

HIGH CARBON STOCK APPROACH

HCSA PEER REVIEW REPORT

Company Name: Triputra Agro Persada
HCS Assessment Area: PT. Dwiwira Lestari Jaya
01 July 2020

Dear peer reviewers:

Thank you for agreeing to review this HCS study. As you know, we are asking you to do a desk review of the material provided and to highlight any concerns you have about the land cover classification, land-use planning, or consultation processes. We have invited you as an expert in your field, and hope that you will bring your own experience and knowledge to this review to help the company improve its study. We are not asking you to provide a pass/fail decision, just to give your honest opinion and suggestions for changes to the company's plans or activities to ensure that the HCS Approach methodology is implemented correctly. Please refer to the latest [HCSA Toolkit](#) as reference.

Some of the issues raised in the review may be complicated and long-standing, especially those related to land tenure and historical conflict with communities. It is not within the scope of the review for you to do hours of research and determine who is at fault, or to examine stakeholder activities outside of the particular concession or plantation which is the subject of the review. Rather we ask that you call attention to topics that need further research or more information from the company, to improve community relations in the future or to reassure external stakeholders that the intent of the HCS Approach is being followed.

Background information to be provided by the HCSA Secretariat:

- 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, a registered Practitioner Organisation, BIOREF, led the HCS Assessment.

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

Yes. The team leader was Faisal Siregar from BIOREF.

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

Yes. Faisal Siregar and Arif Prasetyo are both Registered Practitioners from BIOREF.

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

Not applicable as the assessment was prior to January 2015.

Questions for peer reviewers

(Peer Review Panel: Neville Kemp)

The estimated time to complete each section is noted in parentheses.

1. Peer Review Summary (2 hours, Lead Reviewer)

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

Please refer to the peer review results in this report.

Finding:

1. Representativeness of communities (very low number of communities involved in the assessment of were engaged in the process)
2. Inaccurate initial vegetation classification (forest patches missed and no young regenerating forest identified)
3. Lack of total # of samples in 'scrub' identified in initial vegetation classification. Potential significant errors induced
4. Results of survey not used to calibrate the initial vegetation classification
5. Patch analysis requires re-working. Connectivity to areas of forest outside boundaries and edge effect buffer not correctly applied.

All initial findings resolved

Reviewers Recommendation:

Only one major finding that requires further clarification to HCSA. DLJ has opted to relinquish some areas of concession back to the state. This may result in future deforestation as there are HCS forests within the land (as well as scrub already cleared by the company).

Does HCSA hold the company responsible for land relinquished? Is this a genuine effort to conserve land that is not suitable for development? Is this a mechanism for avoiding HCS conservation responsibilities?

This approach taken by the company requires further clarification. It is advised that the company does not develop any land until a) clarification is given how this forest will be maintained and stakeholder responsibilities for conservation defined and b) the new license boundary is finalized.

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

Please refer to Section 2 of the Summary Report.

Finding: Yes although not in report

Reviewers Recommendation: None

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?

Please review Section 10 of the Summary Report and the peer review results in this report.

Finding: None, but clarification of land given back to state is needed.

Reviewers Recommendation: None

2. Social Issues (4 hours)

Please review Section 3 of the Summary Report and please also look at the full HCV report (Section 4) for how HCVs 5 and 6 were assessed.

The HCSA Toolkit provides more information on the expected quality of community consultation and FPIC procedures.

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: Social Impact Assessment has been conducted report positive impacts and mitigation of indirect negative impact on communities. Not summarized directly in HCS report.

Reviewers Recommendation: A SIA is available, and the report would normally provide a summary of this in section 3.1 from the perspective of HCS (conservation of land and the threats that this potentially presents to communities).

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

Finding: Yes (although not vetted and rarely done for HCS assessments as procedure not clear). A land tenure study was carried out through participatory mapping that clarified patterns of land tenure. It was stated that tenure does not impact most of the HGU area (exception area of rice fields in DLJ-1 with most communities used areas of land around the HGU. Other factors include 1) Land was released from forestry estate (previously a logging concession).

2) There was general support for oil palm development as reported in SIA. 3) Letters of land hand-over to company noted and Company to accommodate community areas as requested.

Reviewers Recommendation: No maps were provided in the report but provided as supplementary evidence. The HCS Approach needs to make sure that any land proposed as 'conservation' or 'for development' (as it is not HCS) does not affect local communities. The maps show no land claims or conflicts with local communities.

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: Supplementary data / maps and a GIS layer of agriculture land available as well as an assessment of land availability of food security and areas of vegetation in villages

Reviewers Recommendation: None

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: Yes. Company has clarified process of FPIC for development and HCS with documentation of participation

Reviewers Recommendation: FPIC record is available in supporting documents. A request for land in Estate I has been received and accommodated (areas will be 'released from HGU for village expansion purposes'). Industrial timber extraction preceded the HGU and representative were chosen based on community representatives for this production forest concession. The FPIC process for oil Palm development, HCV and HCS included adat leaders, key community figures and local government (district and village).

- 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: Yes

Reviewers Recommendation: The views of the communities were summarized in the report (and included HCV results and impact to livelihoods from SIA report). There was no protest for use of the area from the participants involved.

From the process with those involved, cases where land was used by communities is referenced and explained as to the low dependence of land owners / users. HCV areas (rivers) were included, there was no issues with conservation of the forest areas, they welcomed the HCS assessment to be carried out and agreed on the results, requested to be involved in the management and monitoring of HCS areas.

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

Finding: Evidence of consultation of the final results of the HCS assessment and areas that are to be developed, safeguarded for communities or HCS forest that requires conservation is desirable in the near future.

Reviewers Recommendation: Evidence of FPIC process has been provided.

3. Ecological and Conservation Values (4 hours)

3.1. Does the summary provided in Section 4.5.1 of the Summary Report adequately represent the findings of the HCV study?

Finding: A full HCV report is available

Reviewers Recommendation: Information contained in the HCV report has been summarized in a table but there no summarized information such as main threats to HCV, management and monitoring recommendations such as those that would normally be presented in a public summary.

Cloud-map of identified HCV Areas, Threats, Management and monitoring information.

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?

The HCV Report can be found in the SharePoint.

Finding: The HCV assessment was completed before the requirement to submit to ALS. The review below is therefore only general observations only

Reviewers Recommendation: There is a lot of information in the HCV report and the assessors have obviously spent a reasonable amount of time in the concession surveying the area. The survey aspects of the assessment are especially good. Identification of the species, erosion potential, environmental services etc. is very thorough. However, there some areas which could be improved.

Below is a list of comments – these are not meant to be a thorough ALS standard review but comments based on a rapid read of the documents provided.

The precautionary approach has not been used and a risk assessment has not been applied. “The larger the scale, intensity and risk of project activities, the more effort should be devoted to detecting, identifying and understanding the characteristics, distribution, sensitivity and vulnerability of HCVs. The assessor must adequately describe the potential impact and scale of proposed operations and ensure that assessment efforts are adequate.” Or at least apply the precautionary approach. For instance, the HCV assessments has not considered the potential expansion of the plantation that may impact areas of forest that are clearly identified during the HCS assessments.

A Map of existing ecosystem at the time of the assessment is not available (as in the HCS report) – areas of HCVA are limited to mostly points (see comment on precautionary approach)

Public consultations were inadequate. 16 people from villages. No academics or regional government seem to have been involved (from data provided).

3.3. Please review Section 89.2 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?

Note that this is a check of procedures, not outcomes. The HCSA Toolkit provides more information on the expected quality of the RBA and the Pre-RBA.

Finding: Pre-RBA and RBA were not conducted but see comments recommendation below

Reviewers Recommendation: The report states “information of key species was recorded from HCV assessment report *where have been represent of all forest patch through field survey*”. No significant biodiversity was found in the 12 patches identified. This can be considered in lieu of RBA.

3.4. Are the forest conservation management and monitoring activities outlined in Section 109.1-3 adequate? Do they take into account forests and protected areas outside the concession?

Finding: Threats and information on immediate management and monitoring included in report.

Reviewers Recommendation: Activities in line with those needed to conserve-HCVs and HCS forests. In the report where HCV is mentioned also corresponds to HCS forest identified as threat are the same – conversion to agriculture, wood harvesting and exotic species

4. **Image Analysis** (6 hours, including land use planning/Decision Tree Section 6 below)

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

The HCSA Toolkit explains how the AOI should be identified.

Finding: Yes

Reviewers Recommendation: None

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

Finding: Yes

Reviewers Recommendation: None

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?
The HCSA Toolkit provides more information regarding the expected quality of the image analysis.

Finding: Yes. The initial vegetation classification has been corrected.

Reviewers Recommendation: None

5. Forest Inventory (4 hours)

- 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.

The HCSA Toolkit describes the expected quality of the forest inventory process.

Finding: Additional plots in areas of scrub and YRF have been conducted. The number of plots has not been calculated correctly even though the standard deviation (and therefore sum of Squares) could have been calculated from previous plots carried out. HCSA need to provide more advice to do this properly as it is relatively simple to do so.

Reviewers Recommendation: Even though there are error in calculating number of plots, additional plots are thought to be adequate for the scale of the concession. No further action required.

- 5.2. Please review Section [2.17-3](#) of the Summary Report. Was the forest inventory team qualified?

The HCSA Toolkit describes the expected qualifications of the forestry team.

Finding: Clarification provided here.

Reviewers Recommendation: Provided here in Peer review

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

The HCSA Toolkit provides more guidance on choosing an allometric equation.

Finding: Yes, Correct allometric equations have been used

Reviewers Recommendation: None

- 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?

The HCSA Toolkit provides more guidance on what statistical analysis should be used.

Finding: Plot data uses a square plot, but the data measured and calculations for estimating carbon stock are correct. The carbon stocks are as expected. Additional plot use the HCSA circular plots. Carbon stock were as expected compared to satellite image.

Reviewers Recommendation: None

6. Land use planning (6 hours with Image Analysis above)

- 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?

The HCSA Toolkit provides more guidance on how to incorporate the forest inventory results into the land cover map.

Finding: Yes

Reviewers Recommendation:

The additional plots allow for accurate calibration. There were a couple of outliers but this does not change the overall classification as these areas were small anomalies in larger areas of scrub (BM). The final vegetation classification is accurate.

- 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?

The HCSA Toolkit explain how to merge patches and identify the core area.

Finding: Yes. The decision tree was followed correctly. Participatory maps (tenure) was used. The patch analysis was re-worked, merged and followed for a medium Forest Cover Landscape. Areas of young regenerating forest proposed for development are in line with the decision tree to step 12.

Reviewers Recommendation: None

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?

The HCSA Toolkit explains how to prioritize patches and go through the Decision Tree.

Finding: Yes. Correctly applied.

Reviewers Recommendation: Extra plots have resolved issues. Reviewer looked at several patches of young regenerating forest next to Riparian conservation areas (HCV). These patches have been recorded as Medium or low priority (due to size), Very high risk, not important for biodiversity (RBA). As the landscape is medium Forest cover Landscape these areas have been included in “indicative develop”.

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 maximize 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: ICLUP conducted according to manual with one anomaly not normally encountered.

Reviewers Recommendation: Integration of HCV with in the results of HCS has been done. See comment above.

The company has proposed to return some land back to the state. There are areas of HCS as well as scrub within this. It is understood that some of these areas are not suitable for Oil Palm development (rocky limestone hills?). It is not understood how the company developed give and take for ICLUP. Giving does not necessarily mean give concession back to the state. If areas relinquished from HGU then become areas outside of the control of the company, deforestation could result. This would be an indirect consequence of the company’s actions. More justification as to why this decision is being taken should be provided to HCSA and how ‘give and take’ was implemented.