

HIGH CARBON STOCK APPROACH

HCSA PEER REVIEW REPORT

Company Name: Genting Plantations Berhad

HCS Assessment Area: 6,612.09

02 March 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. Aidenvironment led the HCS assessment.
- b) Was the HCS Team Leader a Registered Practitioner?**
Yes. Adriani from Aidenvironment is the Team Leader.
- c) Were at least two (2) HCS team members Registered Practitioners?**
Yes. Adriani and Haryono are in the HCS team.
- 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>).**
Yes. 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:

For the social element of the HCS assessment, far too little information has been provided to provide a meaningful review.

For the biodiversity element, the reviewer has reservations about the quality of the land cover mapping (which is crucial to the HCS assessment). Data is provided about late secondary species being present in areas that are mapped as scrub (belukar), furthermore there are many tree species rated IUCN: VU or above in these areas. There are many plots marked as mixed rubber with either no rubber or <50% of the BA being rubber.

There are major differences between the land cover use for the HCV assessment and the HCS assessment with no reconciliation or explanation provided.

Reviewers Recommendation:

Recommendations relevant to the aforementioned points are made below and not repeated here.

The reviewer still believes that the HCV assessment needs to be revisited based on the findings of the HCS assessment where there are many areas with IUCN species – some IUCN:CR (e.g. *Shorea accuminatissima*) which are not in HCV areas. The company has stated that they have reviewed the findings though have made no changes nor described the reason for not making changes.

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:

There were two team members that were HCS registered practitioners that were part of the team (including the team leader). Though it does state that

the GIS specialist must be an HCS registered practitioner “For each HCS assessment team, the team leader and one GIS specialist, at a minimum, must be registered practitioners.”

Reviewers Recommendation:

1. For future assessments ensure the GIS specialist is an HCS registered practitioner.
2. Include a short biography of the main team participants in the annex.

A short biography has been added.

- 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:

There are significant gaps in the social element of the HCS assessment. If the social work has been completed, the associated reports have to be attached. The landcover mapping does not match with the plot data provided.

Reviewers Recommendation:

1. Attach associated social reports that are required as further evidence.
2. Remap the landcover so that it matches the plot data provided. Alternatively, if the company stands by the landcover mapping considerable ground truthing evidence must be provided.

Additional information on FPIC and food security has been added. Though not all the HCSA Social Requirements have been addressed.

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:

There is mention of FPIC being undertaken June – July 2019, however no accompanying FPIC report has been provided.

For FPIC it describes how the company formed a working group that included all layers of the community. This involved representatives from 3 villages and also the local government.

Participatory Mapping (PM) was based on a sketch map where the participants were asked to indicate the locations used by residents to cultivate crops as a source of livelihood, boundaries of the concession PT. AAC, village administrative boundaries, meet basic needs and other land uses. The output is Gambar 3.1, which shows the land cover within the concession and the community land.

It is stated clearly that the purpose of these activities is to facilitate the land acquisition process (*Ganti rugi lahan*).

The HCSA Social Requirements – particular SR7 (FPIC) – describes the basic requirements of the FPIC process. The company must ensure each of these requirements have been undertaken and they are adequately documented. The description of the FPIC process has been strengthened with the resubmission of the HCS report. However, it is very focussed on the land acquisition process and does not describe the requirements of SR7 – for example a discussion of the outcomes of the HCV and HCS processes and the proposed management has not been mentioned.

Photos of meetings with communities have now been provided as well as a table discussing the main points that were raised at the meetings.

Reviewers Recommendation:

1. Please provide the FPIC report which was the output of the FPIC process (mentioned in table 2.2). The company needs to describe how its community engagement policies and procedures are structured. Providing links to community engagement policies and procedures. In the revised report there is mention of an FPIC policy in Lampiran 2 but Lampiran 2 is empty. Please provide the FPIC policy.
2. Based on the above, show how FPIC was implemented. Currently it reads like it was based on a single PM study rather than a series of engagements that took place over time. This should ideally be done by presenting a timeline of engagements with evidence such as meeting minutes and attendance lists in the appendices. Particularly showing how the suggestions from the community were used in developing a conservation plan. A discussion of how the FPIC represented a series of engagements has now been provided. However, the description of the meetings in Tabel 3.2 appear to be totally focussed on organising the land acquisition process.
3. Provide a village map and describe how the “potentially affected communities” and “affected communities” were determined. A village map has now been provided (Gambar 3.1) as with a discussion of how the affected communities were determined.
4. Ensure each of the requirements of the FPIC process (as described in SR7) have been undertaken for each of the affected communities. These must be adequately described in the FPIC report. Participatory mapping is now described but most of the requirements of SR7 have not been covered.

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

Finding:

Currently there is no reference to a land tenure assessment¹ in the summary report. The full report and the summary report appear to be the same documents?

There is no discussion of land tenure in the SIA.

With the resubmission there is mention of land use, though in considerably less detail than is required for a land tenure assessment. There is some mention of the pattern of land ownership though not in great detail.

Reviewers Recommendation:

1. Provide a land tenure assessment that fulfils the criteria specified in SR1 (Social Knowledge). Even with the resubmission, the reviewer believes considerably more detail has to be added to fulfil the requirements of SR1. E.g. there is no mention of current or potential land conflict and how this can be avoided.

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:

The output of the PM process is provided. This is gambar 3.1 in the Summary Report. Though the process to develop the PM was not consistent with Appendix 3 of the HCSA Implementation Guide (IG). The guide suggests that a base map is prepared based on topographic maps or satellite images. This map should have key geographical features on it as well as legal boundaries. There is no mention of a geographically referenced base map being used.

Additional information from the IG is :

“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).”

“additional information may be noted down, including who has authority over lands, how lands are acquired, inherited and transferred, and any customary

¹ The Social Requirements of the HCSA Toolkit state “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.”

or informal rules related to access to and use of natural resources”

The IG is a guidance, not a requirement, but it does not recommend sketch maps because it is impossible to accurately translate a sketch map into a geographically referenced PM.

There is no mention of the calculation of the minimum requirement of 0.5 ha / person for garden areas.

Reviewers Recommendation:

1. In the future follow Appendix 3 of the IG which suggests using a satellite image or topographical map as a base map for mark-up by the community.
2. Follow HCS Advice Note 1 section 4 regarding “Local people’s lands for food security”, particularly ensuring that the minimum requirement of 0.5 ha / person for garden areas is discussed. This Advice Note also documents information relating to food security that must be provided. With the resubmission information has been provided relating to food security. However there is still no calculations of the minimum requirement of 0.5 ha / person in comparison with the population.

- 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:

There is a record of the consultation with three communities (Desa Enggadai, Desa Baru Lombak and Desa Bagan Asam). However, these are not defined anywhere as the affected communities.

There is mention of the community members electing their own representatives “Dalam rangka untuk memulai pembukaan kebun sawit, perusahaan terlebih dahulu melakukan sosialisasi termasuk di dalamnya terkait dengan kompensasi lahan atau yang biasa disebut dengan istilah Ganti Rugi Lahan (GRL).”

Reviewers Recommendation:

1. Whilst there is mention of consultation with these communities, the only topic that is mentioned is ganti rugi (GRL). While GRL is an element of FPIC; the following Social Requirements have to be addressed during the Preparation and Assessment stages

SR1 Social knowledge

SR 2 Fair representation and agreeing a process for consent,

SR 3 Recognising land rights as a basis for ensuring just acquisition of land or of rights to land access and use

SR 4 Securing ecosystem services for communities,

SR 5 Securing livelihoods and local food security,

SR 6 Cultural diversity and identity,
SR 7 Free, Prior and Informed Consent
SR 8 Equitable incentive and benefit packages for conservation
SR 9 Management and monitoring of conservation areas
SR 14 Implications for communities of HCS swaps

Currently there is little to no (or not enough) discussion on any of these social requirements.

2. There is a general mention of PM and the formation of a working group. However, a discussion of the actual work (e.g. providing specific examples) that they did is required (this can be put in an Appendix). This should include the methods and results but also include minutes of meetings and attendance lists.

With the resubmission, additional information has been provided about food security (SR5) and FPIC (SR7), though the other social requirements have yet to be addressed.

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 information provided is not sufficient. At this stage here was no information provided about :

The communities' views being addressed and reflected in the plans and implementation of the plantation.

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.

Reviewers Recommendation:

1. This requirement should first be addressed in the company's policies and procedures (which should be in the appendices). With the resubmission, it is mentioned that the FPIC procedure is in the appendices, although this has not been provided. This should be attached.

2. Records of discussions with each of the communities. This should show a clear link between how their views are reflected in the plans and implementation of the plantation. Similarly, there should be records of the company stating that the community can say no to development at any stage

and recommending the community get independent legal representation. With the resubmission there are now records of consultation with the communities. There is one mention of an area being conserved “Secara adat pohon tengkawang dan buah durian adalah dilindungi, sehingga perusahaan perlu kehati-hatian dalam kegiatan LC.” Although this does not give the reviewer confidence that the community has been comprehensively consulted about areas that it wants set aside from development. For this reason, the reviewer believes that this discussion needs to be strengthened with more detail about methods of engagement. There is still no specific mention of the community being told they can reject development and this should be added to the report – if it was mentioned.

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

Finding:

At this stage there is so little information provided that it is difficult to make any additional recommendations. On resubmission, the company has added information about FPIC and food security. Though all the other social requirements should be comprehensively addressed.

Reviewers Recommendation:

1. Please provide the information listed in the previous sections. If this is provided the reviewer will be able to make recommendations.

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 map of the HCV area is provided along with a table with the areas by HCV. There is an extremely brief explanation in the foot notes regarding the values being conserved with each HCV.

Reviewers Recommendation:

No recommendation.

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 was judged satisfactory by the HCVRN. It can be accessed via the following link :

<https://hcvnetwork.org/reports/hcv-concession-area-of-pt-agro-abadi-cemerlang-sanggau-regency-west-kalimantan-province-indonesia/>

It is concerning that the HCS team found many IUCN:VU species or above in an area mapped by the HCV assessor as rubber or mixed agriculture (e.g. plots 2.1-2.5) and these areas were not marked as HCVA.

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 no information provided in the Summary Report about and Pre-RBA nor RBA. There is only a mention of steps 1 and 11 of the PADT with none of the intervening steps.

Reviewers Recommendation:

1. Provide information about the whole patch analysis process including the Pre-RBA and RBA processes and the logic and data used for making the conserve / develop decisions. This is particularly important as there is many IUCN:VU or above species listed in the plot data.

The key problem here is that the data provided and the land cover map are inconsistent. Based on the landcover map itself, there are no potential HCS forest areas in the concession or within the concession buffer. However the data present suggests otherwise, with areas classed as mixed rubber with no rubber trees or a very low percentage of the basal area being rubber.

- 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:

Gambar 10.1 does not map the forests inside the buffer. Therefore, the reviewer cannot make a link between the forests outside the concession and the M&M measures.

The M&M measures that are outlined are incredibly general. Ideally the measures that are outlined should be at a level of detail that can be directly used by a Sustainability Manager. For example – “Identifikasi ancaman terhadap area NKT seperti perambahan lahan, pengambilan kayu, perburuan, pembakaran lahan dan ancaman lainnya, serta tindakan mitigasi dan penanganannya.” - The areas of particular threat should be identified e.g. areas where logging was taking place. From there discuss how the company is protecting these areas, such as paying ganti rugi to the landowner in order to be able to protect the forest area. If ganti rugi has not been paid, the company could discuss other conservation measures they have agreed upon with the community.

Other examples are “Sosialisasi dan komunikasi dengan masyarakat sekitar mengenai batas-batas areal NKT, fungsi penting NKT, serta melakukan pengelolaan dan pemantauan secara partisipatif.” By the end of the survey the management and monitoring measures with the community should have been decided upon. There should be a description of how M&M will be done in conjunction with the community and what will be the priority areas – e.g. areas for rehabilitation.

Reviewers Recommendation:

1. The HCS forests outside the concession must be mapped and the M&M measures must be relevant to these areas also.
2. Provide a description of the M&M activities in considerably more detail. Actual activities need to be discussed and linked to areas on maps.
3. Reference agreements made with the community for collaborative M&M activities. This should be linked to minutes of meetings held with the community.

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 has been defined as the concession area of PT AAC and a 1 km buffer around the concession. This follows the guidance provided in the HCS TK.

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 image used was a Sentinel 2 image (10 m pixels) acquired 14 September 2018. Table 2.2 describes the HCS process being undertaken July – August 2019, therefore the image is within the 12 month window allowed by HCS.

The HCS TK also states “The data must be of a quality that is sufficient for the analysis with less than 5% cloud cover within the Area of Interest (AOI), with no or very minimal localised haze.” There is a large area of haze right across the AOI – the GIS classification algorithms would not classify correctly over this area. The image could have been augmented with a second image which is cloud free over the hazy area.

Reviewers Recommendation:

1. Provide a second image that is cloud free over the hazy area.

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:

It appears that all the natural areas have been classified as belukar (scrub) or mixed rubber. From the images canopy trees can be seen in the belukar. It has definitely been under-classified and should at a minimum be considered LDF. This is consistent with the species list provided in the plot data. There has been no accuracy assessment undertaken (as is required and described on pg 19 Mod 4 GCS TK).

Mixed rubber is very difficult to differentiate from natural forest. This requires a lot of in-field ground truthing plots to ensure the classification is correct. There is a significant difference between the land cover used for the HCV assessment and that used for the HCS assessment. Furthermore, based on the mixed rubber plot data <50% of the BA of plots is rubber and as such should be considered YRF (see table 1 Module 4 HCS TK). The company has stated

that the sample plot data used by the reviewer is wrong – but no correct data has been provided.

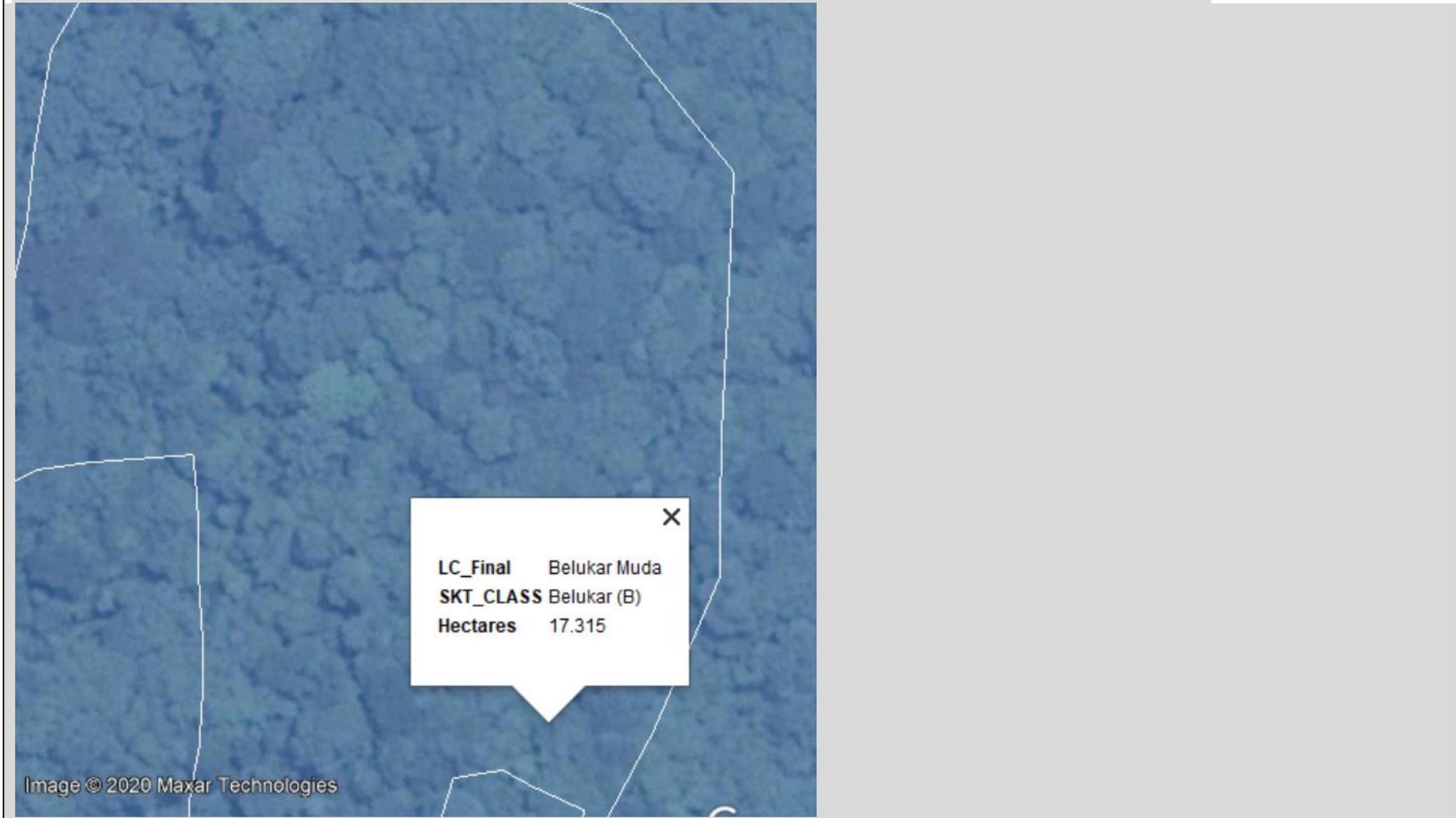


Figure 1. Canopy trees are visible in areas that are classified as scrub. This shows that the areas have been under-classified.

Reviewers Recommendation:

1. Undertake an accuracy assessment of the initial and final landcovers.
2. Use the HCS plots for ground truthing – after reviewing whether areas that were classified as belukar are in fact belukar.
3. Undertake ground truthing, especially focussing GT points in the mixed rubber areas.
4. Revisit the classification of plots that was undertaken in the field because there are some clear errors e.g. plots 12.1 and 12.3 which are classified as mixed rubber but there are no rubber trees in the plot. Also reclassify plots with <50% BA as rubber as YRF.
5. The shape file for the HCV assessment should be provided and a reconciliation made explaining why the 2 landcovers are significantly different.
6. Please provide the correct sample plot data.

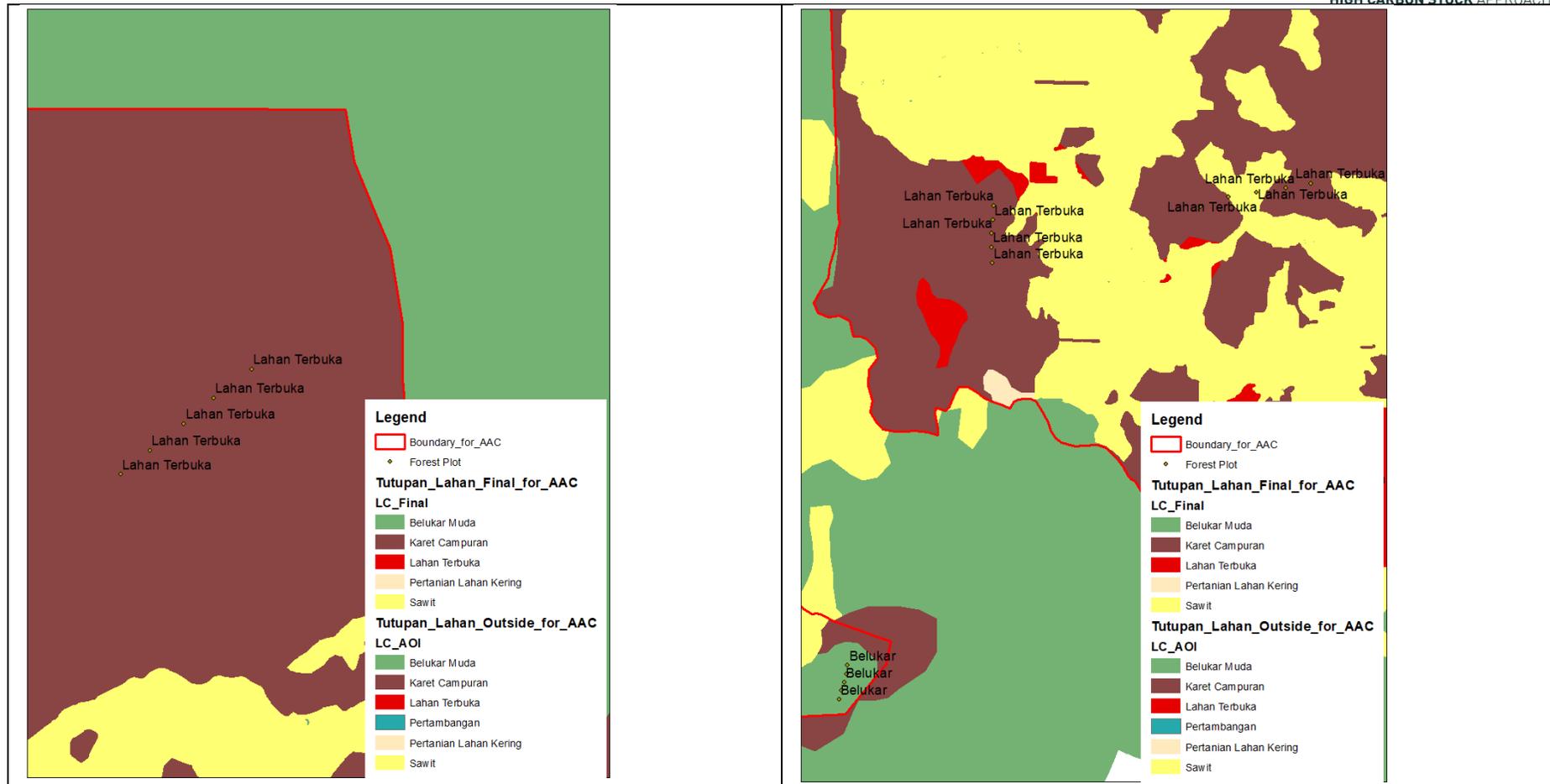


Figure 2. Areas classified as rubber but the inventory team has classified the plots as open land. The land cover should be updated based on the in-field ground truthing.

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 layout of the plots appears to follow the recommended approach described in the HCS TK

Reviewers Recommendation:

For the calculation of the number of plots required, provide the standard deviation that was used in the equation and state where this figure was obtained. Standard deviations have now been provided; the figures appear reasonable.

- 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:

The team leader is supposed to be a graduate forester. It is assumed this is the case because no qualifications are mentioned.

Reviewers Recommendation:

1. State the qualifications of the team leader. The qualifications of the team leader are stated in the annex, although it would be good to mention the key qualifications (required by HCSA) in table 7.2.

- 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.

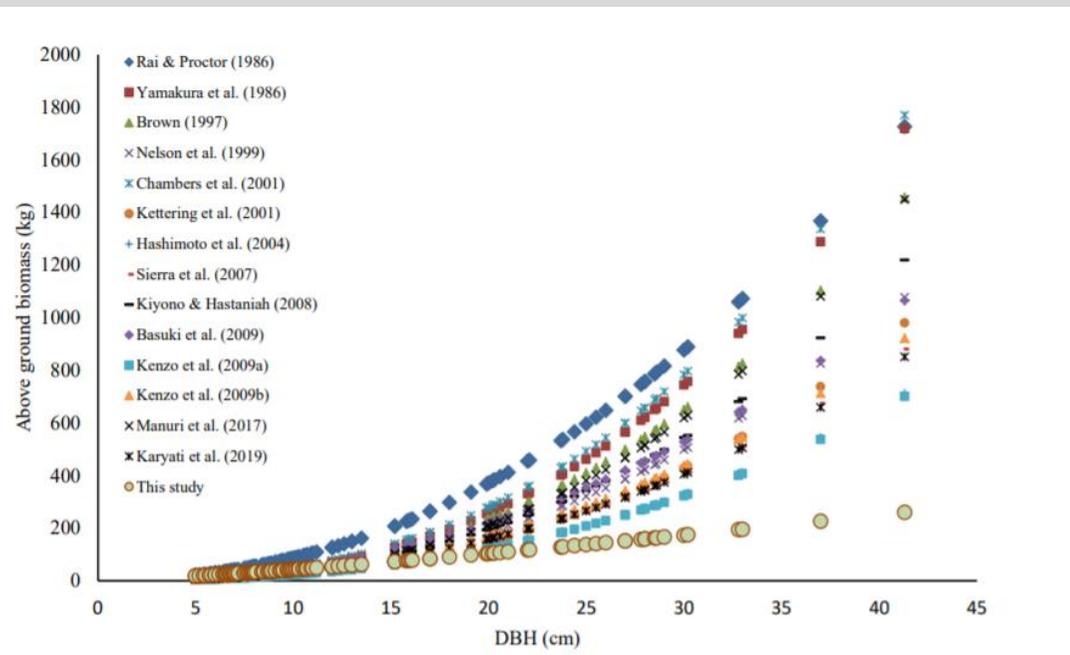
Finding:

The team used the allometric Ketterings et al 2001. This equation is aimed at calculating AGB in abandoned lands and uses a data set of 30 pioneer species. Figure 7 in the paper shows that the equation significantly underestimates AGB in comparison with 14 comparable equations. Ketterings data set is very small (30 trees) and based on pioneer species, whereas the species observed in this study range from pioneer through to late secondary species.

Reviewers Recommendation:

1. Provide calculations of AGB against more robust equations that have used much larger data sets for their formulation. HCS TK suggests Chave. A more recent Chave equation is available (2014).

The reviewer has never seen the Ketterings equation used before and given that it is built from a sample set of 30 trees; if it is widely used in Indonesia, this is concerning. This should be compared with Chave (2014) which uses 58 study sites and 4004 trees.



- 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:

The classification of most of the plots as belukar seems incorrect. The HCS TK defines scrub as “Land areas that were once forest but have been cleared in the recent past. Dominated by low scrub with limited canopy closure. Includes areas of tall grass and fern with scattered pioneer tree species. Occasional patches of older forest may be found within this category.” Whereas there are many plots with secondary species such as Shorea and Eusideroxylon zwageri – there is no way this should be classified as belukar. The belukar plots on average have 18 trees in them. This is a reasonably high stocking which would have canopy closure. 23 t.C / ha seems incorrect for belukar.

This is the same for Mixed rubber plots which have 30 trees / plot on average - 25 t.C / ha seems incorrect also for mixed rubber.

There is no AGB displayed in the Forest Plot Data spreadsheet to enable the reviewer to check the statistics.

Table 7.5 – Basal areas are far too high and need to be checked.

Reviewers Recommendation:

1. Present a comparison of the results using Chave 2014 and Ketterings equation. Present the AGB in the Forest Plot Data spreadsheet using both the Chave 2014 and Ketterings equations

2. Recalculate the basal areas in table 7.5.

It appears that the company has used plot carbon stock values to assign HCS classes. This is not consistent with the HCSA methodology which requires plots to be assigned their HCS class. The company should refer to the description of the methodology on pg 20 of HCS TK module 4 :

“Table 1 shows a general description of what land cover is expected in the different carbon stock classes. Note that the table includes qualitative factors that must be identified during the ground surveys.... Field assessment should take into account not only the conditions within the plot boundaries, but also in the areas immediately adjacent to the plot, when assigning vegetation classification.” So, plots should be classified based on in-field conditions not based on the carbon values after the measurements are complete.

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:

As shown in section 4.3 the land cover map has not been calibrated with the results of the HCS plots. Furthermore, given the plot data the reviewer questions the classification of all-natural areas as belukar (scrub). Based on the species mix, there are a lot of trees that cannot be considered pioneer species. This is supported by the presence of canopy trees in the satellite images (see example provided in section 4.3 of this review)

Reviewers Recommendation:

1. Revisit the mapping of the belukar and mixed rubber based on the HCS plot data.

The company has stated that the data has been revisited – but no new datasets or commentary has been provided.

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

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

Finding:

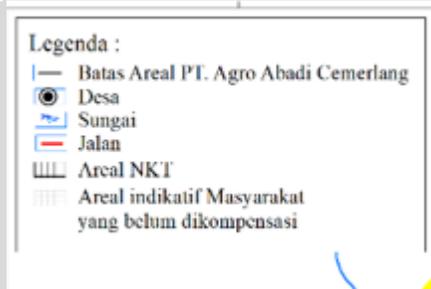
No patch analysis shapefile has been provided. The reviewer assumes that this is because the company believes there is no HCS forest. However, as discussed, the evidence presented in the forest plot data shows that a lot of the areas that have been classified as non-HCS forest should be classified as HCS.

No results of the PM have been included.

Reviewers Recommendation:

The results of the PM should be included in step1 of the Patch analysis.

In step 1 of the Patch Analysis the following legend is provided:



Areal indikatif masyarakat yang belum dikompensasi doesn't sound like community garden areas that, which based on the TK can be used in the give and take process. In the final map (Step 11) all these areas have been removed from the HCS area. This does not follow the TK.

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:

No Patch analysis data has been provided

Reviewers Recommendation:

Revisit the classification and of landcover and include the resulting patch analysis data

No results of the revisit have been provided.

- 6.4. Please review Sections 10.1 and 10.2 of the Summary Report. Were the final integrated conservation and land use planning steps completed to 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 company has used the HCV areas as the final conservation area for the ICLUP. This includes the riparian areas (HCV 1 and 4). The company maintains there is no HCS forest within the concession of within the 1 km buffer.

Reviewers Recommendation:

Provide information about the final ground verification.