HIGH CARBON STOCK APPROACH

HCSA PEER REVIEW REPORT

Company Name: PT Kencana Graha Permai
HCS Assessment Area: 9,333 ha
23 February 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?**
b) **Was the HCS Team Leader a Registered Practitioner?**
c) **Were at least two (2) HCS team members 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).**

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:

As a general statement the HCS study seems to have been carried out adequately. The weak point is the writing up of the study – it is very important that the study be well documented and easily understood by a reviewer / third party.

It would be good to provide a summary of the key information about the development of the plantation to date and the proposed development plan in the summary report. This would include maps of the area of the plasma area and the inti area.

It should be explained why the HGU and the izin lokasi have different extents.

None of the HCV / HCSA or PM areas in the buffer around the concession have been either mapped or taken into consideration.

Reviewers Recommendation:

1. The reviewer could see that the company had done excellent work with this assessment (e.g. the participatory mapping) but the write up of the reports, in general, lacked detail and associated evidence. As an example, the minutes of meetings with the community should be provided as evidence of FPIC. Furthermore, there are key points in the process (e.g. that the community was told that they had the right to say no to development). It needs to be made clear exactly how this was communicated to the community and have supporting evidence provided.

2. A single map with all the village boundaries should be provided.

3. Every map / discussion in the reports has to, at a minimum, include the 1 km buffer around the concession.

Additional data has been provided which has strengthened the social aspect of this assessment considerably.

Company Responses:
1. All off minute meetings has been provide in share point link
2. Please see figure 2 in summary report (map of the villages overlap with PT KGP)
3. AOI Map which include 1 km buffer is shown in HCS full report (please see figure 12)

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:
A team list is provided, but no biographies have been provided. The report date (2015) probably precedes the requirement that the team includes 2 registered HCS assessors.

Reviewers Recommendation:
Provide short biographies for the key team members. Biographies have now been provided.

Company Responses:
Biographies team has been updated in the HCS full report and summary report (please see Annex 1)

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:
1. Please see the recommendations below.

Reviewers Recommendation:
All the field work and analysis appear to be adequate. However, the reporting needs to be improved. Primarily this involves adding more detail and evidence. Additional detail has been added to the reports. However, there are now inconsistencies in the data, which appear to be caused by the study having been done over the whole landscape (many companies) and the spreadsheet data only being presented for PT KGP. This means the data cannot be reconciled. Furthermore, there are inconsistent landcover names used in the report and the spreadsheets.

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:

This HCS Survey was undertaken in 2015, as such using version 1 of the HCS Toolkit. Version 1 has very limited detail regarding social engagement required for an HCS assessment. This was expanded considerably in the TK version 2. However, the reviewer is required to review the assessment against the toolkit version 2; which at the time of the survey the company would not have had access to.

Only the most general description of any community engagement, FPIC and participatory mapping has been provided (e.g. it mentions 4 villages; Rangkung, Belaban, Randai and Batu Payung Dua were surveyed). There are no village maps provided, even in the SIA.

Reviewers Recommendation:

1. Provide a village map of all the villages that overlap with the assessment area. Explain why these villages were deemed to be the only affected communities. Village boundaries have been added to the summary report (figure 2) – it would be good to add the village names to the map also.

2. Provide a summary of the company's SOPs that relate to FPIC (e.g. land acquisition, community engagement, CSR). A brief summary of FPIC and PM have been provided, but not a summary of the SOPs.

3. Provide the participatory mapping that has already been undertaken. Note that this should contain the key components of land use. Figure 15 of the summary report has been provided, which shows key land uses.

Company Responses:

1. Please see figure 2 in summary report (map of the villages overlap with PT KGP)

2. Brief summary FPIC, PM assessment and result provide in summary report (page 8) and the HCS full report (page 40).

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

Finding:
There is no mention of a tenure study having been undertaken.

Page 8 of the HCS TK Module 2 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."* It appears that most of this information is in the PM reports and as such needs to be summarised in the main report.

It is important the village boundary maps be brought into the main report as these are important information.

Reviewers Recommendation:
1. The summary of the information from the PM reports should be brought into the main report and the PM reports be referenced. Some information has been brought into the main report, although there is no information provided on "covers land tenure and rights issues in detail, including in relation to inheritance and transfer, and identifies potential or actual areas of conflict."
2. Provide a map of the village boundaries. The map of the village boundaries, as determined from the PM has been brought into the summary report. Though the villages should be labelled on the map.

Company Responses:

1. Summary of information from PM reports provide in full report HCS (page 40)

2. Please see figure 2 in summary report (map of the villages overlap with PT KGP)

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 mention of PM being undertaken and there is information about this provided in the Full HCS report, but not the summary report. Information is provided in gambar 16 which shows the land use in the area (which is primarily oil palm or mixed agriculture). However, this does not match with the land cover map (which shows significant forested areas).

Regarding PM, the Implementation Guide suggests "Community members can be invited to mark in the trails that they follow and the areas that they use in different ways (for example for farming, and for hunting, fishing and collection of forest resources)." The PM (Gambar 14 in the Summary Report) looks like something that could be produced from a satellite image, rather than mapping done in conjunction with the community. However, there are very detailed separate PM reports provided (which are not referenced in the HCS reports). The reviewer thought the PM reports were excellent work.

Reviewers Recommendation:

1. Provide the PM and ensure that both (1) calculations of the minimum requirement for garden areas and (2) the key components of community land use are provided in the summary report (this land use information is in the separate PM reports). HCSA Advice Note 1 has a section which elaborates on the issue of garden areas. The requirements of the Advice Note should be consulted. No information has been provided relevant to food security that addresses the requirements of Advice Note 1.

2. Ensure the land use map (PM) and land cover (patch analysis) are consistent. The polygon areas are the same between the land cover map in the summary report (fig 15) and the landcover in the full report (fig 12). But what is called "Kebun campuran" (mixed gardens) in the summary report–is BM, HK1 and HRM (all forested landcovers) in the full report. This still appears inconsistent to the reviewer.

3. Add legal boundaries (e.g. village boundaries) and areas under different forms of ownership (e.g. inti, plasma) to the PM map in the summary report. This information is in the PM reports. Still not added to the PM map (gambar 15)

4. Add detail to the PM map regarding resources for farming, and for hunting, fishing and collection of forest resources. There are photos in the PM reports with sketch maps. Still not added to the PM map (gambar 15)

5. Provide an annex with the maps that were marked up by the community. This is mentioned in the full HCS report *"Data primer juga dikumpulkan sebagai bagian dari PM dan dikumpulkan melalui berbagi teknik mulai dari sketsa penggunaan lahan yang dibuat oleh masyarakat".* There are annexe provided in the summary report and but is still unclear how something like this is turned into this.

The reviewer can't see any similarities.

Company Responses:

1. Please see figure 2 in summary report (map of the villages overlap with PT KGP)

2. Please see page 9 in summary report for the explanation and please see figure 22 in Participatory Mapping Report per each village for the Map.

3. Maps that marked up by community for PM Process provide in summary report (Please see Annex 3) or please see figure 6 Participatory Mapping Report per each village.

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: The affected communities are not clearly stated. It is mentioned that Rangkung, Belaban, Randai and Batu Payung Dua were surveyed. No information was provided about how these were deemed to be affected communities nor how other communities in the area were deemed to be not affected.

There are records in the SIA and HCS about consultation with the community. However, there is no mention of FPIC itself. Which involves a description that covers off on all the requirements of FPIC in SR7. What is lacking is a description of how the company approached the affected communities and informed the communities of the company's development plans. Particularly the communities' right to say no to development at any stage. From there every step has to be described and documented through to the signing of agreements for development.

In the SIA in table 3.3 there is documentation of the issues raised by the communities.

There is no mention of the communities nominating their own representatives.

Reviewers Recommendation:

1. Explain the process for determining the affected communities. It is now mentioned "identifikasi desa yang berbatasan langsung dengan perusahaan" – if this is the criteria for determining the affected communities – this should be clearly stated. However, note that it does not match with the HCS definition of affected communities.

2. Describe and provide evidence for each step of FPIC as mentioned in HCS TK mod 2 SR7. Though each step that was undertaken by the company is mentioned in the summary report now, not all the evidence is provided. Nor are all the requirements of SR7 fulfilled. E.g one of the requirements of SR7 is "Developers make clear that they shall respect community decisions and that FPIC includes the right to say 'no' to proposals." – this is not explicitly stated.

3. Generally in Indonesia community representatives are the Kepala Desa and Kepala Dusun as well as members of the BPD. If the communities used these entities as representatives, this should be stated in the report. If another mechanism was used, this should be stated. This is now explained on pg 8 of the summary report.

Company Responses:

1. Process for determine the affected community provide in summary report (please see page 8)
2. Step of FPIC mentioned in summary report (please see page 8)
3. The mechanism for representative was explained in summary report (please see page 8)

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:

The only comments from the community are in the SIA and these were relating to the employment conditions. These are not really relevant to the company's development plan or the setting aside areas for conservation.

There is mention of community consultation in the HCS reports but in the FPIC section. It does say the community was given the freedom to decide at each stage, but it does not go into details of how this was communicated to the community regarding their opportunity to say no nor that they could (or were advised to) seek independent legal representation.

Reviewers Recommendation:
1. If the views of the community were addressed and reflected in the plans and implementation of the plantation this should be described. Stating what the community requested / suggested and how this was reflected in the development plan. This has not been mentioned.
2. If the community were made aware that they can say no to development, this should be described. This should be reflected in minutes of meetings and the company's SOPs. There is mention in the notes of the PM about the implementation of company FPIC & Community Engagement Policies. The reviewer assumes that the right to say no to development was mentioned. This should be stated specifically rather than reference to implementation of policies.
3. If it was recommended to the community that they should seek independent legal advice, this should be stated in the methodology and the results section. It should also be reflected in the minutes of meetings. It is mentioned now that the communities can seek independent legal advice.
4. If the communities had independent legal advice, it should be stated who this was and in what capacity they advised the communities. There is mention that the communities can seek independent legal advice although it was not mentioned if this was sought and if so what advice or revisions to agreements were made.

Company Responses:

1. FPIC process, independent legal advice was explained in summary report (please see page 9)

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

Finding:

A description of the structure of the company's FPIC and community consultation processes is necessary. A discussion of the SOPs and how these were implemented in the context of PT. KGP.

There is no mention of the location of the inti and plasma areas.

Regarding FPIC, there needs to be considerably more detail added. This would include timelines – e.g. dates of meetings and dates where outcomes were provided. There needs to be a records (i.e.minutes) of all the meetings which should be provided as evidence.

Reviewers Recommendation:

1. Provide a discussion of the SOPs and how these were implemented in the context of PT. KGP. The FPIC SOP is now provided but there is no discussion about how the SOP was implemented

2. In general the descriptions lacked detail and associated evidence. The minutes of meetings with the community should be provided as evidence of FPIC. For example the company wrote *"Penjelasan berupa informasi dari setiap tahapan proses kegiatan dan proyek yang memberikan dampak kepada masyarakat senantiasa dilakukan. Pemberian informasi di awal dan masyarakat diberikan kebebasan untuk memutuskan."* It needs to be explained exactly what information was provided to the community and how they were given to the freedom to decide. This needs to be qualified with evidence such as minutes of meetings and company SOPs.Minutes of meeting are now provided in the PM, however this appears to be mainly about mapping the boundaries of the desa and teaching them how to use a GPS rather than affirming the communities' freedom to decide.

Company Responses:

1. All of minutes meeting was provide in share point link (Please see annex participatory mapping report)
2. SOP FPIC was provide in share point link

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

Finding:
The scope of the HCV seems to be different from the HCV report and the HCS report. See Figure 1 below. All the datasets have to be consistent. If the data sets are inconsistent there must be an explanation provided as to why they are inconsistent.
A description of all the HCV areas is provided in table 5 of the summary report.

Reviewers Recommendation:
1. Ensure the HCV data sets that are used are consistent. If there are inconsistencies, these have to be explained (in the report). It is now explained that the results of the HCV verification report were used in the patch analysis. However, it isnot clear to the reviewer why there are no HCVs mapped in the northern area.

whereas in the 2011 report there were HCVs in this area.

Have the HCV areas gone? They are river buffers, one assumes the river is still present?
2. Provide a map in the summary report, that enables the reviewer to cross-reference the HCV areas described in table 5 with the areas on the map.
A map has now been provided but the resolution is extremely blurred. For example, the reviewer tried to find Bukit Besar (from HCV4) in the map. Maybe the area below is Bukit Besar, but it is illegible.

Company Responses:

1. The HCV data for analysis was used HCV verification report 2015 (the report hass been shared in share point link) and has been explained in full report page 38 and in summary report page 14
2. Map of HCV area has been provide in summary report (please see annex 4 and 5)
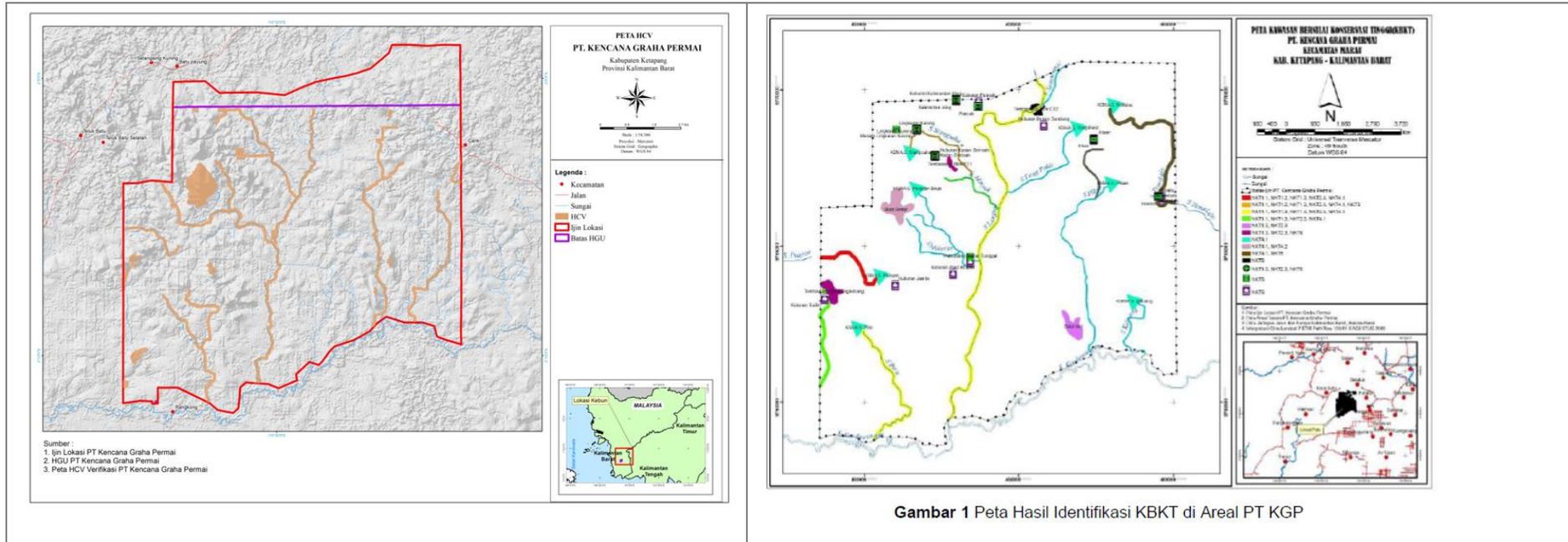
Figure 1. Left: HCV areas according to the HCS full report. Right: HCV areas according to the HCV review report. In the HCS report no areas in the northern section are used, furthermore areas such as the 30 ha of HCV 1.3 and 2.3 in Bukit Ibul are missing from the HCV area used in the HCS report.

2.8. 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 report was produced in 2011, which pre-dated the ALS. Therefore, the report was not reviewed by the ALS.

Note that there has been no mapping of HCVs outside the boundaries of the concession (but within the AOI) – this appears to be an ALS requirement and was not done prior to the ALS.

The site description appears to be adequate except for the land cover map (**Gambar III-5**.) which does not describe the various land covers. Of particular interest is the Hutan Sekunder Lahan Kering – ringed with blue circles in the map below. These locations are not labelled in any of the maps. So it is not clear whether there was any survey effort. There are survey point locations in the methodology section and it appears the forest area in the west and north were not surveyed and the forest area in the east received only 3 survey points, even though it is the most extensive forest area. It appears strange that no birds, mammals or trees that are VU or above or endemic or CITES listed were sighted in these areas. The lack of survey effort in these areas that intuitively would have been the focus of the biodiversity survey needs to be explained in the methodology section.
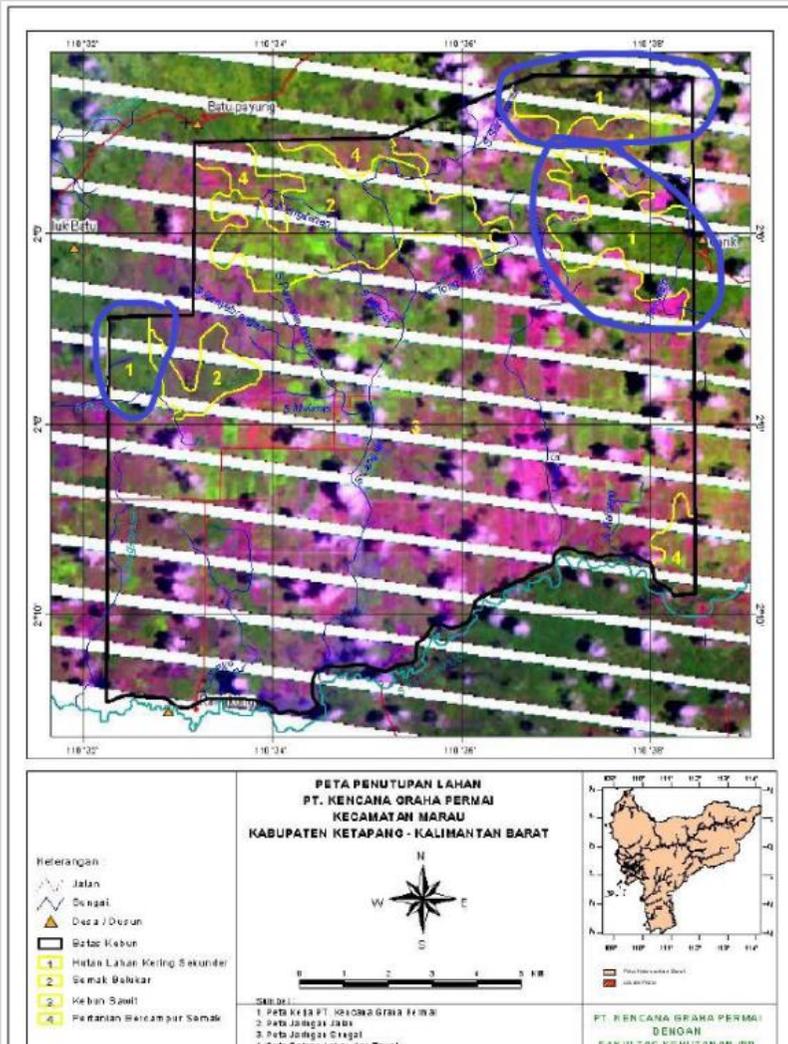
The mapping of the HCVs often doesn't follow the toolkit or the information present and the mapping of the HCVA is inconsistent. A commentary is provided below.

HCV1.1 – This is the river buffer zones. Some of the smaller river buffers have been given 25 m buffers. Some of the smaller rivers (see Gambar IV-15 have no buffer). This is not consistent with PP 2011/38 which requires all rivers to have a 50 m buffer.

HCV1.2 – The information provided doesn't seem to make sense. For example, the report states that Shorea balangeran and Dipterocarpus grandifloras were present in Sg Biru, yet Sg Biru is not mapped as HCV1.2. It is not clear why all the Hutan Sekunder Lahan Kering was not mapped as HCV1.2 or HCV1.3. It doesn't appear that there was any survey in these areas – which needs to be explained.

HCV1.3 – The map (Gambar IV-23) does not map all the location names that are mentioned in the tables where HCV1.3 species were sighted. There are many locations where HCV1.3 species were sighted but are not mapped as HCVA 1.3.

HCV2.1 – The methodology used for identification of HCV2.1 does not match the methodology described in the Indonesia HCV TK.

HCV2.2 and 2.3 are acceptable.

HCV3 – The Indonesia HCV TK describes 2 methodologies for identification of HCV3 (precautionary and analytical). The process used by the assessor doesn't appear to follow either approach.

HCV4.1 - 4.3 are acceptable.

Reviewers Recommendation:

1. Ensure consistency with the mapping of protected areas in HCV 1.1 with government regulations.
2. Ensure the consistency of mapping HCV1.2 with the locations of the CR species.
3. Map all the locations in Gambar IV-23 that are mentioned in the HCV1.3 species presence tables.
4. Reanalyse HCV 2.1 using the methodology described in the HCV TK.
5. Reanalyse HCV 3 using the methodology described in the HCV TK.
6. Explain the lack of survey effort in Hutan Sekunder Lahan Kering that should have been the focus of the biodiversity survey in the methodology section.

From the company's response it appears they will cross-check the information and ensure it is correct. However, this step has not been done yet.

Company Responses:

1. All HCV data for analyse patch analysis was used HCV verification Report for the identification report will ensure and crosscheck with the previous assessor for the metodology for identification all of HCV.

2.9. 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:

Pre RBA was done on a series of patches. It is stated "Terdapat 5 patch prioritas rendah yang disarankan untuk dilakukan kajian pre RBA. Tiga (patch no. 2, 6, 7) dari 5 patch yang ada memiliki atribut-atribut yang mencirikan sebuah areal berpotensi sebagai kawasan lindung sehingga perlu dikonservasi), 1 patch (patch no. 9) direkomendasikan di enclave karena berada dalam penguasaan masyarakat". The toolkit states "The aim of the Pre-RBA is to identify any impediments to development and operations." The reviewer doesn't really believe that land managed by the community could be accepted as an impediment to development in the pre-RBA context. The TK gives examples of "excessive slope and wetland areas" – therefore the TK is more focussed on physical impediments to development rather than tenure issues.

Regarding the RBA, it is stated : *"sementara sisanya (patch no. 4) perlu dilakukan kajian lebih mendalam melalui RBA dan dienclave. Kajian yang lebih detail ini juga memperlihatkan bahwa patch tersebut memiliki tingkat keanekaragaman hayati yang tinggi sekaligus sebagai habitatnya yang tersisa."* There was only one patch that required an RBA and it had high biodiversity values, but was not captured in the HCV assessment.

Reviewers Recommendation:

1. The description of the methodology used for the Pre-RBA and the Rapid Biodiversity Assessments was very brief. It should be expanded to provide more detail of exactly what was done. For example, what species were sighted in the location of patch no.4 that caused it to be deemed a conservation area.

The full report now states that 5 patches were considered for RBA (Patches 2,4,6,7,9). No shapefile of the patch analysis has been provided, so the reviewer cannot check the data. It is stated "Tiga (patch no. 2, 6, 7) dari 5 patch yang ada memiliki atribut-atribut yang mencirikan sebuah areal berpotensi sebagai kawasan lindung sehingga perlu dikonservasi". However the reviewer recommends being exact about the attributes that these patches have to be considered for conservation, so that it is clear the company has followed the TK (e.g. presence of streams or permanently wet areas). Another patch is enclaved because of "penguasaan masyarakat" – this is not one of the criteria given for being reserved from development by the toolkit. The final patch it is stated that it contains Eusideroxylon zwageri – which is IUCN:VU. This is a valid reason for conserving of this patch.

Company Responses:

1. The information of species were sighted in patch No. 4 Already provide in full report (please see page 37)

2.10.   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:

None of the maps or analysis takes into account forests outside the concession. The HCV process now requires mapping of landcover within the AOI (which includes the area around the concession).

The management and monitoring (M&M) activities outlined in Section 10.3 are extremely general and read more like "Next Steps" than M&M. Ideally the M&M section should be in sufficient detail that a Sustainability Manager could pick up this section and develop an operational plan from it. Ideally it needs to determine the threats. The biggest issue for most conservation areas is maintaining the boundaries and stopping encroachment. If natural areas are left undisturbed, their condition will generally improve naturally.

Most of the conservation areas are river buffers, which have a high edge:area ratio. Furthermore, from the photos many of these areas appear to be already planted in oil palm. These areas will need remediation.

Reviewers Recommendation:

1. The HCV report needs to define an AOI and map the HCVA within the buffer areas as well (i.e. areas outside the concession).Note that the Indonesia TK (2008) states in section 6.3.1 "The spatial extent of the area that must be assessed for preliminary mapping extends beyond the MU to surrounding areas of the same landscape and/or watersheds connected to the MU." Therefore a wider landscape must be considered in the analysis – almost all the HCVs require consideration of HCVs beyond the boundaries of the MU.

2. Discuss each of the conservation areas, identifying the main threats to the areas and how these will be managed. Where remediation is required this should be mentioned. No change has been made to the updated report to make it more specific.

Company Responses:

1. HCV Asessment began in 2011 which there is no requirement assessment based on landscape.

2. HCV Area was identified will be manage based on management and monitoring plan

3.1. 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 AOI is not mentioned in the report, however the company has only mapped the concession itself.
The toolkit requires mapping landcover within a 1 km buffer of the boundaries. The patches within the buffer also have to be taken into account in the patch analysis. Neither of these things were done.
Additionally, "The minimum distance for considering broad connectivity with other large forest areas within the surrounding landscape is 5 km from the boundary of the proposed development area." – something like the KLHK land cover map could be provided to show forest areas in the vicinity of the concession.

Reviewers Recommendation:
1. Remap the area within 1 km of the boundary of the concession and take these areas into account in doing the patch analysis. The HCS areas that are outside the MU (and presented in Gambar 12) should be presented in the final HCV/HCS map (Gambar 15).
2. Take into account corridors to large forest areas within 5 km of the concession boundaries. A potential source of this data would be the KLHK landcover map.   Large forest patches within the 5 km buffer are now presented in Gambar 13.

Company Responses:
1. AOI Map which include 1 km buffer is shown in HCS full report (please see figure 12)

2. Map large forest overlay with 5 km of concession boundaries is shown in HCS Full Report (Please see figure 13)

3.2. 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 image provided is not of sufficient quality. It has a number of low clouds and a layer of thin high cloud (which will prevent the landcover classification algorithm working properly). Furthermore it is stated in section that the image is dated May 2015, which does not match with section 2.2 of the report, which states that the image interpretation was done in June 2014.

Reviewers Recommendation:

1. Please provide the actual image that was used for classification as the May 2015 image doesn't appear to be the correct one, given the timeline. A June 2014 image has been provided and it is stated that the land cover was subsequently refined with the May 2015 image. However, no land cover shapefile has been provided so the reviewer cannot check the mapping.

Company Responses:

1. The Image has been provide in share point link and the timeline was explained in full report page 14 and in summary report page 6

3.3.   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: No landcover has been provided yet.

Reviewers Recommendation:

1. Provide the landcover shapefiles. No shapefile was provided of the landcover in the resubmission.

Company Responses:

1. Will Provide in the share point link
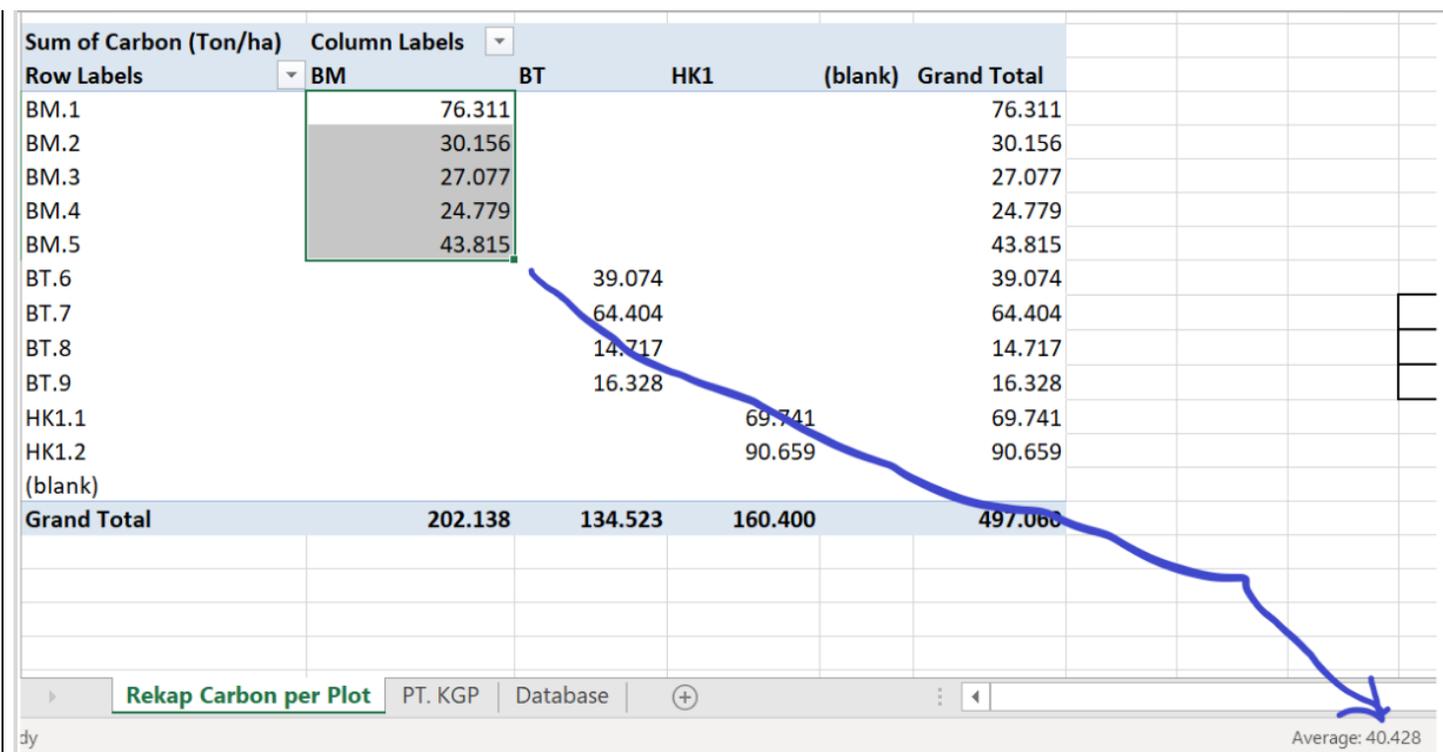
4. Forest Inventory (4 hours)

4.1. 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: The description of the plot set up and measurement follows the recommended procedure in the HCS TK. The location of the plots makes sense. Although there were only 11 plots in the concession, it was mentioned that the data got grouped with plots that were done in neighbouring companies. ("Perhitungan jumlah dan sebaran titik contoh di PT KGP dilakukan secara landscape dengan perusahaan lain di region Ketapang, Kalimantan Barat (PT Kencana Graha Permai – PT KGP, PT Bangun Nusa Mandiri - PT BNM, dan PT Cahaya Nusa Gemilang – PT CNG)"). Using all the data in the landscape, provided it is relatively homogeneous, is acceptable.

Reviewers Recommendation:
1. Provide details of the complete data set, showing the number of plots located in the other company. A spreadsheet has been provided of the KGP data, thought this does not match with table 9 which is labelled "Analisis varians di PT. KGP" and mentions 83 plots were measured, but the spreadsheet only has details of 11 plots. Furthermore the C stocks do not match – e.g. table 9 for Belukar Muda 32.3 tC/ha but in the spreadsheet the average is 40 tC/ha

Sum of Carbon (Ton/ha)	Column Labels				
Row Labels	BM	BT	HK1	(blank)	Grand Total
BM.1	76.311				76.311
BM.2	30.156				30.156
BM.3	27.077				27.077
BM.4	24.779				24.779
BM.5	43.815				43.815
BT.6		39.074			39.074
BT.7		64.404			64.404
BT.8		14.717			14.717
BT.9		16.328			16.328
HK1.1			69.741		69.741
HK1.2			90.659		90.659
(blank)					
Grand Total	202.138	134.523	160.400		497.06c

Rekap Carbon per Plot | PT. KGP | Database

dy — Average: 40.428

Furthermore the average Cstock for BM is 40tC/ha whereas BT is 33 tC/ha

2. Provide the input data to the Winrock calculation - the predicted biomass for each class and predicted standard deviation. Also state the basis for these predictions. The Winrock spreadsheet has now been provided which shows how the number of plots required was calculated.

3. HCSA Advice Note 1 section 2.2 discusses the use of plots outside the assessment area. Provide a discussion that shows the use of additional plots meet the criteria mentioned in Advice Note 1. There is no explanation of the use of data from other plots from other companies surrounding PT KGP in the context of the requirements of Advice Note 1. It is made additionally hard to review because the spreadsheet provided has data for the HCS classes BM,BT and HK1. However the report uses the categories HK1, Belukar and HRM. The categories must be consistent between the report and the datasets.

Company Responses:

1. All the allometrics, statistic analysis, Winrock calculation are presented in the share point link

4.2.   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:

Tabel 10 provides information about the team names and their tasks. However, no biographical information is provided, as such the reviewer cannot determine if the team was adequately qualified.

Reviewers Recommendation:

Please provide a short biography for each team member detailing their qualifications and experience relevant to their tasks. Short biographies have now been provided.

Company Responses:
1. Already provide (please see annex 1)

4.3.   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 assessor uses two equations (1) Basuki 2009 and (2) Manuri (2014). The reviewer is not familiar with either of these equations. Neither of these equation use species specific variables (e.g. species density). The figures for carbon stock appear a bit higher for HRM and HK1 than the reviewer would expect and higher compared than the comparison table in HCS Mod 4 pg 23. Looking at the plot photos in section 7.6, the reviewer does not believe that the plots in the photos for HK1 and HRM would be anything like 115 and 79 tC/ha. However, the discrepancies are not different to the point that they appear incorrect (e.g. the photos may have been taken at a plot where the trees are small).

A spreadsheet has been provided of the plot data. However, the data provided is just the tree data, there is no calculation of AGB. Furthermore, each plot is on a separate sheet, this makes the data impossible to analyse.

Reviewers Recommendation:
1. Put all the plot data in one single sheet and add the calculations of AGB as embedded equations so the reviewer is able to review these. A spreadsheet

and the equations have been provided.

2. Provide references to (1) Basuki 2009 and (2) Manuri (2014).   There is still no full reference to the papers. This should be provided in the references section of the report.

3. Explain why species were identified if the equations only use tree diameter. It is stated "Pada studi HCS ini pendugaan biomassa dilakukan dengan menggunakan model allometrik biomassa untuk hutan lahan kering (Basuki, 2009) dan hutan lahan basah dan gambut (Manuri, 2014)," However for all areas the Basuki equation is used. But for rubber the following equation is used (0.0124*(M12)^2.444) – this equation is not mentioned in the report at all. This rubber equation should be mentioned in the report and the reason for its use explained also.

Company Responses:

1. AGB calculations has been provide in share point link

2. Already mentioned in full report (please see page 21)

3. Why spesies was identified (please see page 20 in full report)

4.4.   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 is a statistical analysis provided in section 3.3 of the Full HCS report. However, there is no statistical analysis provided in spreadsheet format which would allow the reviewer to check the analysis provided.

Reviewers Recommendation:
1. Provide the statistical analysis from section 3.3 of the Full HCS report in spreadsheet format. A statistical analysis spreadsheet has been done over the 11 plots that fell within PT KGP. There are issues with this as in one spreadsheet BM has 5 plots in another spreadsheet BM has 4 plots so the data is inconsistent. Also the data is not consistent with the analysis in the report that used the data from all the companies in the ANOVA (not just the 11 plots within PT KGP)

D	E
Carbon (Ton/ha)	**Stratifikasi hasil Inventory (berdasarkan kerapatan karbon permukaan tanah)**
30.156	BM
27.077	BM
24.779	BM
16.328	BM

	A	B
1		
2		
3	**Sum of Carbon (Ton/ha)**	**Column Labels**
4	**Row Labels**	**BM**
5	BM.1	76.311
6	BM.2	30.156
7	BM.3	27.077
8	BM.4	24.779
9	BM.5	43.815
10	BT.6	

In one spreadsheet BM has 4 plots and in another BM has 5 plots - so the data is inconsistent.

2. Provide the HCS plot data in one single spreadsheet with all the calculations able to be viewed.

A spreadsheet has now been provided.

Company Responses:

1. Statistical analysis and HCS plot data has been provide in share point link

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

5.1. 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 land cover and plot location shapefile has not been provided. The patch analysis shapefiles have still not been provided.

Reviewers Recommendation:
1. Provide the plot location and land cover shapefile.

Company Responses:
Will Provide in the share point link

5.2. 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: The patch analysis and the PM data files were not provided. The patch analysis shapefiles have still not been provided.

Reviewers Recommendation:
1. Provide the patch analysis and the PM data files

Company Responses:
Has been Provide in the share point link (lampiran PM)

5.3. 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 and the PM data files were not provided. The patch analysis shapefiles have still not been provided.

Reviewers Recommendation:
1. Provide the patch analysis and the PM data files

Company Responses:
Has been Provide in the share point link (Lampiran PM)

5.4. 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:
The reviewer cannot see any connection between the "Gambar 14. Peta PM di PT. KGP" and the output of the PM process. Taking as an example the report for Desa Batu Payung Dua there is a map presented ("Gambar 22 Peta Penggunaan Lahan Desa Batu Payung Dua") which appears to be the output of the PM for that village. But the details of this map are not reflected in the Summary Report. The PM used for the Summary Report should bring together all the information from the all the PM reports to make decision making easier.
The final HCS map ("Gambar 17. Peta Areal HCS PT. KGP") needs to show all the conservation set aside areas. Currently it does not include the set asides from the PM or the HCV assessment.

All the conservation set asides that have been agreed upon in the PM are mapped in gambar 19. This needs to be integrated into gambar 17 – the final HCV / HCS map.

Reviewers Recommendation:

1. Update the PM maps so they show all the information that came out of the PM.

2. Update the final HCS map so that it shows the community set asides and the HCV areas.

3. Provide an area statement of the total conservation area and the total development area. Even in the full report it only mentions about the HCS forest areas *("Analisis patch mengidentifikasi tutupan lahan kelas HCS (HK1 dan HRM) seluas 271,14 ha, sementara kelas Non-HCS seluas 10.153,04 ha.")*. This does not include the set asides for HCV and community set asides.

Company Responses:

1. Please see Figure 19 in full report