

Updated: 20 December 2019



# HIGH CARBON STOCK APPROACH

## HCSA PEER REVIEW REPORT

*Company Name: PT. Globalindo Agung Lestari*

*HCS Assessment Area: 26,492.17 ha*

*Date: 10/02/2021*

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?**

Riyan Karida Pratama from Aksenta led the assessment.

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

Yes. Riyan Karida Pratama is a Registered Practitioner.

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

Yes. The team has 3 Registered Practitioners – Riyan Karida Pratama, Riswan Zein, Harry Kurniawan

- 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. Assessment prior January 2015.

## 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:**

The HCS Assessment has been reasonably well done. The company should focus on the guidance provided in the HCS toolkit. In many cases the write-up lacks detail and does not follow the toolkit even though the reviewer believes the work was done well. In the social section there is seldom adequate evidence provided.

**Reviewers Recommendation:**

Carefully follow the requirements of the toolkit. See the more detailed recommendations below.

#### 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 assessment team has the experience and qualifications required to undertake an HCS assessment. The lead assessor is an HCS registered practitioner. The GIS expert must be an HCS registered practitioner also – the report states “HCS assessor” for the GIS expert. Clarify that the GIS expert is an HCS registered practitioner.

**Reviewers Recommendation:**

1. Clarify that the GIS expert is an HCS registered practitioner. The company has stated (in this document) that the GIS expert is not a registered HCS practitioner. It is recommended that the GIS expert becomes registered before continuing with other assessments as this is a requirement of the HCSA.

Also, it should be clarified that the GIS expert was not a registered HCS practitioner in the report.

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:**

The report does not provide the reviewer with crucial information. The information required is the area of the concession that is already developed for oil palm and the company's development plans. i.e. does the company intend to develop more area? If so, how many hectares and which areas are ear-marked for development? Without this information, it is hard to review the report. If all the development has already taken place at the time of the HCS report, then this should be clearly stated.

**Reviewers Recommendation:**

1. Provide information about the company's development plans (if there are any). Even though the company has stated below that they have no plan to develop further areas, they also state that they are finalising GRTT. This seems contradictory, why is the company finalising GRTT if there are no further plans for planting.

## 2. Social Issues (4 hours)

*Please review Section 3 and Section 4 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 adequately represent and explain the community engagement, FPIC processes, and participatory mapping activities carried out?

### **Finding:**

Section 3 of the report is an overview of the contents of the SIA and AMDAL (EIA). There is some mention of community engagement / FPIC in this section relating to the SIA (socialization of the company's plans, land acquisition, recruitment of workers). It only states that these activities were undertaken. There is no detail / evidence at all provided.

Section 4 of the report provides information on community engagement, FPIC processes, and participatory mapping. The information provided is quite good but lacks detail. It appears that this may be summarised from a Land Use and Land Tenure Study done as part of the HCS Study – if so, the full LULT Study should be provided. Furthermore, the PM map in the summary report (Fig 4.10) and the shapefile of the PM provided are different. (e.g. the area to the NW of the concession in fig 4.10 is “open land” and in the shapefile it is “Hutan Lindung”)

### **Reviewers Recommendation:**

1. There must be information and evidence provided regarding how the company met each of the requirements of SR 7 (FPIC). See HCS TK module 2. Whilst the company has stated that they have evidence of each of the requirements of SR7, these have not been provided to the reviewer. Furthermore, the requirements of SR7 are very far reaching e.g. “Prior to negotiations, developers and communities agree in advance to the procedure to be used for sharing information, discussion of development and conservation options, and negotiation. Developers shall respect communities’ culturally-preferred methods of negotiation and decision-making.” For requirements such as this the company must provide documentation of the communication procedure and how agreement has been met. There are multiple requirements in SR7 that extend beyond PM and FGD.

2. Regarding Community Engagement and Participatory Mapping; HCS TK module 2 -sections SR2,3 and 7 documents the requirements of these processes. Information and evidence must be provided about how Community Engagement and Participatory Mapping were undertaken to fulfil these social requirements of the HCS process. There is information provided about how Community Engagement and Participatory Mapping are used for confirming the areas for livelihoods. However, there are many requirements such as “Developers also respect the right of parties to choose their own independent legal counsel or other advisors to guide them through negotiations.” These have not been mentioned.

3. In addition to what has been provided in Section 4 (which is good information), the company should state when the PM took place. Was it done on a community x community basis or done with large meetings and who was involved and whether they had the right to represent the whole community? The company states that this has been provided in table 3.3, but there is no table 3.3 in the HCS report.

4. Provide consistent PM datasets (fig 4.10 and the PM shapefile). The reviewer accepts the information provided below by the company – in future it would be useful to explain anomalies and methodologies used. This is important because if there is a large area of forest, one would expect it to be utilised by the community. Clearly it cannot be used by the community if it is only a burnt area.

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

**Finding:** In section 4.1 of the summary report there is a very good description of land tenure.

**Reviewers Recommendation:**

1. Include in the summary report a table of which villages are transmigrant villages and which are original villages (desa asli). There is no table 3.1 in the HCS report.
2. Mention if all the areas were involved in the PLG because there are only a few areas mapped as peat by the company. Addressed below.
3. Add information about how land is inherited in the area. Information is provided below about the indigenous people – but more information was expected e.g., about how Dayak people use a system of ownership based on rivers, whether the land is divided equally between the deceased’s male and female children etc... Furthermore, there is no mention of inheritance in the transmigration villages.
4. Add information about the process of land sales. There is some information provided but the reviewer was expecting information about how land ownership documents are transferred and the role of the Kepala Desa office in the process.

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 a good discussion in section 4 of food security. It states that the staple carbohydrate that is eaten in the area is primarily rice. The area does not support rice cultivation, as such, all the rice is bought – some of which is government subsidised. It is explained that this area is basically a cash economy that relies on income derived from the oil palm plantations to buy food from elsewhere.

In the participatory mapping there is a category “Kebun Masyarakat” – though when compared with the satellite image and landcover map. The Kebun Masyarakat is actually forest area or rubber, not a place for growing food.

It would be better to differentiate a land use category for food security (i.e., where food crops are grown)

There is a shapefile of a participatory map, but no information is provided about it (e.g. what date it was done, who was involved in the process, how was its accuracy verified). Comparing the PM with the satellite image provided it doesn’t seem to be very accurate, for example, there is a large area to the north-west of the plantation which is labelled as “Hutan Lindung” but in the image it is a large burn scar. Furthermore, the shapefile of the PM is different from the PM in the Summary Report (Fig 4.10). The PM in the summary report appears to be more accurate, but fig 4.10 is too small to be reviewed.

**Reviewers Recommendation:**

1. Please submit information related to a land use map and future garden areas. This should be consistent with SR3 and SR 5 (HCS TK module). Information provided by the company below.
2. Also, Advice Note 1 section 4 details additional requirements relating to garden areas. Information provided by the company below.
3. Provide information on the PM – e.g., methods, timing, who was involved, definitions of the land use categories. Ensure that the PM meets all the requirements of HCSA. This should be described using the guidance in Appendix 3 of the HCSA Implementation Guide. The reviewer accepts the information provided by the company on PM. However, the reviewer encourages the company to read Appendix 3 of the HCSA Implementation Guide as a more complete write up the PM process should be provided.

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:** A list of “affected communities” has not been provided. There is mention of consultation with communities as part of the SIA process. The SIA is one step in the FPIC process. The SIA was done in 2013 whereas the HCS assessment was done in 2020, so the data in the SIA is quite dated. Within the SIA there is evidence provided of consultations in the Appendices. Though the only community members that were consulted were the Kades and Sekdes, not the wider community.

At the time when the HCS report was produced it appears that most of the concession was already converted to oil palm except for areas in the north and it is unclear whether the company had further development plans.

**Reviewers Recommendation:**

1. Provide a definitive list of “affected communities” and describe how these have been determined. Addressed below – although it appears the company means table 4.1 not 3.1.
2. Provide records of consultation with the affected communities. This should be beyond the SIA process, which appears to be focussed on collection of data from the communities. It does not cover socialisation of HCSA for example – primarily because the SIA pre-dated HCSA. There is no table 3.3. There is some information about FPIC in table 4.9 also it appears there was some information provided about HCS by the statement in this table “Masyarakat mendukung rencana kerja dari tim PT ALZ untuk melakukan kegiatan penilaian HCS di areal izin lokasi PT. GAL” – however, more information could have been provided about what was mentioned to the community about HCSA.
3. Describe the processes of FPIC and the socialisation of the HCSA. A textual description of this process must be supported by evidence (e.g. Minutes of Meetings and attendance lists). There is no Appendix 3.5 in the report as mentioned below.
4. Describe how the community nominated its own representatives. A textual description of this process must be supported by evidence (e.g. Minutes of Meetings and attendance lists). An adequate description is provided below.

- 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 no information provided about future plans for further development of the plantation. There is no information provided about the right of communities to reject development and get independent legal representation.

**Reviewers Recommendation:**

1. State whether the company has future development plans. Mentioned below that all development has been completed in the area.
2. If the company does have future development plans explain the process of socialisation about the right of communities to reject development and get independent legal representation. Not relevant.

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

**Finding:** Already mentioned above.

**Reviewers Recommendation:**

Provide the information mentioned in 2.1 – 2.5. Addressed above.

3. Ecological and Conservation Values (4 hours)

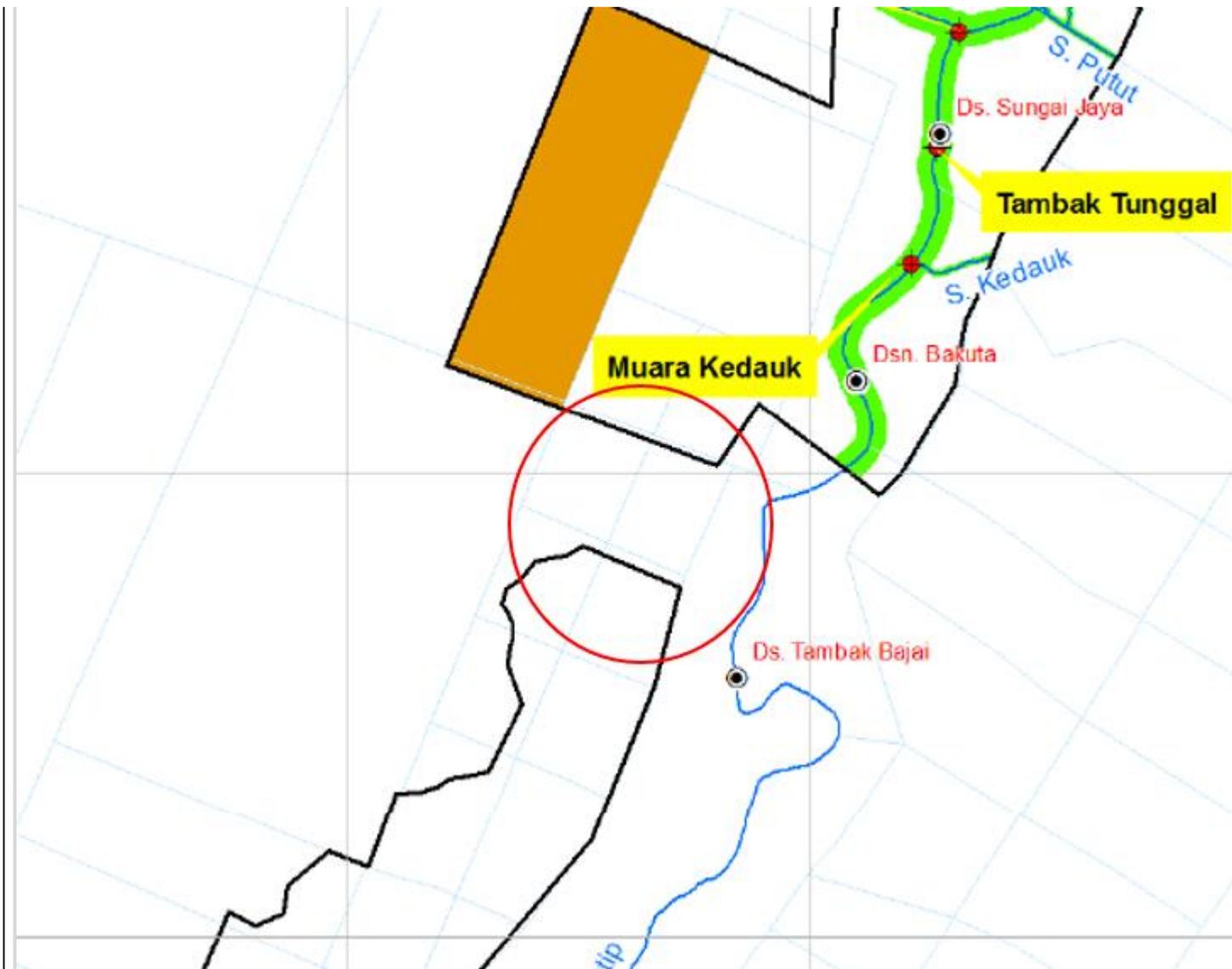
- 3.1. Does the summary provided in Section 5 of the Summary Report adequately represent the findings of the HCV study?

**Finding:** Section 5 of the report presents an area statement of the area x HCV as well as the management and monitoring recommendations from the HCV report. No map of the HCV areas is provided. Although a shapefile of the HCV area is provided, but this has a total area of 744 ha, compared with the total HCV area of 3,432.32 ha in table 5.1 of the summary report.

The HCV report was completed in 2014 (so is a bit dated). So, it would be good to see the development that took place between 2014 -2020. Additionally, the HCV study was done over different areas from the HCS study. Therefore, there will be areas within the HCS study that were not covered by the HCV study.

**Reviewers Recommendation:**

1. Present a map of the HCV areas. This should reconcile the area of the HCV and HCS study and show areas that were in the HCSA but not in the HCV study. A map of the HCV areas is presented in Gambar 6.1. However, this does not show the areas that were in the HCS study but not in the HCV study. For example, the area indicated with the red circle below.



2. Show the extent of land development between 2014 (when the HCV report was completed) and 2020 (when the HCSA took place). The map provided in Lampiran 2 shows that there has been very limited development after the HCS study.

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 HCSA 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 done in 2014 – so it pre-dated the ALS.

Only a Summary HCV Report has been provided. There is no information on the site description, the analysis of the landscape and national or regional context provided, so the reviewer cannot comment on this. The methods read about how to do “an” HCV assessment rather than the methods employed in “this particular” HCV assessment. So the method information is too general for the reviewer to make any valid comments.

The HCV report has subsequently been provided.

**Methods:** This section was extremely general and provided information about how to do “an” HCV assessment rather than discussing the exact methods employed in this particular situation. There was nothing in the text that seemed incorrect, but the reviewer would have liked to have seen “assessment specific” information (e.g. where the biodiversity surveys took place and reason why these locations were selected, villages that were surveyed (who took part) and questionnaires that were used).

**Site description:** This section provides a comprehensive background

**HCVs 1-4 :** The identification of HCVs seem to be reasonable. However the reviewer noticed a number of issues – for example Shorea balangeran is listed as HCV 1.2 which is for IUCN:CR but Shorea balangeran is IUCN : VU. The assessor mentions a Lampiran fauna which is not included – definitely there will be Manis javanica at this site which is IUCN : CR – which is not mentioned in this section. HCV2 – no HCV 2 was identified. HCV3 – even though the flowchart in fig 5.24 shows analysis at the ecosystem level. The analysis appears to be done at the biographic region level, which gives an incorrect result. In this area the reviewer would expect the forested areas remaining to be classified as HCV3 (given the extent of deforestation caused by the mega rice project). HCV4 – not all the peat areas were identified (note the difference in the peat areas between the HCV and HCS reports). Only one of the canals

has a buffer on it – while there are many canals in this concession. It needs to be justified as to why none of the other canals require buffers.

Regarding the HCVs 1-4, only a list of the HCVs and the extent of the HCVs is provided in the report. The assessor cannot really make any comment because no information is provided on the methods for identifying HCVs and the associated results of the field survey which lead areas to be identified as HCVs. A couple of points have caught the reviewer's eyes. These are – only peat > 3 m deep has been identified as HCV 4 – which is not consistent with the Indonesia HCV TK. Also, only 1 canal has been identified as being HCV, whereas there are many canals in the area, so why has just one canal been identified as HCV?

**Reviewers Recommendation:**

1. Provide the full HCV report. This has been provided
2. Include a map of the HCVs in the summary report. The report has been updated but the HCV map is labelled “Gambar 5.1. Hasil sketsa pemetaan partisipatif dalam bentuk spasial” – it is recommended that the label be corrected.
3. Provide a reconciliation of the area of the HCSA and HCV assessment, this should highlight the area in the HCSA that did not have an HCV assessment over it. It is explained that there are changes in boundaries between 2014 – 2020, this results in areas not being covered by the HCV assessment that are within the HCS assessment. This should be explained in the patch analysis.

- 3.3. Please review Section 8.2 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:** It is stated that no pre-RBAs or RBAs were done because all the HCS patches overlapped with HCV areas. Consequently, there was no need for the RBA – the reviewer agrees with this method.

**Reviewers Recommendation:**

No recommendations.

3.4. Are the forest conservation management and monitoring activities outlined in Section 9.1 adequate? Do they take into account forests and protected areas outside the concession?

**Finding:**

No forests outside the concession have been mapped, although based on the land cover map there will only be small areas that fall into this category. Nevertheless, they should be mapped and included in the HCS area.

The management and monitoring recommendations are quite general, though they are probably a good starting point.

**Reviewers Recommendation:**

1. Provide details on the areas that have already been planted and are peat areas (therefore HCS). Will these areas be replanted? HCSA does not appear to have a policy on replanting of peat areas so how will the company address this issue? No further comment.
2. The HCS forest areas – will the company pay GRTT on these areas so they can be protected and have sign boards put up. It is assumed that the company cannot put sign boards up in front of areas that have not had GRTT paid. The HCS report has been updated.

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 AOI was the concession plus a 3 km buffer around the concession. This exceeds the minimum requirements of HCSA (1 km buffer). Therefore the AOI has been correctly identified.

**Reviewers Recommendation:**

No recommendations

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:** A good image is provided with minimal cloud cover dated 17 Nov 2019. This is within the time frame allowed by HCS – the study began in January 2020.

**Reviewers Recommendation:**

No recommendations

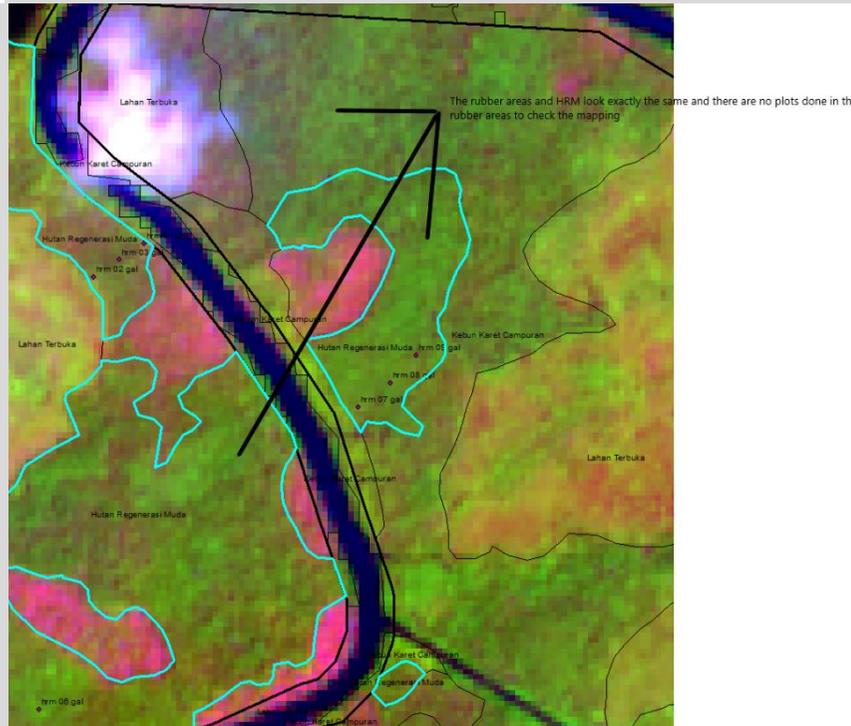
4.3. Please do a quality check using the images provided in 6.2. Was the initial vegetation classification done properly? Do the land cover areas in the tables in Section 6 look reasonable? Are there any obvious errors in classification?

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

**Finding:**

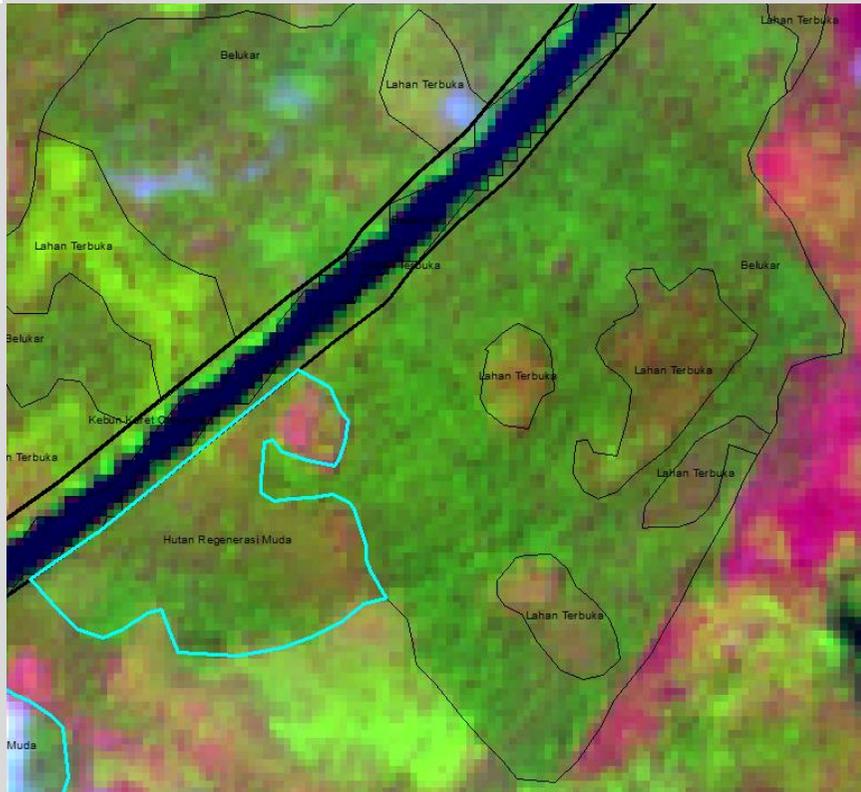
Most of the concession is already developed. However, there are some areas in the north that are mapped as rubber, but look the same as the HRM. Furthermore, there are no plots done in the mixed rubber areas to (1) confirm the quality of the mapping and (2) to ensure that >50% of the BA is rubber

and there for not HCS forest.



There are other areas further south (snapshot below), where the Belukar and HRM look exactly the same. In fact on Earth the Belukar looks to be

thicker forest.



**Reviewers Recommendation:**

1. Review the areas of belukar and mixed rubber with, at a minimum, ground truthing plots. The data (shapefiles) has been updated to show the areas shown above as HRM. The report has been updated
2. Provide data and locations of the in-field ground truthing plots – these are required (“The collection of a sufficient amount of in-situ ground truthing samples is mandatory to assess the accuracy of the final land cover classification” pg 16 Module 4). The reviewer acknowledges that it is very difficult to differentiate forest from mixed rubber from satellite images.

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:** The method for calculating how many plots are required is explained in table 7.1. This follows the approach used in the toolkit. The way of measuring the plots also follows the methodology described in the toolkit.

**Reviewers Recommendation:**

No recommendation

- 5.2. Please review Section 2.1 of the Summary Report. Was the forest inventory team qualified?

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

**Finding:** There are 2 HCS registered assessors in the forest inventory team. Also, it states that these two people have 10 years experience working on similar assessments. This should be adequate.

**Reviewers Recommendation:**

No recommendation

5.3. Please review Section 7.6 of the Summary Report. Was the allometric chosen adequate?

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

**Finding:** The assessor uses Ketterings et al 2001 equation. The assessment is based on mainly pioneer species - Ketterings equation appears to be formulated for pioneer species. The only reservation the reviewer has is that Ketterings formulated the equation based on a very small data set (31 trees) and therefore lacks the robustness of Chave.

One minor note is that the company has incorrectly identified *Melaleuca leucadendra*. Whereas the species would be *Melaleuca cajuputi* in Kalimantan.

**Reviewers Recommendation:**

No recommendation

5.4. Please review Sections 7.3, 7.4, 7.5, and 7.7, 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:** The C stocks described in table 7.3 appear to be roughly what one would expect from the forest class in Kalimantan. The calculations appear to be correct, though the way the company has formatted the data makes it difficult to check – every plot is on a different sheet, rather than putting all the data in the same sheet which would enable pivot tables to be done and subsequent analysis.

As another point the plot naming convention used in the spreadsheet (e.g. HRM\_GAL\_1-1) is not used in the shapefile of plot locations.

The key difference is between Belukar (scrub) and HRM(YRF). The company states that the Scheffe test finds that there is a significant difference between Belukar and HRM which this is the case. The Scheffe Critical Value =  $2.94 \times 3 = 8.84$ .  $F_s$  for Belukar and HRM = 54.6 which is greater than 8.84, therefore the difference is statistically significant.

**Reviewers Recommendation:**

1. Please use the same plot naming convention on the shapefile as the spreadsheet. The plot naming convention has been updated appropriately. The reviewer can now link the data in the spreadsheets with spatial locations.

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

- 6.1. Please review Section 6.4 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 HCS plots have been used for calibrating the land cover map. However, no data from the ground truthing points has been presented.

**Reviewers Recommendation:**

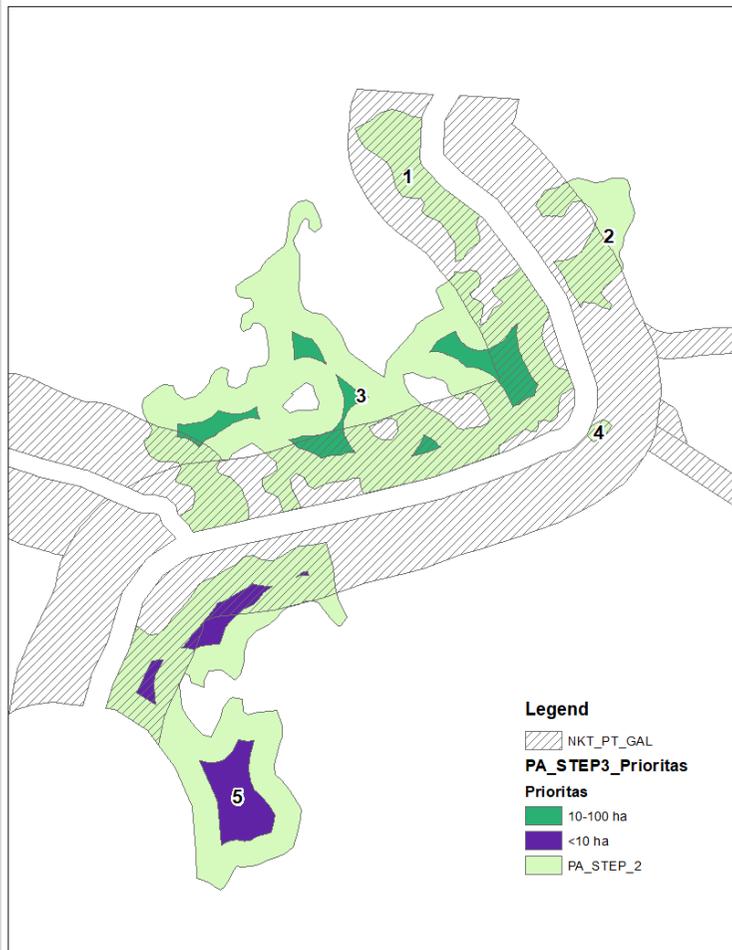
1. Present the data from the ground truthing points. The reviewer could not find any data on the ground truthing points. For example, table 6.5 includes 66 ground truthing points. The reviewer was asking for a point file of their locations.

6.2. Please review Section 8 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 closest thing to Community Lands in the PM is “Kebun Masyarakat” – which based on the land cover mapping appears to be rubber or even forest areas. It doesn’t make sense that these are enclaved. The PM does not seem to have delineated any areas that are community subsistence garden areas. From the information provided on food security, the communities are completely reliant on the cash economy to earn money and purchase in food from elsewhere. Any agriculture that is undertaken appears to be incidental rather than crucial. As such no area is enclaved in step 1. However, step 1 also requires setting aside peat and HCV areas. No shapefile of peat areas is provided.

Regarding the patch analysis. Using patch 5 as an example (see map below), the company has stated that the whole of patch 5 is to be conserved because it overlaps with HCV area. However, it is only the area of patch 5 that overlaps with the HCV area that should be automatically conserved. Low and Medium priority patches have to enter into step 4 and beyond.



**Reviewers Recommendation:**

1. Provide a shapefile of the peat areas. The peat areas have been provided
2. Undertake the full patch analysis for patches 2,3,5,6, 7 and 8. The patch analysis has been completed for these patches.

- 6.3. Please review Section 8 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:** See the discussion in 6.2.

**Reviewers Recommendation:**

No further recommendations

- 6.4. Please review Sections 9 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 an already developed estate this is difficult to do as there are few options available. However, the company appears to have identified areas for conservation. It is not clear though how areas that have been planted with oil palm and are now identified for conservation will be managed moving forward.

**Reviewers Recommendation:**

1. Clarify how oil palm areas planted on peat will be managed in the future. Will they be retired and restored to forest? No further comment.