

Road Traffic Safety Plan

for

PT Domas Agrounti Prima

1 INTRODUCTION

[The Project Company, PT. Domas Agroiinti Prima (DAP), is a large and unique producer of top quality highly-refined oleochemical products. DAP is the oleochemical producing arm of PT Bakrie Sumatera Plantation Tbk (BSP), one of the oldest and largest Indonesian plantation conglomerates and a vertically integrated palm fruit plantation and processing operation. The facility is currently mothballed, and the BSP management is working to fund and execute a restart of the existing operating equipment, as well as a buildout of the partially completed capabilities.]

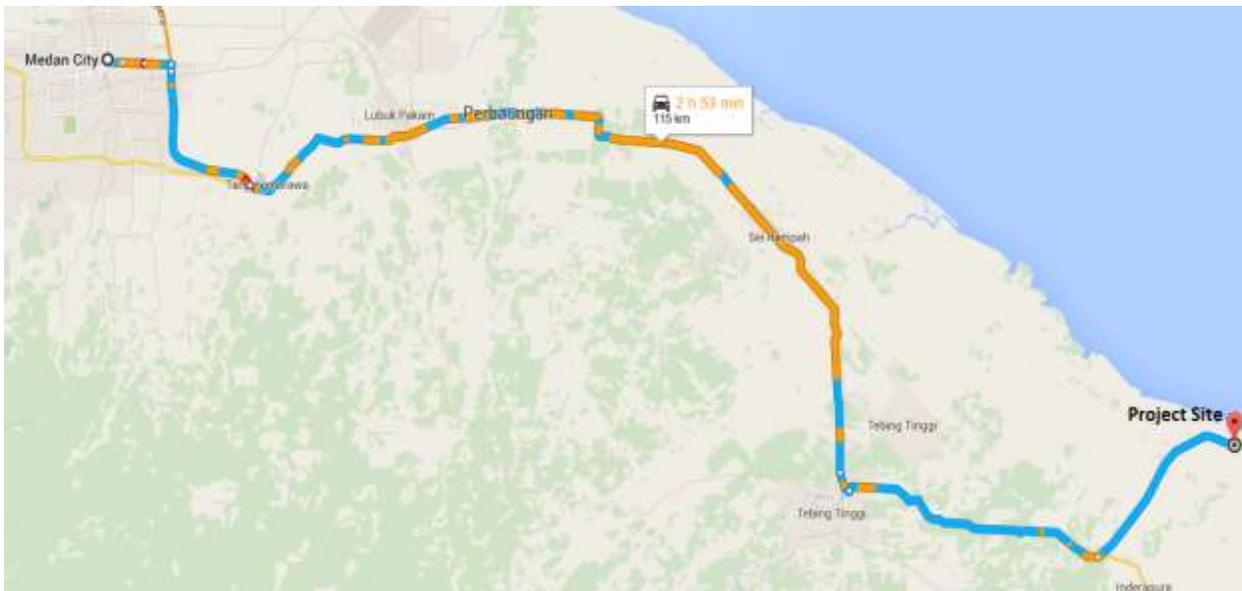
This document is a Road Traffic Safety Plan (RTSP) describing the planned road traffic safety management process for the Project. It outlines a systematic approach to road traffic safety that will help to reduce the risk of traffic related accidents and injury in the areas around the Project. DAP will file monthly reports discussing any accidents, complaints or other road traffic safety developments that occurred since the previous report.

The RTSP is a living document and it will be regularly monitored, reviewed and updated by DAP throughout all stages of project implementation.

2 PROJECT DESCRIPTION

2.1 PROJECT LOCATION

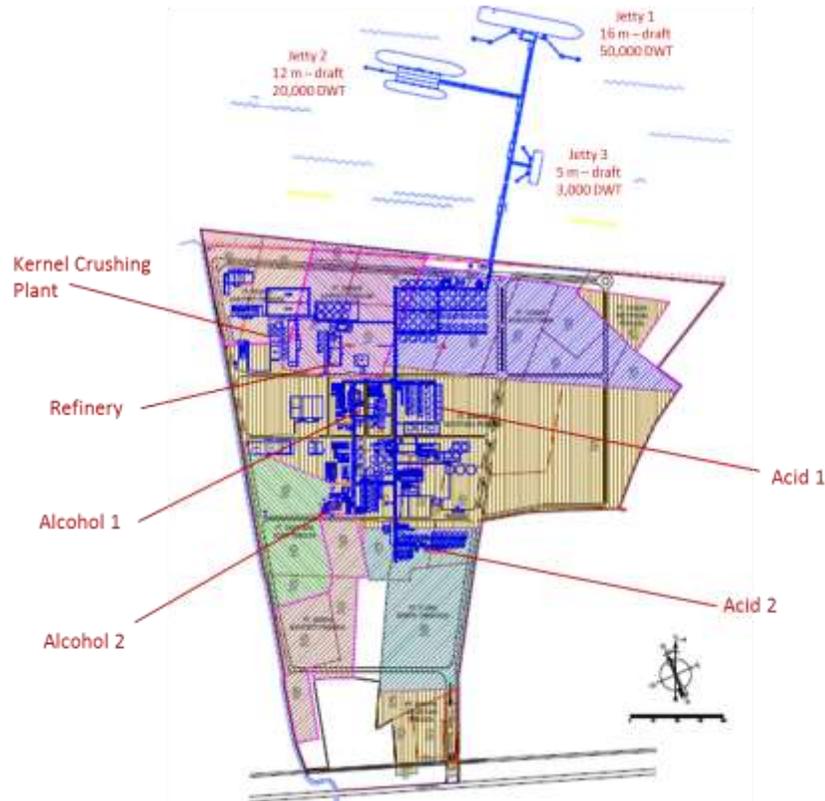
The oleochemical processing facilities (the “Project”) of DAP are located on a land area of around 114 Ha within the PT Sarana Industama Perkasa industrial estate in Kuala Tanjung, North Sumatra, Indonesia. The Project is located approximately 120km (between two and four hours drive depending on traffic) from Medan City. A majority of the route between Medan City and the Project is made up of relatively narrow two-lane roads, with residences and constant human activity on either side of the road.



2.2 PROJECT CHARACTERISTICS

This plant is comprised of 5 key facilities:

1. Line 1 Fatty Acid and Fatty Alcohol;
2. Line 2 Fatty Acid and Fatty Alcohol;
3. Refinery;
4. Kernel Crushing Plant; and
5. Jetty.



2.3 PROJECT VEHICULAR USE AND REQUIREMENTS

When the Project reaches full operational capacity, there will be approximately 50 heavy vehicles transporting products to and from the site each day. While there are already a large number of trucks servicing other facilities in the area, this increase in traffic could in turn increase road congestion and the likelihood of serious traffic accidents. Presently, DAP reports zero incidences of involvement in accidents or injuries as a result of vehicles servicing the facility.

3 RISK IDENTIFICATION AND MITIGATION

3.1 ROAD CONGESTION

Risk

Access to the Project requires travel along a single two-lane road into the industrial park. A large number of heavy vehicles travel this road daily in order to transport raw materials to and deliver finished products from facilities located in the industrial park. The lack of alternate access routes results in traffic congestion along the access road and increases the risk of serious traffic.

Mitigating Efforts

As there are currently no alternative routes into the industrial park where the Project is located, the risk of an accident associated with road congestion can only be mitigated by education about and the employment of safe driving practices. These practices include: driving in lane; driving within the speed limit; using indicators, headlights and safety belts; refraining from the use of mobile phones or other electronic devices while driving; maintaining a safe distance from other vehicles on the road; and knowledge of the route and road conditions of the planned journey.

Other mitigating efforts will come in the form of possible new infrastructure development including:

A new road

DAP and Pacific Harbor will lobby for a 'truck route' road to bypass the most populated part of Kuala Tanjung. While a new road cannot be guaranteed and lobbying of the local government will take time, DAP and Pacific Harbor are committed to the effort.
[Map to follow]

Speedbumps

Speedbumps will be installed within the facility to ensure drivers onsite maintain safe speeds when operating motor vehicles. DAP and Pacific Harbor will also lobby an offer to pay for speedbumps at selected points along the route where speeding drivers create the highest risk of serious traffic accidents.

Crossing Guards

DAP and Pacific Harbor will offer to hire and train crossing guards and road monitors to be placed near to schools and thickly settled areas in Kuala Tanjung and along the route to reduce risk of serious traffic accidents.

3.2 ROADSIDE RESIDENCES AND HUMAN ACTIVITY

Risk

There are numerous residences located immediately adjacent to the road, which results in large amounts of human activity in close proximity to operating vehicles. This proximity increases the risk of serious traffic accidents.

Mitigating Efforts

Similar to the risks and mitigating efforts associated with road congestion, mitigation of the risks associated with the presence of residences and human activity immediately adjacent to the road can only be achieved through proper driver education and employment of safe driving practices. These practices include: driving in lane; driving within the speed limit; using indicators, headlights and safety belts; refraining from the use of mobile phones or other electronic devices while driving; maintaining a safe distance from other vehicles on the road; and knowledge of the route and road conditions of the planned journey.

DAP and Pacific Harbor will also lobby and offer to pay for improved sidewalks in Kuala Tanjung and other populated areas along the route to reduce the risk of serious traffic accidents.

3.3 FITNESS OF DRIVERS

Risk

Drivers of heavy vehicles transporting goods to and from the Project can increase the risk of serious traffic accidents by driving while fatigued, distracted or under the influence of alcohol or drugs. Drivers can also increase this risk by driving without the proper use of safety equipment such as seat belts and head lights. There is also increased risk associated with members of the local community failing to use safety equipment such as seat belts, bike and motorcycle helmets and child restraints.

Mitigating Efforts

In order to reduce the risks associated with unfit drivers, all persons employed to transport products to and from the Project will be subjected to health and competency screenings, as well as a mandatory instructional session regarding road safety and safe driving practices. This will aid in the removal of persons who may be prone to sudden illness or incapacitation while operating a motor vehicle due to pre-existing health conditions, as well as those at risk of alcohol or drug use while driving. The instructional session will help those deemed fit to drive understand the risks and preventative measures associated with the transport of large quantities of product using heavy vehicles.

DAP will offer drivers cash bonuses and recognition for hours of safe and accident free driving. [Award schedule to follow]. DAP will also put a sticker on each truck servicing the Project with

a complaint hotline in the event that members of the local community witness a driver failing to employ safe driving practices. Drivers subject to complaints will be cautioned, penalized and potentially terminated for numerous or especially severe complaints. [Schedule to follow]

3.4 MECHANICAL FAILURE

Risk

The heavy vehicles transporting goods to and from the Project could increase the risk of serious traffic accidents due to mechanical failure if they are not properly maintained through regular inspections and repairs.

Mitigating Efforts

All vehicles used to transport goods to and from the Project site will be required to undergo regular inspections every [3/6/12] months. These inspections will ensure that all vehicles remain in working condition. Any vehicle failing to pass a regular inspection will not be allowed to transport any goods to or from the Project site until all necessary repairs have been made. The driver will also be responsible to check the vehicle before every trip to and from the Project site. This includes checking fuel and oil levels, tire pressure and securing the product load.

3.5 ACCIDENT RESPONSE

Risk

In the event of a serious traffic accident, risks and damages are increased if the drivers and other persons involved in the accident do not respond quickly and appropriately as needed.

Mitigating Efforts

DAP will ensure that all drivers are educated on the appropriate forms of accident response, such as informing the proper authorities of the incident and requesting medical assistance if required and moving clear of the accident site if possible to further injury or damage from a second accident. DAP will have a post-crash response and first aid personnel on hand as part of its emergency preparedness policy.

4 ACTION PLAN

In order to ensure effective implementation of this Road Traffic Safety Plan, DAP will:

- 1 Actively screen drivers to discern possible physical and mental health concerns and bar any drivers that fail these screenings from operating vehicles under its control;
- 2 Ensure all drivers are properly insured and licensed to operate the required vehicles;
- 3 Provide this Plan and a mandatory instructional session on road traffic safety, safe driving practices and accident response to all drivers;

- 4 Ensure all vehicles are properly licensed to transport products to and from the Project site;
- 5 Regularly inspect vehicles for mechanical issues and, upon identifying a mechanical issue in a vehicle, remove such vehicle from the road until the mechanical issue has been remedied;
- 6 Host annual meetings and instructional sessions with members of the local community to discuss grievances and concerns relating to road traffic safety and educate them on road traffic safety and safe driving practices;
- 7 Conduct an annual internal review of any incidents, grievances or concerns relating to road traffic safety and update the RTSP accordingly; and
- 8 Ensure that this Plan is available to all DAP employees and members of the surrounding communities when requested.

5 CONTACT DETAILS

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