

# HIGH CARBON STOCK APPROACH

## HCSA PEER REVIEW REPORT

*Company Name: Genting Plantations Berhad*  
*HCS Assessment Area: PT Kharisma Inti Usaha*  
*05 July 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, Remark Asia a Registered Practitioner Organisation led the HCS assessment.

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

Yes, Dwi Muhtaman is a Registered Practitioner leading the team.

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

Yes, Dwi Mutaman and Dwi Budi Siswantono are Registered Practitioners in the team.

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

Satisfactory.

## Questions for peer reviewers

*(Peer Review Panel: Neville Kemp)*

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

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

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

*Please refer to the peer review results in this report.*

**Finding: All aspects of the report have been presented well.** Social, environmental, impact and initial mapping aspects of the report are good. Calculation of carbon stock have been corrected and are good. A very small area of HCS has been identified and also covered under HCVA

**Reviewers Recommendation:**

The assessors and company have addressed all elements of the report. There are no further recommendations, actions or requests are required.

#### 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:** Registered practitioners of on the HCSA website.

**Reviewers Recommendation:** None

#### 1.3. What elements of the HCS Approach still need to be completed in order to create a final land use and conservation plan? Are there aspects which you feel need to be re-done?

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

**Finding:** No further corrections are required for this report. All elements have been completed satisfactorily and provide for a robust report.

**Reviewers Recommendation:** No further recommendations

## 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:** Yes. The report explains the process of community engagement for the HCS survey, participative mapping carried out and FGD held with the communities apart from the field HCS survey.

**Reviewers Recommendation:** No recommendations

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

**Finding:** KIU has been developed for some time (2008 onwards) so the assessment team carried out investigation to find out if the land was previously owned occupied by the community. The community previously used land on an informal basis for farming. Later land titles have been secured by the community for commodities such as rubber and oil palm. Very little of the area was compensated for during development. Much of the HGU area was swamp with no access before development indicating no formal ownership. The report notes that land tenure in the plasma areas need to be carried out again with care as much of the land has already been sold to investors outside of the area.

**Reviewers Recommendation:**  
No further comments

- 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:** Participatory mapping was carried out to identify community land use and areas of land held by the community. “Enclaved” areas are not part of the assessment. Food security and Land use has been described in the report

**Reviewers Recommendation:** No further recommendations

- 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:** FPIC was thoroughly conducted for the assessment and investigation about consent at the time of plantation development. No significant concerns were raised by the community representative engaged in the HCS survey. Community representatives also took part in the HCS surveys

**Reviewers Recommendation:** None

- 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 plantation has already been developed and no significant concerns were raised by the community. The report states that the community are in largely in favour of the company development although there are issues that need to be addressed to improve some social impacts such as developing specific access to Keladan plasma areas rather using village roads. Other recommendations do not affect the implementation plan and are more aligned with water management, road management and other CSR activities to mitigate any other social impacts.

**Reviewers Recommendation:** None required

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

**Finding:** None

**Reviewers Recommendation:** No additional 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:** Yes. A good summary and maps of the ALS satisfactory HCV report is provided.

**Reviewers Recommendation:** None

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 and has identified all HCVs that are likely to be present, identified threats and provided suitable management and monitoring recommendations for the company

**Reviewers Recommendation:** None

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:** The RBA and Pre-RBA Check were not carried out because all HCS identified areas in the PT KIU HGU were connected to or had High Conservation Value (HCV) identified.

**Reviewers Recommendation:** None

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:** Recommendation for HCV and HCS management are reasonable and include HCV and HCS to be excluded from the land development (No-Go) to be informed to the relevant stakeholders, strengthened protection and raising awareness with local communities to stop illegal logging in protected areas, socialization and communication with the surrounding community regarding the boundaries, and important functions of HCV-HCS, as well as participatory management and monitoring.

**Reviewers Recommendation:** None

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

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

*The HCSA Toolkit explains how the AOI should be identified.*

**Finding:** Yes. Perhaps a hydrological Unit approach could have been employed to include potential areas of HCS in the landscape but this would not have altered the results of the ICLUP of patches of HCS.

**Reviewers Recommendation:** None

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

*The HCSA Toolkit describes the expected quality of the images.*

**Finding:** A satellite image captured within 12 months of the survey was used with 10m resolution and no cloud cover over the AOI for accurate vegetation classification.

**Reviewers Recommendation:** None

- 4.3. Please do a quality check using the images provided in 6.3. Was the initial vegetation classification done properly? Do the land cover areas in the tables in Section 6 look reasonable? Are there any obvious errors in classification?

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

**Finding:** No obvious errors were seen in the initial vegetation classification. More questions are asked in the final vegetation analysis after areas have been reclassified.

**Reviewers Recommendation:** No recommendations

## 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 calculations for the number of plots required in this disturbed landscape, as well as the layout of plots considering difficulties of access and edge effect were considered and adequate in this case.

**Reviewers Recommendation:** No further recommendations

- 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: Yes.** Several members of the team were registered HCSA practitioners

**Reviewers Recommendation:** No further recommendations

5.3. Please review Section 7.4 of the Summary Report. Was the allometric chosen adequate?  
*The HCSA Toolkit provides more guidance on choosing an allometric equation.*

**Finding:** Yes. A suitable allometric equation has now been applied.

**Reviewers Recommendation:** No Further recommendations

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:** A simple but rigorous format for carbon stock estimates was represented. Scheffe test was carried out and, even though scheffe values were different the results of statistical difference had the same conclusion.

**Reviewers Recommendation:** No further recommendations

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:** Many areas were reclassified due to their assumed carbon stock in the report. Reclassifications are in-line with the carbon calculations and an adequate explanation has been provided.

**Reviewers Recommendation:** No Further recommendations

- 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:** Participatory mapping and results were used in the assessment. Enclaved areas are not included in the assessment as still belong to communities and therefore HCSA has not been applied in these areas.

**Reviewers Recommendation:** No further recommendations

- 6.3. Please review Section 9 of the Summary Report, and select a few sample patches to test that the Decision Tree was used correctly. Were the patches correctly identified as High, Medium, or Low Priority? Was the Patch Analysis done according to the HCS Approach Decision Tree?

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

**Finding:** Yes. Patch analysis was carried out correctly. Very limited HCS forest

**Reviewers Recommendation:** No Further recommendations

- 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:** All carried out correctly

**Reviewers Recommendation:** No Further recommendations