

HIGH CARBON STOCK APPROACH

HCSA PEER REVIEW REPORT

Company Name: Kuala Lumpur Kepong (KLK)

HCS Assessment Area: PT. Menteng Jaya Sawit Perdana

Date Published: 9 May 2019

Background information:

- a) Did a Registered Practitioner Organisation lead the HCS assessment? If not, has the organisation which led the assessment started the process of registration?**

Yes, both Bias Berlio Pradyatma and Risa Desiana Syarif are registered practitioners listed under the HCSA Registered Practitioner Organisation of Aksenta.

- b) Was the HCS Team Leader a Registered Practitioner?**

Yes, both Bias Berlio Pradyatma and Risa Desiana Syarif are registered practitioners listed under the HCSA Registered Practitioner Organisation of Aksenta.

- c) Were at least two (2) HCS team members Registered Practitioners?**

Yes, both Bias Berlio Pradyatma and Risa Desiana Syarif are registered practitioners.

- d) Was the HCV assessment judged 'satisfactory' (highest rating) by the HCV Resource Network (HCVRN) Assessor Licensing Scheme (ALS)? (See <https://www.hcvnetwork.org/als/public-summaries>).**

The HCV assessment of PT. Menteng Jaya Sawit Perdana was conducted before January 2015.

Questions for peer reviewers

(Peer Review Panel: Ihwan Rafina, Asep Firdaus)

1. Peer Review Summary

1.1. What are the major findings and recommendations from the peer review?

Finding:

Social – Report already provide general slight information of community engagement, FPIC process but no clear information/elaboration from land tenure study and participatory mapping.

Ecological and conservation – Report already represent HCV study with note that HCV study not yet review by HCVRN.

Forest Inventory – The sample design for the forest inventory has been described in this section but has not been explained in detail and the calculation of the number of samples is not in accordance with the HCS toolkit. The number of sampling in each land cover class is not stated in the sub-chapter, and the sampling calculation does not explain the 90% confidence interval used in the calculation.

Company already respond and clarify the findings.

Image analysis – Adequate methodology, images use and scope of analysis with minor possible missing interpretation.

Company already respond and revise the findings.

Patch analysis – HCA report look already identified patches according to HCSA DT, but since the dataset not completed reviewer need more information to conduct detail PA review process.

Company already respond and revise the findings.

Land use Planning – Assessment consider HCV, HCS, Peat as conservation and development input and also input from community, but still need further ground checking and FPIC consultation for further confirmation with community.

Company already respond and clarify the finding.

Reviewers Recommendation:

- Company to provide more explanation on social baseline study, carry out complete land tenure study, elaboration of participatory mapping methodology and results include FPIC process with community. It's also recommended the company to conduct/update social baseline study – can be align with implementation and monitoring of conservation and development.
- Consider of Sungai Budhing to be include as part of conservation area with confirmation from community and further analysis/biodiversity assessments.

- Elaborate ecological conservation issue in the report as recommended in each section.
- Company to provide digital files of Patch Analysis process for further review.
- Completed HCSA report with standardised map in all Section.
- Develop clear and manageable timeline for finalising the ICLUP include integration with FPIC process in further development and conservation planning and include in the report.

Company Responses:

Amendment will be made to the summary report accordingly with reviewer’s recommendation.

Final Reviewers Recommendation:

Company already respond on the social issues section, but several respond still not cleared whether it’s already revised in the documents or still in the process (refer to each section of social issues).

Company already provided additional information for activities to completed, in order to more organize and workable workplan these activities can be integrated in to matrix action plan that also contain recommended timeline and PIC.

1.2. Did the HCS assessment team include or have adequate access to relevant expertise to undertake the HCS assessment?

Finding:

Yes, the HCS assessment was conducted by an adequate team from Aksenta (registered HCS assessor organisations). But need additional information regarding HCS field inventory team.

Reviewers Recommendation:

To be completed information for HCS field inventory team.

Company Responses:

Summary of the forest inventory team will be provided.

- 1.3. What elements of the HCS Approach still need to be completed in order to create a final land use and conservation plan? Are there aspects which you feel need to be re-done?

Finding:

It is stated/identified that the community already proposed food security and timber plantation in the area, also noted that the concession located in Kawasan hutan (production forest) with forest release permit in reconciliation process.

Possible of minor missed interpretation of HCS classes and Patch Analysis results, include information from community for their productive land need to be consider and confirmation for finalisation of final land use plan.

Reviewers Recommendation:

Proposed final land use plan can be completed with parallel process in terms of HCV/HCS monitoring with community participations, where company should have clear action plan regarding the activity to be completed before further oil palm development. Its already a list in the report activities still to be carried out before land use plan finalised.

Company to develop clear action plan that integrated community engagement, government (district, province and national level, include Badan Restorasi Gambut) to address all issue related to conservation and development plan in PT MJSP.

Company Responses:

A draft of action plan will be prepared and provided in the summary report.

Final Reviewers Recommendation:

Company already provided additional information for activities to completed, in order to more organize and workable workplan these activities can be integrated in to matrix action plan that also contain recommended timeline and PIC.

2. Social Issues

General Recommendations:

In general, social, land-rights (tenure) and environmental issues related to the operations of oil palm plantation companies cannot be separated from the legal aspects that apply in Indonesia. For example, oil palm plantation can only be granted business licenses (IUP) on land with APL status (other use areas) that have been established in the district spatial plan. Plantation business licenses (IUP) can only be issued if all of the requirements have been fulfilled, for example having an AMDAL document / Environmental Permit. In addition, each oil palm plantation company is required to have a Business Use Right (HGU) as the legal basis for the company to start the operational works on the land. All legal obligations determined by the laws and regulations related to plantation business must be fulfilled in order to avoid legal problems in the future.

Based on the HCS Assessment Report for PT MJSP_Bahasa version document, it has been explained the permits owned by PT. MJSP. However, it was recognised by the assessor that the plantation area is mostly located in the forest areas which are not allocated for plantation business. Before the business license for PT. MJSP was issued in 2007 by the Bupati, the company must submit a request to the Ministry of Forestry for the release of a forest area on the basis of a location permit owned by PT. MJSP in 2005. Location permit are instruments for carrying out land acquisition for plantations including to apply for the release of forest areas. Based on the report, the release of forest area inside location permit of PT. MJSP is still being proceed. There are potential legal implications in the event of disobedience to laws and regulations in Indonesia.

The reason that spatial planning of Central Kalimantan Province is still being reconciled between APL (other land use) and forest area, will not eliminate potential violations of applicable laws and regulations. Community engagement, FPIC and participatory mapping that have been carried out will be useless if obedience to Indonesian legislation is not fulfilled. This issue needs to be considered as key important aspect in the plantation operation.

This review is carried out by referring to the HCS Approach Module-2 Toolkit (version 2.0, May 2017), where there are 14 stages of HCS assessment to meet social requirements.

- 2.1. Does the summary provided in Section 3.1 adequately represent and explain the community engagement, FPIC processes, and participatory mapping activities carried out?

Finding:

The summary has provided the general information and explanation of the community engagement, FPIC process and participatory mapping. Particularly related to participatory mapping, the summary has described only related to the joint agricultural area managed by farmer groups, while the mapping of ownership, control and use of land by each family head is not informed. Has a social baseline study been conducted?

Social baseline study is a key step before the company conduct community engagement, FPIC and participatory mapping. What method was used by the company to determine the representative of the villagers/locals; land owners; land occupiers, land users, if the company have not had a social baseline. This information needs to be elaborate more in the report. It is important in term of community engagement and FPIC process.

Reviewers Recommendation:

Please elaborate more on the social baseline study which refers to the #1 principle of social baseline study of the module 2 - social requirements of HCSA toolkit.

Company Responses:

More detailed elaborations accordingly with the stagers of social requirement in the HCS Approach Toolkit will be provided in the summary report.

2.2. Has a tenure study been completed and has it been vetted by independent social experts?

Finding:

There is no information/explanation on the tenure study both in the HCSA summary report and other assessment documents such as FPIC review and HCV report.

Reviewers Recommendation:

To complete the HCS assessment report that refers to Module - 2 regarding social requirements in the HCS approach, a more complete "tenure study" has to be carried out.

Referring to the Principles #3 of module 2-social requirements of HCSA toolkit that says:

Developers seeking to access land for oil palm development are required to respect the rights of those who already own, occupy or otherwise use the land. They shall acquire such land through a fair process that first recognises these rights and then obtains the agreement of these rights holders and land users (to acquire lands by force or against the will of the people concerned is described as 'land grabbing'). The rights of those using the lands, who may not be the owners, shall also be recognised. Such users can include tenants, sharecroppers, farm workers and other companies with leases on the land, or those with legal or informal permits to access and use the lands and natural resources.

Company Responses:

Land ownership as the basis of land compensation and acquisition has been carried out by the company. Explanation of them has been provided and improved in the summary.

However, to ensure whether the mapping has conformed to the FPIC principles, a verification was organized and conducted and carried out by independent expert. Result of the verification has been provided in the summary.

Final Reviewers Recommendation:

No more recommendation.

- 2.3. Is there a participatory land use map and does it contain the key components of community land use including the minimum requirement of 0.5 ha per person for future garden areas?

Finding:

There is no specific information about whether participatory mapping has been done or not. When reading the summary report on the results of HCS assessment of PT. MJSP, I (reviewer) did not see clear information about it.

As described in module - 2 of the social requirements in the 3rd - stage HCS approach, it is stated that information (data) regarding community land use and control, both the land-rights regulated by state law (ownership rights) and based on customary law (in the form of customary land) need to be mapped. It needs to be described regarding the control and use of land by the people who are landowners, tenants, working farmers, other land tenant companies, or parties with legal or informal permits.

Reviewers Recommendation:

Information about the participatory mapping process must be included/elaborated in the HCS report of PT. MJSP.

Company Responses:

Map of community land use, which are the proposed area for community's future food security have been provided. It is based on the proposal and recommendations from the communities and the local government. Moreover, company has acknowledged and agreed to set aside the proposed areas from the development plan. Meaning that the mapping and agreement was preceded by preparation by the community and was all carried out through a participatory process.

Final Reviewers Recommendation:

No more recommendation.

- 2.4. Is there a record of consultation with affected communities and FPIC processes on the proposed development, the HCS Approach and issues/concerns they raised? Did the community nominate their own representatives?

Finding:

Information about the consultation process has been adequately informed and covers all three villages. However, it has not been explained yet about how the process of selecting and determining community representatives involved in the consultation process.

Reviewers Recommendation:

The summary should elaborate the process on the selection and determine the representative of the community in the consultation process.

Company Responses:

Recommendations from the village government of the Bagendang Tengah for the company, as presented in the summary report explains that the government is representing the communities in terms of acceptance to the company's presence and operations. Several requests from the communities were also recommended to and have been agreed by the company.

In this case, the company is not in capacity to verify the process of selection and determination of representative of the community. However, the company is open to receive aspirations from each member of the communities including the workers. It can be verified with the requests from the communities that are being agreed by the company.

Final Reviewers Recommendation:

No more recommendation.

- 2.5. Were their views addressed and reflected in the plans and implementation of the plantation? Is there specific reference to the customary owners being made aware that they can say no to the development and they have the right to independent legal representation with regard to their agreements before they sign (to meet the 'prior informed' test)?

Finding:

In the summary report and the FPIC and HCV report documents, it was explained that the community was given the opportunity to express their opinion and free to make decision whether to accept or not accept the development and operation of oil palm plantation of PT. MJSP.

Reviewers Recommendation:

This information needs to be elaborated more by adding information and or examples of who from the community expressed their opinions or refused the development of the plantation and how the company responded to this.

Company Responses:

During the social survey (verification of company's FPIC), engagements with community (interviews and group discussions) were carried out involving village officials, traditional leaders, and village residents comprised of whom is working in the company and whom is owning garden land. The explanations that "the community has given the opportunity to express their opinion and free to make decision" were verified through the social surveys carried out by the assessors as mentioned above. Moreover, there is also finding provided in the FPIC section in the summary report explaining that there are particular areas which are requested from the communities to the company to be excluded from company's development plan. The requested areas were set for community's agriculture land (i.e. food security) and managed by farmer group organizations called kelompok tani. More detailed information will be provided, however, examples requested by the reviewer seemed not relevant since the information in question has been provided.

2.6. What recommendations do you have for any improvements regarding community consultation and negotiation of Free, Prior and Informed Consent?

Finding:

I always found the social base line and tenure study has not been done or at least it was not clearly elaborated in the report when I did the peer review.

Reviewers Recommendation:

I recommend to the assessor has to check those two studies report before doing the HCS assessment.

Company Responses:

The assessor will check the corresponding reports and provide more detailed elaboration in the summary report.

Final Reviewers Recommendation:

No more recommendation.

3. Ecological and Conservation Values

3.1. Does the summary provided in Section 4.1 of the Summary Report adequately represent the findings of the HCV study?

Finding:

Summary report has represented the finding of HCV Study.

Reviewers Recommendation:

None.

3.2. If the HCV assessment was not judged satisfactory (highest rating) by the ALS scheme of the HCVRN (as noted in the introductory information from the HCS Secretariat – please see page one of this document), please do a cursory review of the HCV report as it relates to HCVs 1-4. Do you have any general comments on the quality of the site description, the analysis of the landscape and national or regional context, or the methods used to undertake the HCV study? Were the determinations of the absence/presence and extent of HCVs 1-4 well-justified? Are the HCV management and monitoring maps accurate?

Finding:

MJSP already conduct HCV re-assessments in 2018 but not yet submit to HCVRN. In HCV study report 2018, there was a reduction in the HCV area based on a preliminary study in 2010, in which HCV areas covering 100.8 ha in the upper of the *budhing river* had inside HCV area. Also, they are not detail explanation methodology of collecting field data to obtain potential HCV 1 (RTE Species).

RTE Species *Hylobate Albibarbis* that are considered or key in the potential of HCV 1 assessing the status of **Endangered** by the IUCN Redlist. In HCV report 2018, it is only note with **vulnerable** status.

The location map for sampling or data retrieval is not available in the HCV report.

HCV studies have not provided information and coverage about the surrounding landscape.

Reviewers Recommendation:

Still considering and entering the upstream of the Budhing River with an area of 100.8 as the HCV area, even though land cover or conditions have changed. It can provide recommendations to companies to undertake species enrichment or rehabilitation.

Explain the data collection method for obtaining RTE species data in HCV report.

Map of location sampling plot should be provided.

More update/elaboration on landscape approach in section of the HCV study.

Company Responses:

As explained by the findings from the reviewer, the HCV Review and Update was not yet submitted to the HCVRN at the time of the submission of the HCSA Summary for review process. However, in addition to that, the company would like to inform that the HCV Review and Update is now in the process of preparation to be submitted to the HCVRN. Therefore, it should be acknowledged by all readers that the results of the HCV Review and Update presented in the HCSA Summary is not yet final, moreover, changes may occur accordingly with recommendations in the report evaluation process.

Incorrect IUCN Redlist status of the *Hylobates albibarbis* provided in the reports will be revised.

Recommendations to the HCV study will be made.

Most recent updates of the HCV Review and Update has been provided; however, they are not yet the final version of the report.

Final Reviewers Recommendation:

No further recommendation.

- 3.3. Please review Section 9.2 of the Summary Report. Was the methodology used for the Pre-RBA and the Rapid Biodiversity Assessments (if any) satisfactory? Did the RBA(s) reveal any significant biodiversity values that should have been captured in either the HCV assessment but were not, or warrant protection?

Finding:

Argument of this section, there are no patches that are considered as RBA Pre-process, but if we check the patch analysis process and existing GIS data, the low priority patch (LPP) has the potential to be pre-RBA done.

Reviewers Recommendation:

Re-ascertain the low priority patch, whether or not the RBA Pre-process is needed. Provide a detailed explanation regarding the stages of patch analysis to consider the pre-RBA process.

Company Responses:

More detailed elaborations, maps, and shapefile of the patch analysis will be provided in the summary report.

Final Reviewers Recommendation:

No further recommendation.

3.4. Are the forest conservation management and monitoring activities outlined in Section 10.3 adequate? Do they take into account forests and protected areas outside the concession?

Finding:

Plan of Activities Management and monitoring of conservation areas is **inadequate**, with several notes:

- # Objects in existing management and monitoring plans have not included HCS areas identified as management and monitoring areas.
- # There is no collaborative management with surrounding communities in protecting conservation areas.
- # There are no related activities to minimise the impact of using chemicals around the area bordering the conservation area.
- # There are no management activities related to ecosystem recovery or restoration.
- # Management and monitoring activities have not considered the condition of the account forest or protected area outside the concession.

Reviewers Recommendation:

- # Incorporate HCS areas as management and monitoring objects in the management and monitoring area map.
- # Incorporate collaborative management activities with community in protecting conservation areas.
- # Incorporate related activities to minimise the impact of using chemicals around the area bordering the conservation area.
- # Include management plan and activities related to ecosystem recovery or restoration.
- # Management plan and monitoring consider the condition of the forest around or outside the concession.

Company Responses:

Reviewer recommendations will be taken into account in the planning of conservation management and monitoring.

Final Reviewers Recommendation:

No further recommendation.

4. Image Analysis

4.1. Please review Section 6.1 of the Summary Report. Was the Area of Interest correctly identified?

Finding:

The AOI already identified correctly with 2km buffer from boundary.

Reviewers Recommendation:

Add justification on 2km buffer as AOI instead of landscape approach.

Company Responses:

A minimum AOI was used (i.e. 2 km buffer) with justification that it covers the extent of forest (potential HCS) areas and the connectivity between forest inside and outside the concession. As it is described in the step 12 of the patch analysis decision tree that connectivity/linkage analysis should be completed within a distance of 5 km between the forest areas.

Final Reviewers Recommendation:

No further recommendation.

4.2. Please review Section 6.2 of the Summary Report. Were the images used of adequate quality, including resolution and date?

Finding:

Accessors used Landsat 8 and Sentinel-2 for landcover classifications. It's a minimum image require for HCS analysis with minimal cloud cover, resolution and date acquire.

Reviewers Recommendation:

Additional information on this section can be improve include information on band combination used for classifications, include software version. Map layout for each section need to improve according to standardise requirement.

Company Responses:

More detailed information as per recommended by the reviewer will be provided.

Final Reviewers Recommendation:

No further recommendation.

- 4.3. Please do a quality check using the images provided in 6.3. Was the initial vegetation classification done properly? Do the land cover areas in the tables in Section 6 look reasonable? Are there any obvious errors in classification?

Finding:

Landcover analysis already look reasonable, but there is a minor in accurate of delineation of potential YRF classes (around 15Ha) to be included in further analysis as show below:



Reviewers Recommendation:

Check with other source of images and field inventory results and include in HCS classification for further analysis, if the area is positively an YRF area.

Company Responses:

Revision of the land cover interpretation and classification has been made accordingly with the reviewer's finding and recommendation.

Final Reviewers Recommendation:

No further recommendation.

5. Forest Inventory

- 5.1. Please review Sections 7.1 and 7.2 of the Summary Report. Were the sample plots selected, set up, and measured properly? Please check the inventory plot layout for adequacy.

Finding:

Section 7.1. The sample design for the forest inventory has been described in this section but has not been explained in detail and the calculation of the number of samples is not in accordance with the HCS toolkit. The number of sampling in each land cover class is not stated in the sub-chapter, and the sampling calculation does not explain the 90% confidence interval used in the calculation.

Section 7.2. The map is not in accordance with the map standard (map title, north arrow, scale, legend, insert, projection and data source used).

Reviewers Recommendation:

Section 7.1. Describes the formula from MacDicken (1997) and explaining the use of the formula, have accessors considered the 90% confidence interval in the calculation. Presents the number of sampling plots of each land cover class, so that it can present the ratio of plot numbers in each land cover class.

Section 7.2 Improve sampling plot maps by adding map attributes that are in accordance with the mapping standards. In legend, information on land cover class can be presented in accordance with the HCS toolkit, so that it can present data on the proportion number of plots in each land cover stratification.

Company Responses:

- Writer of the report has mistakenly put incorrect term to refer the method used. Revision has been made. However, it is acknowledged that the method used in the inventory was not following the recommendations in the toolkit. Explanation of the justification and the accuracy of the result has been provided.
- Revision to the map has been made.

Final Reviewers Recommendation:

No further recommendation.

5.2. Please review Section 7.3 of the Summary Report. Was the forest inventory team qualified?

Finding:

Section 7.3 Do not explain forest team inventory qualification but describes the used for forest sampling methodology.

Reviewers Recommendation:

Describes and explain the composition and qualifications of the inventory team, please refer to the latest summary report template.

Company Responses:

Explanation of the forest inventory team has been provided.

Final Reviewers Recommendation:

Additional information on involvement of company staff or community member.

5.3. Please review Section 7.4 of the Summary Report. Was the allometric chosen adequate?

Finding:

The inventory method in the field is not in accordance with the HCS toolkit. Determining the use of allometric equations is included in Section 7.7.

Reviewers Recommendation:

Improve the collection of forest inventory data using methodology in accordance with the HCS Toolkit.

Company Responses:

Result of the forest inventory has been provided accordingly with the table template of the summary report.

It is acknowledged that the forest inventory in this assessment used different technique from the methodology recommended in the toolkit, i.e. circular plot. However, recommendation from the reviewer which is to use the recommended technique in the toolkit for improvement of the forest inventory is not possible in terms of the need for resources. Moreover, the technique used in the assessment is also suitable to present data in way that is required by the summary template. Therefore, the technique used in the assessment is considered sufficient.

Final Reviewers Recommendation:

No further recommendation but recommend in the future to use the methodology referring to HCSA Toolkit.

- 5.4. Please review Sections 7.5, 7.6, 7.7 and 7.8 of the Summary Report, and do a cursory review of the forestry data and statistical analysis. Are there any obvious errors in the raw forestry data? Are there any flags where a result does not seem consistent with your rough interpretation of the land cover image? Do the final carbon classes seem accurate given what is known about other forests in the region?

Finding:

Section 7.5 Carbon calculations have been described using the IPCC ratio index, but have not presented the determination of allometric equations used for the calculation of dry biomass. From the excel raw forest data file, there is no calculation of dry biomass and carbon (ton / ha) of each existing tree species and in the sum in the carbon value per plot, so it is difficult to trace the calculation of the data clearly and correctly. From the calculations in each plot there are 2 uses of allometric equations but there is no clause that explains the choice of allometric equations.

Section 7.6 The documentation of each vegetation is not in accordance with the HCSA toolkit, where the photo is not taken in accordance with 4 direction include photo of canopy cover, the photo has not provided a description of the land cover class according to the HCS Toolkit criteria.

Section 7.7 Detailed explanations and considerations in determining allometric equations used are not explained. The allometric equation formula used is not presented. The confidence interval number used for the confidence test is not explained.

Section 7.8 Data has been described in the statistical analysis table in calculating the carbon value that the average value of carbon in each type of land cover is accurate and entered into the range of land cover classes, but because the raw data does not provide complete data, it cannot see the calculation and statistical analysis correctly.

Reviewers Recommendation:

Section 7.5 Presents allometric equations used and provides a detailed explanation of the selection of allometric equations to calculate carbon values. Improve raw forest inventory by presenting calculation steps to calculating dry biomass, carbon (tons/ha) in each tree type and the amount of carbon in the plot.

Section 7.6 Improve the documentation of each land cover class in the report summary in accordance with the HCS toolkit, by presenting photo documents with 4 directions included photo of canopy cover in each land cover class that has high carbon stock potential.

Section 7.7 present allometric equations used and provide a detailed explanation of the selection of allometric equations in calculating carbon stock values. Explain the calculation in detail in each step to get the carbon value in each hectare. provides definitions related to the confidence interval percent used in conducting confidence tests.

Section 7.8 Fix this table section by presenting DBH Class data in the column data stems per ha and basal area, by presenting diameter size data in accordance with the HCS Toolkit.

Company Responses:

Improvement of the elaboration of allometric used in the calculation has been made.

Final Reviewers Recommendation:

No further recommendation.

6. Land use planning

- 6.1. Please review Section 8.1 of the Summary Report. Was the initial vegetation classification map adequately calibrated and adjusted to take into account forest inventory results?

Finding:

The forest inventory plotted in 3 (three) landcover classes that results from the initial vegetation, based on forest inventory verification results the final landcover used for further HCS analysis already map adequately calibrated and adjusted. Yet, based on initial check of imageries, need to make sure for accuracy of delineation of others potential YRF area (see 4.3).

Reviewers Recommendation:

See 4.3.

Company Responses:

Patch analysis has been redone in accordance with the recent update of the HCV Review and Update. Shp of the detailed step by step of the patch analysis has been made and provided.

6.2. Please review Section 9 of the Summary Report. Was participatory mapping data used in step one to identify community lands that should be enclaved? Were patches merged correctly? Was the core area correctly identified? Was the connectivity analysis done correctly?

Finding:

Accessor provide information for Food Security area from community, but its not clear whether it will be used for final patch analysis results. Its not clear also for patch merge and core analysis used for PA process. Accessor already consider connectivity analysis in PA, but since the dataset not completed reviewer need more information to conduct detail PA review process.

Reviewers Recommendation:

Need further dataset from patch analysis dataset for further review, company to provide shapefiles from PA.

Company Responses:

More detailed shp and elaboration for the patch analysis and land use planning has been made.

- 6.3. Please review Section 9 of the Summary Report, and select a few sample patches to test that the Decision Tree was used correctly. Were the patches correctly identified as High, Medium, or Low Priority? Was the Patch Analysis done according to the HCS Approach Decision Tree?

Finding:

HCA report look already identified patches according to HCSA DT, but since the dataset not completed reviewer need more information to conduct detail PA review process.

Reviewers Recommendation:

Need further dataset from patch analysis dataset for further review, company to provide shapefiles from PA.

Company Responses:

Shp containing detail step by step process of the patch analysis will be provided.

- 6.4. Please review Sections 10.1 and 10.2 of the Summary Report. Were the final integrated conservation and land use planning steps completed to maximise the ecological and social viability of the conservation areas (HCV, HCS, peatland, riparian zones, customary forest, etc)? Were the results of the final ground verification (if any) adequately incorporated into the land use plan and final HCS map?

Finding:

Final ICLUP already consider of conservation areas from HCV study and peat area, also show community land for food security area that's still not clear for consideration in ICLUP. Although its already stated for follow up recommendation on list of activities before finalisation of Conservation and Development, but its need to justify clear timeline for each activity.

Reviewers Recommendation:

Company to provide clear timeline/action plan for finalisation of ICLUP with FPIC process and collaboration with other stakeholders.

Company Responses:

To provide a clear timeline for action plan is not possible since there is still several process that the company have to through (i.e. HCVRN Evaluation for the HCV Review and Update and RSPO NPP). Moreover, those processes generally would take quite time and difficult to predict. However, more elaboration and detailed action plan for the company to be carried out has been provided in the summary.