

Sabah TLAS Audit Report

Sabah Legality Standard Principles 1 – 4

Licensee	Licensee: Benta Wawasan Sdn. Bhd. 199601005068 (377414-H) Contractor: RT Plantations Sdn. Bhd. 201301004133 (1033974-D)	Reference #	GFSSBH 003-380
Contact Person	Richard Ondoh (Officer in-Charge RBJ Tawau) Mohd. Farid G. (RT Plantations Estate Manager)	Date of Report Date of close out	05/12/2025 -
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		Approved By	Dr. Kevin Grace

Statements

Statement of Compliance	GFS 052 LVS		
Issuance Date	08 December 2025	Expiration Date	07 December 2026

Assessment Details

Assessment Dates	01-05 December 2025
Scope of Assessment	Sabah TLAS P1-4: Tree Plantation and Forestry Management Agreement JP(TKA)122/96(CO) FMU 24 (Partly) & FMU 26 (Partly)
Species	Oil Palm (<i>Elaeis guineensis</i>), ITP: <i>Neolamarkia cadamba</i> (Laran)
Lead Assessor	Teddy Quintin, Eljipy Sualim (Acting Lead)
Assessor(s)	Anne Gimbir (Remotely)
SFD Staff	Varenius V. Untomon (ADFO Kalabakan), Rosdin Abd Rahman (PPD Kalabakan), Abdul Hadi Ruddani (PPD Kalabakan), Jonathan Laminggu (PPD Kalabakan)

OBJECTIVES:

- The objective of this checklist is to verify compliance to the Criteria listed in the Sabah Legality Standard as defined by Principles 1 - 4 for Sabah dated November 2020 (**SFD-TLAS-002**).
- Compliance is defined when all applicable criteria are observed to be compliant. A minor Gap to any indicator does not constitute non-compliance to a criterion. A Major Gap to any applicable indicator does reflect non-compliance to a criterion. Compliance with a criterion where multiple minor gaps are identified in indicators under the criterion may reflect non-compliance to the criterion.
- All issues identified under this standard shall be considered appropriate to the scale and degree of forestry operations undertaken by the parties under the agreement.

Summary Information

Overview of Licensee:

The project site for RT Plantation's oil palm plantation is within Class II production forest, which is a part of the Sabah Forest Reserve Benta Wawasan project established in 1996 to replace natural forest with *Acacia mangium* forest plantation. Within 10 years, production setbacks had forced the project to become an oil palm plantation.

Benta Wawasan Sdn. Bhd. (Licensee) assigned the project area to Rakyat Berjaya Sdn. Bhd. (Rakyat Berjaya), which is a subsidiary of Yayasan Sabah to be developed under the agroforestry concept. Rakyat Berjaya enters into a Joint Venture (JV) Agreement with Rinukut Plantations Sdn. Bhd., presently known as RT Plantations Sdn. Bhd. (RT Plantations), signed on 07/12/2012 to jointly develop an agroforestry project.

RT Plantations operating primarily in oil palm operation at approximately 5,000 ha concession located within Kalabakan (FMU 26) and Gunung Rara (FMU 24) FR. RT Plantations concession is a Class II Commercial Forest which "allocated for logging to supply timber and other produce that contributes to state economy."

RT Plantations is associated with Serijaya Industries Sdn. Bhd., and TSH Resources Berhad, which comes under the auspices of the TSH Group companies.

RT Plantations does not engage any other subcontractor for harvesting FFB and oil palm plantation maintenance.

The previous assessment was conducted in December 2024 that resulted in 3 gap(s) and 7 observation(s) (Report #: GFSSBH 003-323a).

Land use classification: Based on 2nd ADP, Table 2.2.

Land classification	FMP Area (ha)	Current Status (ha)
Total Project Area	5,000	5,000
Planted Area *: Oil Palm = 1,770 ha Laran = 170 ha	1,940	1,940 Oil Palm = 1,770 Laran *** = 170
Unplantable Area: Steep slope above 25° = 1,019.42 ha Riparian = 335.37 ha Buffer Zone (Inclusive partial of Sg, Tiagau Ext II FR & Road Buffer) = 206.13 ha Sg. Tiagau (Ext II) Class I FR = 877.37 ha Water pond reserve = 3.65 ha	2,441.94	2,441.94
Approved Coupe permit **: TWU.01/13 = 380.40 ha TWU.01/14 = 384.10 ha TWU.04/15 = 794.60 ha TWU.02/16 = 1,042.90 ha	2,602	2,602

Note*: Planted areas are within the Coupe permit area.

Note **: 618.06 ha of unplanted area is within the Coupe Permits excluding unplantable areas.

Note***: Based on the ECR May 2025, Laran planting stopped since Dec 2023.

Current Operations:

Based on the AWP 2025, there will be no plan of land preparation for oil palm in 2025, since land activities had ceased since Dec 2015 due to RSPO requirement on implementing New Planting procedure. RT Plantations plans to conduct oil palm crop operations and forest restoration (Silviculture treatment) in 2025.

Based on AWP 2025, Table 3.1

Estimated FFB Production & Mature Oil Palm (Ha)		
Coupe	Compartment	Harvest Area (Ha)
TWU 01/13	BW 1/3: 15 & 16	324.19
TWU 01/14	BW 1/3: 13, 14 & 17	330.04
TWU 04/15	BW 1/3: 12, 13 17 to 22	562.87
TWU 02/16	BW 1/3: 5a, 5b & 7	559.82
Total		1776.92

List current coupes under FFB collection.

Coupe #	NFM / ITP	Status	Area (ha)	Geo-location data
TWU 01/13	Oil Palm	Sabah TLAS EUDR	380.40	NW: RY504250 BOR505000 NE: RY504900 BOR508400 SW: RY503250 BOR505500 SE: RY503500 BOR507500
TWU 01/14	Oil Palm	Sabah TLAS EUDR	384.10	NW: RY505750 BOR505100 NE: RY505500 BOR508500 SW: RY504400 BOR505000 SE: RY504600 BOR508750
TWU 04/15	Oil Palm	Sabah TLAS EUDR	794.60	NW: RY507500 BOR508000 NE: RY505100 BOR513000 SW: RY505000 BOR513000 SE: RY506000 BOR506000
TWU 02/16	Oil Palm	Sabah TLAS EUDR	1,042.90	NW: RY507500 BOR508000 NE: RY510400 BOR514100 SW: RY505500 BOR509000 SE: RY505400 BOR515000

Environmental Context:

Existing EIA report & key elements for protection / mitigation:

EIA	Ref. #	Consultant
Development of Oil Palm Plantation Within Part of Block YT2/04 (5,000 Ha approximately) at Kalabakan, Sabah	JPAS/PP/TWU/600-1/11/1/172 Klt.2(5) dated 10/10/2017	Envolve Sdn. Bhd.

Forest type and short history of management:

For the past 10 years, RT Plantations has been following the guideline provided by the previous 1st ADP (2013-2022). A total of 1,947 ha has been planted with oil palm trees and Laran trees.

The Project area has been logged in the past and now consist of secondary vegetation, mostly low quality species of Dipterocarps as well as other non-commercial trees species.

Principal commercial species currently existing:

The existing species are Oil Palm (*Elaeis guineensis*) and *Neolamarkia cadamba* (Laran).

Specific biological values (e.g., rare or endangered species):

Faunal surveys were conducted within the Project Area and among the species of fauna found within the site Red Leaf Monkey, Bornean Gibbon, Borneo Pygmy Elephant, Bulbuls, Monitor Lizard, Reticulate Python, Blood Python and Slender Litter Frog.

Environmental services (e.g., critical watersheds, wildlife habitat, peat swamp, etc.):

The tributaries of Ulu Sg. Kuamut and Ulu Sg. Kalabakan pass through the site at the southwest and northeast boundary respectively. The flow pattern of the area is generally controlled by the topography of the area.

Social Context:

Social assessment **SBS / SIA / EIA** summary:

Based on the EIA, human settlements were not observed nearby. Human populations were found to be within the site at the base camp of the logging company. Additionally, the nearest populated areas are the SUAS Project Area, INNIKEA Project Area and RIL Project Area, all located at adjacent to the Project Area.

Identified communities that are dependent on the FMU:

There are no human settlements were observed nearby. Thus, no communities dependent on the FMU.

Land claims, disputes & communication system:

There are no human settlements were observed nearby. Thus, no land claims, disputes and communication system.

Community Forestry Projects:

There are no human settlements were observed nearby. Thus, no community forestry projects.

Scope of Assessment	
- The scope of the evaluation is to verify compliance of Benta Wawasan Sdn. Bhd. (RT Plantations Sdn. Bhd.) with the Tree Plantation and Forestry Management Agreement, JP(TKA)122/96(CO) for FMU 24 (partly) and FMU 26 (partly). - The assessment is in accordance with the terms of the agreement for the "Sabah Legality Standard Principles 1 - 4 dated 1 January 2024 (SFD-TLAS-006). - Site evaluation to verify and report the level of compliance by Benta Wawasan Sdn. Bhd. and contractors to the standard in respect to each of the criteria within this report. - Compliance is defined when the auditee demonstrates that the indicators consist of none or only minor gaps against any applicable criteria of the standard. Non-compliance to the Sabah Legality Standard occurs when the auditee does not comply adequately with a criterion.	

Itinerary & Mandays: 01-05 December 2025 / FMU 24 (Partly) & 26 (Partly): Benta Wawasan Sdn. Bhd. (RT Plantations Sdn. Bhd.) / Kalabakan District

Date	Activity	GFS Staff	Mandays
01 December 2025 Monday	Travelling to Kalabakan and overnight.	Teddy Quintin, Eljipy Sualim, Anne Gimbir	3
02 December 2025 Tuesday	Opening meeting at RT Plantations estate office. Field assessment to Laran planting area and maintenance, encroachment, Coupe TWU02/16, Block S1 = PSP, licensed boundary, protected areas. Field visit to operation, workshop, workers' quarters, landfill, hazardous waste. Document review. Overnight at Kalabakan.	Teddy Quintin, Eljipy Sualim, Anne Gimbir	3
03 December 2025 Wednesday	Document review at RT Plantations estate office and compiling report.	Teddy Quintin, Eljipy Sualim, Anne Gimbir	3
04 December 2025 Thursday	Closing meeting at PPD Kalabakan office. Travel back to home base.	Teddy Quintin, Eljipy Sualim, Anne Gimbir	3
05 December 2025 Friday	Finalizing report.	Teddy Quintin, Eljipy Sualim, Anne Gimbir	3
06-07 December 2025	Reporting/Administration: GFSSBH003-380	Dr. Kevin Grace Teddy Quintin	2

Total	17
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Highlights of Assessment

(Major Gaps = 0; Minor Gaps = 3; Observations = 5)

Benta Wawasan Sdn. Bhd. (RT Plantations Sdn. Bhd.) has complied with the Sabah TLAS requirements (FDS TLAS-006) as no non-compliance was identified during the assessment on 01-05 December 2025.

Summary of status of operations by **Principle:**

Principle 1. Right to Harvest

Benta Wawasan Sdn. Bhd. (Licensee) assigned the project area to Rakyat Berjaya Sdn. Bhd. (Rakyat Berjaya), which is a subsidiary of Yayasan Sabah to be developed under the agroforestry concept. Rakyat Berjaya enters into a Joint Venture (JV) Agreement with Rinukut Plantations Sdn. Bhd., presently known as RT Plantations Sdn. Bhd. (RT Plantations), signed on 07/12/2012 to jointly develop an agroforestry project.

RT Plantations amended and submitted the revised 2nd ADP draft on 02/08/2025. However, still pending approval from the SFD.

February 2025: Observation 001-2025 – Checklist 1.3.1, 1.4.1

The 2nd ADP is pending approval from the SFD.

December 2025: Observation 001-2025 (Outstanding)

The ADP has yet to be approved by the SFD.

December 2024: Observation 001-2024 – Checklist 1.1.3,

No evidence of coupe permit TWU 02/16 conditions revision to include Laran plantations.

December 2025: Observation 001-2024 (Outstanding)

Coupe permit TWU 02/16 has not been revised to include Laran plantations.

December 2024: Gap 002/2024 (minor) – Checklist 1.3.2.4, 1.3.2.6

The 2nd ADP land use table does not reflect the actual management area.

December 2025: Gap 002/2024 (minor) – Outstanding

The 2nd ADP land use table does not reflect the 618.06 ha of unplanted areas within the 5,000 ha management area.

December 2024: Observation 002-2024 – Checklist 1.3.2.13

The FFMP is pending approval from SFD.

December 2025: Observation 002-2024 (Addressed)

The FFMP was approved by the SFD on 11/12/2024.

December 2025: Observation 002-2025 – Checklist 1.3.2.12

The 2nd ADP did not reference standard procedures for monitoring of resources, buffer zones & steep slopes.

December 2024: Observation 003-2024 – Checklist 1.4.6

The 2nd ADP draft did not define the R&D program to be implemented in the next 10-yr management plan.

December 2025: Observation 003-2024 (Closed)

The 2nd ADP was revised based on SFD suggestions without a requirement for a formal R&D program.

December 2024: Observation 004-2024 – Checklist 1.4.7

The 2nd ADP draft did not define the monitoring of mortality and plantation growth inside Laran plantation.

December 2025: Observation 004-2024 (Outstanding)

Monitoring of fire, mortality and growth of Laran plantation was not defined.

December 2024: Gap 004/2024 (minor) – Checklist 1.6.4, 1.6.5, 1.6.6, 1.7.2, 1.7.4

RT Plantations has not developed the CPP for the planted Laran.

December 2025: Gap 004/2024 (minor) – Outstanding

The CPP for Laran planting was not developed and submitted to the SFD.

Principle 2. Forest Operations

Highlights of Assessment

All workers are legally employed, and adequate safety and fire control training was conducted. Protection areas are mapped and identified on the ground.

December 2024: Gap 004/2024 (minor) – Checklist 2.1.8

RT Plantations has not developed the CPP for the planted Laran.

December 2025: Gap 004/2024 (minor) – Outstanding

The CPP for Laran planting was not developed and submitted to the SFD.

December 2024: Gap 005/2024 (minor) – Checklist 2.3.3

RT Plantations has not established PSP for the ITP areas.

December 2025: Gap 005/2024 (minor) – Closed

RT Plantations has established PSP plots inside the Laran ITP areas.

December 2024: Observation 005-2024 – Checklist 2.3.5

RT Plantations has yet to conduct the forest fire awareness program as required.

December 2025: Observation 005-2024 (Addressed)

RT Plantations has conducted the forest fire awareness program as planned in the FFMP.

December 2025: Gap 001/2025 (minor) – Checklist 2.4.1, 2.4.2

Four workers have an expired work permits.

Principle 3. Statutory Charges

Applicable fees are paid to the SFD.

December 2025: Observation 003-2025 – Checklist 3.1.1

The Occupational Permit application for the Shop (Tamu) is pending approval from the SFD.

December 2024: Observation 006-2024 – Checklist 3.1.2

The FFB royalty payment for October 2024 is pending from RT Plantations.

December 2025: Observation 006-2024 (Addressed)

The FFB royalty payment for October 2024 has been paid by RT Plantation.

Principle 4. Other User Rights

Based on the EIA, human settlements were not observed nearby. Human populations were found to be within the site at the base camp of the logging company. Additionally, the nearest populated areas are the SUAS Project Area, INNIKEA Project Area and RIL Project Area, all located at adjacent to the Project Area.

Summary Results:

(Major Gaps = 0; Minor Gaps = 3; Observations = 5)

Gap raised against indicators & criteria during the December 2025 assessment.

GAP	Type	Checklist	Status	Description
002/2024	minor	1.3.2.4, 1.3.2.6	Outstanding	December 2024: The 2 nd ADP land use table does not reflect the actual management area. December 2025: The 2 nd ADP land use table does not reflect the 618.06 ha of unplanted areas within the 5,000 ha management area.
004/2024	minor	1.6.4, 1.6.5, 1.6.6, 1.7.2, 1.7.4, 2.1.8	Outstanding	December 2024: RT Plantations has not developed a CPP for the planted Laran. December 2025: The CPP for Laran planting was not developed and submitted to the SFD.
005/2024	minor	2.3.3	Closed	December 2024:

GAP	Type	Checklist	Status	Description
				RT Plantations has not established PSP for the Laran ITP areas. December 2025: RT Plantations has established PSP plots inside the Laran ITP areas.
001/2025	minor	2.4.1, 2.4.2	New	December 2025: Four workers have an expired work permits.

Observation raised against indicators & criteria during the December 2025 assessment.

Obs #	Checklist	Description
001-2024 Outstanding	1.1.3	December 2024: No evidence of coupe permit TWU 02/16 conditions revision to include Laran plantation. December 2025: Coupe permit TWU 02/16 has not been revised to include Laran plantations.
002-2024 Addressed	1.3.2.13	December 2024: The FFMP is pending approval from SFD. December 2025: The FFMP was approved by the SFD on 11/12/2024.
003-2024 Addressed	1.4.6	December 2024: The 2 nd ADP draft did not define the R&D program to be implemented in the next 10-yr management plan. December 2025: The 2 nd ADP was revised based on SFD suggestions without a requirement for a formal R&D program.
004-2024 Outstanding	1.4.7	December 2024: The 2 nd ADP draft did not define the monitoring of mortality and plantation growth inside Laran plantation areas. December 2025: Monitoring of fire, mortality and growth of Laran plantation was not defined.
005-2024 Addressed	2.3.5	December 2024: RT Plantations has yet to conduct the forest fire awareness program as required. December 2025: RT Plantations has conducted the forest fire awareness program as planned in the FFMP.
006-2024 Addressed	3.1.2	December 2024: The FFB royalty payment for October 2024 is pending from RT Plantations. December 2025: The FFB royalty payment for October 2024 has been paid by RT Plantation.
001-2025 Outstanding	1.3.1, 1.4.1	February 2025: The ADP is pending approval from the SFD. December 2025: The ADP has yet to be approved by the SFD.
002-2025	1.3.2.12	December 2025: The 2 nd ADP did not reference standard procedures for monitoring of resources, buffer zones & steep slopes.
003-2025	3.1.1	December 2025: The Occupational Permit application for the Shop (Tamu) is pending approval from the SFD.

Highlights of Close Out Visit (if applicable)	Dates	-
Not applicable		

Recommendations

Benta Wawasan Sdn. Bhd. (RT Plantations Sdn. Bhd.) demonstrated compliance with the Sabah TLAS requirements (FDS TLAS-006) for its designated area and is recommended to receive a GFS Statement of Compliance and Sabah Timber Legality Assurance System Compliance Certificate (TLAS-CC) from SFD.

Gap(s)/Observation(s) identified in this assessment should be addressed before the next surveillance visit.

Action required to close the gap(s)/observation(s) include:

Gap 002/2024 (minor) Outstanding - Checklist 1.3.2.4, 1.3.2.5: Revise the 2nd ADP land use table to include the 618.06 ha of unplanted areas within the 5,000 ha management area.

Gap 004/2024 (minor) Outstanding - Checklist 1.6.4, 1.6.5, 1.6.6, 1.7.2, 1.7.4, 2.1.8: RT Plantations shall develop the CPP for the planted Laran.

Gap 001/2025 (minor) - Checklist 2.4.1, 2.4.2: Foreign workers must have valid work permits.

Observation 001-2024 Outstanding - Checklist 1.1.3: SFD shall revise the coupe permit conditions to include Laran planting.

Observation 004-2024 Outstanding - Checklist 1.4.7: RT Plantations shall include monitoring of fire, mortality and growth of Laran plantations.

Observation 001-2025 Outstanding - Checklist 1.3.1, 1.4.1: SFD shall expedite the approval process for the submitted 2nd ADP.

Observation 002-2025 - Checklist 1.3.2.12: The 2nd ADP shall reference standard procedures for monitoring of resources, buffer zones & steep slopes.

Observation 003-2025 - Checklist 3.1.1: The SFD shall expedite the inspection and approval of the Occupational Permit for the Shop (Tamu).

The next annual surveillance audit will be scheduled for **December 2026**.

End of Summary Report