

RSPO NOTIFICATION OF PROPOSED NEW PLANTING

This notification shall be on the RSPO website for 30 days as required by the RSPO procedures for new plantings (<http://www.rspo.org/?q=page/535>). It has also been posted on local on-site notice boards.

Date of notification: 22nd – December - 2014

Tick whichever is appropriate

	This is a completely new development and stakeholders may submit comments.
√	This is part of an ongoing planting and is meant for notification only.

- COMPANY** : **PT. PP LONDON SUMATRA INDONESIA, Tbk**
- SUBSIDIARY (If any)** : -
- RSPO Membership Number** : **1-0015-04-000-00 (November 5th, 2004)**
- Location of proposed new planting**
- Company Name : PT. PP LONDON SUMATRA INDONESIA, Tbk – WILAYAH INDAH PERMAI ESTATE (IPE)
 - Location : **Indah Permai Estate (IPE):** Village of Dingin, Sub-District of Muara Lawa, Village of Dasaq, Sub-District of Muara Pahu, Village of Kaliq, Sub-District of Siluq Ngurai, Regency of Kutai Barat, Province of Kalimantan Timur, INDONESIA
 - Geographical location : East: 115° 47' 49.167" - 115° 55' 49,737"
South: 0° 25' 53,730" - 0° 31' 50,210"
 - Surrounding Entities : **Indah Permai Estate (IPE):**
North: Villages of Peninggir, Dasaq and Kendang Pahu River
East: Jelau River
South: Area of PT. Energi Batu Hitam (Coal Mining Company).
West: Village of Dingin.
 - Planting Area Indah Permai Estate : **6,936.00 Ha (Total Area)**
58.78 Ha (Planted year 2013); 1,650.23 Ha (HCV Area); **5,226.98 Ha (Proposed Planting 2014 – 2017)**
 - New Planting Programme : **5,226.98 Ha**

1. SUMMARY FROM SEI ASSESSMENTS:

1.1. Executive Summary:

INDAH PERMAI ESTATE (IPE)

Administratively, the plantation area of PT. PP London Sumatera Indonesia Tbk (Wilayah Indah Permai Estate) is located in three sub-districts namely : Muara Lawa Sub-district covering Dingin Village, Muara Pahu Sub-district covering Dasaq Village and Siluq Ngurai Sub-district covering Kaliq Village, Kutai Barat Regency, Province of East Kalimantan. The company's area includes in the Mahakam Watershed (DAS) – subwatersheds of Kedang Pahu and Jelau.

The plantation area in the past was Logged Over Forest Area which managed by the forest concession companies : PT Sumber Mas II and PT Meratus Kalimantan Timber with three predominant land cover namely mixed farming fields, dryland farming fields and shrubs. According to the head of National Land Agency's Decree No : 13/HGU/BPN/2003 dated 31 January 2003, the company was granted forest concession area of 15,000 ha for oil palm plantation development which currently managed under the Management of Indah Permai Estate (covering area of ± 6,936 ha) and of Isuy Makmur Estate.

Currently, the company's management of Indah Permai Estate is in the beginning step in the form of land acquisition and introducing the company's plantation development plan to the surrounding communities, relevant village and subdistrict officials and other local stakeholders.

Due to the company's concern to a sustainable development of oil palm plantation in accordance with P&C RSPO especially Principle 5 and 7 (New Planting Procedure), in 2013, the company of PT PP London Sumatera Indonesia Tbk – Indah Permai Estate performed Tracing and Identification HCVs in his plantation area with the intention to 1) Verify and identify the HCVs presence in the company's area, and 2) Provide recommendation on the Management and Monitoring required on each HCV area determined.

Review on the SEIA assessment which conducted in July 2014, it is shown that the presence of the oil palm plantation of PT PP London Sumatera Indonesia Tbk - Indah Permai Estate has generated impacts, either positive and negative, to the environment and the surrounding communities. In order to minimize the negative impacts, the company committed to implement the Environmental Management Plan (RKL) and Social Management Plan that have been prepared.

The presence of the company has delivered positive impacts to the local communities especially of Kaliq Village, in the forms of: employment opportunities, improvement of village land roads, and providing paddy seeds. Meanwhile, those positive impacts have not been delivered to the local communities of Dasaq and Dingin villages due to the company's management of Indah Permai Estate is in the beginning step in the form of and acquisition and introducing the company's plantation development plan to the surrounding communities, relevant village and subdistrict officials and other local stakeholders.

The presence of the company has also the potentials to generate negative impacts to the environment and the surrounding communities, namely social conflicts in the local community relating to the rights of land ownership.

The Assessment has identified HCVs within the area of PT. PP London Sumatera Indonesia Tbk (Wilayah Indah Permai Estate) containing HCV1 (HCV1.2, and HCV1.3), and HCV4 (HCV4.1 and HCV4.2) which covering areas of 1,650.23 ha containing River Riparian and Buffer Zone of Swamp Areas of 100.00 ha, Swamp Areas of 181.01 ha, and Hilly Secondary Forest Areas of 1,369.22 ha.

The EIA Assessment in the area of PT. PP London Sumatera Indonesia Tbk (Wilayah Indah Permai Estate) was held by competent consultant of PT POLIGON KALTIM UTAMA and has been approved by the Head of Mining and Environmental Agency / Chairman of EIA Commission of Kutai Barat Regency according to the Decree No. No 540.660.1/030.1/AMDAL-KBR/X/2005 dated 26 October 2005. In 2007 PT PP London Sumatera Indonesia Tbk had initiated conducting internal and external HCV assessment by involving AKSENTA as assessor independent. Meanwhile, the HCV and SIA assessments were conducted in 2014 by Faculty of Forestry – Bogor Agricultural University which supported by assessor team accredited by RSPO.

The company of PT. PP London Sumatera Indonesia Tbk (Wilayah Indah Permai Estate) manages the plantation area comprehensively and professionally with reference to the principles, criteria and indicators for New Plantings Procedure of RSPO.

1.2. Scope of the SEIA and SIA Assessments:

Organizational information and contact persons

Company's Name: PT. PP London Sumatera Indonesia Tbk

Address: Jalan Bung Tomo Komplek Keledang Mas Baru Blok BA No. 3 Samarinda Seberang Propinsi Kalimantan Timur.

Contact: Muhammad Waras (Email address: muhammad.waras@londonsumatra.com)

- | | | |
|--------------------------|---|--|
| Deed of The Company | : | Company Deed No 93, dated 18 December 1962 |
| Deed of Company's Change | : | No.20, dated 9 September 1963 (Notary Raden Kadiman), Ministry of Justice Approval No. J.A5/121/20, dated 14 September 1963. |
| | : | No. 9, dated 10 May 2012; Ministry of Justice Approval No.AHU-0044755.AH-61.09/2012, dated 11 May 2012 (Notary Pahala Sutrisno Amijoyo Tampubolon, SH,M.Kn). |
| Investment Type | : | Foreign Investment (PMA) |
| Land Status | : | Areas permit on behalf of PT. London Sumatera International which is issued by the Head of National Land Agency of Kutai Barat Regency (SK. No: 33/PKT/BPN-16.3/UM-33/XI-1995 dated 21 November 1995) covering area of 18,000 ha and located in Jempang and Muara Pahu Sub-districts, Kutai Regency. |
| | | Principle approval on the plantation bussiness license on behalf of PT. London Sumatera Internasional which is issued by the Agriculture Minister (SK No 9 K8.320/458/Mentan/XII/95 dated 4 December 1995). |
| | | Area permit on behalf of PT. London Sumatera Indonesia which is issued by the Head of National Land Agency of Kutai Barat Regency (SK. No: 07/PKT-BPN-16.3/UM-03/111-1996 dated 8 March 1996) covering area of 15,000 ha and located in Muara Lawa and Muara Pahu Sub-districts, Kutai Regency. |
| | | Area permit for oil palm plantation development on |

behalf of PT. London Sumatera Indonesia which is issued by the Head of National Land Agency of Kutai Barat Regency (SK. No: 06/PRT/BPN.16.3/UM-16/III-1997 dated 26 March 1997) covering area of 11,500 ha and located in Muara Ohong village, Perigiq village, Mancong village, Tanjung Laung village, Jempang Sub-districts, Kutai Regency.

Principle approval on the plantation business license on behalf of PT. London Sumatera Indonesia which is issued by the Director General of Plantation (SK No KB.320/458/Mentan/XII/1995 dated 04 December 1995) and the license renewal No HK.530/E5.776/09.9/dated 3 September 1997.

Principle approval on the plantation business license on behalf of PT. London Sumatera International which is issued by the Agriculture Minister (HK.300/E5.724/09/96 dated 13 September 1996) covering area of 15,000 ha and located in the villages of Tebisak, Jerang Dayaq, Tanah Mea, Tepian Ulag, Muara Baroh, Muara Pahu, Dasaq, Mendong, Kolik, Jerang Melayu, Sub-district of Muara Pahu, Kutai regency.

Renewal of Area Permit on behalf of PT. London Sumatera International for oil palm plantation development (SK No 10/PKT/BPM-16.3/UM-10/IV-1997).

Total Area : 6,936.00 Ha (Indah Permai Estate).

List of Legal documents, regulatory permits and property deeds related to the areas assessed;

Legal documents provided before operational are as follows:

1. Area permit on behalf of PT. London Sumatera Internasional which is issued by the Head of National Land Agency of Kutai Barat Regency (SK. No : 33/PKT/BPN-16.3/UM-33/XI-1995 dated 21 November 1995) covering area of 18,000 ha and located in Jempang and Muara Pahu Sub-districts, Kutai Regency
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3. Area permit on behalf of PT. London Sumatera Indonesia which is issued by the Head of National Land Agency of Kutai Barat Regency (SK. No : 07/PKT-BPN-16.3/UM-03/111-1996 dated 8 March 1996) covering area of 15,000 ha and located in Muara Lawa and Muara Pahu Sub-districts, Kutai Regency.
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- KB.320/458/Mentan/XII/1995 dated 04 December 1995) and the license renewal No HK.530/E5.776/09.9/dated 3 September 1997.
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 7. Renewal of Area Permit on behalf of PT. London Sumatera Internasional for oil palm plantation development (SK No 10/PKT/BPM-16.3/UM-10/IV-1997).
 8. Law No. 32 of 2009 regarding The Environmental Management and Protection.
 9. Government Regulation No 82 of 2001 regarding Water Quality Management and Water Pollution Control
 10. Regulation of The Environmental Minister No 11 of 2006 on The List of Bussiness and Activity Plans That Must be Provided with EIA (AMDAL)
 11. Regulation of The Environmental Minister No 08 of 2006 on Guidance of The Environtmental Impacts Analysis Document Preparation.
 12. Regulation of The Environmental Minister No 45 of 2005 regarding to Guidance of The Implementation of Environmental Management (RKL) and Monitoring Plans (RPL).
 13. 13. Decree of The Head of Environmental Control Agency No. Kep-015, 1997 regarding to Guidance of The Implementation of Environmental Management and Monitoring Plan (RKL/RPL).

INDAH PERMAI ESTATE (IPE)

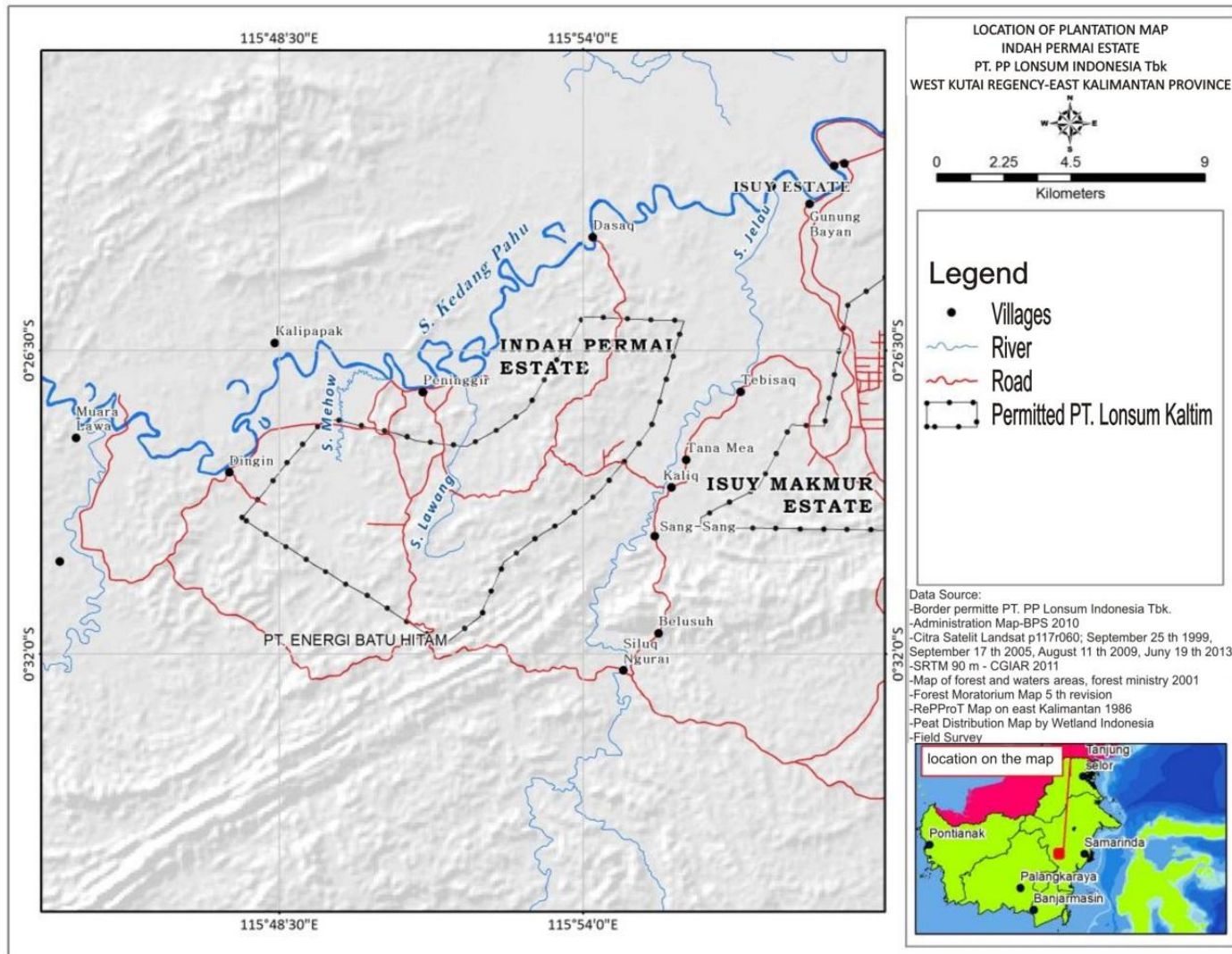


Figure-1. Location maps – both at landscape level and property level;

PT. PP London Sumatera Indonesia Tbk (Wilayah Indah Permai Estate) manages a area of ± 6,936.00 ha for oil plam development which administratively, located in three sub-districts namely : Muara Lawa Sub-district covering Dingin Village, Muara Pahu Sub-district covering Dasaq Village and Siluq Ngurai Sub-district covering Kaliq Village, Kutai Barat Regency, Province of West Kalimantan. The company's area includes in the Mahakam Watershed (DAS) – subwatersheds of Kedang Pahu and Jelau.

Based on the land status, the area of PT. PP London Sumatera Indonesia Tbk (Wilayah Indah Permai Estate) is located in Other Land Use areas (APL) and it is found Protection / Conservation Area namely Padang Luwai Nature Reserve Area and it is far from the location of the company's area with the distance of about ± 10.5 km to the west. **Figure 1.**

According to the field survey, and interpretation of satellite imagery 8 Path/Row 126-60 period 18 March 2014, it is shown that land cover in the area of PT. PP London Sumatera Indonesia Tbk (Wilayah Indah Permai Estate) consists of 1) Dryland Secondary Forest Area (3,609.91 ha), 2) Mixed Farming Fields (2,800.36 ha), 3) Farming Fields (15.56 ha), 4) Shrubs (319.00 ha), 5) Water Body (197.25 ha), 6) Bare land (17.15) ha. **Figure 2.**

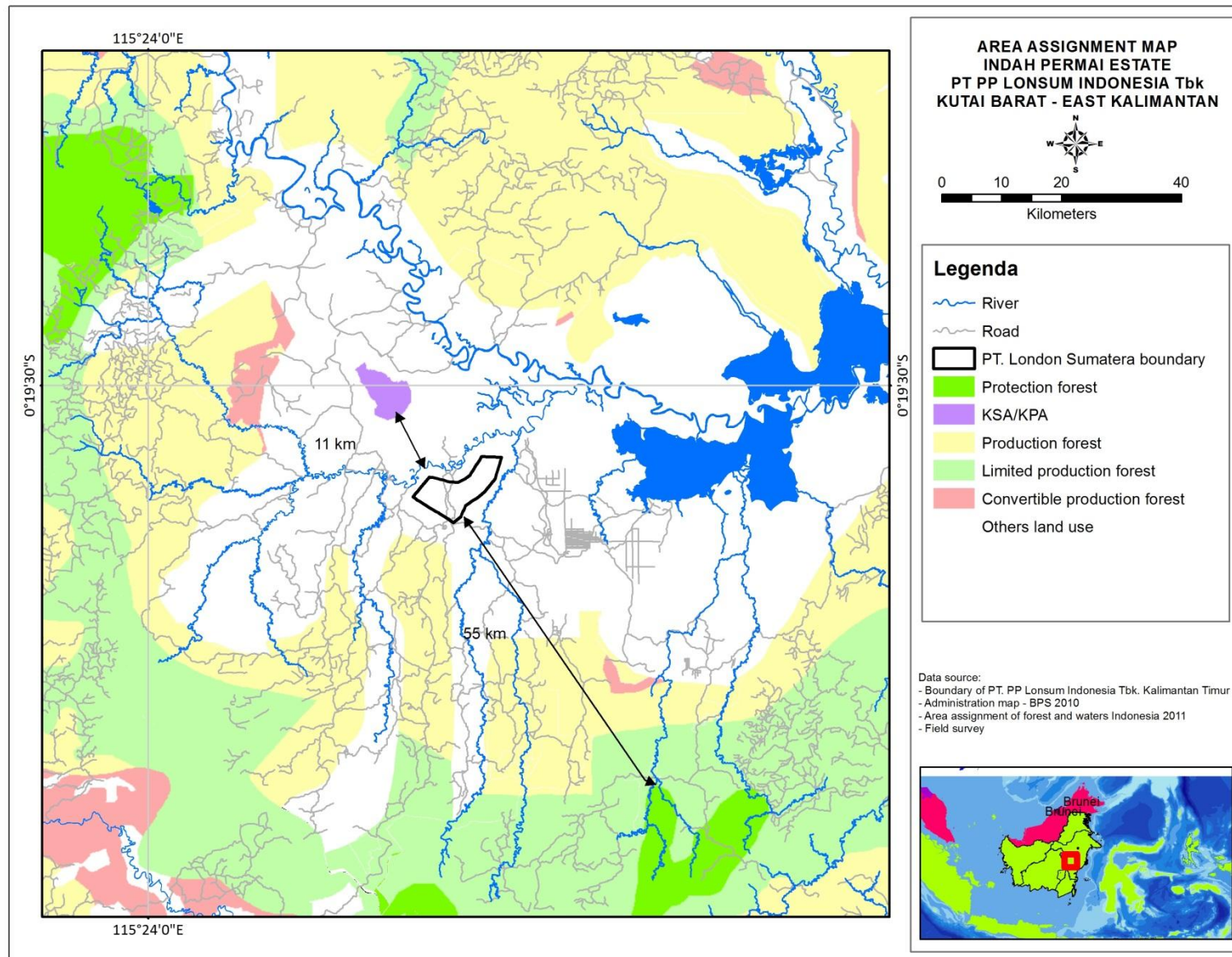


Figure-2. Overlay Map (Forest Area Status with Indah Permai Estate)

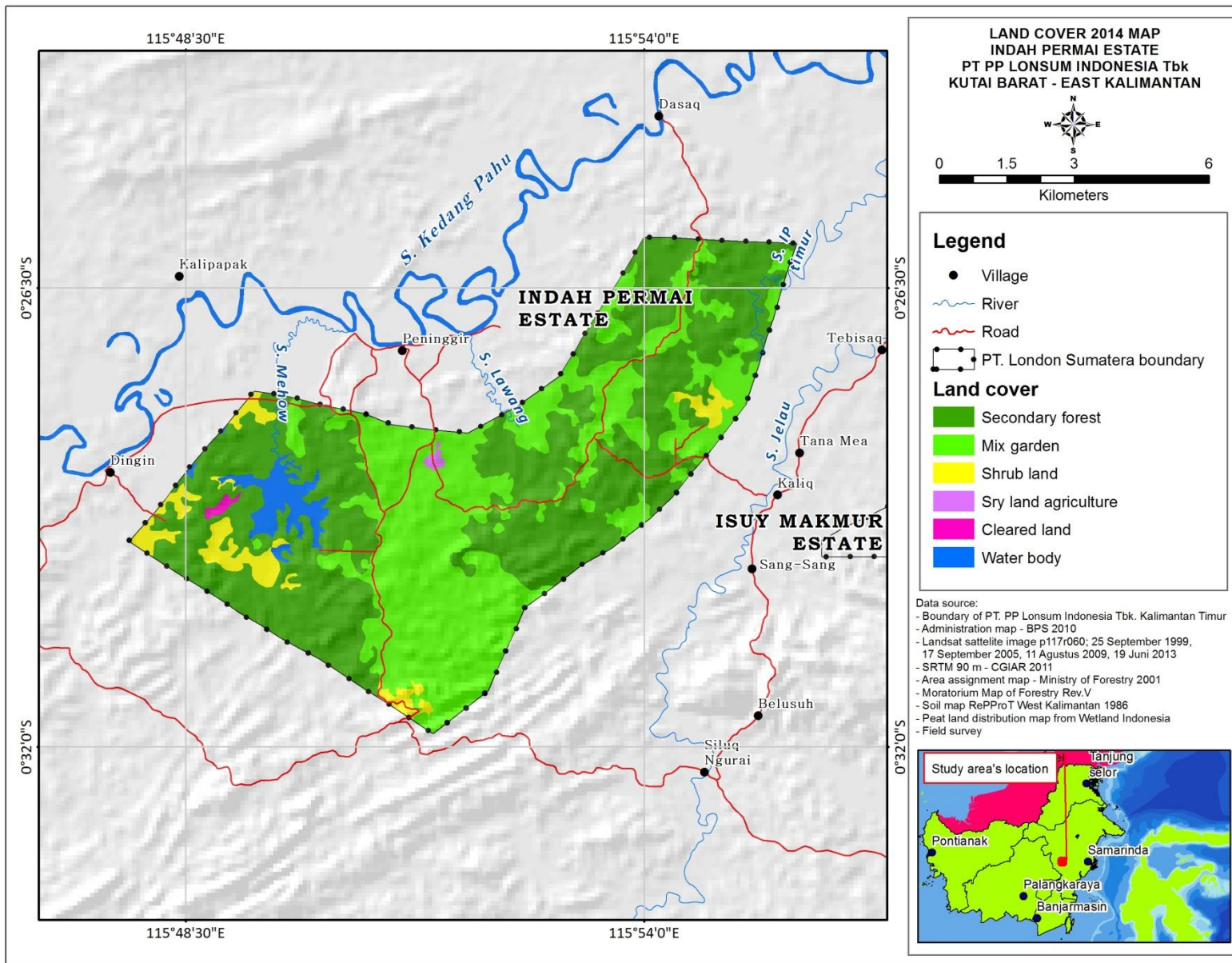


Figure-3. Land Cover Status 2014 Map of Indah Permai Estate

New Planting Areas and Time of Implementation Plan

Data Planting Programme

Description	Indah Permai	Remarks
Planting Program 2014	1,000.00	
Planting Program 2015	1,000.00	
Planting Program 2016	2,000.00	
Planting Program 2017	1,226.99	
<i>Proposed planting</i>	5,226.99	
HCV Area	1,650.23	

1.3. Assessment process and procedures (for SEI Assessment):

Assessor and their Credential

a. HCV (High Conservation Value) Assessment

The HCV Assessment was performed by:

Faculty of Forestry – Bogor Agricultural University

Kampus IPB Darmaga - Bogor, Kabupaten Bogor - Provinsi Jawa Barat

Indonesia 16001

Telp.: 62-251- 621947, Fax: 62-251-621947

Website: <http://www.fahutan.ipb.ac.id/hcv/index.html>

Email: fahutan@ipb.ac.id, hcvteam@yahoo.co.id

Assessor Team

Dr. Ir. Nyoto Santoso, MS – Team Leader

(Specialty: Biodiversity Management and Conservation)

He was born in Banyuwangi on 15 March 1962, as a Team Leader of Faculty of Forestry's HCV Team – Bogor Agricultural University, with the specialty:

Biodiversity Management and Conservation. Obtained Master at The Environment and Natural Resources Management – Bogor Agricultural University in 1992 and his Phd awarded at The Forest Management Science – Bogor Agricultural University in 2012. His experiences in the Environmental Field started in 1987. He is a lecturer at the Forest Resource and Ecotourism Conservation Department, Faculty of Forestry – Bogor Agricultural University with the subject : Wildlife Ecology and Management, Environmental and Forestry Policies, conservation of important ecosystems and primates ecology (at the forestry science and primates study program - IPB masters program). He was an Executive Director of Indonesian Mangrove Development and Research Institute, registered as a Member of National Mangrove's Expert Council, as an Expert Council Member of Sustainable Strategic Plantation Development Forum.

Dr. Ir. Burhanuddin Mas'ud, MS – Team Member

(Specialty: Wildlife)

He was born in Flores Timur on 21 November 1958. Obtained Bachelor's Degree at the Faculty of Animal Husbandry – UNDANA, Kupang in 1982. He is a lecturer in the UNDANA University since 1986 and a permanent researcher in the Wildlife Breeding Laboratory, Department of Forest Resource and Ecotourism Conservation, Faculty of Forestry – Bogor Agricultural University. He has experiences in the assessment on both plant and wildlife related to the natural resource utilizations.

Udi Kusdinar, S.Hut –Team Member

(Specialty: Socio-Economic and Cultural)

He was born in Ciamis on 13 May 1983, and registered as a member of Bogor Agricultural University – Faculty of Forestry’s HCV Team with the specialty: Socio- Economic and Cultural. Obtained Bachelor’s Degree of Forestry at The Forest Resource and Ecotourism Conservation Department – Faculty of Forestry – Bogor Agricultural University in 2009. Experience in the social assessment started in 2009.

Rae Birumbo, S.Pi – Team Member

(Specialty: Socio-Economic and Cultural)

He was born in Jogjakarta on 24 August 1976 Lahir di Ciamis, 13 Mei 1983, and registered as a member of Faculty of Forestry’s HCV Team – Bogor Agricultural University with the specialty : Socio-Economic and Cultural. Obtained Bachelor’s Degree in the Gajahmada University in 2002. His experience in the social assessment started in 2002 in the Coastal Community Empowerment Project (PEMP) and HCVs Assessments in Papua, Kalimantan and Sumatera. Joined in the Institut of Mangrove Research and Development 2007-2010.

Arif Prasetyo, S.Hut – Team Member

(Specialty: G I S and Environmental Services)

He was born in Metro on 6 May 1987, and registered as a member of Bogor Agricultural University – Faculty of Forestry’s HCV Team with the specialty: G I S and Environmental Services. Obtained Bachelor’s Degree of Forestry at The Forest Resource and Ecotourism Conservation Department – Faculty of Forestry – Bogor Agricultural University in 2010. Experience in the HCVs assessment started in 2010.

b. Environmental Impact Analysis (EIA)

Study of Environment Impacts Analysis was held by: PT POLIGON KALTIM UTAMA

Address : Jalan Kapas No 18 Sidomulyo

Samarinda – Kalimantan Timur

Phone : 0541 - 732182

Assessor Team

Dr Ir Risman Situmeang - Team Leader

Ir Zainal Mutaqin MP - Team Member (Specialty: Physical - Chemistry)

Ir Syarifudin - Team Member (Specialty: Physical - Chemistry)

Junser Naibaho Msi - Team Member (Specialty: Biology)

Ir Sulaiman - Team Member (Specialty: Biology)

Dra Rahmaniari - Team Member (Specialty: Socio-economic)

Drs Agus Salim - Team Member (Specialty: Socio-economic)

c. SIA (Social Impact Assessment)

The SIA Assessment was performed by: Faculty of Forestry – Bogor Agricultural University

Kampus IPB Darmaga - Bogor, Kabupaten Bogor - Provinsi Jawa Barat, Indonesia 16001,

Telp.: 62-251- 621947, Fax: 62-251-621947, Website:

<http://www.fahatan.ipb.ac.id/hcv/index.html>, Email: fahatan@ipb.ac.id,

hcvteam@yahoo.co.id.

Assessor Team

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He was born in Ciamis on 13 May 1983, and registered as a member of Faculty of Forestry's HCV Team – Bogor Agricultural University with the specialty : Socio- Economic and Cultural. Obtained Bachelor's Degree of Forestry at The Forest Resource and Ecotourism Conservation Department – Faculty of Forestry – Bogor Agricultural University in 2009. Experience in the social assessment started in 2009. His experiences in the social assessment are : Social Impact Assessment in Oil Palm and Sugar Cane Plantation; HCVs Identification in Mangrove Concession Companies, Oil Palm Plantation, Coffee Plantation, and Sugar Cane Plantation; Identification and Economic Valuation Analysis of Socio-Economic Impacts in the Forest Land Use in CA and TWA Papandayan; Identification and Comprehensive Analysis of Community Social Assessment & Framework Community Development Plan PT. Daya Bumindo Karunia; dan *Study On Good Practice Of Social Forestry For Sustainable Forest Management And REDD+ in Province of Nusa Tenggara Barat.*

Dr. Ir. Burhanuddin Mas'ud, MS – Team Member

(Specialty : Wildlife)

He was born in Flores Timur on 21 November 1958. Obtained Bachelor's Degree at the Faculty of Animal Husbandry – UNDANA, Kupang in 1982. He is a lecturer in the UNDANA University since 1986 and a permanent researcher in the Wildlife Breeding Laboratory, Department of Forest Resource and Ecotourism Conservation, Faculty of Forestry – Bogor Agricultural University. He has experiences in the assessment on both plant and wildlife related to the natural resource utilizations

Rae Birumbo, S.Pi – Team Member

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He was born in Jogjakarta on 24 August 1976 Lahir di Ciamis, 13 Mei 1983, and registered as a member of Faculty of Forestry's HCV Team – Bogor Agricultural University with the specialty : Socio-Economic and Cultural. Obtained Bachelor's Degree in the Gajahmada University in 2002. His experience in the social assessment started in 2002 in the Coastal Community Empowerment Project

(PEMP) and HCVs Assessments in Papua, Kalimantan and Sumatera. Joined in the Institute of Mangrove Research and Development 2007-2010.

Assessment Methods

A. High Conservation Value (HCV)

1. Data Collection

a) Documents/reports collected, consisting of a) Map of The Concession Area of PT. PP. London Sumatra Indonesia Tbk (Wilayah Indah Permai Estate), b). Map of Village Around The Area of PT. PP. London Sumatra Indonesia Tbk (Wilayah Indah Permai Estate Estate), c) Land Cover Map; d). Land Status Map; e). Landsystem Map; f). Map of Topography and Land Slope; g). River Network Map. h) Subdistricts Data Monograph of 2013.

b) Types of secondary data collected were general condition of the company's area, (including land management history, area and location, area boundaries, land slope and topography, soil and geology, climate, hydrology, land cover, and socio-economiccultural); maps and other relevant documenta/reports. Secondary data collection is also performed through the study of literature,

which collecting data and information from various reports or documents and maps from the relevant agencies.

c) *Review* on the documents/reports was conducted on the document/report/relevant maps. The things that reviewed, were availability and adequacy of data / information that required in the analysis. The review results were then used as the basis in the implementation of secondary data collection and field survey (field verifications).

2. Field Observation and Data Analysis

Primary data that have been collected in the field observation consisted of physical aspect of the concession area, environmental services aspect, socio-economic aspect and sociocultural aspect.

a) Mapping and Landscaping

Mapping and landscaping team collects data to verify data and secondary information such as river network, land road network, area boundary, soil types, topography, and overviewing on the hole area assessed. In addition, the mapping and landscaping team will also support other teams in mapping all finding data and information into the map and to analyze it.

b) Wildlife Assessment

In the field, wildlife data collection is performed using rapid assessment method (qualitative field observation) to get the actual informations on the existing wildlife condition in and around the study area. Output of the wildlife assessment is a list of wildlife species found and the species protection status according to the IUCN, CITES and PP No 7 of 1999.

c) Plant Assessment

In the field, plant species data collection is performed using interview and field observation methods. The data collected are then identified the species protection status according to IUCN, CITES and PP No 7 of 1999. Furthermore, the data and information collected are used to verify the initial map of ecosystem distribution (HCV2 and HCV3) in the study area; and also used to identify forest stand structure, species density or species dominance on each ecosystem type.

d) Socio – Economic – Cultural Assessment

In the field, data collection is performed using interview and field observation methods on the selected location. List of structured questions is used as a guidance for interviewer with the informations collected consisting of : the way of fulfilling basic needs for local community, community's custom and culture, inter-relationship between local community and forest area, and inter-relationship between local community and the company. The data / information collected are analysed to identify level of local community's dependency on the forest area and the role of forest area in the local community's everyday lifes and their cultural identity.

3. Time of Implementation

The study was conducted in the area of PT. PP. London Sumatra Indonesia Tbk (**Wilayah Indah Permai Estate**) and the surrounding villages namely: Muara Lawa Sub-district covering Dingin Village, Muara Pahu Sub-district covering Dasaq Village and Siluq Ngurai Sub-district covering Kaliq Village, Kutai Barat Regency, Province of East Kalimantan. The HCVs Assessment was completed in 2 month from May-June 2014 and and the field observation was carried out on 27 May – 1 June 2014. The study have visited 14 observation sites with the following details:

No	Observation Sites	Number
1	Mixed Farming Fields	4
2	Secondary Forest Area	2
3	River Riparian Areas	3
4	Sub-district Government Office	3
5	Village Government Office	3
Total		14

4. Analysis and Mapping

Analysis and Mapping is the most crucial and important step in the assessment process. In the analysis, it is performed a deep and comprehensive analysis on the secondary and primary data collected in the field consisting of physical aspect, spatial, flora, wildlife, and socio-cultural aspect. Outputs of the analysis, will be used as the basis in the identification of HCV's presence in the area assessed and then continued with mapping them using GIS software.

HCV1. Areas Containing Important Level of Biodiversity.

- a) Mapping the company's area, including land cover and ecosystems, at the site and landscape levels.
- b) Mapping the existence of protection forest or conservation areas in the company's area and the surroundings, including conservation area designated by local community.
- c) Identifying the potential roles of company's area in providing support to the biodiversity in protection or conservation areas within or around the company area.
- d) Identifying the areas that have the potential roles in providing support functions to the biodiversity in protection or conservation areas in or around the company area.

HCV2. Landscapes That Important for Natural Ecological Dynamics

- a) Mapping vegetation cover of the company's area at landscape level.
- b) Mapping the mature vegetation cover on each Management Unit at the landscape level with special attention to the area boundaries for example: clear boundary delineation on the forest (or natural forested areas) with degraded forest area due to human activities.
- c) Identifying the potential presence of core zone and buffer zone required to reduce impacts generated by the activity of each management unit.
- d) Consider the possibility of change scenarios on the core and boundary zones based on the land use plan set by government.

HCV3. Areas Containing Rare or Endangered Ecosystems

- a) The first step is to identify rare or endangered ecosystems in each Management Unit (UP), consisting of Mangrove ecosystem, deep-peat ecosystem (>3m), Karst ecosystem, Heath Forest ecosystem, etc.
- b) Then to analyze the extent, distinctiveness and uniqueness of the rare or threatened ecosystems identified, as well as the threats, functions of those ecosystems in the biodiversity and environmental sustainability, and area delineation on each rare or endangered ecosystems identified.

HCV4. Areas Providing Natural Environmental Services

- a) Overlap the area boundaries of the company's area with Map of Forest Land Use (TGHK) and Provincial Spatial Planning (RTRWP).
- b) Delineate the watershed and sub-watershed areas in each Management Unit (UP) and the surrounding.
- c) Identify dependency of local community to the existing water sources.
- d) Delineate the left-right area of river flowing in each Management Unit (UP) and determine these areas as riparian with the size specified in the applicable rules.
- e) Identify the presence of important ecosystems in the ecosystem map prepared by HCV3 Team. The identification can also be performed using RePPPProt Data as the indicative map which showing where the important ecosystems usually exist (if the ecosystem map is not available).
- f) Prepare land cover map based on the field observation combined with the latest satellite imagery interpretation.

HCV5. Areas Containing Important Function in Fulfilling Basic Needs for Local Community
Benchmarking for important category is defined as 50 % or more of one or more subsistence can be fulfilled by utilizing other forests or ecosystems. HCV5 does not apply limit criteria at community level or sub-group of it.

HCV6. Areas That Have Important Functions for Local Community's Cultural Identity

HCV6 will be determined in a Management Unit if in the HCVs Assessment, it meets one or more of the following indicators:

- It is found that local community acknowledges zoning in the village areas according to the the land use purposes such as public burial areas and sacred places.
- It is found dispersion of customary areas at landscape level that acknowledged by local communities, either in the low, medium or high dispersion which will be used as the complementary information's relating to preparing the management treatment required by a Management Unit.
- It is identified level of interest, either in the low, medium and high level, of those areas in providing interests to the local communities.

B. Environmental Impact Analysis (EIA/AMDAL)

Formal Method

Formal method is used to measure or estimate impact parameters using mathematical statistical model.

Informal Method

Informal method is used based on the intuition, analogy and experience, in measuring or estimating environmental parameters using statistical mathematical approach. The common approach used in the informal method are:

a). Analogy

In the analogy method, environmental problems that have been arised in an area due to various human activities, will be used as the basis and consideration in the estimation of impacts that may arise in other places with the same ecosystem type.

b). Environmental Standard

Environmental standard used is the criteria and standard that have been determined by local, regional, sectoral or even national regulations, or using the standards and criteria that have been accepted and recognized by public.

c). Professional Consideration

This method is used only when we meet lack of data and information (unadequate data available) in the field and the lack of understanding to impacts.

Data collected consists of primary and secondary data. While filed survey which is supported by structured interview is to collect primary data. Assessor will use questionnaire as the guidance in the interview. While collecting data sourced from regional offices, is conducted using purposive sampling method to identify conditions of demography, public health and education, religion, social, culture and economic in the form of secondary data.

C. SIA (Social Impact Assessment)

1. Data Collection

Data required in the assessment consists of primary and secondary data which collected from the company's office, relevant government agencies and field verifications.

a) Secondary Data

Documents/reports collected, consisting of a) Map of The Concession Area of PT. PP. London Sumatra Indonesia Tbk, b). Map of Village Around The Area of PT. PP. London Sumatra Indonesia Tbk, c) Land Cover Map; d). Land Status Map; e). Landsystem Map; f). Map of Topography and Land Slope; g). River Network Map. h) Subdistricts Data Monograph of 2013.

b) Primary Data

Primary data was collected using Field Observation, Focus Group Discussion (FGD) and interview methods, based on the representativeness of the socio-economic aspects, working areas, and the pattern of interaction with the company.

Field Observation

Field observation is performed to identify the existing condition in the field in order to:

- make sure that data that have been collected are the same or at least almost the same with the real condition in the field.
- explore deeper information in the field on the condition of community's socioeconomic in and around the company's area.

Focus Group Discussion (FGD)

Focus Group Discussion is performed to explore information, problems, hopes and perception of local community related to the company's oil palm development plan.

The FGD was conducted in all study villages.

Interview

Interview is performed using two methods, namely: structured and semi-structured interview.

2. Location and Time of Implementation

The study was conducted in the area of PT. PP London Sumatera Indonesia Tbk **Wilayah Indah Permai Estate** and the surrounding villages namely: Muara Lawa Sub-district covering Dingin Village, Muara Pahu Sub-district covering Dasaq Village and Siluq Ngurai Sub-district covering Kaliq Village, Kutai Barat Regency, Province of East Kalimantan. The HCVs Assessment was completed in 2 month from May- June 2014 and the field observation was carried out on 27 May – 1 June 2014.

1.4. Summary of assessment findings (for SEI Assessment):

According to the review on the EIA, RKL/RPL and SIA documents, it is shown that the presence of PT. PP. London Sumatra Indonesia Tbk (Wilayah Indah Permai Estate) Plantation has generated impacts, both positive and negative, to the environment and the surrounding communities. In order to minimize the negative impacts, the company of PT. PP. London Sumatra Indonesia Tbk (Wilayah Indah Permai Estate) committed to implement the Environmental Management Plan (RKL) and Social Management Plan that have been prepared.

Positive Impacts

The presence of the company has delivered positive impacts to the local communities, in the forms of: improvement of village land roads, increased village land values, increased employment and business opportunities.

Meanwhile, those positive impacts have not been delivered to the local communities of other villages because the CSR Programs was still in the step of planning. Some of the local communities are very optimistic that the company of PT PP London Sumatera Indonesia Tbk - Wilayah Indah Permai Estate will provide positive impacts for development of the village and the surrounding communities.

Negative Impacts

The presence of the company has also the potentials to generate negative impacts to the environment and the surrounding communities. According to the Focus Group Discussion (FGD), it was revealed that most of the surrounding communities gave negative perceptions towards the company, due to the lack of social programs for local communities by the previous management in the past. People assumed that the presence of the company would prohibit logging by local communities which interrupt source of community's income, displacing "limbo" and the ancestral graves.

It was also revealed the potential negative impacts to the surrounding communities, namely : increased social conflict potentials related to the land acquisition mechanism, land occupation, plasma farmers partnership program, social program, indication of overlapping land with a coal mining company.

The potential negative impacts in general are degradation of environmental quality, diminishing land availability for farming, timber/wood sources and other non-wood forest products.

2. SUMMARY FROM HCV ASSESSMENT(S):

2.1. Executive Summary:

INDAH PERMAI ESTATE (IPE)

Background

Administratively, the plantation area of PT. PP London Sumatra Indonesia Tbk – Indah Permai Estate is located in three sub-districts namely : Muara Lawa Sub-district covering Dingin Village, Muara Pahu Sub-district covering Dasaq Village and Siluq Ngurai Sub-district covering Kaliq Village, Kutai Barat Regency, Province of East Kalimantan.

According to the head of National Land Agency's Decree No : 13/HGU/BPN/2003 dated 31 January 2003, the company was granted forest concession area of 15,000 ha for oil palm plantation development which currently managed under the Management of Indah Permai Estate (covering area of ± 6,936.00 ha) and of Isuy Makmur Estate. The company started the activity in 1996 and then stopped until 2005 due to the conflicts with local community.

The plantation area in the past was Logged Over Forest Area which managed by the forest concession companies : PT Sumber Mas II and PT Meratus Kalimantan Timber with three predominant land cover namely mixed farming fields, dryland farming fields and non-productive shrublands. Consider these land cover conditions, it was then led the company to utilize those lands as oil palm plantation in order to provide better land benefits in the aspects of socio-economic and cultural, and ecologically under the implementation of appropriate management practices.

Due to the company's concern to a sustainable development of oil palm plantation in accordance with P&C RSPO especially Principle 5 and 7 (New Planting Procedure), in 2013, the company of PT PP London Sumatera Indonesia Tbk – Indah Permai Estate need to perform Identification of HCVs (Full Assessment) in his plantation area .

The assessment was performed using Guide of HCVs Identification Indonesia version 2 of June 2008 and Draft of HCVA Management and Monitoring Guide – Indonesia published by HCV RSPO Indonesian Working Group (HCV-RIWG) of August 2009. High Conservation Value Area is an area that has one or more of the following characteristics 1). Areas containing important level of biodiversity (HCV1); 2). Natural landscape areas that important for natural ecological dynamics (HCV2); (3) Areas containing rare or threatened ecosystems (HCV3); (4) Areas providing natural environmental services (HCV4); (5) Areas containing important functions for meeting local communities's basic needs (HCV5); and (6) Areas containing important functions for local cultural identity (HCV6).

Land Management History

According to the head of National Land Agency's Decree No: 13/HGU/BPN/2003 dated 31 January 2003, the company was granted forest concession area of 15,000 ha for oil palm plantation development which currently managed under the Management of Indah Permai Estate (covering area of ± 6,936.00 ha) and of Isuy Makmur Estate. The company started the activity in 1996 and then stopped until 2005 due to the conflicts with local community.

The plantation area in the past was Logged Over Forest Area which managed by the forest concession companies : PT Sumber Mas II and PT Meratus Kalimantan Timber with three predominant land cover namely mixed farming fields, dry land farming fields and non-productive shrub lands.

Currently, the company's management of Indah Permai Estate is in the beginning step in the form of land acquisition and introducing the company's plantation development plan to the surrounding communities, relevant village and subdistrict officials and other local stakeholders.

Company Area and Boundary

PT. PP London Sumatra Indonesia Tbk – Indah Permai Estate manages a area of ± 6,936.00 ha for oil plam development which administratively, located in three sub-districts namely : Muara Lawa Sub-district covering Dingin Village, Muara Pahu Sub-district covering Dasaq Village and Siluq Ngurai Sub-district covering Kaliq Village, Kutai Barat Regency, Province of West Kalimantan. The company’s area includes in the Mahakam Watershed (DAS) – subwatersheds of Kedang Pahu and Jelau.

The company area boundaries are as follows :

- North : Villages of Peninggir, Dasaq, and Kedang Pahu River
- South : Area of PT. Energi Batu Hitam
- East : Jelau River
- West : Dingin Village

Land Cover Within The Company Area and The Surroundings

- In the field observation, it was shown that land covers in the area of PT PP London Sumatera Indonesia Tbk – Indah Permai Estate are identified as 1) Secondary Forest Areas, 2) Mixed Cultivaltion Lands, 3) Cultivation Drylands, 4) Shurblands, 5) Open lands, 6) Water bodies. Meanwhile the land covers in the surrounding area of PT PP London Sumatera Indonesia Tbk are identified as plantation areas in the north, mixed cultivation lands belonging to local community (commonly found as rubber lands). While the remaining forested areas within the concession of PT PP London Sumatera Indonesia Tbk – Indah Permai Estate are scattered and not connected with other forested areas outside the company area. The remaining forested areas within the area of PT PP London Sumatera Indonesia Tbk – Indah Permai Estate are Logged Over Forest Area of the previous forest concession company and as ex illegal logging. Currently, some of those areas have been occupied by community and cleared for cultivation lands.
- The company’s area includes in the *Mahakam Watershed* (DAS). and it is found Protection / Conservation Area namely *Padang Luwai Nature Reserve Area* and it is far from the company’s area with the distance of about ± 10.5 km to the west.

HCVs Identification and Analysis

The Assessment has identified HCVs within the area of PT. PP London Sumatera Indonesia Tbk - Indah Permai Estate containing HCV1 (HCV1.2, and HCV1.3), and HCV4 (HCV4.1 and HCV4.2) which covering areas of 1,650.23 ha containing River Riparian and Buffer Zone of Swamp Areas of 100,0 ha, Swamp Areas of 181.01 ha, and Hilly Secondary Forest Areas of 1,369.22 ha with the following details :

Location	Type of HCV	River Width (m)	River Riparian Width (m)	Length of River (km)	Area (Ha)
Riparian Ecosystem					
River. Mehow	HCV1.2, HCV4.1	3	10	2.59282	5.19
River Lawang	HCV4.1	5	10	0.632234	1.28
River IP Timur	HCV4.1	10	25	4.39847	21.96
Buffer zone of Mehow Swamp	HCV1.2, HCV4.1				71,57
					100.00
Water Body					
Mehow Swamp	HCV4.1				181.01
					181.01
Hilly Area					
Secondary forest within Indah permai Estate	HCV1.2, HCV1.3, HCV4.2				1,369.22
					1,369.22
HCV Area (ha)					1,650.23
Concession Area (ha)					6,936.00
Percentage (%)					23.79%

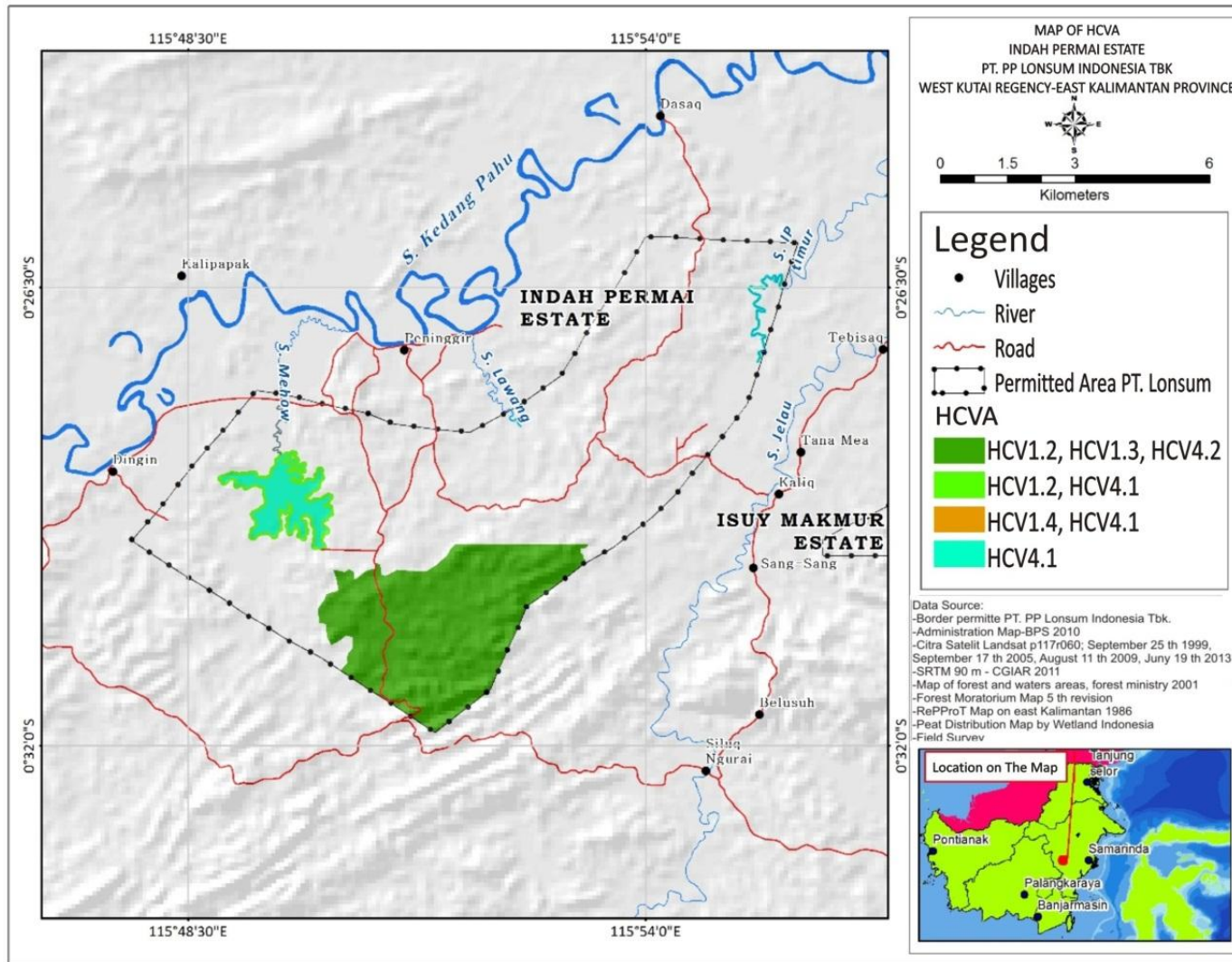


Figure-1. Map of HCV Areas Identified in The Area of PT PP London Sumatera Tbk - Indah Permai Estate

2.1 Public Consultation

Public consultation was held on 31 May 2014 in the Plantation Office of PT. PP London Sumatera Indonesia Tbk (Wilayah Indah Permai Estate). The public consultation results will be used as inputs in the completion of HCV document report

3. SUMMARY OF PLANS:

3.1. Executive Summary

Background

PT PP London Sumatera Indonesia Tbk - Indah Permai Estate is an Oil Palm Plantation Company, administratively located in Kutai Barat Regency, Province of East Kalimantan. Due to the company's concern to a sustainable development of oil palm plantation, it is required to perform *Social Environmental Impact Assessment (SEIA)* to reduce social conflicts that may happen in the period of pre operational, operational and post operational, and to gain support from stakeholders

Social Environmental Impact Assessment (SEIA) is an identification and analysis of impacts both positive and negative that have generated and potential impacts that may happen in the future. The assessment will also identify community's perceptions and hopes, strategic issues which is important as a part of *Social Safeguard Efforts*.

For the company, the document of Social Impact Assessment can be used as the basis in the preparation of Social Management Plan and activity plans in the *Corporate Social Responsibility (CSR)*. CSR is a company's effort to synergize shareholders and stakeholders interests in the step of both, planning and the implementation. In an extractive industry, the implementation of CSR program is emphasized to establish relationship and supports from local communities, which intended to improve sense of belonging of the stakeholders toward the company, improve independence and empowerment of local community. Law No 40 of 2007 on Limited Company and the Law No 25 of 2007 on Investment, require a company to conduct *Corporate Social Responsibility (CSR)*.

It is expected that social management program implemented by the company will fit the needs of local community and the company social sustainability will be met. The Social Impact Assessment will be one of the requirements in the RSPO Certification Process.

3.2. Reference Documents:

INDAH PERMAI ESTATE (IPE)

- a) Document report on The Environmental Impact Analysis (AMDAL) of PT T PT. PP. London Sumatra Indonesia Tbk (Wilayah Indah Permai Estate) by PT POLIGON KALTIM UTAMA of 2005.
- b) Document report on the High Conservation Value (HCV) in the area of PT T PT. PP. London Sumatra Indonesia Tbk (Wilayah Indah Permai Estate) by Faculty of Forestry – Bogor Agricultural University of 2014.
- c) Document report on the Social Impact Assessment (SIA) in the area of PT T PT. PP. London Sumatra Indonesia Tbk (Wilayah Indah Permai Estate) by Faculty of Forestry – Bogor Agricultural University of 2014.

3.3. SEIA and HCV Management & Planning Personnel:

INDAH PERMAI ESTATE (IPE):

Estate Manager IPE: Ir. Chris Runtu; Head Assistant Agronomy: Ir. Parlaungan Hasibuan; Head Assistane Development: Ir. Jhon Abdi; Head Assistant LA: Ir. Suroto.

3.4. Summary of Management and Mitigations Plans (SEIA):

According to the review on the *EIA*, *RKL/RPL* and *SIA* documents, it is shown that the presence PT. PP. London Sumatra Indonesia Tbk (Wilayah Indah Permai Estate) Plantation has generated impacts, both positive and negative, to the environment and the surrounding communities. In order to minimize the negative impacts, the company PT. PP. London Sumatra Indonesia Tbk (Wilayah Indah Permai Estate) committed to implement the *Environmental Management Plan (RKL)* and *Social Management Plan* that have been prepared.

The presence of the company has delivered positive impacts to the local communities especially of Tanjung Jan Village, in the forms of : improvement of village land roads, increased village land values, increased employment and business opportunities. Meanwhile, those positive impacts have not been delivered to the local communities of other villages because the CSR Programs was still in the step of planning. Some of the local communities are very optimistic that the company of PT PP London Sumatera Indonesia Tbk - Isuy Makmur Estate will provide positive impacts for development of the village and the surrounding communities.

The presence of the company has also the potentials to generate negative impacts to the environment and the surrounding communities. According to the *Focus Group Discussion (FGD)*, it was revealed that most of the surrounding communities gave negative perceptions towards the company, due to the lack of social programs for local communities by the previous management. People assumed that the presence of the company would prohibit logging by local communities which interrupt source of community's income, displace "limbo" and the ancestral graves.

It was also revealed the potential negative impacts to the surrounding communities, namely : increased social conflict potentials related to the land acquisition mechanism, land occupation, plasma farmers partnership program, social program, indication of overlapping land with a coal mining company.

The potential negative impacts in general are degradation of environmental quality, diminishing land availability for farming, timber/wood sources and other non-wood forest products.

Social Impact Management for Local Communities

a. Build communication and networking with all stakeholders associated with PT. PP. London Sumatra Indonesia Tbk, consisting of the following activities - Organizing regular meeting with stakeholders and coordination with village officials, community's leaders and other informal leaders.

- Introducing clear information on the company's oil palm plantation development plan to the surrounding communities to the surrounding communities.

b. Improve public educational quality which containing

- Prepare educational development plan according to the local community's need.

- Provide scholarships for excelled students and poor peoples.

c. Improve public health quality which containing

- Identification of Public Health Facilities in the surrounding villages.

- Providing medication and introducing of public health and sanitation to the surrounding communities.

- Providing clean water supply facilities.

- Providing Health Center Facilities (Poliklinik) within the plantation area.

- d. Improve village accessibility which in the form of improvements of village land roads.
- e. Local community empowerment which consisting of :
 - Identification and analysis of the surrounding village potentials
 - Encouraging the development of intensive agriculture.
 - Training on the community's skills to increase job and bussiness opportunities as alternative local community's livelihoods
 - Local labor recruitment
 - Implementation of Plasma Program Partnership
- f. Environmental management programs consisting of :
 - Mitigation on the potential of water quality degradation.
 - Public education and trainings on the 3R (Reduce-Reuse-Recycle) to local community.
- g. Settlement of Tenure Problems
 - Identification and mapping the land ownership within the area PT. PP. London Sumatra Indonesia Tbk
 - Identification of the indications of overlapping land with a coal mining company
 - Identifications of problems that have occured and the settlement efforts that have been done.
 - Preparing SOP on the Settlement of Land Acquisition.
 - Providing Identification, Verification and Land Acquisition Teams
 - Facilitating measurement of village area boundaries within the concession area.
 - Documentation of legalization process undertaken by the company.

Social Impact Management for Company's Internal

Consider that the company of PT. PP London Sumatra Indonesia Tbk (Wilayah Indah Permai Estate) is in the beginning step, all of the activities are managed temporarily under the management of PT. PP London Sumatera Indonesia Tbk – Isuy Makmur Estate.

Currently, total of workforce recruited in the company of PT. PP London Sumatera Indonesia Tbk - Isuy Makmur Estate is 1,877 peoples consisting of 147 permanent employees, 178 non-permanent employees and the rest, are 1,552 peoples of daily workers. Workforce is one of the important stakeholders to be identified and considered by the company's management because they have direct influence in encouraging the company's business According to the origin, workforce in this company consisting of 25% are the workforce from Dayak, 20% from Kutai and the rest are migrant peoples who mostly came from Nusa Tenggara Timur (40%). The need for workforce in this company is likely to increase in the future according to the increase of planted acreage

According to the field observation, it was shown that all support facilities required for employees are using the facilities available in the Isuy Makmur Estate such as office, housing, worship afcility, sports Facilities and clinic; except workers in the nursery which using the existing facilities in the surrounding community's settlement. According to the origin, workforce in this company consisting of 25% are the workforce from Dayak, 20% from Kutai and the rest are migrant peoples who mostly came from Nusa Tenggara Timur (40%). The need for workforce in this company is likely to increase in the future according to the increase of planted acreage.

The company's programs relating to the management of social impacts for company's internal consist of :

Educational and Worship Facilities, Personal Protective Equipment, Health Facilities for Employees, Housing and Water Supply Facilities, Support the establishment and activities of Labor Unions.

3.5. Summary of Management and Mitigations Plans (HCV):

HCVA Management

The Assessment has identified HCVs within the area of PT. PP London Sumatra Indonesia Tbk (Wilayah Indah Permai Estate) containing HCV1 (HCV1.2, and HCV1.3), and HCV4 (HCV4.1 and HCV4.2) which covering areas of 1,650.23 ha containing River Riparian and Buffer Zone of Swamp Areas of 100.00 ha, Swamp Areas of 181.01 ha, and Hilly Secondary Forest Areas of 1,369.22 ha with the following details :

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River Lawang	HCV4.1	5	10	0.632234	1.28
River IP Timur	HCV4.1	10	25	4.39847	21.96
Buffer zone of Mehow	HCV1.2,				71.57
Swamp	HCV4.1				100.00
Water Body					
Mehow Swamp	HCV4.1				181.01
					181.01
Hilly Area					
Secondary forest within Indah permai Estate	HCV1.2, HCV1.3, HCV4.2				1,369.22
					1,369.22
HCV Area (ha)					1,650.23
Concession Area (ha)					6,936.00
%					23.79%

Objectives

HCVA Management Plan is aimed at the prevention and maintenance of the functions on each HCV area identified using the following steps :

1. Formulation of policy and efforts to maintain and enhance the values of HCV's in the area of PT. PP London Sumatera Indonesia Tbk (Wilayah Indah Permai Estate).
2. Formulation of relevant stakeholder in the implementation, coordination and surveillance of HCVA Management in order to maintain and enhance the values of HCV's in the area of PT. PP London Sumatra Indonesia Tbk (Wilayah Indah Permai Estate).

Importance

The importance of HCVA Management Plan in the area of PT. PP London Sumatera Indonesia Tbk are:

1. For Company: It can be used as Guidance in the implementation of HCVA Management.
2. For Community : As source of informations of the company's activities of environmentally sound plantation management It is expected to avoid misunderstanding, which in turn can establish mutually beneficial cooperation between the management of PT. PP London Sumatera Indonesia Tbk and the surrounding communities.

Goals

Goals to achieved is the sustainability of each HCVA and other area in general, in order to achieve the increased plantation productivity and better community's welfare in the long term.

Management and Mitigation Plan

The HCVs management and mitigation plan in the area of PT. PP London Sumatera Indonesia Tbk consists of the following activities :

- 1) HCVA Protection

- a. Area Boundary Marking
 - b. Providing and Maintaining signboards
 - c. Preventing and Controlling Land Fires
 - d. Area, Flora and Wildlife Protection
- 2) Maintenance of Area Functions
- a. Inventory and identification of HCVA land cover
 - b. Land rehabilitation and enrichment planting
 - c. Empowerment of Human Resource Quality

The empowerment of human resource quality can be done through education and training activities to both local communities and company's staff in a certain amount and gradually, with the education/training content : the importance of HCVA and biodiversity conservation internally and externally to the relevant institutions (Training Centers/ PUSDIKLAT).

3) Institutional Strengthening

The institutional strengthening in management unit can be implemented by the establishment of an organization which in charge on the HCVA management implementation in the concession area. When the organization existed, then it needs to optimize the functions of the environmental division.

4. VERIFICATION STATEMENT:

PT PP LONDON SUMATRA INDONESIA – WILAYAH INDAH PERMAI ESTATE opted for document audit. Two (2) Mutuagung Lestari auditors have conducted desk study at their site office in Jakarta from 16th - 17th October 2014; and also held interviews with the management representatives of PT PP LONDON SUMATRA INDONESIA - WILAYAH INDAH PERMAI ESTATE during the verification. The auditor teams are: Y. Wisnu Rahmanto (HCV and SEIA Aspect), Marsudi Eko Santoso (Legal and Social Aspect).

The SEIA (AMDAL) was conducted by the government-accredited consultant whereas the SIA and HCV assessments were conducted by RSPO-approved assessors. In accordance with RSPO requirements PT PP LONDON SUMATRA INDONESIA - WILAYAH INDAH PERMAI ESTATE needs to obtain free, prior and informed consent from the local community that would be affected by the development of the concession area. Summary of Land Compensation within period 2010 – 2014 covering 6,977.01 Ha (17 land ownership within Indah Permai area) are:

2012: 167.42 Ha of 17 land ownership has been compensated (Indah Permai Estate).

Therefore PT PP LONDON SUMATRA INDONESIA - WILAYAH INDAH PERMAI ESTATE has adhered to RSPO New Planting Procedure for On-Going New Planting.

Submission of on-going new planting area PT PP LONDON SUMATRA INDONESIA - WILAYAH INDAH PERMAI ESTATE is covering 6,936.00 Ha and there is planting activities was commenced before January 1st, 2010 is identified. Documents of the assessments process and the content of the plan are comprehensive, of professional quality and in compliance with relevant RSPO Principles, Criteria and Indicators. In relation with the process and action steps for inclusion of Criterion 7.8, carbon assessment (including identification, calculation and estimation) of PT PP LONDON SUMATRA INDONESIA - WILAYAH INDAH PERMAI ESTATE is being progress and will be submitted to ERWG via RSPO Secretariat.

Signed on behalf of,

Mutuagung Lestari

PT. PP LONDON SUMATRA INDONESIA,
Tbk



YUDWI WISNU RAHMANTO

Lead Auditor
22nd – December – 2014

MUHAMMAD WARAS

Position
22nd – December – 2014