HIGH CARBON STOCK APPROACH

HCSA PEER REVIEW REPORT

Company Name: Genting Plantations Berhad
HCS Assessment Area: PT. United Agro Indonesia
19 April 2021
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. Kresno Dwi Sentosa led the HCS Assessments.

b) Was the HCS Team Leader a Registered Practitioner?
   Yes.

c) Were at least two (2) HCS team members Registered Practitioners?
   Kresno Dwi Sentosa and Harnios Arief are team members from 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).
   Satisfactory.
Questions for peer reviewers
(Peer Review Panel: Jules Crawshaw)

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:** In general, this assessment was done well. The main findings are that the assessment has been undertaken in an existing plantation. As such, the assessor has to describe a lot of the past FPIC that has been done. Typically this has focussed on GRTT rather than land management and conservation issues which are advocated by HCSA.
A lot of good information was presented in the social section. But this has to be strengthened with appropriate evidence and reference to the company’s SOPs.
The HCV assessment was based on an ALS approved assessment.

**Reviewers Recommendation:**
Follow the recommendations mentioned below. Also add section 4 back into the report.

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:** The HCSA requires 2 registered practitioners to be on the team. One being the lead assessor and the other the GIS expert. Kresno Dwi Santosa and Harnios Arief are both registered practitioners. It states that Kresno Dwi Santosa was the lead assessor. However, the GIS expert was not mentioned. The company subsequently stated the GIS expert was not a registered HCS practitioner, though had sufficient skills and experience to perform the tasks required.
**Reviewers Recommendation:**

1. State who was the GIS expert and confirm this person was a registered practitioner. It is recommended that the GIS Expert undertakes training to become an HCS registered practitioner for future assessments.

<table>
<thead>
<tr>
<th>1.3.</th>
<th>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?</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Finding:</strong></td>
<td>There are no aspects that need to be redone. More information has to be added as described below. There are some comments made by the reviewer that will hopefully be taken into account for future HCSA work.</td>
</tr>
<tr>
<td><strong>Reviewers Recommendation:</strong></td>
<td>No recommendation.</td>
</tr>
</tbody>
</table>

**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.

**NOTE** – in the report provided all of section 4 (“4.Keterlibatan Masyarakat / FPIC”) has been deleted. This is a key section and should be added back into the report. The file name provided to the reviewer is “Laporan HCSA PT UAI_4 April 2021.doc”

<table>
<thead>
<tr>
<th>2.1.</th>
<th>Does the summary provided in Section 3.1 adequately represent and explain the community engagement, FPIC processes, and participatory mapping activities carried out?</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Finding:</strong></td>
<td>There is mention of an SIA that took place. A list of generic positive and negative impacts of development are provided. Background information is provided about the communities – similar to what one would expect in the Social Background Study (SR1). There is discussion of the FPIC processes that took place. These appear to be very focussed around the GRTT process rather than around HCS and land management issues. There is a discussion about the PM process that took place.</td>
</tr>
</tbody>
</table>
Reviewers Recommendation:
1. The discussion presented is good. However, it does not focus on the implementation of company SOPs. As such, the assessor cannot be assured that this is not a one-off process. In terms of community engagement the FPIC and community engagement SOPs have to be presented. In the context of the company SOPs, the text must describe how the processes are fulfilling the implementation of the SOPs. In section 3.1.5 a suite of SOPs are listed which address topics relating to FPIC.
2. Evidence must be presented to support all the statements made in the text. For example it is stated “PT UAI selalu melibatkan masyarakat sebelum perusahaan membuka perkebunan kelapa sawit. Hal tersebut dilakukan oleh PT UAI untuk menghindari konflik dan menguatkan hubungan perusahaan dengan masyarakat.” – evidence of this must be presented. The reviewer accepts the company’s explanation below. Still it would be good to refer to evidence in the text of the statement that was made. The recommendation was more about how the information has been presented.

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

Finding: There is no mention of a special land tenure study having been undertaken. However, in section 4.1.2.1 there is a good description of land tenure in the area. There is a description of the two ownership systems between transmigrants and original residents. Additionally information is provided about usage patterns in relation to livelihoods (e.g. planting of food crops and rubber).

SR1, relating to the LTS, states “The Land Tenure and Use Study requires field research, which is conducted in a participatory and inclusive manner with affected communities and other local stakeholders. This study covers land tenure and rights issues in detail, including in relation to inheritance and transfer, and identifies potential or actual areas of conflict. The study also assesses existing community practices in relation to livelihoods and conservation, including the usage patterns of areas to be proposed for conservation, whether use is economic, social or cultural.” Further points are discussed in the Participatory Mapping section (4.2) relating to potential and actual areas of conflict. Still no information is provided about:
- inheritance and transfer and
- community practices in relation to conservation.
The information was acquired at desktop level and supplemented with participatory mapping. This is consistent with SR3.

Reviewers Recommendation:
1. Provide additional information about
- inheritance and transfer and
- community practices in relation to conservation.
The reviewer acknowledges that the recommendation should have been clearer. The reviewer was hoping to see more detailed information. E.g. the indigenous people – e.g. when people inherit land - do they divide the land up equally among their children (men and women, oldest to youngest). How is the transfer process administered in the society, do they have designated people in the community to oversee this process?

Regarding conservation – this statement should be added to the report. However the reviewer’s observation is that communities tend to leave riparian strips of trees and some species of trees don’t get cut down (e.g. figs because they have spirits in them, other useful trees get conserved such as Koompassia excelsa).

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:** A participatory land use map is provided in 4.10. With the following categories

**Participatory Mapping:**
- Hutan Galam
- Lahan Terlantar
- Hutan Lindung
- Pemukiman
- Kebun Masyarakat
- Perkebunan Sawit

Regarding the “key components of community land use” the HCSA TK provides the following guidance:

“map of the boundaries and customary land use of local communities, created through a participatory process as outlined in Module 2 of this toolkit. Forest gardens, ‘swidden fallows’ and future farm lands that are areas fundamental to meeting basic food security are identified and recorded on maps, both for communal lands and individually claimed and used areas. If these areas are located within the proposed development area for plantation, then they will be enclave and excluded from being categorised as HCS forest and from plantation development”

The PM categories should be matched to the categories required by the HCSA. The “Kebun Masyarakat” matches to the land use of local communities but the status of “lahan terlantar” is unclear.

Advice Note 1 section 4 (Local people’s lands for food security and livelihoods) details the requirements of HCSA relating to food security. Most of the required information is presented in the HCS report, however there is no analysis of land availability in comparison with the populations of each community.

**Reviewers Recommendation:**
1. Explain the PM categories used and match these against the categories required by the HCSA. For some reason, the company deleted section 4 of the report (which should be added back in). Therefore the reviewer cannot read what the company provided.
2. Calculate the minimum amount of land to be allocated for food security based on the requirement that 0.5 ha of farmland per person shall normally be allocated for food production. The assessor should state the number of hectares necessary to meet this requirement based on population size. The assessor must then provide a brief analysis of the feasibility of allocating the minimum amount of land for relevant populations. Whilst the explanation that this area is not suitable for growing rice is valid, this is not a mitigating factor that the HCSA mentions. The reviewer suggests providing the calculations and also a discussion mentioning that this is not ideal agricultural land for food crops such as rice.

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: It is stated that there were 5 communities interviewed for the study (Desa Sumber Alaska, Desa Dadahup, Desa Sri Mulya, Desa Sumber Makmur (F3) and Desa Tambak Bajai) though it was not expressly stated that these are the affected communities and where this information was taken from – it should be from the LTLU study. It is stated “Prioritas pertama adalah desa-desa yang berada di dalam lokasi izin lokasi, prioritas kedua adalah desa-desa yang terletak berbatasan dengan izin lokasi dan prioritas ketiga adalah desa-desa yang berada di luar izin lokasi.” So it needs to be explained which community falls into each category.

The report states that the proposed development was socialised with the community. However there is no mention of the HCS approach being discussed at meetings.

There is mention of the community representatives being selected.

Reviewers Recommendation:
1. State that the 5 communities were the affected communities and where this information regarding their designation as affected communities has been taken from. Whilst the reviewer understands that the company got the information from the SIA it must be stated very clearly that these are affected communities currently table 3.1 states “Luas wilayah desa-desa sekitar PT. UAI”. The reviewer recommends that the statement is added “These are the affected communities” – because this is crucial to the HCSA process.

2. Provide evidence of the socialisation of the proposed development and HCSA with each of the communities. Here, the company’s FPIC SOP must be presented and it must show how each of the steps undertaken have been consistent with the SOP. Additionally, minutes of meetings and attendance lists must be presented as evidence (photos without associated documentation cannot be considered evidence of meetings). No Appendices have been provided with the HCSA report so the reviewer cannot review Lampiran 4.

3. Evidence should be provided of the community nominating its own representatives. The response provided below by the company is excellent – however it must be included in the report itself.
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:**
There is a description of the consultation with the community relating to the GRTT process. Especially the due diligence process that the company undertook prior to making payments. It appears that the communities’ input in the development and implementation of the plantation was limited to their individual decisions to sell or not sell their land. There is no information provided which states that the communities were informed that they can say “no” to development.

There is no information provided about whether the community was informed that they have the right to independent legal representation.

Much of the GRTT was done prior to the HCSA report, therefore if the correct process was not followed in the implementation of HCSA when GRTT was undertaken then the company must follow the procedure outlined in the HCSA Implementation Guide “Box 2 Implementing the SRs when applying the HCSA to existing operations”

**Reviewers Recommendation:**
1. If the communities were informed that they can say “no” to development this should be clearly stated. Evidence must be provided in terms of minutes of meetings. This should be consistent with the FPIC SOP also. Whilst the reviewer notes the sentence “Adapun untuk masyarakat yang tidak ingin bermitra di antaranya karena beberapa alasan: ingin mandiri dalam mengelola lahan, adanya isu bahwa sawit tidak ramah lingkungan atau ketakutan bahwa sertifikat tidak akan kembali.” The concept of being free to reject development is so crucial it should be stated unambiguously.

2. If the communities were informed that they have the right to independent legal representation this should be clearly stated. Evidence must be provided in terms of minutes of meetings. This should be consistent with the FPIC SOP also. The information provided should be added to the report.

3. If the “prior informed” test is found to be lacking the guidance regarding “Implementing the SRs when applying the HCSA to existing operations” should be followed. Based on the information provided below it should be stated in the report, that though the HCSA study was done on an existing operation, the principles of FPIC were followed since implementation.

2.6. What recommendations do you have for any improvements regarding community consultation and negotiation of Free, Prior and Informed Consent?
Finding: The social section of the HCSA report has been well done. The major problem is that the HCS assessment was undertaken in an existing plantation, not prior to development. This means that the assessor / company must continue discussions on the mechanisms of engagement on gaps in the SRs application and how to address them.

Reviewers Recommendation:
1. Follow the recommendations made in sections 2.1 – 2.5
3. **Ecological and Conservation Values (4 hours)**

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

**Finding:** A summary of the area statement of the HCV assessment is provided along with an HCV map. Basically 100% of the plantation area is mapped as HCV but 573 ha of the 6723 ha are considered “no go”

**Reviewers Recommendation:**
1. Generally HCV area is considered “no go” so the report should describe which of the HCV areas are developable. The reviewer missed the line on the HCV report 6-6. It is recommended that the company explains the logic in the HCV section as this is very confusing to someone that is not familiar to the area. The reviewer assumes that though the area was mapped as KHG (a peat land system), the area has been drained in the mega rice project and all the peat has rotted and disappeared and as such is not peat anymore? If this is the case, then this should be explained.

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 report received a satisfactory ranking by the ALS

<table>
<thead>
<tr>
<th>HCV in the Permit Area PT United Agro Indonesia</th>
<th>RSPO New Planting</th>
<th>Closed</th>
<th>Indonesia</th>
<th>Kresno Santosa</th>
</tr>
</thead>
</table>

**Reviewers Recommendation:**
No 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?

*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:** There is a description of how 7 patches were assessed against a pre-RBA. 6 of these patches were set aside for conservation because they were seasonally flooded areas. However for the other patch it is stated “terdapat 1 patch yang diusulkan untuk pengembangan karena kondisi dan resiko yang tinggi apabila dijadikan sebagai usulan konservasi.” This does not follow the toolkit, if at the end of the Pre-RBA patches are considered “Indicative Develop” an RBA must be done. It appears this final step was not undertaken.

**Reviewers Recommendation:**
1. Undertake an RBA on patch no.9. It is explained that information has been used from the HCV report to determine that this would unlikely contain RTE species. It is a 2.5 ha patch of YRF. This is accepted by the reviewer.
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:** The management and monitoring activities are extremely generic. For example, rehabilitation and restoration is mentioned but how will areas be managed that are already planted with oil palm. Similarly have all conservation areas already had GRTT paid, if there are areas that have not had GRTT paid or are part of the plasma area – how will these areas be managed?

Also it states “PT. UAI tidak memiliki areal gambut” and then in point 2 states “Melakukan pengelolaan gambut di areal perkebunan sawit”

**Reviewers Recommendation:**
1. Ensure the information presented about peat is consistent. The point that the reviewer is making is – if there is no peat in the concession why is the following management recommendation made?
   - Melakukan pengelolaan gambut di areal perkebunan sawit
2. Provide more detailed information on the management of areas that are HCS that have been converted to OP. Information has been provided.
3. Provide information on the management and monitoring activities of areas that are HCS that are owned by the community. Information has been provided.
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:** The HCSA requires the AOI to include the concession plus a minimum 1 km buffer. The company has identified the concession plus a 2 km buffer. Therefore, the AOI has been correctly identified.

**Reviewers Recommendation:**
No recommendation

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:** The date of the image that was used for landcover mapping is 17 November 2019 and the study was undertaken January – March 2020. The satellite image that was used was Sentinel which has 10 m pixels. All these are within the timeframe and image quality required by HCSA.

**Reviewers Recommendation:**
No 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?

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

**Finding:** The accuracy of the classification relies a lot on the ground truthing that was undertaken. Ground Truthing is a mandatory step for HCSA. But no ground truthing data has been made available. Calculations of the Kappa and the overall accuracy have been made. However, this only includes a subset of the landcovers identified. There is no matching between the land cover categories used by the assessor and the HCSA categories (e.g. semak relates to which HCSA land cover category).
Reviewers Recommendation:

1. Provide the ground truthing data that was used for verifying the land cover classification.
2. Undertake an accuracy assessment over all the land covers.
3. Provide a table which matches all the land cover categories used by the assessor against HCSA land cover categories. The information in point 1 should be provided in a table format as well as matching the English land cover categories to the HCS categories.
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.*

<table>
<thead>
<tr>
<th>Finding:</th>
<th>The plots were set up and measured according to the guidance in the HCSA.</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>The number of plots required was based on the formula specified in the HCSA toolkit. However, the formula required 52 plots to be measured and only 30 plots were measured.</td>
</tr>
<tr>
<td></td>
<td>“The assessor must include the inventory sampling plan in the report, including a step by step calculation of the target number of plots. Separate sampling estimates should be prepared for each stratum. Combining the LDF/MDF/HDF strata into a single forest stratum is acceptable if reasonable justification is provided.</td>
</tr>
<tr>
<td></td>
<td>A fewer number of plots is only acceptable in small areas (less than 100 ha of potential HCS forest), or in forest classes higher than YRF. At a minimum, there must be statistical difference shown between the YRF and Scrub strata. Evidence and justification should show that YRF forest and above (denser forest classes) have been correctly identified for conservation, even if the plot data does not provide statistically significant distinctions between those forest classes.”</td>
</tr>
<tr>
<td></td>
<td>The assessor mentions “karena keterbatasan akses dan tutupan yang tidak sesuai” – this is a common problem that is encountered in the field but it is not accepted by HCSA.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Reviewers Recommendation:</th>
<th>1. In future the number of target plots must be reached and fewer plots can only be measured for the reasons outlined in Advice Note 1. The information provided below should be added to the report.</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>2. Provide a shapefile of the plot locations. Currently a file named “Titik_Sampling” is provided but it only has one point in it. Provided</td>
</tr>
<tr>
<td></td>
<td>3. It needs to be clearly stated whether the classification of the land cover was done at the plot or re-classified after the plot data came back. Note that the HCSA TK states that the classification must be done at the plot. The data must not be manipulated afterwards (eg: reclassifying HRM-&gt; BK or vice versa). The method described below by the assessor is incorrect – the land cover classification must be set at the plot.</td>
</tr>
</tbody>
</table>
5.2. Please review Section 7.3 of the Summary Report. Was the forest inventory team qualified? 

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

Finding: No information is provided about the forest inventory team in section 7.3.

Reviewers Recommendation: Please provide a table of the individuals involved in the forest inventory, their roles and qualifications. Now this is provided.

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: 
The following allometric is used: 

“AGB = 0.11ρ(D^{2.62})

AGB : Above Ground Biomass (Kg)
D : Diameter at breast height (cm)
ρ : Wood density (g.cm-1)"

However, no reference is provided to where this equation was obtained.

Reviewers Recommendation:
1. Provide the references for the equation and a paragraph on why this allometric was chosen. Complete.
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: There seems to be something wrong with the statistical analysis. The results on the page “UJI UAI REV” has only data from 29 plots, but the report states 30 plots were measured. Also the ANOVA table does not match with the data provided. (e.g. the anova table has 8 BK plots whereas there are only 7 in the data, similarly the number of KC plots do not match). As it stands the scheffe test shows no difference between KC and HT. Whereas the assessor has stated there is a significant difference. The reviewer has recalculated the Scheffe Value based on the data provided and it shows there is no significant difference (F<Fcrit 0.47<2.95).

The plot data provided appears to be accurate and the C stocks correctly calculated. Some of the classifications do not appear in correct (e.g. Plot HRM 1.02 has S Dracontomelon dao – D.dao are not pioneer trees that are typical of YRF – this plot should have been classified as LDF).

The assessor could not review the land cover against the plot locations because the plot location shapefile has not been provided.

Reviewers Recommendation:
1. Recalculate the ANOVA and scheffe data. Recalculations have been completed
2. Provide the plot location shapefile. The plots shapefile has been provided and the final landcover has been used for calibrating the land cover.
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:** The location of the HCS plots (a shapefile with only 1 point was shared) and the ground truthing plots was not provided to the reviewer. Consequently the reviewer cannot verify the calibration of the initial vegetation map.

**Reviewers Recommendation:**
1. Provide all the ground truthing points and locations of all the HCS plots in shapefile format. A shapefile of the HCS plots has been provided but not the ground truthing points.

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:** There is no information provided about community lands being enclaved. This comes back to the point raised in section 2.3 of this review, where a number of areas are delineated as a result of the PM. However, it is not unambiguously stated what are community lands (e.g. community subsistence garden areas) – “kebun masyarakat” seems to fit this description however this seems to overlap with mixed rubber areas.

The patch analysis seems to have been undertaken correctly.

**Reviewers Recommendation:**
1. If there are any community subsistence garden areas this should be stated and these areas should be enclaved in step 1. Now mentioned in the report.

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: The patch analysis seems to have been undertaken correctly.

Reviewers Recommendation: No recommendation

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: In the north there are only tiny patches of HCS area remaining and little chance for connectivity. In the south there is a significant patch identified, but this is based on the HCV assessment (which does not consider area external to the concession). There doesn’t appear to be any mapping of HCS or HCV areas external to the concession

Reviewers Recommendation:
1. Consider HCV areas external to the concession as part of the final HCS map. This should take into account the final ground verification. The area with the blue stripes is HCV area outside the concession – this should be mapped as HCS area also.