confirmed the following: Revised SOP Document no. SC-033 Rev no. 4 (05 Jul 2017) satisfactorily amended to correct the mistakes on the model category to IP. The corrective action satisfactorily addressed the non-conformance.</p>
		<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 70%;">NC status verified by auditor: Closed by OCL</td> <td style="width: 30%;">Date closed: 19/07/2017</td> </tr> </table>
NC status verified by auditor: Closed by OCL	Date closed: 19/07/2017	
		<p>Verification (for effectiveness): In ASA-01: Verified that the implementation of corrective action is effective.</p>

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NCR	RSPO P&C / CLI Indicator	Details of NCR
Major NC# OCL-02	Supply Chain D.3.1 (b)	Date issued: 23/06/2017
		Nonconformance: The Mill Manager, i.e. Mr. Vong Pharith (Monorum Mill and Anlong Kropeu Mill) has the overall responsibility and authority for implementation and compliance with the documented procedure.
		(1) The Pre-verification Data submitted by the PMU to Intertek contained the following errors for FY Jul 2016 to Jun 2017: (a) Wrong figure for Total Certified FFB Processed (MT) in Table 7A(ii), (b) Wrong figure for Total Certified PK Production (MT) in Table 7A(ii) and Table 7B(ii).
		(2) Although production and trading records were available, both POMs did not provide in timely manner the data for the monitoring of CSPO and CSPK produced and traded for period FY Jul 2015-Jun 2016 and FY Jul 2016-May 2017.
		The Manager and the supporting staff need to demonstrate an understanding of the RSPO Supply Chain Certification Standard Module D (Identity Preserved) requirements and its implementation.
		Root Cause and Corrective Action(s): The Mill Manager will take immediate actions to correct the above NC as follows: i. Reviewing the error figure in the Pre-verification Data previously submitted to Intertek, then do verification and correction of figure for Total Certified FFB Processed (MT) in Table 7A(ii) and Total Certified PK Production (MT) in Table 7A(ii) and Table 7B(ii). ii. Coordinating with the RSPO section to arrange the course outline of the RSPO Supply Chain Certification Standard Module D (Identity Preserved) requirement and its implementation, and then conduct the awareness training to staff and managers concerned within the 1 st week of July 2017 and will do refreshment at least once a year.
		Verification (Corrective Action): On-site verification carried out confirmed the following: Errors in the Pre-verification Data corrected and Awareness Training conducted on 06/07/2017 for staff and managers as evidenced by attendance list and photo. The corrective action satisfactorily addressed the non-conformance.
NC status verified by auditor: Closed by OCL		Date closed: 19/07/2017
Verification (for effectiveness): In ASA-01: Verified that the implementation of corrective action is effective.		
		Date verified: 22/06/2018

NCR	RSPO P&C / CLI Indicator	Details of NCR
	5.2.4	Date issued: 23/06/2017

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Major NC# SH-01		<p>Nonconformance: Both Estate A and Estate C have forested areas on their boundaries. However, the management plan for these areas did not contain the ongoing monitoring of the status of HCV and RTE species as there was no regular reporting on the ground situation. (Upgraded to Major NC from Minor NC# OCL-01 of previous assessment).</p>		
		<p>Root Cause and Corrective Action(s):</p> <p>The current practice of patrolling the wildlife at the strategic set-aside conservation zone and HCV for surveying whether there is any RTE species existing within and/or surrounding the oil palm plantation or not. Few evident reports of patrolling wildlife are sight. However, we accept that the comprehensive management plan detailing the ongoing monitoring of the status of HCV and RTE species is not in place. Therefore, the Management is going to develop the standard operating procedure (SOP) for patrolling and conserving the status of RTE species at our strategic areas. The procedure will state clearly that during working hours, any staff or worker found any wildlife, especially RTE species shall report with the concerned form or to the concerned Estate Management for proper recording. The evident of SOP on Conservation of RTE Species and Wildlife and few reports of wildlife patrolling is enclosed.</p>		
		<p>Verification (Corrective Action):</p> <p>On-site verification carried out confirmed the following: SOP documented for the sighting and reporting of RTE species by two processes:</p> <ol style="list-style-type: none"> (1) Ad-hoc sighting by any workers and staff to be reported to the estate management for raising a report. (2) A regular patrolling by conductors and security personnel of the plantation areas and recording of any sighting or non-sighting in a report. <p>The corrective action satisfactorily addressed the non-conformance.</p>		
		<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 70%;">NC status verified by auditor: Closed by OCL</td> <td style="width: 30%;">Date closed: 19/07/2017</td> </tr> </table>	NC status verified by auditor: Closed by OCL	Date closed: 19/07/2017
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NC status verified by auditor: OCL	Date verified: 22/06/2018			

3.2.2 Year 2017 Re-certification Assessment: 3 Minor NCRs

NCR	RSPO P&C / CLI Indicator	Details of NCR
Minor NC# CBK-01	4.7.5	<p>Date issued: 23/06/2017</p> <p>Nonconformance: There were occurrence of accidents at the Sterilizer Stations in the Anlong Kropeu Mill on 20 Apr 2017 and in Monorum Mill on 18 Jun 2017. These accidents were reported, investigated and follow up actions were proposed and time frame for implementation was recommended. However, there were no evidence that reassessment of the risk for the Sterilizer operation was conducted.</p>

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		<p>Root Cause and Corrective Action(s):</p> <p>The Mill Manager will immediately take actions to correct this NC as followings:</p> <ol style="list-style-type: none"> i. Review the Risk Assessment and do the revision by adding the identified hazard/risk with the controllable measures as per the accidents happened at the Sterilizer Stations for both in Anlong Kropeu and Monorum Mills; and then ii. Once finished the revision, the awareness training shall be conducted to concerned operators to ensure that they know how to operate safely. <p>The supporting evidence of the revision of the Risk Assessment and training record are enclosed.</p>		
		<p>Verification (Corrective Action):</p> <p>On-site verification carried out confirmed the following: Revised risk assessment included the hazards/risks with control measures at sterilizer stations in both mills. Awareness training conducted on 10 Jul 2017 as evidenced by attendance list and photo. The corrective action satisfactorily addressed the non-conformance.</p>		
		<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 70%;">NC status verified by auditor: Closed by OCL</td> <td style="width: 30%;">Date closed: 19/07/2017</td> </tr> </table>	NC status verified by auditor: Closed by OCL	Date closed: 19/07/2017
NC status verified by auditor: Closed by OCL	Date closed: 19/07/2017			
		<p>Verification (for effectiveness): In ASA-01: Since a non-compliance against this same indicator was found during ASA-01, the corrective action is not effective and the NC is graded as a Major NC# CBK-01 (ASA-01).</p>		
		<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 70%;">NC status verified by auditor: CBK and OCL</td> <td style="width: 30%;">Date verified: 22/06/2018</td> </tr> </table>	NC status verified by auditor: CBK and OCL	Date verified: 22/06/2018
NC status verified by auditor: CBK and OCL	Date verified: 22/06/2018			

NCR	RSPO P&C / CLI Indicator	Details of NCR
Minor NC# JMD-01	6.5.3	Date issued: 23/06/2017
		<p>Nonconformance:</p> <p>During ASA-04 Assessment (year 2016) an Observation reference OBS# JMD-03 was raised as follows:</p> <p>“The rubbish from the linesite is collected once a week. However, it was found that the surrounding area of the linesite still require improvement, especially with regards to management of grass. It was also found that there was no fire extinguisher available at the linesite.”</p> <p>During this Re-Certification Assessment, follow-up verification was carried out on the observation. It was found that the actions taken on the linesite cleanliness (rubbish and grass) did not adequately addressed the requirement. Thus the observation is upgraded to a Minor NC in this current assessment.</p>
		<p>Root Cause and Corrective Action(s):</p> <p>A comprehensive Master Plan for Accommodation Improvement for addressing the concerned issues is made by the Associate Director in charge of Administration and Human Resource, focusing on the main areas as following:</p> <ol style="list-style-type: none"> i. Hygiene and sanitation ii. Enhancing the accommodation committee’s effective performance <p>The Master Plan for Accommodation Improvement will serve as a guideline for improving and enhancing good welfare, safety and health conditions for staff and workers who are staying at the company’s provided accommodation. The plan and actual work done are enclosed herewith for verification.</p>

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		Verification (Corrective Action): On-site verification carried out confirmed the following: Master Plan developed by Associate Director in charge of Administration and Human Resource implemented as verified by the improved conditions seen on-site. The corrective action satisfactorily addressed the non-conformance.	
		NC status verified by auditor: Closed by OCL	Date closed: 19/07/2017
		Verification (for effectiveness): In ASA-01: Since a non-compliance against this same indicator was found during ASA-01, the corrective action is not effective and the NC is graded as a Major NC# CBK-01 (ASA-01).	
		NC status verified by auditor: AL and OCL	Date verified: 22/06/2018

NCR	RSPO P&C / CLI Indicator	Details of NCR	
Minor NC# SH-01	5.2.3	Date issued: 23/06/2017	
		Nonconformance: There was no clear program to regularly educate the workforce on the status of rare, threatened or endangered (RTE) species and the appropriate measures to be taken in accordance with the company rules and national law if any individual is found to capture or kill the RTE species.	
		Root Cause and Corrective Action(s): The Management has accepted that there is no a proper awareness training program and rules and regulations to take against who captures or kills the RTE species in place at the moment. However, to correct this non-conformance, the HR department incorporates with the Plantation and R&D department to develop the training program and rules and regulations concerned on the protection of RTE at the strategic set-aside conservation zone and High Conservation Value area. The evident is enclosed herewith for the verification.	
		Verification (Corrective Action): On-site verification carried out confirmed the following: Plantation and R&D department developed and implemented the training programs on RTE species for the period Jul 2017 to Jun 2018: (1) Training program for staff conducted on 06 & 07/07/2017. (2) Training program for workers in Estate A and Estate C on 10/07/2017 and 08/07/2017 respectively. (3) Training program for communities scheduled for Mar 2018. The corrective action satisfactorily addressed the non-conformance.	
		NC status verified by auditor: Closed by OCL	Date closed: 19/07/2017
		Verification (for effectiveness): In ASA-01: Verified that the implementation of corrective action is effective.	
		NC status verified by auditor: OCL	Date verified: 22/06/2018

3.2.3 Year 2017 Re-certification Assessment: 6 Observations

Ref No:	Cambodian Local Indicator	Location	Details of Observation	Status		
				Opened date	Closed date	Remark, if any

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OBS # SH-01	5.2.1	Estate A and Estate C	The landscape maps indicated certain areas as mountains at the boundaries to the estates. It is more accurate to indicate the vegetation of these mountains.	23 Jun 2017	22 Jun 2018	Closed
OBS # SH-02	5.2.2	Estate A and Estate C	Both estates have forested mountain on their boundaries. Additional signages should be erected at strategic locations.	23 Jun 2017	22 Jun 2018	Closed
OBS # SH-03	5.2.2	Estate C	The extent of buffer zone was not clearly demarcated at certain stretches along the river passing through field C3. Also, at water sampling point E2 at the river, there is a small signage. This signage should be made more prominent in order to indicate the importance of the area.	23 Jun 2017	22 Jun 2018	Closed
OBS# CBK-01	4.6.6	Estate C	The self-drawn poison symbol for Glyphosate container at the Central Store need to be replaced with the proper international poison symbol (skull and crossed bones symbol).	23 Jun 2017	22 Jun 2018	Closed
OBS# CBK-02	4.7.5	Monorum Mill	As a consequence of the findings relating to the accident on 16/6/2017 at FFB Sterilizer station, the SOP-CM-022 Machinery Safety should include the new and additional measures and instructions (e.g. workers to stay clear of the rope, routine checking of the rope, etc.).	23 Jun 2017	Upgraded to Major NC# CBK- 01 during ASA-01	-
OBS# CBK-03	4.8.2	Anlong Kropeu Mill	The Personal Training Record should be updated as soon as training has been conducted (noted a time delay as long as 12 months).	23 Jun 2017	22 Jun 2018	Closed

3.2.4 Year 2018 Annual Surveillance Assessment ASA-01: 2 Major NCRs

NCR	RSPO P&C / CLI Indicator	Details of NCR
Major AL-01 (upgraded)	6.5.3	Date issued: 22/06/2018
		Indicator requirement: Growers and millers shall provide adequate housing, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible.
		Nonconformance: Location: Estate B, Estate C & Monorum Mill

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		<p>At the housing blocks for workers there were still domestic rubbish such as empty plastic containers (for lubricants) found thrown around. Large Waste bins which were provided but not properly used.</p> <p>Estate B: Several vacant units of housing blocks were not adequately maintained as old furniture and miscellaneous items were still lying around.</p> <p>Estate B & C: The contractor workers makeshift housing were not adequate and also rubbish were scattered all over including at the drains.</p> <p>At primary school (Anlong Krapeu), the temporary housing for the teacher was noted to be in a classroom which should not be permitted. Broken glass was on doors are noted to be potential safety hazards to the school children. Broken toilet doors were not repaired. Overall maintenance is not satisfactory.</p> <p>This NC is now upgraded to Major status as previous year NC (2017) was issued and action taken to date is considered to be not effective.</p> <hr/> <p>Root Cause and Corrective Action:</p> <p>Root Cause</p> <p>1. Domestic Rubbish at Estate B, C and Monorum Mill: There may be two combination factors that causing the messy domestic rubbish at the housing blocks for workers at the Estate B, C and Monorum Mill:</p> <ul style="list-style-type: none"> (a) Conducting awareness of living hygiene for the workers who are coming from the different background is not enough to make them adopting the paradigm shift of good and proper domestic rubbish. There are some evidences of awareness session conducted by the concerned departments regarding to the living hygiene. (b) The limitation of the monitoring process of implementing the applicable internal rules and regulations of the company accommodation. <p>2. Inadequate maintenance of vacant units of the housing blocks at Estate B: We accept that there is less attention on monitoring and properly maintaining those several vacant units of housing blocks at Estate B due to the number of workers are less occupying them.</p> <p>3. Inadequate makeshift housing for contracting workers at Estate B & C: There may be under estimated the number of contracting workers who are always fluctuated at the position of staying at the company's worker quarter.</p> <p>4. The temporary housing for the teacher in the classroom and the broken glass on the doors at Anlong Krapeu primary school: The company does not have directly authority to supervise the school.</p> <p>Corrective Action:</p> <p>1. Domestic Rubbish at Estate B, C and Monorum Mill The Management shall do immediate actions as following:</p> <ul style="list-style-type: none"> (a) Reviewing the master action plan on the sanitation and hygiene at all company's accommodation once again in order to make sure that the activities of awareness/campaign concerned are sufficient (b) The applicable rules and regulations of the company accommodation regarding to the sanitation and hygiene shall be reinforced; and the regular scheduled actions shall be taken place with the progress of report after monitoring. <p>2. Inadequate maintenance of vacant units of the housing blocks at Estate B The Admin Manager who is in charge of this issues, by getting support from the relevant department (if need), is taking immediate action to clean up and rearrange everything in the vacant units of house blocks at Estate B in a proper and good condition. The report on taking actions on this enclosed for the proof evidence.</p>
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		<p>3. Inadequate makeshift housing for contracting workers at Estate B & C The immediate action is that the Admin department is working with the concerned estates rechecking and confirming the actual number of the contracting workers who are staying at the makeshift housing at the company accommodation. After that we are going to analyse the quantity of the makeshift housing needs and look for the vacant units of housing blocks to be arrange for them accordingly.</p> <p>4. The temporary housing for the teacher in the classroom and the broken glass on the doors at Anlong Kropeu primary school The company management is going</p> <ul style="list-style-type: none"> • to work and collaborate with the concerned teacher to find out the possible and proper solutions to the problem of taking classroom for the temporary housing and • to fix the broken glass on the doors at the Anlong Kropeu primary school. The enclosed is the evidence for the company management's action taken. 		
		<p>Verification (Corrective Action): Off-site verification carried out. The following evidences submitted were verified and found to be acceptable for closing the non-conformance:</p> <ol style="list-style-type: none"> (1) Master action plan on the sanitation and hygiene at all company's accommodation, Rules & Regulations on accommodation, Hygiene awareness training on 30/06/2018, report, attendance list and photo. (2) Clean-up done on 20&21/07/2018 supported by report, attendance list and photo. (3) Survey report on the housing needs, building plan and photos of commencement of building works of 10 units of housing. (4) Report of meetings with the School Director and five teachers on 04/07/2018 and 13/07/2018 respectively and agreed actions on temporary accommodation elsewhere and building of new permanent accommodation. Photos of the repair and replacement of broken doors and glass windows. <p>The corrective actions satisfactorily addressed the non-conformance.</p>		
		<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 60%;">NC status verified by auditor: Closed by OCL</td> <td style="width: 40%;">Date closed: 02/08/2018</td> </tr> </table>	NC status verified by auditor: Closed by OCL	Date closed: 02/08/2018
NC status verified by auditor: Closed by OCL	Date closed: 02/08/2018			
		Verification (for effectiveness): Next assessment.		

NCR	RSPO P&C / CLI Indicator	Details of NCR
Major CBK-01 (upgraded)	4.7.5	Date issued: 22/06/2018
		<p>Indicator requirement: Accident and emergency procedures shall exist and instructions shall be clearly understood by all workers. Accident procedures shall be available in the appropriate language of the workforce. Assigned operatives trained in First Aid should be present in both field and other operations, and first aid equipment shall be available at worksites. Records of all accidents shall be kept and periodically reviewed.</p>
		<p>Nonconformance: <u>(1) At Anlong Kropeu Palm Oil Mill</u> (I) There was accident that had occurred during repair and maintenance of the sterilizer in the Anlong Kropeu Mill on 5 May 2018 when the hand of a cleaner got caught in the machine. This accident was reported, investigated and follow up actions were proposed and time frame for implementation was recommended. The lost time due to this accident was reported to be 50 hours. a) There was no evidence that reassessment of the risk for the Sterilizer</p>

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		<p>operation was conducted.</p> <p>b) There was no evidence of follow up training session provided to the workers on new control measure to prevent recurrence of the accident.</p> <p>c) The cleaner who was involved in the accident was not trained or authorised to perform repair and maintenance work on the steriliser.</p> <p>(II) The fire extinguisher near the water treatment plant showed that it required recharge. There was no evidence that the readiness of the fire extinguishers was monitored</p> <p>The fire hose located near the water treatment plant was leaking and without a nozzle.</p> <p>At Estate B</p> <p>The lost time due the accident involving worker (Hoy Rathana) on 7 March 2018 was reported to be 72 hours. However, there was no evidence that a risk re-assessment was conducted.</p> <p>(2) At Monorom Palm Oil Mill,</p> <p>Risk Assessment reviewed on 26/4/2018 had included reassessment of previous accident when the rope for pulling the cage came loose and hit the worker. It was recorded in the risk re-assessment that additional control measure included was to always stand away from path of rope while pulling cage.</p> <p>However, SOP-CM-022 Machinery Safety had not included this additional control measure.</p> <p>[Since at the previous assessment (Re-cert 2017), a Minor NC# CBK-01 and an Observation OBS# CBK-02) have been raised against this same indicator, the NC is now upgraded to Major NC as the corrective action taken is considered to be not effectively implemented.]</p> <hr/> <p>Root Cause and Corrective Action:</p> <p>Root Cause:</p> <p>(1) Anlong Kropeu Palm Oil Mill</p> <p>(I) There is misunderstanding of the context of risk assessment on the Kernel Recovery station, which is not stated about other person, could be harmed except the operators and maintenance staff.</p> <p>(II) Insufficient training on how to check the usage condition of the fire extinguisher to the staff who was assigned to collect and replace The monitoring of the fire hose is not put into the Preventive Maintenance plan. Thus, the attention is less focused</p> <p>The Accident at Estate B : The Risk not re-assessed</p> <p>There was misunderstanding between accident related to the work operations and the personal accident.</p> <p>(2) Monorum Palm Oil Mill: The additional control measure from re-assessment resulted from the accident not included into the SOP-CM-022 Machinery Safety</p> <p>The unexpected thinking was mistaken that incorporating the reassessment of the accident happened into the Risk Assessment reviewed on 26th April 2018 was fulfill to all concerns.</p> <p>Corrective Action:</p> <p>(1) Anlong Kropeu Palm Oil Mill</p> <p>The immediate action as following</p> <p>(I) The Management of Anlong Kropeu Palm immediately re-assesses the risk for the Kernel Recovery station; and then the training session for all concerned staff and workers is conducted. The evidence is enclosed</p> <p>(II) The OSH-ESG (Occupational safety, health, environment, social & gender) sub-</p>
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		<p>committee held a meeting in order to select the responsible staff for taking care on monitoring the fire extinguisher. The training session for the assigned staff is conducted. Evidence enclosed.</p> <p>For the fire hose, the purchasing requisition for the total amount of 12 sets was issued and approved 28th May 2018 for replacing the old ones. The replace work is expected to be done within next month.</p> <p>The Accident at Estate B : The Risk not re-assessed</p> <p>The detailed procedures on the accident relevant to the driving, which is separated from the field working procedures for the Plantation, is fully covered by the Road Safety Policy endorsed on 27th May 2013. Therefore, once again, the Admin/HR department is going to conducting a refresh session on the Road Safety Policy to all concerned staff.</p> <p>(2) Monorum Palm Oil Mill : The additional control measure from re-assessment resulted from the accident not included into the SOP-CM-022 Machinery Safety</p> <p>The immediate review and incorporating the additional control measure after the accident is included into the SOP-CM-022 Machinery Safety. The enclosed is the review of SOP-CM-022 on Machinery Safety for the evidence.</p>		
		<p>Verification (Corrective Action):</p> <p>Off-site verification carried out. The following evidences submitted were verified and found to be acceptable for closing the non-conformance:</p> <p>(1) Re-assessment of the risk for the Kernel Recovery station; and training session on 11/07/2018 with attendance list and photo.</p> <p>Meeting conducted on 12/07/2018 with attendance list and photo. Mr. Ngov Phearum (Supervisor) appointed as the Fire Extinguisher Controller. The training session on inspection of fire extinguisher was conducted on 12/07/2018 with attendance list and photo.</p> <p>Purchasing requisition for 12 sets of fire hose to replace all the old fire hose.</p> <p>Refresher training on driving safety conducted for all relevant staff on 10-12/07/2018 with attendance list and photos.</p> <p>(2) The control measure had been included in the SOP-CM-022 Machinery Safety. The corrective action satisfactorily addressed the non-conformance.</p>		
		<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 60%;">NC status verified by auditor: Closed by OCL</td> <td style="width: 40%;">Date closed: 02/08/2018</td> </tr> </table>	NC status verified by auditor: Closed by OCL	Date closed: 02/08/2018
NC status verified by auditor: Closed by OCL	Date closed: 02/08/2018			
		<p>Verification (for effectiveness): Next assessment.</p>		

3.2.5 Year 2018 Annual Surveillance Assessment ASA-01: 2 Minor NCRs

NCR	RSPO P&C / CLI Indicator	Details of NCR
Minor OCL-01	5.1.3	Date issued: 22/06/2018
		<p>Indicator requirement:</p> <p>This plan shall incorporate a monitoring protocol, adaptive to operational changes, which shall be implemented to monitor the effectiveness of the mitigation measures. The plan shall be reviewed as a minimum every two years to reflect the results of monitoring and where there are operational changes that may have positive and negative environmental impacts.</p>

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	<p>Nonconformance:</p> <p>Location: Monorum POM</p> <p>According to the Environmental Action Plan (p13) for Monorum POM, the discharge of POME into the stream only when sample taken and analyzed found to meet the standard requirements for various parameters. Noted that for the sample dated 18 May 2018, the analysis results dated 24 May 2018 from Food and Chemical Services stated the following parameters as not complying with the standard requirements:</p> <table style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: left;"><u>Parameter:</u></th> <th style="text-align: center;"><u>Result</u></th> <th style="text-align: center;"><u>Requirement</u></th> </tr> </thead> <tbody> <tr> <td>Ammoniacal Nitrogen (mg/L)</td> <td style="text-align: center;">28</td> <td style="text-align: center;">< 7 mg/L</td> </tr> <tr> <td>Total Dissolved Solid (mg/L)</td> <td style="text-align: center;">3200</td> <td style="text-align: center;">< 2000 mg/L</td> </tr> <tr> <td>Chemical Oxygen Demand (mg/L)</td> <td style="text-align: center;">155</td> <td style="text-align: center;">< 100 mg/L</td> </tr> </tbody> </table> <p>Location: Anlong Kropeu POM</p> <p>According to the Environmental Action Plan (p14) for Anlong Kropeu POM, the discharge of POME into the stream only when sample taken and analyzed found to meet the standard requirements for various parameters. Noted that for the sample dated 18 May 2018, the analysis results dated 24 May 2018 from Food and Chemical Services stated the following parameters as not complying with the standard requirements:</p> <table style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: left;"><u>Parameter:</u></th> <th style="text-align: center;"><u>Result</u></th> <th style="text-align: center;"><u>Requirement</u></th> </tr> </thead> <tbody> <tr> <td>Ammoniacal Nitrogen (mg/L)</td> <td style="text-align: center;">59</td> <td style="text-align: center;">< 7 mg/L</td> </tr> <tr> <td>Total Dissolved Solid (mg/L)</td> <td style="text-align: center;">3600</td> <td style="text-align: center;">< 2000 mg/L</td> </tr> <tr> <td>Chemical Oxygen Demand (mg/L)</td> <td style="text-align: center;">270</td> <td style="text-align: center;">< 100 mg/L</td> </tr> </tbody> </table> <p>There was no evidence of a review of the analysis results by a responsible person to detect non-compliance results and identification of further action.</p> <p>Root Cause and Corrective Action:</p> <p>Root Cause: There was less focus on the result of POME due to at the Monorum POM this year is not many processing and rarely discharging into the stream, while for the Anlong Kropeu POM is not directly discharged to the stream.</p> <p>Corrective Action: The immediate action is as following:</p> <ul style="list-style-type: none"> - Retaking one sample of POME at final discharge point for both POMs for the lab analysis once again - If the results are still not fulfilled the requirement, the Mill Management shall seek for the specialist for consultancy to correct it. <p>Verification (Corrective Action Plan): Off-site verification carried out. The Corrective Action Plan (CAP) for re-sampling and analysis to determine compliance with requirements and further necessary action is acceptable. The implementation of the CAP shall be verified at the next surveillance assessment.</p> <table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 60%;">NC status verified by auditor: CAP accepted by OCL</td> <td style="width: 40%;">Date closed: Next assessment.</td> </tr> </table> <p>Verification (for effectiveness): Next assessment.</p>	<u>Parameter:</u>	<u>Result</u>	<u>Requirement</u>	Ammoniacal Nitrogen (mg/L)	28	< 7 mg/L	Total Dissolved Solid (mg/L)	3200	< 2000 mg/L	Chemical Oxygen Demand (mg/L)	155	< 100 mg/L	<u>Parameter:</u>	<u>Result</u>	<u>Requirement</u>	Ammoniacal Nitrogen (mg/L)	59	< 7 mg/L	Total Dissolved Solid (mg/L)	3600	< 2000 mg/L	Chemical Oxygen Demand (mg/L)	270	< 100 mg/L	NC status verified by auditor: CAP accepted by OCL	Date closed: Next assessment.
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NCR	RSPO P&C / CLI Indicator	Details of NCR
Minor OCL-02	5.6.3	Date issued: 22/06/2018
		Indicator requirement: A monitoring system shall be in place, with regular reporting on progress for these significant pollutants and emissions from estate and mill operations, using appropriate tools.
		Nonconformance: Location: Estate B and Estate C It was found that the standard BOD limit of < 30 mg/L was exceeded in the following water sampling and analysis for May 2018: (1) Estate B: BOD results for streams at Div B1, Div B3 and Div. B4 ranged from 40 to 59 mg/L. (2) Estate C: BOD results for streams at Div C1 and Div. C3 were 60 and 71 mg/L respectively. There was no evidence of a review of the analysis results by a responsible person to detect non-compliance results and identification of further action.
		Root Cause and Corrective Action: Root Cause: There was less focus on the interpretation for the results of BOD value for stream water samples. Corrective Action: The immediate action is as following: <ul style="list-style-type: none"> - Retaking one sample of each sampling point concerned for lab analysis for verification - If the results are still not fulfilled the requirement, the Quality Assurance section shall seek for the specialist for consultancy to correct it.
		Verification (Corrective Action): Off-site verification carried out. The Corrective Action Plan (CAP) for re-sampling and analysis to determine compliance with requirements and further necessary action is acceptable. The implementation of the CAP shall be verified at the next surveillance assessment.
		NC status verified by auditor: CAP accepted by OCL
		Verification (for effectiveness): Next assessment.

3.2.6 Year 2018 Annual Surveillance Assessment ASA-01: 6 Observations

Ref No:	RSPO P&C / CLI Indicator	Location	Details of Observation	Status		
				Opened date	Closed date	Remark, if any
OBS# OCL-01	4.1.1	Estates A, B, C and D	The SOP "Leaf & Soil Sampling Analysis" did not have any SOP no. and revision no. for control status to ensure that the latest version of this procedure is being used.	22 Jun 2018		Follow up at next assessment

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OBS# OCL-02	5.6.2	Monorum POM	It was noted that the emission air quality report for sample dated 31 May 2018 at Monorum POM did not include a test for dust particle emission.	22 Jun 2018		Follow up at next assessment
OBS# CBK-01	4.2.2	Estate A and Estate B	Adequate wooden planks should be provided to ensure that the fertiliser bags are not directly in contact with the cement floor of the fertiliser stores in both estates.	22 Jun 2018		Follow up at next assessment
OBS# CBK-02	4.7.2	Monorum POM and Anlong Kropeu POM	The risk assessment relating to working at heights, flocculation tanks at water treatment plant, noise mapping results should be updated.	22 Jun 2018		Follow up at next assessment
OBS# AL-01	6.5.4	Health Dispensary	It is noted that records and data are compiled by the Nursing Assistants and submitted to Admin / HR for review. However the analysis of data can be improved for more proactive / preventive action such as on the cases of 'abdominal pains'.	22 Jun 2018		Follow up at next assessment
OBS# AL-02	6.9.3	Estates A, B, C & D	There mechanism for obtaining feedback (including any grievance) can be improved to include smaller group sessions with simplified question and answer requests as briefing were presently done were noted to be in big groups which does not allow for any anonymity for feedback or complaints.	22 Jun 2018		Follow up at next assessment

3.2.7 Identified Positive Elements

1. Strong commitment by the management and staff in sustainability improvements.
2. Provided infrastructure (roads, bridges, schools and worship temples), free transport, fire-fighting service and contributions for social and community support.
3. Provided employment opportunities for the local community and nearby villagers.

3.3 Summary of Feedback Received from Stakeholders and Findings

Prior to and during the Assessment, written and verbal feedback communicated from the stakeholders on the environmental and social performance of the PMU operations were sourced. All pertinent feedback issues were reviewed and followed up for verification and these had been accordingly incorporated into the report findings. See table below:

3.3.1 Feedback Raised by Stakeholders (Re-certification Assessment – Year 2017)

Communication done via email on 28 Apr 2017 to various categories of stakeholders (see list under **para 2.5**):

Stakeholders' Feedback	PMU Response	CB verification / comments	Follow up comments (if any)
Government Agencies:			

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No feedback received.	Ongoing consultations will be maintained. No response needed.	Verified during on-site assessment that no response needed.	Nil
Non-Governmental Organizations: No feedback received.	Ongoing consultations will be maintained. No response needed.	Verified during on-site assessment that no response needed.	Nil
Local Communities - Stakeholders' Consultation: Selected stakeholders representing the complete range of various stakeholder categories were invited for the Stakeholders' Consultation on 22 Jun 2017. A total of 13 stakeholders (2 government agencies, 2 transporters, 2 villager leaders, 2 school teachers, 4 cattle owners, 1 temple caretaker) were present at the consultation. They were interviewed by the auditors without the presence of any of the PMU staff. Concerns and suggestions received during interviews and stakeholder consultations: 1. Both parties involved in the cattle issues, i.e. MRICOP and the cattle owners, should find a solution which could benefit both parties.	The PMU will consider the concerns and suggestions from the stakeholders briefed by the auditors during the closing meeting.	The PMU and the cattle owners agreed in reduction in the number of cattles and the PMU will grow more napier grass for grazing.	Nil
Local Communities - Interviews: Interviews of sampled staff and workers were also conducted by the auditors during field visits from 19 to 23 Jun 2017 at the PMU: Staff/Workers sampling: POM = 29 males, 5 females Estate Offices = 31 males, 9 females Field/sites visit = 21 males, 5 females No issues raised by the sampled staff and workers.	No response needed.	No response needed.	Nil
Other Interested parties: No feedback received.	No response needed.	No response needed.	Nil

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3.3.2 Feedback Raised by Stakeholders (Annual Surveillance Assessment ASA-01 – Year 2018)

Communication done via email on 16 May 2017 to various categories of stakeholders (see list under para 2.5):

Stakeholders' Feedback	PMU Response	CB verification / comments	Follow up comments (if any)
Government Agencies: No feedback received.	Ongoing consultations will be maintained. No response needed.	Verified during on-site assessment that no response needed.	Nil
Non-Governmental Organizations: No feedback received.	Ongoing consultations will be maintained. No response needed.	Verified during on-site assessment that no response needed.	Nil
Local Communities - Stakeholders' Consultation: Selected stakeholders representing the complete range of various stakeholder categories were invited for the Stakeholders' Consultation on 21 Jun 2018. A total of 11 stakeholders (2 government agencies, 1 contractor, 7 villager leaders and 1 school teacher) were present at the consultation. They were interviewed by the auditors without the presence of any of the PMU staff. Concerns and suggestions received during interviews and stakeholder consultations: 1. Snake bites experienced by villagers when passing near oil palm fronds at night. 2. Female worker who was bitten and still receiving treatment need financial assistance. Her husband is working at MRICOP. 3. Permission to collect loose fruits by elder / retired 'old' villagers.	The PMU will consider the concerns and suggestions from the stakeholders as briefed by the auditors during the closing meeting.	To be followed up during the next Assessment.	-
Local Communities - Interviews: Interviews of sampled staff and workers were also conducted by the auditors during field visits from 18-22 Jun 2018 at the PMU: Staff/Workers sampling: POM = 32 males, 6 females Estate Offices = 35 males, 12 females			



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Field/sites visit = 25 males, 13 females			
No issues raised by the sampled staff and workers.	No response needed.	No response needed.	Nil
Other Interested parties: No feedback received.	No response needed.	No response needed.	Nil

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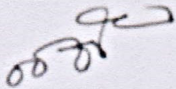
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4.0 ASSESSMENT CONCLUSION AND RECOMMENDATION

Based on the findings above, Mong Reththy Investment Cambodia Oil Palm Co. Ltd., MRICOP had been able to demonstrate its compliance with the RSPO Principles and Criteria (Apr 2013), Cambodian Local Indicators (2014) and the RSPO Supply Chain Certification Standard (Jun 2017) for Palm Oil Mill.

Therefore, it is recommended that the certification of Mong Reththy Investment Cambodia Oil Palm Co. Ltd., MRICOP be approved and continued.

Signed for and on behalf of
Intertek Certification International Sdn Bhd



Dr. Ooi Cheng Lee
Lead Assessor

Date: 13 August 2018

4.1 Acknowledgement of Internal Responsibility and Confirmation of Assessment Findings

This is to acknowledge and confirm the assessment visits described in this report and the acceptance of the contents and findings in this assessment report.

Signed for and on behalf of
Mong Reththy Investment Cambodia Oil Palm Co. Ltd (MRICOP)



Mr. Sunchai Choongan
Deputy Managing Director – MRICOP / MTSI

Date: 13 August 2018

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4.2 Intertek RSPO Certificate Details for the PMU

Certificate No:	RSPO 928088
Issue date:	15 Aug 2012
Expiry date (new):	14 Aug 2022
New Certificate date:	15 Aug 2018
Organization	Mong Reththy Investment Cambodia Oil Palm Co. Ltd (MRICOP)
Address of Head Office:	#52, St. 598 Sangkat Boeung Kak II, Khan Toul Kork, Phnom Penh, Cambodia.
RSPO Membership No:	1-0109-11-000-00
Plantation Management Unit:	MRICOP Grouping
Standards:	RSPO Principles and Criteria (Apr 2013); Cambodian Local Indicators (2014); RSPO Supply Chain Certification Standards (Jun 2017) for the Palm Oil Mill.
Certification scope:	Production of Crude Palm Oil and Palm Kernel
Supply Chain model for CPO & PK:	Identity Preserved (IP)

Details of Mills and Supply bases covered by this certificate and the tonnage approved are:

Name	Address	GPS Reference		Certified (Titled) Area (ha)
		Latitude	Longitude	
Monorum Palm Oil Mill Capacity: 30 MT/hour	Mong Reththy Investment Cambodia Oil Palm Co. Ltd., National Road 4, Monorum, Choeung Kor, Prey Nop, Preah Sihanouk Province, Cambodia.	10° 54' 33.7" N	103° 50' 04.2" E	20,580.20
Anlong Kropeu Palm Oil Mill Capacity: 45 MT/hour	MRT-TCC Sugar Investment Co. Ltd., National Road 4, Anlong Kropeu, Choeung Kor, Prey Nop, Preah Sihanouk Province, Cambodia.	10° 57' 59.3" N	103° 54' 12.7" E	
Estate A (Tapoa)	National Road 4, Sangkat Cheung Kor, Khan Prey Nop, Preah Sihanouk Province, Kingdom of Cambodia.	10° 48' 59.7" N	103° 47' 46.9" E	
Estate B (Svay)	National Road 4, Sangkat Cheung Kor, Khan Prey Nop, Preah Sihanouk Province, Kingdom of Cambodia.	10° 52' 08.2" N	103° 51' 19.2" E	
Estate C (Anlong Kropeu)	National Road 4, Sangkat Cheung Kor, Khan Prey Nop, Preah Sihanouk Province, Kingdom of Cambodia.	10° 57' 58.7" N	103° 54' 02.0" E	
Estate D (Kirivon)	National Road 4, Kirivon, Stoeng Chhay, Prey Nop, Preah Sihanouk Province, Cambodia.	10° 57' 58.4" N	103° 54' 01.9" E	



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The annual certified tonnages produced at the PMU are detailed as follows:

Monorum POM	Annual Tonnages (MT)
Certified FFB	53,510
Certified CPO	10,488
Certified PK	2,461
Supply chain module	Identity Preserved (IP)

Anlong Kropeu POM	Annual Tonnages (MT)
Certified FFB	214,040
Certified CPO	42,219
Certified PK	10,113
Supply chain module	Identity Preserved (IP)

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Appendix A

Qualifications of Lead Assessor and Assessment Team

Dr. Ooi Cheng Lee (OCL) - Lead Assessor / Team Leader / Technical Expert

(Palm Oil Mill, Environment, OHSAS, Social, HCV, Land Use and Supply Chain)

- PhD in Welding, Cranfield University, UK
- M.Sc. (Engineering) in Metallurgy, University of Birmingham, UK
- B.App.Sc (Hons), Science University of Malaysia
- Diploma in Translation for Science and Technology, Malaysia Translation Society

Dr. Ooi Cheng Lee is an IRCA Lead Auditor and Lead Tutor for ISO 9001. He is also involved in auditing in other integrated management systems. He has successfully completed the RSPO Lead Assessor Course for Principles and Criteria (RSPO P&C) and the RSPO Supply Chain Certifications (RSPO SCC). He is currently involved in the management of all types of system and process/product certification in Intertek. He has more than 32 years work experience in product and process specifications, research & development, inspection and testing, quality assurance, engineering development, training, product certification, auditing and quality management system certification. He has conducted assessments of organizations in Malaysia, Singapore, Indonesia, Vietnam, Philippines, China, Myanmar, Cambodia and other regional countries. Assessments include those of rubber and oil palm plantations in Malaysia and Indonesia. His previous position as the General Manager of Lloyd's Register Quality Assurance (LRQA) Malaysia include the management of all types of systems certification, including that of environmental (ISO 14001), safety & health (OHSAS 18001) and Clean Development Mechanisms (CDM). He is currently the General Manager in Intertek Certification International Sdn. Bhd. He is a member of the Internal Review Panel for RSPO Assessment reports since May 2011. He is part of the RSPO CB Assessment team which audited RSPO certified Plantation Management Units since 2012.

Mr. Augustine Loh (AL) – Assessor / Technical Expert

(Palm Oil Mill, Environment, Social, Conservation & HCV area, GAP, IPM, Land Use and Supply Chain)

– Master in Business Administration, USA and Diploma in Maritime Studies, Singapore

Mr. Augustine Loh is an IRCA Third Party Assessment Lead Auditor and IRCA Lead Tutor for IRCA ISO 9001 and OHSAS 18001 Lead Auditor Courses as well as Tutor for RSPO Certification Programs and Integrated Management System in Intertek, Malaysia. He is a PORLA Licensed Surveyor / Inspector. He has over 25 years of fieldwork and experience in Palm based product survey, supply chain monitoring, inspection and testing. He has successfully completed the IRCA accredited Lead Auditor course in ISO 9001, ISO 14001, OHSAS 18001, ISO 22001, ISO 27001, RSPO Principles and Criteria Lead Assessor Course, RSPO Supply Chain Certification and the International Sustainable Carbon Certification (ISCC) Lead Auditor courses. He has also completed the RSPO training on RSPO P&C, RSPO Palm GHG tool, RSPO RED and RSPO NEXT requirements. He has conducted assessments of organizations in Malaysia, Singapore, Indonesia, Brunei, Thailand, Cambodia and Australia. He is currently the RSPO Regional Program Manager of Intertek Certification International, Malaysia and has performed over 800 auditing days on quality, environmental and safety & health assessments in various sectors including agriculture and oil palm plantations. He was the RSPO CB Assessment Team Leader / Member which audited several RSPO certified Plantation Management Units since 2009. He was the CB Team Leader in the stakeholder consultation and development of the RSPO Cambodian Local Indicators. He is a member of the CB Internal Review Panel for RSPO Assessment reports since 2010. He is also a Lead Auditor in the Malaysian Sustainable Palm Oil (MSPO) certification.

Mr. Chin Bit Kee (CBK) – Assessor / Technical Expert

(Good Agriculture Practice, Integrated Pest Management and Social)

– Degree in Food Technology from University of Reading, United Kingdom

Mr. Chin Bit Kee has more than 5 years working experience in the oil palm plantation, agriculture & social (worker welfare) related field. He has successfully participated in RSPO training conducted internally by Intertek on 17 April 2014 and completed a supervised period of training in practical auditing in agriculture industry and related field, with more than 15 days audit experience in at least 3 audits at different organizations. He has adequate knowledge on Palm Oil sector such as industry fundamentals sustainability, social and OHS issues (e.g. worker welfare issues and social matters such as employment terms, gender issues, worker welfare etc.) environmental matters (e.g. pollution control, conservation of resources). He is a member of the RSPO CB Assessment team which audited several RSPO certified Plantation Management Units since 2014.

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Mr. Reaksa Rous (RR) – Local Expert

(Local Expert cum Interpreter)

– Master in Political Science & International Relations, Diploma in Criminology & Crime Administration, BBA in Management

Mr. Reaksa Rous had held several work positions since 1991 till to date as a Teacher, Lecturer, Trainer, Interpreter and Consultant. He has over 10 years' experience and knowledge of Cambodian laws and regulations including Agriculture, Social and Environmental related laws. His experiences include specialization in Khmer Literature, Drug Enforcement Law, Nature Crime Investigation on Wildlife and Labor Migration Policies and Management. He was a CB Local Technical Expert cum Interpreter in the stakeholder consultation and development of the RSPO Cambodian Local Indicators in 2012.

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Appendix B

Assessment Plan (Actual)

Date	Time	Assessors and Assessment Activity			
		Assessment Team			
18 Jun 18 Monday (Day 1)	8.00 am – 11.00 am	Travel to Phnom Penh			
	11.00 am – 1.00 pm	Travel from Phnom Penh to Anlong Kropeu POM			
	1.00 pm – 2.00 pm	Lunch Break			
	2.00 pm – 2.30 pm	Opening Meeting and Briefing at POM Office (to be attended by representatives from the Estates as well)			
	2.30 pm – 5.00 pm	Document Review and Assessment by all Assessors on respective RSPO P&C:1 to 8 at POM			
		OCL	CBK	AL	RR
		Site assessment at Mill 1 <ul style="list-style-type: none"> • P1 Transparency • P2 Laws & regulations • P3 Economic & Financial Viability • P5 Environmental, Conservation & HCV • SCC for POM 	Site assessment at Mill 1 <ul style="list-style-type: none"> • P2 Laws & regulations • P4 Best Practices at Mill • P8 Continual Improvement 	Site assessment at Mill 1 <ul style="list-style-type: none"> • P2 Laws & regulations • P6 Employees, Individuals & Communities incl. Gender Issues • P8 Continual Improvement 	Site assessment at Mill 1 <ul style="list-style-type: none"> • Assisting Auditors • P2 Laws & regulations • P4 - P8
	<ul style="list-style-type: none"> • Verification of effectiveness of corrective actions for non-conformances • Review of Time Bound Plan • Verification for compliance with rules on Multiple Management Units. 				
	5.00 pm – 6.00 pm	Travel to Hotel & Break			
	6.00 pm – 7.00 pm	Team Meeting and Discussion			

Date	Time	Assessors and Assessment Activity			
		OCL	CBK	AL	RR
19 Jun 18 Tuesday (Day 2)	8.30 am – 12.30pm	Site assessment at Estate A <ul style="list-style-type: none"> • P1 Transparency • P2 Laws & regulations • P3 Economic & Financial Viability • P5 Environmental, Conservation & HCV 	Site assessment at Estate A <ul style="list-style-type: none"> • P2 Laws & regulations • P4 Best Practices at Estate • P7 New Plantings • P8 Continual Improvement 	Site assessment at Estate A <ul style="list-style-type: none"> • P2 Laws & regulations • P6 Employees, Individuals & Communities incl. Gender Issues • P8 Continual Improvement 	Site assessment at Estate A <ul style="list-style-type: none"> • Assisting Auditors • P2 Laws & regulations • P4 - P8
		Lunch Break			
	1.30 pm – 5.00 pm	Site assessment at Estate B	Site assessment at Estate B	Site assessment at Estate B	Site assessment at Estate B

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		<ul style="list-style-type: none"> • P1 Transparency • P2 Laws & regulations • P3 Economic & Financial Viability • P5 Environmental, Conservation & HCV 	<ul style="list-style-type: none"> • P2 Laws & regulations • P4 Best Practices at Estate • P7 New Plantings • P8 Continual Improvement 	<ul style="list-style-type: none"> • P2 Laws & regulations • P6 Employees, Individuals & Communities incl. Gender Issues • P8 Continual Improvement 	<ul style="list-style-type: none"> • Assisting Auditors • P2 Laws & regulations • P4 - P8
	5.00 pm – 6.00 pm	Travel to Hotel & Break			
	6.00 pm – 7.00 pm	Team Meeting and Discussion			

Date	Time	Assessors and Assessment Activity			
		OCL	CBK	AL	RR
20 Jun 18 Wednesday (Day 3)	8.30 am – 12.30pm	Site assessment at Estate C <ul style="list-style-type: none"> • P1 Transparency • P2 Laws & regulations • P3 Economic & Financial Viability • P5 Environmental, Conservation & HCV 	Site assessment at Estate C <ul style="list-style-type: none"> • P2 Laws & regulations • P4 Best Practices at Estate • P7 New Plantings • P8 Continual Improvement 	Site assessment at Estate C <ul style="list-style-type: none"> • P2 Laws & regulations • P6 Employees, Individuals & Communities incl. Gender Issues • P8 Continual Improvement 	Site assessment at Estate C <ul style="list-style-type: none"> • Assisting Auditors • P2 Laws & regulations • P4 - P8
	12.30 pm – 1.30 pm	Lunch Break			
	1.30 pm - 5.00 pm	Site assessment at Estate D <ul style="list-style-type: none"> • P1 Transparency • P2 Laws & regulations • P3 Economic & Financial Viability • P5 Environmental, Conservation & HCV 	Site assessment at Estate D <ul style="list-style-type: none"> • P2 Laws & regulations • P4 Best Practices at Estate • P7 New Plantings • P8 Continual Improvement 	Site assessment at Estate D <ul style="list-style-type: none"> • P2 Laws & regulations • P6 Employees, Individuals & Communities incl. Gender Issues • P8 Continual Improvement 	Site assessment at Estate D <ul style="list-style-type: none"> • Assisting Auditors • P2 Laws & regulations • P4 - P8
	5.00 pm – 6.00 pm	Travel to Hotel & Break			
	6.00 pm – 7.00 pm	Team Meeting and Discussion			

Date	Time	Assessors and Assessment Activity			
		OCL	CBK	AL	RR
21 Jun 18 Wednesday (Day 4)	8.30 am – 12.30pm	Site assessment at Mill 2 <ul style="list-style-type: none"> • P1 Transparency • P2 Laws & regulations • P3 Economic & Financial Viability 	Site assessment at Mill 2 <ul style="list-style-type: none"> • P2 Laws & regulations • P4 Best Practices at Mill • P8 Continual Improvement 	Site assessment at Mill 2 <ul style="list-style-type: none"> • P2 Laws & regulations • P6 Employees, Individuals & Communities 	Site assessment at Mill 2 <ul style="list-style-type: none"> • Assisting Auditors • P2 Laws & regulations • P4 - P8

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		<ul style="list-style-type: none"> • P5 Environmental, Conservation & HCV • SCC for POM 		<ul style="list-style-type: none"> incl. Gender Issues • P8 Continual Improvement 	
	12.30 pm – 1.30 pm	Lunch Break			
	1.30 pm - 4.00 pm	Site assessment at Mill 2 <ul style="list-style-type: none"> • P1 Transparency • P2 Laws & regulations • P3 Economic & Financial Viability • P5 Environmental, Conservation & HCV • SCC for POM 	Stakeholders' Consultation on the following categories (see Notes 1 and 2 below): <ul style="list-style-type: none"> • Contractors • Suppliers • Transporters • NGOs • Government Department / Agencies • Local Community Notes 1. It is mandatory for the PMU to inform Intertek and provide the information (as a minimum the no. of stakeholders in each applicable category and contact number) on the stakeholders <u>prior</u> to the assessment. 2. This will facilitate the random and impartial selection of stakeholders (including independent and organized smallholders, where applicable) and to meet the sample size requirement		
	4.00pm – 5.00 pm		Site assessment at POM or estates to follow up on any specific criteria/areas		
	5.00 pm – 6.00 pm	Travel to Hotel & Break			
	6.00 pm – 7.00 pm	Team Meeting and Discussion			

Date	Time	Assessors and Assessment Activity			
		OCL	CBK	AL	RR
22 Jun 18 Friday (Day 5)	8.30 am – 10.00 am	Site assessment at POM or estates to follow up on any specific criteria/areas			
	10.00 am – 11.00 am	Preparation for Closing Meeting			
	11.00 am – 11.30 am	Team Meeting and Discussions with POM Management Representative			
	11.30 am – 12.30 pm	Closing Meeting & Briefing at Palm Oil Mill Office			
	12.30 pm – 1.30 pm	Lunch Break			
	1.30 pm – onwards	Travel to Phnom Penh			

Date	Time	Assessors and Assessment Activity		
		OCL	CBK	AL
23 Jun 18 Saturday (Day 6)	Morning	Flight back to Kuala Lumpur		

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Appendix C-1

Location Map of MRICOP, Cambodia (Map Scale 1:100km)

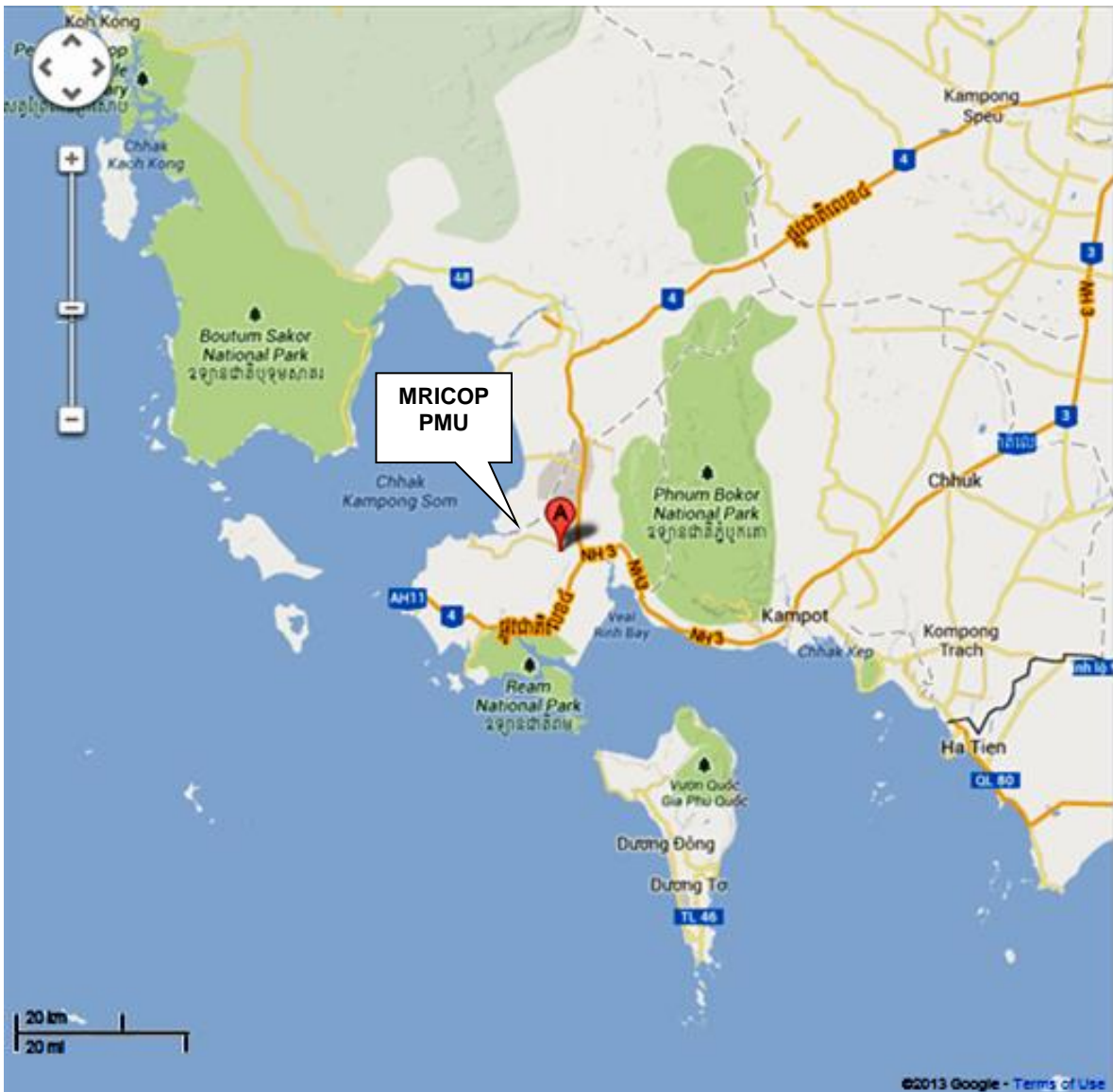


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Appendix C-1-2

**Location Map of MRICOP Choeung Kor Commune, Prey Nop District,
Sihanoukville, Cambodia (Map Scale 1: 20km)**



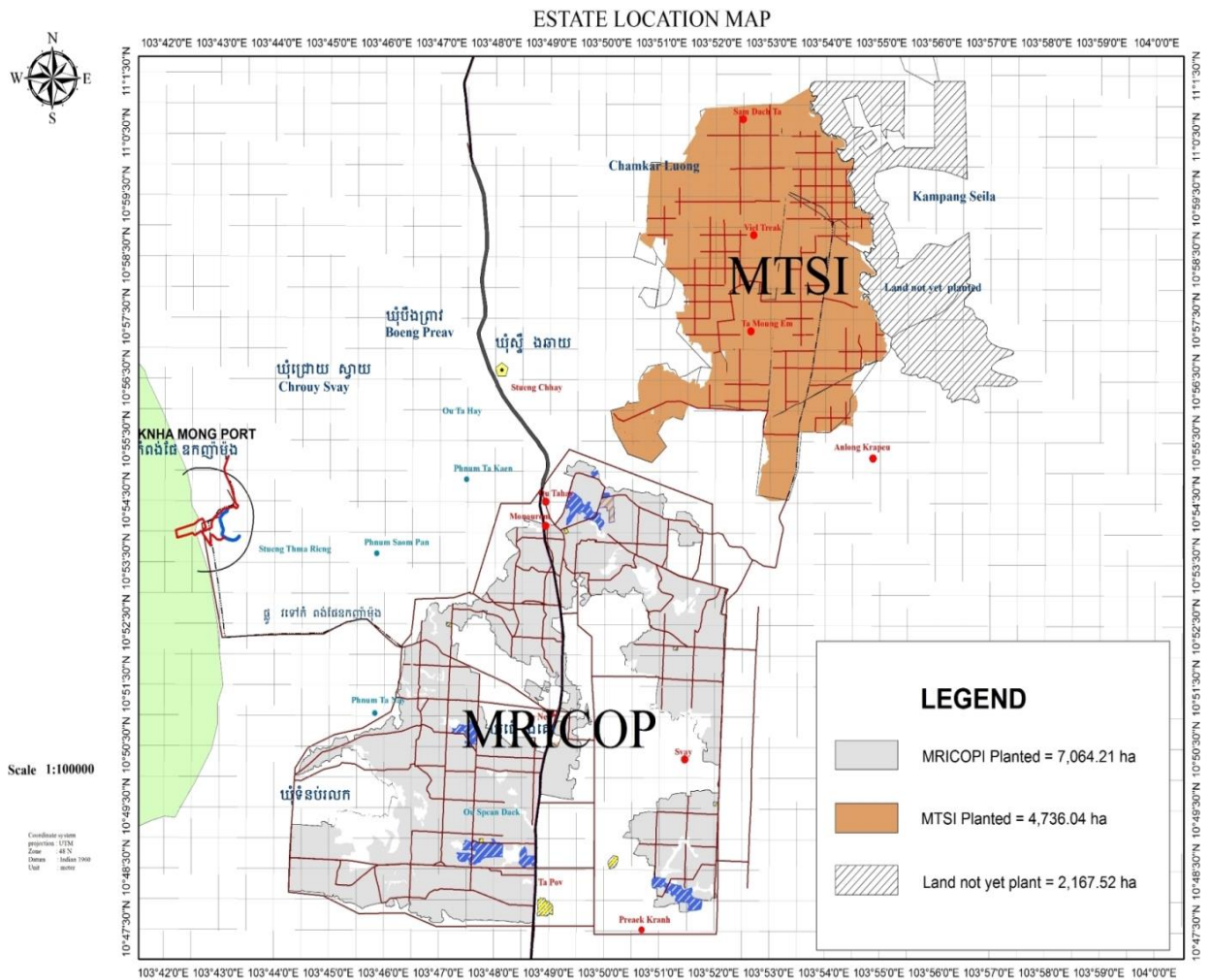
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Appendix C-2

Location of Estates and surrounding landscape



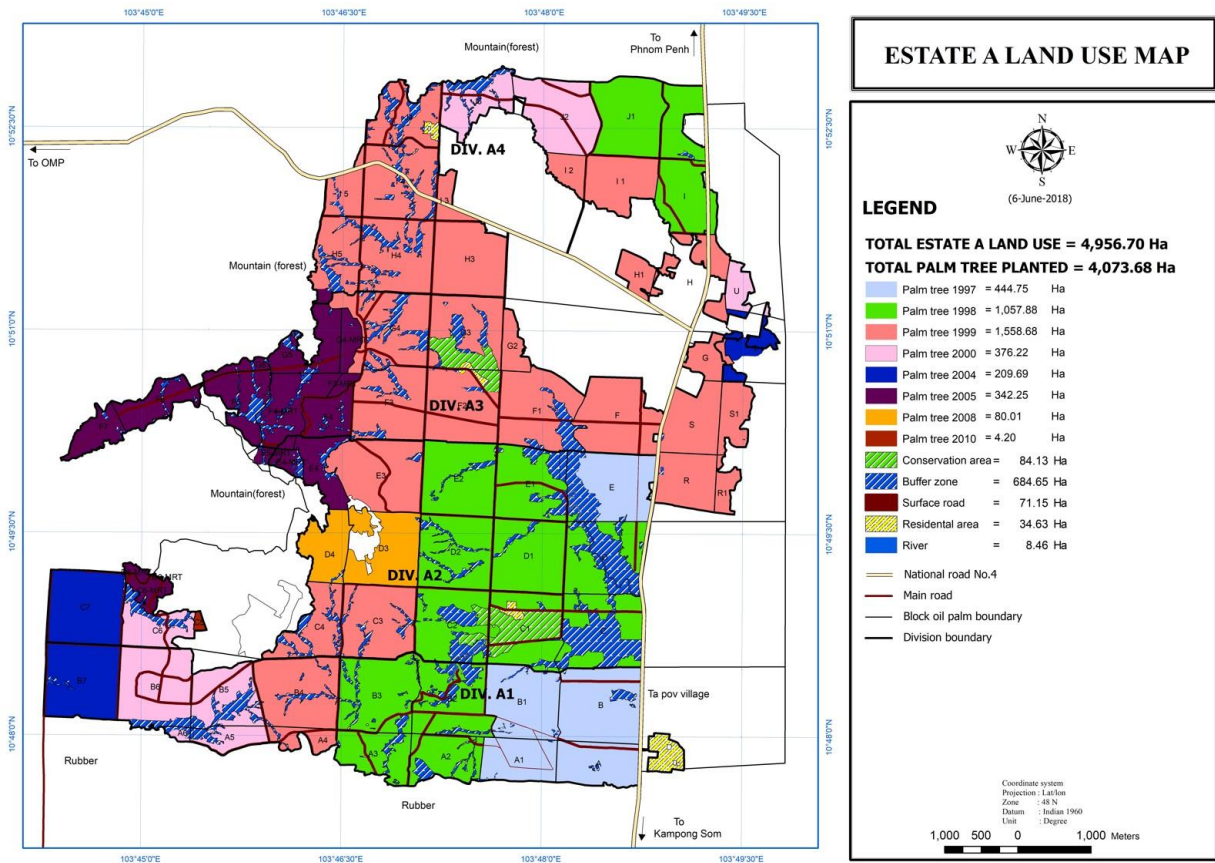
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Appendix C-2-1

Land Use Map – Estate A



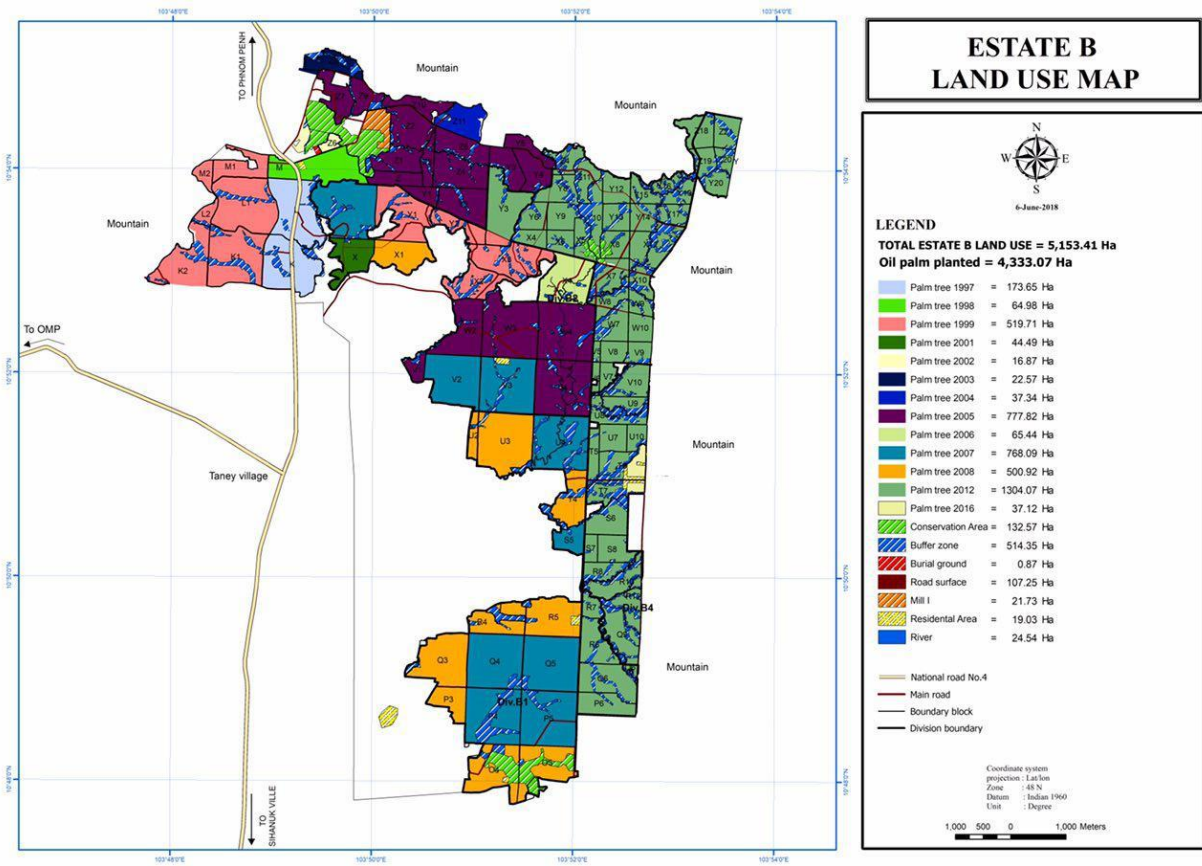
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Land Use Map – Estate B



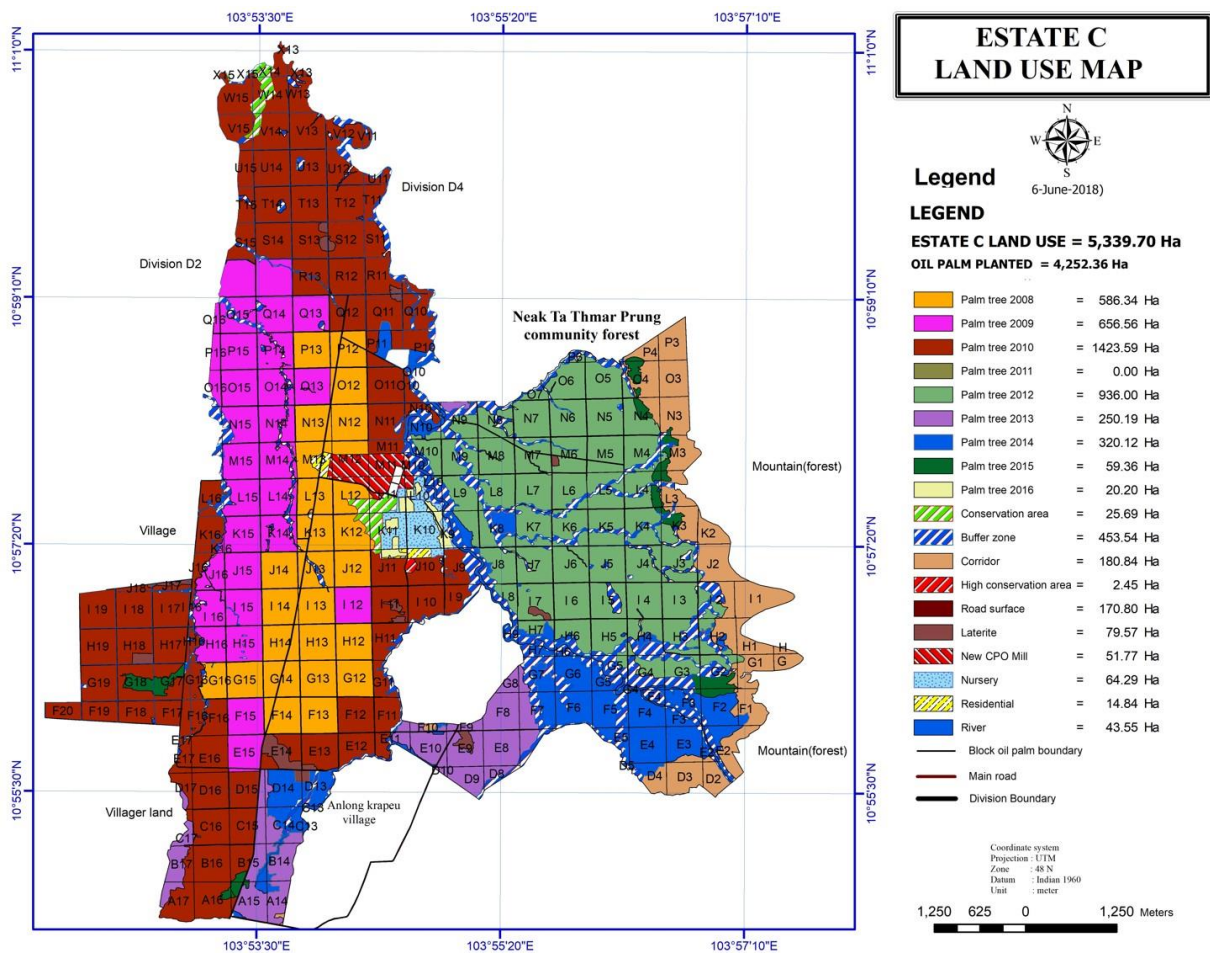
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Land Use Map – Estate C



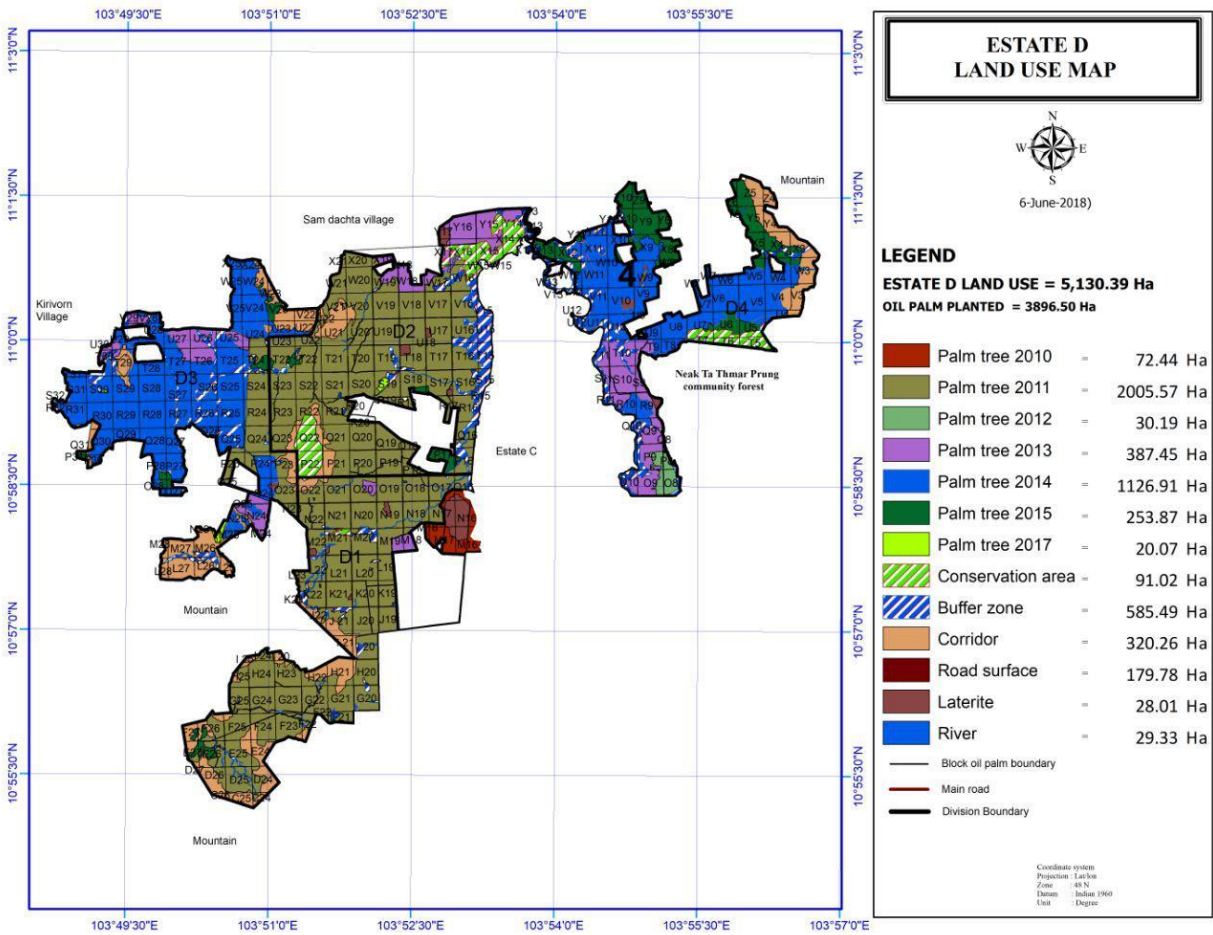
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Land Use Map – Estate D



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Appendix D

Photographs taken at the PMU



Pond at Estate A identified as Conservation Area with signboards.



Estate A - Overflow as part of Water Management Plan to prevent flooding.



Buffer zone between estate and mountain outside the boundary of Estate A.



Anlong Kropeu river flowing from the mountain and passing outside the boundary of Estate C.



Estate C - Signboard at the buffer zone to the Anlong Kropeu river.



Community forest (for villagers use) located outside the boundary of Estate C with a buffer zone.

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Appendix D Photographs taken at the PMU (cont.)



PPE issued during audit – Estate A



Domestic waste bins at housing area – Estate B



Day care centre for Estate C and Estate D



Health dispensary near Monorum POM



Stakeholders' consultation with local representatives



Closing meeting at Anlong Kropeu mill office