HIGH CARBON STOCK APPROACH

HCSA PEER REVIEW REPORT

Company Name: Genting Plantations Berhad
HCS Assessment Area: PT Sepang Intisurya Mulia
04 March 2022
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, PT Anugerah Lintas Zaman who led the HCS assessment is a Registered Practitioner Organisation.

b) Was the HCS Team Leader a Registered Practitioner?
   Yes, Kreso Dwi Santosa was the HCS Team Leader.

c) Were at least two (2) HCS team members Registered Practitioners?
   Yes, Kreso Dwi Santosa and Dandun Sutaryo were Registered Practitioners.

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 was conducted 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: In general, the HCS assessment seems to have done well. The plot measurement and patch analysis have also been done well. The major weakness with this assessment is the social section. The reviewer believes that the company has engaged with the community in an open and transparent way – however, the report lacks detail (only ever discusses methods – no findings or output are provided), which makes it difficult to review. This is discussed in more detail in the social section.

The other weakness is the HCV report, there was no HCV mapping done over the buffer around the concessions. Also a lot of the descriptions of the HCVs and the associated maps are lacking in detail. This makes it impossible for the reviewer to verify whether the mapping of the HCV is accurate or otherwise.

Ideally the HCS report and HCV report would be done at the same time in order that that the datasets are able to be merged to complete the ICLUP. Having the HCV report being done in 2014 and the HCS report being done in 2021 cause problems with comparability.

Reviewers Recommendation:
See the recommendations in the subsequent sections of this review.
The company has done a good job in updating the report in line with the reviewer’s recommendations.

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 2 registered HCS practitioners involved in this assessment. The rest of the team, based on their experience and qualifications in the short biographies in Annex 5 seem to be well qualified.

Reviewers Recommendation:
No recommendations

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 a few small things that need to be re-done. Some of the landcover mapping needs to be improved. Also there are several patches that were classified as “for development”, that based on the new ruling in HCS Advice Note 5 – these patches will be conserve as they are within 200 m of HCV areas.

The HCV assessment has not included areas in the AOI buffer (area outside the concession)– this means that riparian areas are not marked as “conserve” in the AOI, which leaps out as an anomaly. This should be stated as a limitation of the assessment. It is probably too late to improve the HCV assessment as this was done in 2014.

Reviewers Recommendation:
1. Improve some elements of the land cover mapping (described in the Image Analysis section).
2. Mark patches for conserve that are currently marked for develop (described in the final section).
3. Explain the limitations caused by the mis-match of timings caused by the two assessments.
All the requirements have been fulfilled.

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: In section 3 of the report there is no mention of the community engagement, FPIC processes, and participatory mapping that have been undertaken. Currently this section only mentions the social impact assessment and the broad contents of this report. On reading the SIA, it describes the work done by the SIA team to gather information about the society in and around PT SIM, which partly fulfils SR1 - “Developers shall conduct thorough and participatory research on the social, economic and political dynamics in affected communities in order to understand these as fully as possible. This research is compiled into a dossier of social knowledge that informs engagement and decision-making processes, and provides the basis for subsequent impact assessment. As such, it must be comprehensive, thorough and accurate.” Therefore, the SIA partly fulfils the requirements of SR1.

Section 4 describes the community engagement, FPIC processes and participatory mapping. There is a description of the methodology. The methodology appears to be complete. However, there is no evidence provided and the output does not reflect the description. For example, the participatory mapping method states “peserta FGD diminta untuk menunjukkan areal areal penting di areal PT SIsM terkait dengan pemanfaatan sumberdaya alam/hutan, areal bercocok tanam sebagai sumber mata pencaharian, lahan lahan penting yang ingin dilindungi, situs sejarah, warisan nenek moyang, batas batas areal konsesi PT SIsM, batas administrasi desa, dan areal areal penting lainnya yang sekiranya akan terkena dampak dari pembangunan perusahaan.” However, the reviewer has looked at the output of the PM which is a shapefile labelled “PM.shp” and the data in this is just a landcover map. There is no mention of historic sites, village boundaries or any of the other things that were said to have been mapped.

Four villages are listed in the SIA. In section 4 of the HCS report “PT. SIsM telah melakukan identifikasi terhadap desa desa yang memiliki keterkaitan dan berpotensi tekena dampak keberadaan perusahaan Prioritas penetapan sampling desa yang terkena dampak pembangunan PT SIsM didasarkan pada wilayah administrasi desa dan keterkaitan desa desa dengan areal izin lokasi.” Therefore the 4 communities listed in this section are defined as “Affected Communities”. A map of the village boundaries has been provided. Though it si not mentioned whether the BPS village boundaries and the villages’ perceptions of the boundaries are congruent.

Reviewers Recommendation:
1. Currently there is mention of the community engagement which was undertaken by the company and the FPIC processes. Only the methods are mentioned – this must be augmented by evidence (Minutes of Meetings and attendance lists). Furthermore relevant SOPs (FPIC and Community Engagement) must be referenced and provided as evidence. Appendix 1 has been added which provides details of meetings with the affected communities as well as attendance lists. There is a mention of discussion of the implementation if the HCS Approach for estate planning.
2. Participatory mapping is a necessary step – the methods for the PM that was undertaken to inform the social knowledge on the area must be described as well as the outcomes must be described. The participatory maps that were developed to fulfil SR3 must be provided as well as a description of how it
informed the HCS assessment. There is still only a discussion of the methods, no discussion of the outcomes. The reviewer was expecting to find commentary such as, “The community had a heavy reliance on hunting and building materials, as such the forest they identified as hunting and forests for building materials were identified as HCV5”. Only administrative boundaries have been marked on the map in Figure 4.2 (which is just a sketch map and HCSA requires a geo-referenced map).

Company’s Response: The report has been updated (page 29 and Map 4.2)
3. Provide the data mentioned in the PM – “SlsM terkait dengan pemanfaatan sumberdaya alam/hutan, areal bercocok tanam sebagai sumber matapencaharian, lahan-lahan penting yang ingin dilindungi, situs bersejarah, warisan nenek moyang, batas-batas areal konsesi PT SlsM, batas administrasi desa, dan areal-areal penting lainnya yang sekinanya akan terkena dampak dari pembangunan perusahaan.” There seems to be a miscommunication here. On map 5.1 it shows land cover with an HCV area in hatching overlying the landcover – but there are no areas marked out that show where the “situs bersejarah” or “pemanfaatan sumberdaya alam/hutan” are located. Potentially the information on the map could be strengthened with annotations and an associated discussion.

Company’s Response: The report has been updated (Map 4.2) page 30
4. In the report it is stated that the company has made various commitments relating to FPIC “Bagi perusahaan, pemberian informasi merupakan bagian dari komitmen terhadap transparansi untuk memastikan bahwa masyarakat paham resiko yang akan dihadapi di kemudian hari dengan menyediakan informasi yang relevan serta memadai.” References should be made to the relevant commitments (e.g. Sustainability Policy) which provide guiding statements for the activities of the company operatives in working together with the community. The sustainability policy has been added.

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

Finding:
SR3 states “The developer will engage with the local communities to carry out a land tenure and use study to understand how they own, control and manage their lands, based on literature, government data sets, participatory mapping and interviews with community representatives, men and women. The assessment should clarify, in particular, which institutions have authority over lands, and who controls how lands are acquired, inherited and transferred.”

There is no mention of a formal tenure study having been undertaken in section 3 or 4 nor is there any mention of a tenure study in the SIA. However, information about land tenure is provided in section 4.1.2. The section 4.1.2 does not describe the methodology for obtaining and verifying the land tenure information. There is no description of the land acquisition and transfer process. Also there is no mention of the impact of the spatial plan on land
ownership and land transfer.
Currently there is no map provided that shows which areas are in the company’s management control and which are under the communities’ management control. This is essential in order to see where the conservation areas are and know which party will be managing these conservation areas.

Reviewers Recommendation:
1. Provide information about how land use and land tenure information was acquired and verified. It says in the discussion that PM was used for identifying the “areal bercocok tanam sebagai sumber matapencaharian”. However, if you look at the marked up map, this information is not on the map. This raises the question, was this actually done? – maybe on another map?

Company’s Response: An explanation and map regarding HCV 5 has been added on pages 29 and 30. That the fulfillment of needs only comes from the SlsM area, only the fulfillment of protein and water needs. As for the fields, they are outside PT SlsM so they are not included in the HCV area.

2. Provide information about the land acquisition and transfer process. There is a description in 4.1.2, it could have been a bit more detailed. For example, it states that few people have a land title certificate. It could explain whether the company assists people getting a certificate or just pays ganti rugi for the land with no certificate (which sounds risky).

Company’s Response: It has been explained on page 22 that the company only performs GRTT on land that has HCS. Then, at the time of measurement, the company involved land owners, village officials, customs and communities bordering the seller to witness the measurements and accompanied by photos.

3. Show maps of the RTRWP and MoEF spatial plans and discuss the significance of these on land ownership. A map has been added of the RTRWP – no discussion of its significance has been added.

The report has been updated at page 12

4. Discuss the institutions that have authority over lands. There is still no mention of the institutions such as the Desa and BPN that administer the purchase process and issue land title certificates.

Company’s Response: It has been explained on page 22 that proof of community land ownership is generally in the form of a Land Certificate (SKT) issued by the Village Government.

5. Provide a map that shows the areas that are under the communities / company’s management control.

2.3. Is there a participatory land use map and does it contain the key components of community land use including the minimum requirement of 0.5 ha per person for future garden areas?
**Finding:** A land use map is provided in Gambar 4.6. Though this is a raw output and has not been digitised and attributed. A PM shapefile is provided but this is a land cover map that appears to be developed from satellite image interpretation (in fact it is the same file as the land cover map that is described in the image analysis section as being generated from a satellite image – not PM).

The HCS Implementation Guidance states the following features must be mapped:

“**The location of the communities.**

- The location and boundaries of the lands under different forms of legal or customary tenure and use, including areas that are used seasonally or in times of crisis (for example during floods, droughts or severe storms), forest gardens, fallow farmland, hunting grounds and gathering areas.

- The location of the proposed development, showing the areas of overlap with the above.

- Areas of critical importance to local communities for ecosystem services (HCV 4)

- Areas of importance for current and future livelihoods and food security (HCV 5), including farmland and areas used for hunting, fishing and collection of forest products.

- Historical, cultural or sacred sites (e.g. graves, ruins of former villages, ceremonial sites, sacred groves and other natural features) (HCV 6).”

Regarding food security – a good explanation of the food security situation has been provided, which explains that the community has made a decision to grow oil palm and import their food. This decision has to be respected.

**Reviewers Recommendation:**

1. Include all the features in the PM that are mentioned in the implementation guide. The features mentioned in the report have to be shown on the map, having textual discussion which mentions, for example there is a gravesite. This is not enough, the people taking part have to point it out on the map so that it can later be identified.

2. Provide an analysis of the Food Security situation based on section 4 of advice Note 1 – this requires:

   - Provide geo-referenced participatory mapping data on current land use in the assessment site.

   - Consider projected future changes in population and potential changes in livelihood choices and patterns. Document discussions with communities about future land-use and other resource needs.

   - Calculate the minimum amount of land to be allocated for food security based on the requirement that 0.5 ha of farmland per person shall normally be allocated for food production. The assessor should state the number of hectares necessary to meet this requirement based on population size. The assessor
must then provide a brief analysis of the feasibility of allocating the minimum amount of land for relevant populations. Discuss where a minimum land allocation may be (tentatively) allocated (e.g. in the AOI, adjacent with or overlapping with the AOI, and/or outside of the AOI). This should be linked to draft maps whenever possible.”

The only issue that has been mentioned is that each household has on average 4 people, which would require 2 ha of land. This information is not terribly useful. The assessor questions why the company didn’t use the population data in table 1-1 to calculate the land requirements. The other issues have not been addressed.

Company’s Response: The KK approach was used because the status of land ownership in the village around PT SIsM is owned by each family and not individually, so the family approach is used to calculate food security needs. Based on this approach, each KK with a total of 4 people needs 2 ha/H of land as food reserves. This has been fulfilled, because based on the explanation 27 each KK has a reserve of 2 ha.

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: In section 4 of the HCS report there is a general discussion of the methodology for consultation. This discussion is extremely general and no specific information is provided. The FPIC appears to be totally focussed on land acquisition – although there is discussion of the HCS Approach (i.e. that the study can go ahead). There is no mention of socialisation of the results of the HCS study and the possibility of setting aside community controlled areas for conservation.

There are no records of consultation provided (e.g. chronology of meetings, presentations, minutes and attendance lists).

There is a section titled “Organisasi Masyarakat” which provides good information about the institutions within each village, particularly for engaging with third parties, such as the company. Community representation is mentioned “1)Tahap Identifikasi para pihak yang berkepentingan. Identifikasi para pihak yang berkepentingan dilakukan melalui studi literatur terhadap dokumen yang ada sebelumnya seperti dokumen HCV dan SIA PT SIsM. Dari dokumen tersebut, kemudian dikonfirmasi kepada manajemen PT SIsM ketika opening meeting;” Clearly the community have been engaged but the description must include information about how the community members that were engaged in the HCS study were chosen by the community. If they were from the existing government bureaucracy – this would be adequate as these people have been elected to address issues of this nature.

1 Dari hasil FGD, masyarakat menerima dengan baik dan menyetujui dilakukannya kegiatan penilaian HCS di areal penambahan PT SIsM oleh tim PT ALZ. Alasan mereka adalah kajian HCS ini baik dan penting agar ada kehati-hatian bagi perusahaan dalam membuka kebun kelapa sawit di masa yang akan datang.
Reviewers Recommendation:
1. Provide records of community consultations (e.g. chronology of meetings, presentations, minutes and attendance lists). This should include exactly what was said about the HCS Approach. This is provided in Appendix 1.
2. Provide information about the socialisation of the results of the HCS survey and what was accepted by the community. Particularly with reference to setting aside community owned land for conservation and how the community has agreed to manage these lands so their values are not degraded. The reviewer was expecting to see a presentation that was delivered to the community regarding the results of the HCS assessment. However, in the discussion it states the community agreed to the outcome.

Company’s Response: This will be carried out by a public consultation regarding iCLUP when the current report is final

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 information provided that the community can say no to GRTT “PT SIsM memberikan kebebasan kepada masyarakat untuk bermitra atau tidak.” Once again there is no evidence provided in the way of letters or presentations given to the community as evidence of this statement. There is no mention of the communities’ views being addressed in the implementation of the plantation

Reviewers Recommendation:
1. Information needs to be included with the data that was obtained from the community and how this was taken into account regarding the development plans (e.g. old graveyards being set aside from development, often the community asks for river buffers not to be developed). There seems to be a miscommunication here, the reviewer was expecting the company to reference “specific points” that the community had raised during the meetings. For example, had the community specifically stated that they wanted an area conserved (e.g. river buffers) which was subsequently taken into account in the management plan.

Company’s Response: Based on the results of the FGD with the community, the areas identified as areas for meeting community and cultural needs were asked to remain protected and designated by the company as HCV areas. The consequence of this policy is that the area will not be cleared for oil palm and designated as a conservation area

2. A section needs to be included relating to the consultation with the community regarding the results of the HCS assessment and how this was received by the community. Whether the community had any input particularly to the conserve / develop areas. All that is said relating to Pangkalan Suka Village is “• Masyarakat mendukung rencana kerja dari tim PT ALZ untuk melakukan kegiatan penilaian HCS di areal izin lokasi PT SIsM”. To the reviewer, this is not terribly informative – this is the opportunity for the company to provide information on meaningful engagement they have done with the
community to initiate a land rehabilitation program. Details of the project should be provided as an example of this.

*Company’s Response:* The community in particular, Pangkalan Village likes to have a program for the rehabilitation of land around the river border. One of the collaborations that will be carried out is by providing seeds which will be carried out by the company.

3. Regarding employment issues – did the company make a commitment to prioritise local labour. This should also be mentioned. SOP provided.
4. Regarding CSR – did the company make a commitment to provide a certain level of CSR. This should also be mentioned. SOP provided. The reviewer expected to see specific CSR commitments that the company had made.

*Company’s Response:* PT SlsM's CSR program has been described on page 18 of the SIA resume.

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

*Finding:* Currently the only documentation available to the reviewer is a discussion of the methods. There is no / very little data provided. The methods, themselves seem acceptable. The problem is with the report (which is far too terse), not with the methods themselves.

*Reviewers Recommendation:*
Please provide data about the community engagement – this would Include:
- chronology of community meetings / engagements.
- Presentations that were made to the communities
- Attendance lists
- Minutes of meetings
Minutes have now been provided, but the information provided is extremely limited. E.g. there is no mention of “who” raised points and what they said. Nor is there information about the company’s replies. E.g regarding the land rehabilitation project at Ds Pangkalan Suka, there is only one sentence that briefly alludes to it. The note taking and documentation has to be improved considerably!

*Company’s Response: The report has been updated*
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:
A map of the HCV areas and an associated data table has been copied directly from the HCV report. Consequently it provides an accurate summary.

Reviewers Recommendation:
1. A short discussion of each HCV and why it was mapped over the particular area would assist the understanding of the report. Furthermore, providing a map of the HCVs with the landcover as a background would be useful as a communication tool. A map of the landcover with a dissolve of all the HCVs is available in 5-1. This was not what was requested. What was requested was a map of HCV 1 and a discussion of why each area was considered HCV1 and so forth until HCV6. This would assist the understanding of HCV mapping.

Company’s Response: Explanation regarding HCV is complete in tables 5-1 and 5-2

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 assessment was undertaken in 2014, this pre-dated the ALS. Consequently, the report has not been assessed by the ALS.

The site description provides a general overview of the area – biodiversity, landscape and social. This has been sourced from secondary data and is adequate. It is a reasonably standard format for HCV assessments.

The elements that are missing is that the site description should include an area around the concession in the discussion. In some maps this has been included (e.g. the mapping of protected areas) and in other maps it has not been included (e.g. mapping of slopes which have been clipped to the concession boundaries).

The METHODS section of the report lacks detail. For example:
- in the biodiversity section, no information is provided about where the biodiversity surveys took place. Similarly for vegetation it is stated “penjelajahan di areal” – the reviewer was expecting something like “100 m transects were laid out with every tree identified 2 m either side” in order to construct a
species list. Usually, a landcover map is presented showing the location of survey points and where RTE species were sighted. This is complemented with a discussion on the location of the sampling points and why these points were selected.

- In the social section it just states information was gathered using interviews which focus on social economy and culture. In reality more information is required about exactly which groups were interviewed and who was invited and what information was gathered.

HCV 1 -4 :

HCV 1.1 – two hills in the concession that have been included based on the protection they afford to the areas below. However none of the river buffers have been included in this HCV (despite photos being provided of the rivers and the buffers).

HCV 1.2 / 1.3 – Species lists are provided of vegetation, birds, mammals and reptiles that were sighted. The same two hills as HCV 1.1 are mapped as HCV 1.2 / 1.3. However, the reviewer is unable to critically analyse the findings and output because (1) the reviewer does not know where the biodiversity survey took place (e.g. was it only on these 2 locations) and (2) it is not clear on the map whether there are other areas that have natural vegetation. Additionally the HCVRN requires HCV areas outside the concession (but within the AOI) that are connected to HCV areas within the concession to be mapped – this has not been done in this report.

HCV 1.4 – this is stated to be not present – so little information is provided that the reviewer is unable to verify this or not.

HCV2 – only HCV2.3 is stated to be present based on the presence of eagles at Bukit Semberuang – this suffers from the same issue as HCV1.2 / 1.3 regarding where the surveys took place and where the natural areas are in the concession.

HCV3 In the section HCV3 it is stated “Ekosistem yang dapat dianggap sebagai ekosistem terancam sebagaimana kriteria NKT 3 harus memenuhi salah satu dari kriteria berikut ini :

1. Dalam suatu unit bio-fisiogeografis suatu ekosistem sudah mengalami kehilangan 50 % atau lebih dari luas awalnya.
2. Dalam suatu unit bio-fisiogeografis terdapat ekosistem yang akan mengalami kehilangan 75 % atau lebih dari luas semulanya berdasarkan asumsi bahwa semua kawasan konservasi dalam tata ruang dapat dikonversikan.” This is taken from the toolkit; however, the toolkit provides 2 methods for verifying the presence / absence of HCV3. One of these analyses must be presented in order to verify that HCV 3 is absent.

HCV4 -HCV 4.1 is adequate

HCV 4.2 seems like something has gone wrong with the analysis
Even areas that are 8-15% (which is not steep at all) have been mapped as having a very high erosion risk. Even the flat areas have a “high” erosion risk. Based on the HCV TK “If an overlay of the MU’s boundary with the erosion potential map indicates presence of an area inside the MU with high or very high erosion potential (see Table 8.4.5), the area is considered HCCA 4.2.” Based on the analysis the whole concession would be considered HCV4.2.

**Reviewers Recommendation:**
This is difficult where the HCS assessment is based on an HCV assessment that is 7 years old. There are a lot of sections in the HCV assessment that need to be improved, however the value in doing this for a 7 year old assessment is probably fairly limited.

1. Gambar 4.13 maps the 4 villages and 6 Dusun (hamlets) within the area. However, the boundaries of the villages have not been mapped – these boundaries should be provided.
2. A wider landscape or AOI should be defined and all the maps and associated discussion should include the wider landscape (currently some maps include a wider landscape – others are clipped to the concession boundaries).
3. There is no National or Regional Context section – this should be included.
4. Repeat the analysis of HCV 4.2 as having “high” erosion risk on a flat area appears to be incorrect.
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:** The Pre-RBA seems to have been done correctly. There were a number of patches in steep areas that were recommended for conservation. The HCV assessment did not include the buffer zone so a check of the areas that continued to the RBA could not include the patches in the buffer. There were a number of patches that needed an RBA and the following description was used:

“19 patch yang tersisa dengan ID (14, 17, 27, 28, 31, 34, 35, 36, 29, 40, 41, 44, 45, 47, 48, 49, 50, 51 dan 52) akan direkomendasikan sebagai indikatif pengembangan karena areal yang berdampingan dengan pengembangan perkebunan dan sangat rentan ancaman pembukaan oleh masyarakat. Walaupun areal tersebut berdekatan dengan sebaran Orangutan, namun berdasarkan wawancara dengan masyarakat sekitar bahwa tidak lagi ditemukan keberadaan mamalia tersebut.” This does not use the HCV assessment and does not follow the toolkit (see step 10) which requires more than just taking into account the presence of orangutans.

**Reviewers Recommendation:**

1. The RBA just relied on presence of orangutans to determine whether patches should be develop or conserve. This does not follow the toolkit. This element of the HCS assessment will have to be completed properly as it requires assessing each area for any RTE species (not just orangutans). The point that is made below by the company is valid, however, it doesn’t actually follow the toolkit.

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: The management and monitoring conservation measures are extremely general and could be applied to any assessment. The reviewer was expecting to see particular issues addressed such as the planting of oil palm within the riparian buffers. Also how the community and company will work together to ensure environmental values are maintained or improved.

Reviewers Recommendation:
1. Provide specific information on areas that are under community control that the community has agreed to manage for conservation values. So the company has stated “the company can only urge and invite the public to protect buffer areas under community control where the laws and regulations already exist in Indonesia”. So the company needs to state exactly what they have done to facilitate conservation in the landscape.
2. Make specific reference to how areas that are mapped as HCS forest but are currently oil palm will be managed in the future (e.g. buffers of S Pawan). The following recommendations have been added – “• Mengembangkan dan menerapkan SOP penggunaan kimia bahwa areal sempadan sungai tidak lagi diberikan bahan kimia. • Melakukan rehabilitasi pada sempadan sungai dan dalam 1 daur yang sudah tertanam sawit.”
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:** A buffer around the concession of 5 km has been used. This was the AOI. It has been clipped by a major river (S Pawan) to the west of the concession. Clipping the AOI to large rivers is not actually mentioned in the toolkit, however, the reviewer believes this assumption is reasonable.

**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:** The field study was done in August 2021 and the images were dated June 2021. The images are Sentinel which has a 10 m resolution. Both the date and resolution are adequate. There is a reasonable amount of cloud in the image provided over the AOI – the report states that other images were used (5 July 2021 and 4 April 2021).

**Reviewers Recommendation:**
1. Provide all images that were used in the land cover classification. Two additional images have been provided which give cloud free view of the whole of the AOI.

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:** Generally the quality of the image classification is acceptable.
Some minor errors were noted:
The light green area along the river looks more like scrub and it has been mapped as oil palm.
The area marked with a red circle above looks more like a water body but it has been mapped as oil palm.

Some of the open land areas (red rings) look more like rubber. The classification now looks reasonable.

Reviewers Recommendation:
1. Fix up the classification of the areas mentioned above.
5. **Forest Inventory** (4 hours)

5.1. Please review Sections 7.1 and 7.2 of the Summary Report. Were the sample plots selected, set up, and measured properly? Please check the inventory plot layout for adequacy.

*The HCSA Toolkit describes the expected quality of the forest inventory process.*

<table>
<thead>
<tr>
<th>Finding:</th>
<th>The number of plots measured and the plot layout exactly follows the toolkit.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Reviewers Recommendation:</td>
<td>No recommendation.</td>
</tr>
</tbody>
</table>

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.*

<table>
<thead>
<tr>
<th>Finding:</th>
<th>The forest inventory team had 5 people with forestry degrees. This shows that the team was well qualified.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Reviewers Recommendation:</td>
<td>No recommendation.</td>
</tr>
</tbody>
</table>

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.*

<table>
<thead>
<tr>
<th>Finding:</th>
<th>The text states that the following allometric was used “AGB = 0.11ρ(D^{2.62})” however no reference is made to the source of the allometric.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Reviewers Recommendation:</td>
<td>Provide a reference for this allometric. The following reference has been added “IPCC. 2006. Guidelines for National Greenhouse Gas Inventories. UNFCCC.”</td>
</tr>
</tbody>
</table>
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 figures for the carbon stocks appear to approximately what one would expect for these classes of forest in Kalimantan.

No plot data has been provided, so the reviewer can only look at the summary data in the report. There is one error that sticks out. The statement “Namun ada beberapa yang tidak berbeda nyata antara HRM dengan HK1 dan Karet Campuran dengan Belukar. Hal ini dikarenakan selisih antara selisih nilai Scheffe hitung lebih rendah dari nilai Scheffe Critical yaitu sebesar 10,33.” However the FS (HKM / HK1) is 13.33 which is greater than Fcrit (10.33) – which means HKM and HK1 are different.

Also it looks like the headers in table 7-6 have got mixed up.
Some of the titles in the analysis table are still wrong
Also the significant differences still seem to be jumbled up

Company’s Response: The report has been updated
### Reviewers Recommendation:
1. Alter the headers in table 7-6.
2. Confirm the results of the scheffe analysis
3. Provide the raw plot data and associated analysis in spreadsheet form. In column T of the spreadsheet the trees with DBH >15 cm should be x 200 (not 1000) as the plot area is 0.05 ha for the large trees.

*Company’s Response: This has already been done in column R.*

<table>
<thead>
<tr>
<th>TIPE</th>
<th>HK26</th>
<th>HK31</th>
<th>HRM8</th>
<th>KCI</th>
<th>KGI</th>
</tr>
</thead>
<tbody>
<tr>
<td>HK26</td>
<td>√</td>
<td>13.85</td>
<td>10.34</td>
<td>17.98</td>
<td>11.81</td>
</tr>
<tr>
<td>HK31</td>
<td>√</td>
<td>√</td>
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<tr>
<td>KCI</td>
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<td>√</td>
<td>√</td>
<td>√</td>
<td>18.48</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Significant-Differences</th>
</tr>
</thead>
<tbody>
<tr>
<td>TIPE</td>
</tr>
<tr>
<td>HK26</td>
</tr>
</tbody>
</table>

In column T of the spreadsheet the trees with DBH >15 cm should be x 200 (not 1000) as the plot area is 0.05 ha for the large trees.

*Company’s Response: This has already been done in column R.*
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:** A file has been provided “Full_Sampling_Plot” but it is not clear on this which are HCS plots and which are ground truthing points – Table 7-1 says that 49 plots were measured and “Full_Sampling_Plot” has 58 points on it. Also there are 19 HRM plots in the sampling file and table 7-1 states 15 HRM plots were measured.

Also some of the plots don’t match

For example this highlighted plot is in HRM based on the landcover and the shapefile states it should be rubber.
Reviewers Recommendation:
1. Ensure the supplementary shapefile data and the data provided in the report are matching. The landcover shapefile and the plot data now match.

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: There was no discussion of participatory mapping identifying community lands at step 1. The merge was done properly (Patch ID=4 was checked – this consists of HK1 and HK2 but was treated as a single patch). The core analysis was done properly (Patch ID=1 was checked – this consists of multiple polygons – but they all formed a single core).

Reviewers Recommendation:
1. Just the patch analysis attribute table has been provided. It would make it a lot easier to understand for the reviewer if the patch analysis attribute table was put in the supplementary material and in the report a map was produced for each step in the patch analysis with a discussion of the outcome of each step. The information and format provided by the company in Annex 4 is very good and can be easily interpreted!

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:
The patch analysis appears to have been done correctly for most patches. However the analysis does not take into account the latest ruling from the HCSA (Advice Note 5) : “Text in Step 5 refers to MPPs and LPPs that do not have “immediate connectivity” to HPPs. This term is not used elsewhere in the Decision Tree but is used to refer to connectivity where a patch is itself within 200m of an HPP or any large (>100 ha core) HCS forest or HCV forest areas, peatlands,
or riparian area, and not connected via stepping stones as can occur in Step 4." This overrules the decision tree at Step 5 and requires all patches that are within 200 m of an HCV area to be conserved. This makes it difficult where there is no HCV assessment in the buffer area.

The brown patches that overlap with the HCV 200 m buffer should be conserve not develop.
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:** The Map 8.1 provides a good summary of the final output, showing the conserve and develop areas. It is unfortunate that the HCV report has not mapped the HCVs in the AOI as a lot of the conserve areas outside the concession would have included the river buffers. However, these HCV areas in the buffer are not present in the ICLUP. It is probably too late to expand the HCV report to include mapping of HCV areas in the buffer.

The management and monitoring recommendations that are provided are very general but make sense. Though they don’t deal with particular issues, such as the buffer of the S Tapai (which is outside the concession) has obviously been planted up by the community. Generally, the government and communities do not want these areas planted in oil palm. So how will the company, in conjunction with the community, address these issues.

**Reviewers Recommendation:**
1. It would be good also to show the areas that were under the company’s management control and those areas that were outside the company’s management control.
2. A note should be put alongside the ICLUP that it does not include the HCV areas in the buffer.

Map 8.1 has been added which fulfils this requirement.