

Talking Sustainability: Seeking the Truth

Findings on the Aidenvironment Allegations to PT. BSS and PT. BNS

Disusun oleh

Aksenta
accentuate life

May 2015

Allegation # 1

Land development in PT. BSS, 2014: conspicuously well ahead of schedule:

- ◆ *PT. BSS was in a rush to fully open PT. BSS in 2014, and ignored its management plan, as published in its NPP on the RSPO website (March 2014).*
- ◆ *The rapid development of PT. BSS resulted in several non-compliance with IOI's sustainability commitments.*

Findings #1

- ◆ According to PT. BSS NPP Summary Report of Planning and Management and the RSPO Notification of On Going Development, the management unit planned to develop further its plantation in 2014, covering a total area of about 3,918 ha, on the central part of the area, and in 2015, covering a total area of about 3,051 ha, on the western part of the area.
- ◆ Later, in April 2014, the management unit decided to build a drainage system in the previously planned '2015 planting block' in 2014. This decision was taken to mitigate the excess of overland water flow by releasing the excess water from the area to Jelai River to the south.
- ◆ Until September 2014, no clearance or stacking activity was conducted in the previously planned '2015 planting block'. The activities only involved drainage development. The management unit begun to conduct stacking in September 2014, after the fires event during August-September 2014 in the area concern(see map on pages 5,6).

Findings #1

- ◆ The bare land on this area as depicted on the satellite imagery of November 2014 as presented in the Aidenvironment document, is mostly caused by the severe effect of the land fires during August-November 2014 (see map on pages 8,9).
- ◆ The GIS acreage estimation on the superimposed Landsat satellite imagery of November 18, 2014 and PT. BSS planting block map, revealed that the severe land fires in the period August-November 2014 have burned nearly all areas to the west of PT HSL canal which crosses PT. BSS Permit Area (located in the previously planned '2015 planting block'), covering a total area of about 1,808 ha. Another significant fire affected area to the east of the PT HSL canal covering a total area of about 3,109 ha of not yet cleared area, and a total area of about 663 ha of newly cleared land in the 2014 planting block.
- ◆ The superimposition of the drainage system with the HCV area map, land cover map, peat land map and carbon stock distribution map showed that the drainage development in the 2015 planting block did not encroach or replace any HCV areas and/or forest areas(map on page 10-12).

Landsat 8 Imagery March 7, 2014

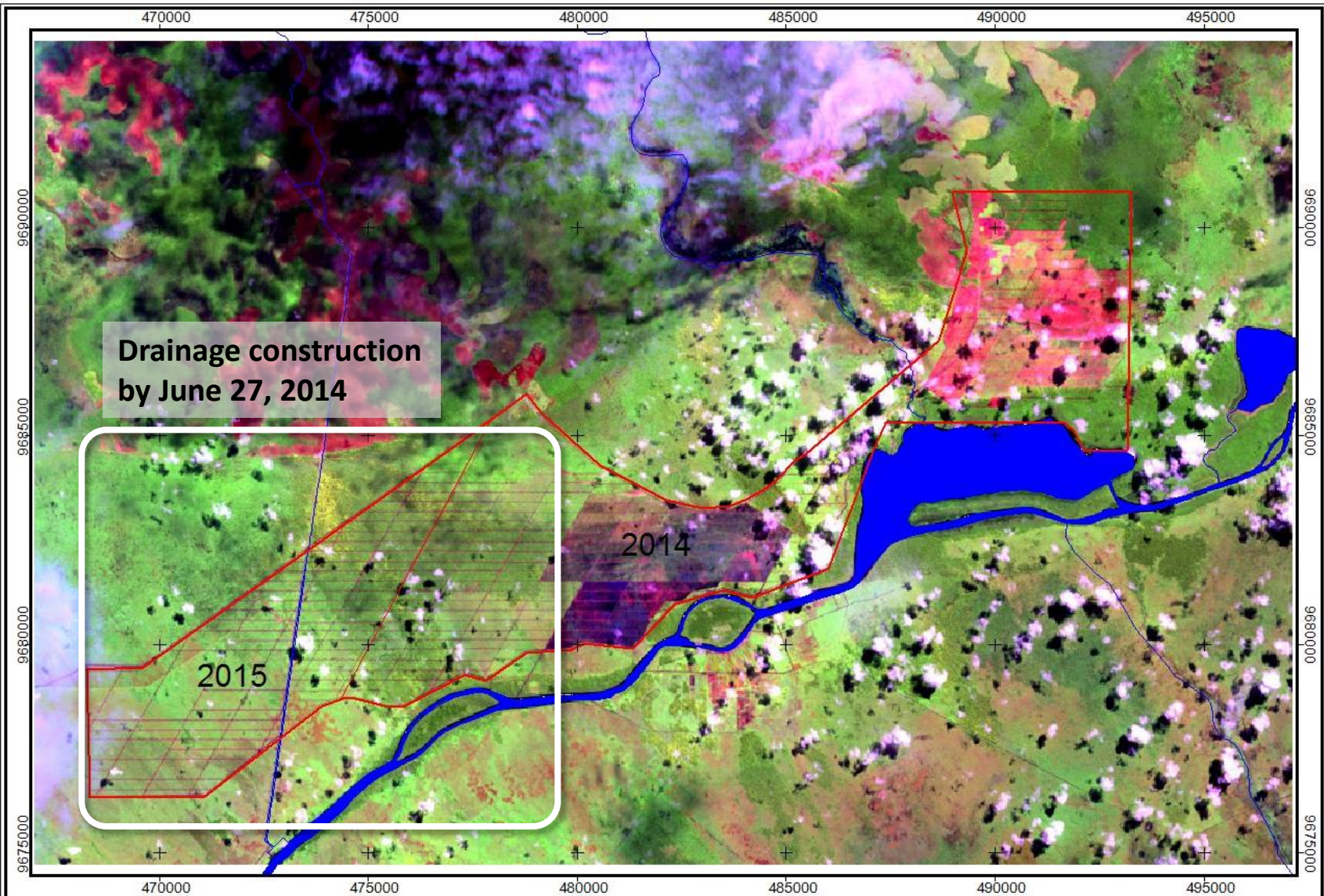
Planned '2015 planting block'

Land clearing activity by March 7, 2014

- The drainage construction in the planned 2015 planting block was required to mitigate the flood risk and draining off the permanently waterlogged area in this block.

Landsat 8 Imagery June 27, 2014

Drainage construction by June 27, 2014



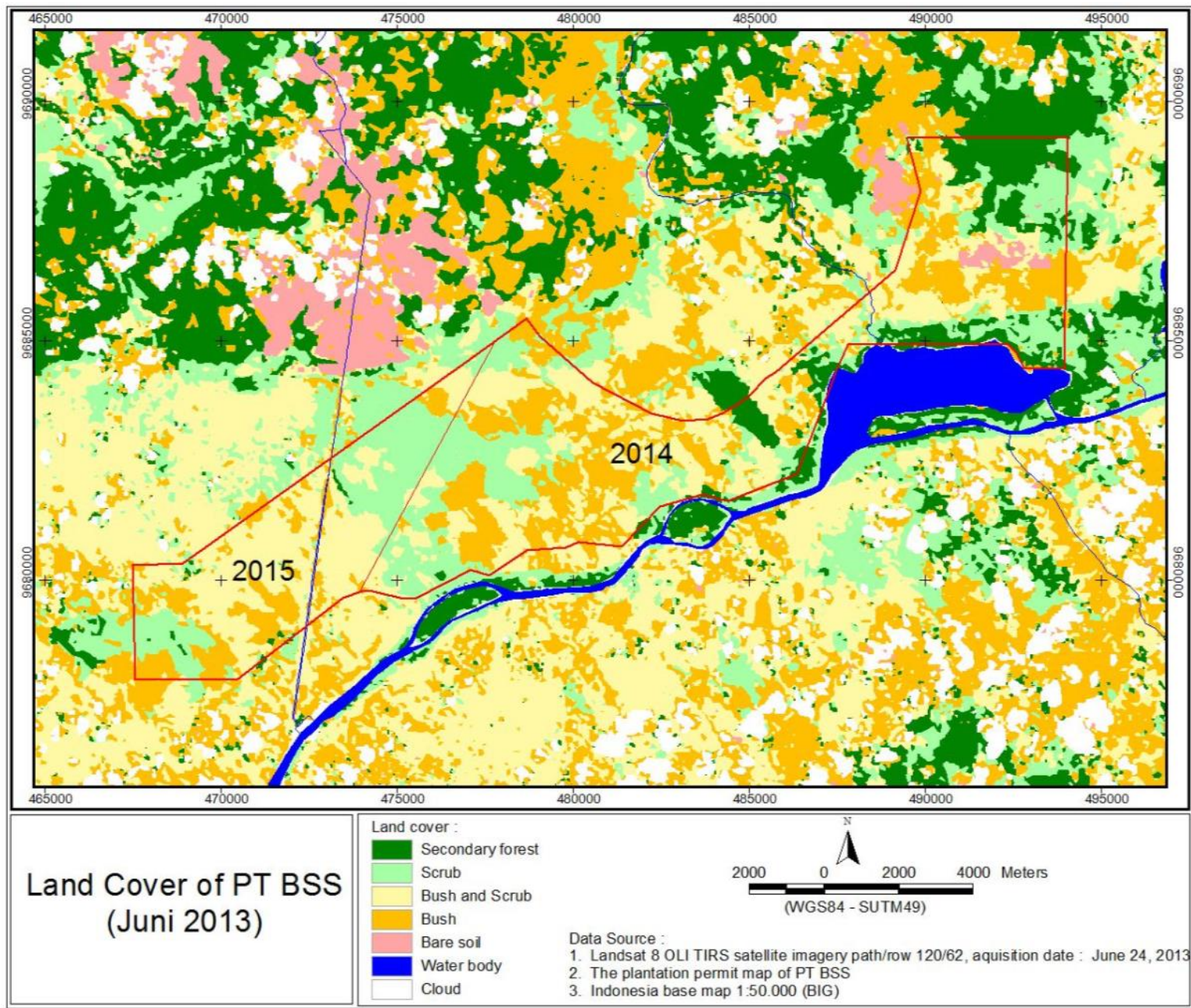
Landsat 8 Satellite Imagery
 path/row : 120/62
 date : June 27, 2014)



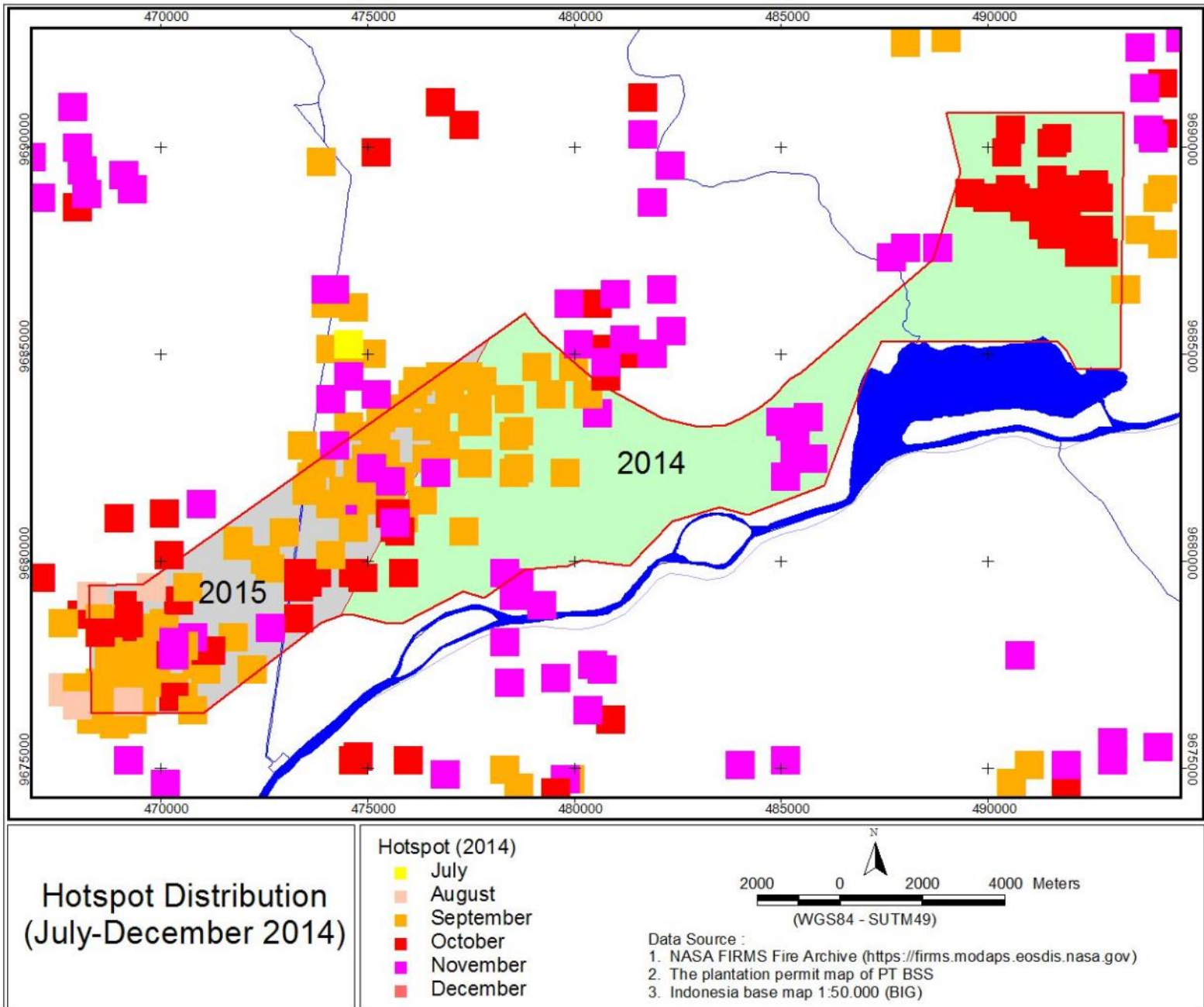
Data Source :

1. Landsat 8 OLI TIRS satellite imagery path/row 120/62, aquisition date : June 27, 2014
2. The plantation permit map of PT BSS
3. Indonesia base map 1:50.000 (BIG)

Land Cover Map of PT. BSS Permit Area, June 2013



Hotspots Distribution in PT. BSS Permit Area and surrounding areas in the period July-December 2014

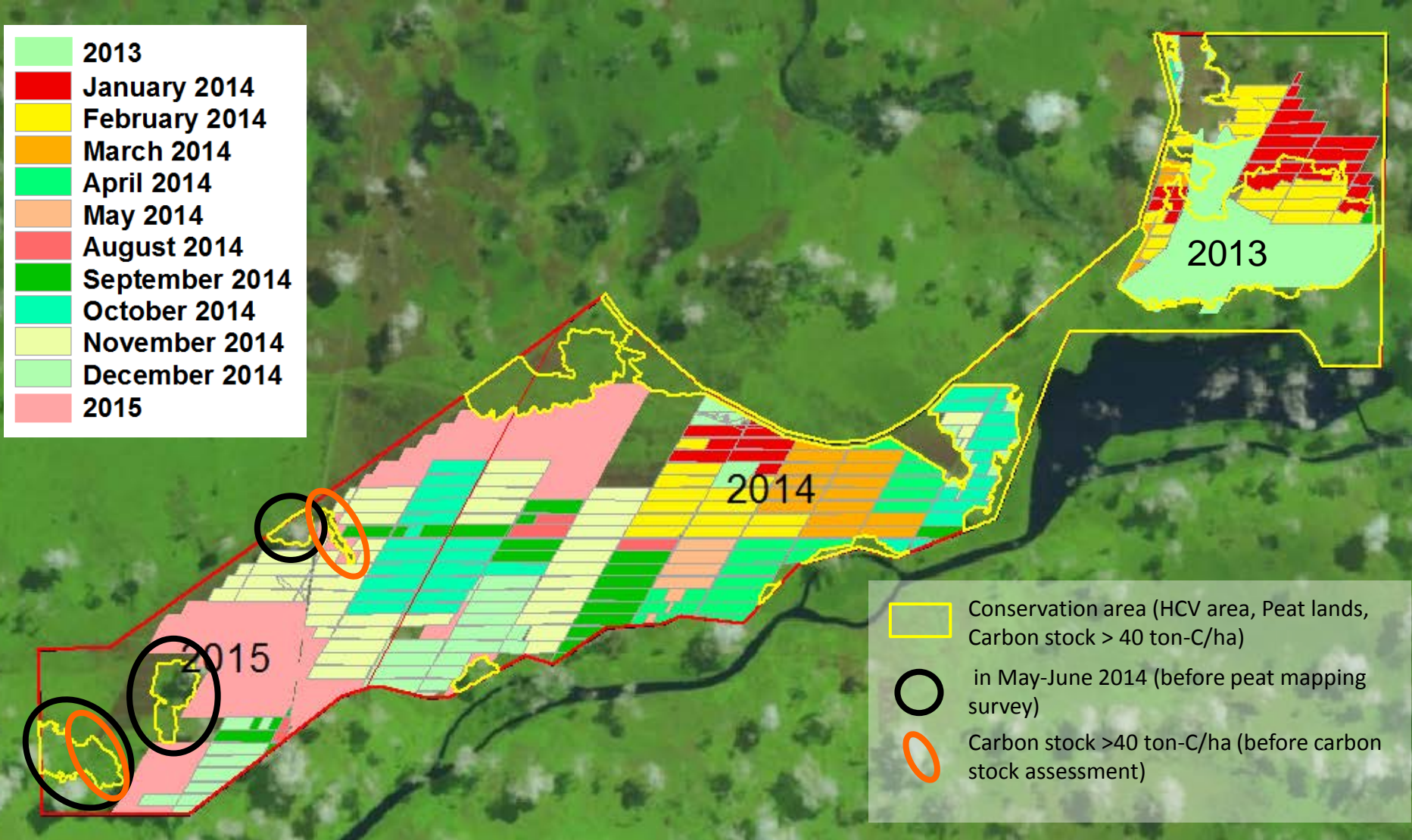


The impact of land fires of August-November 2014 in the PT. BSS Permit Area



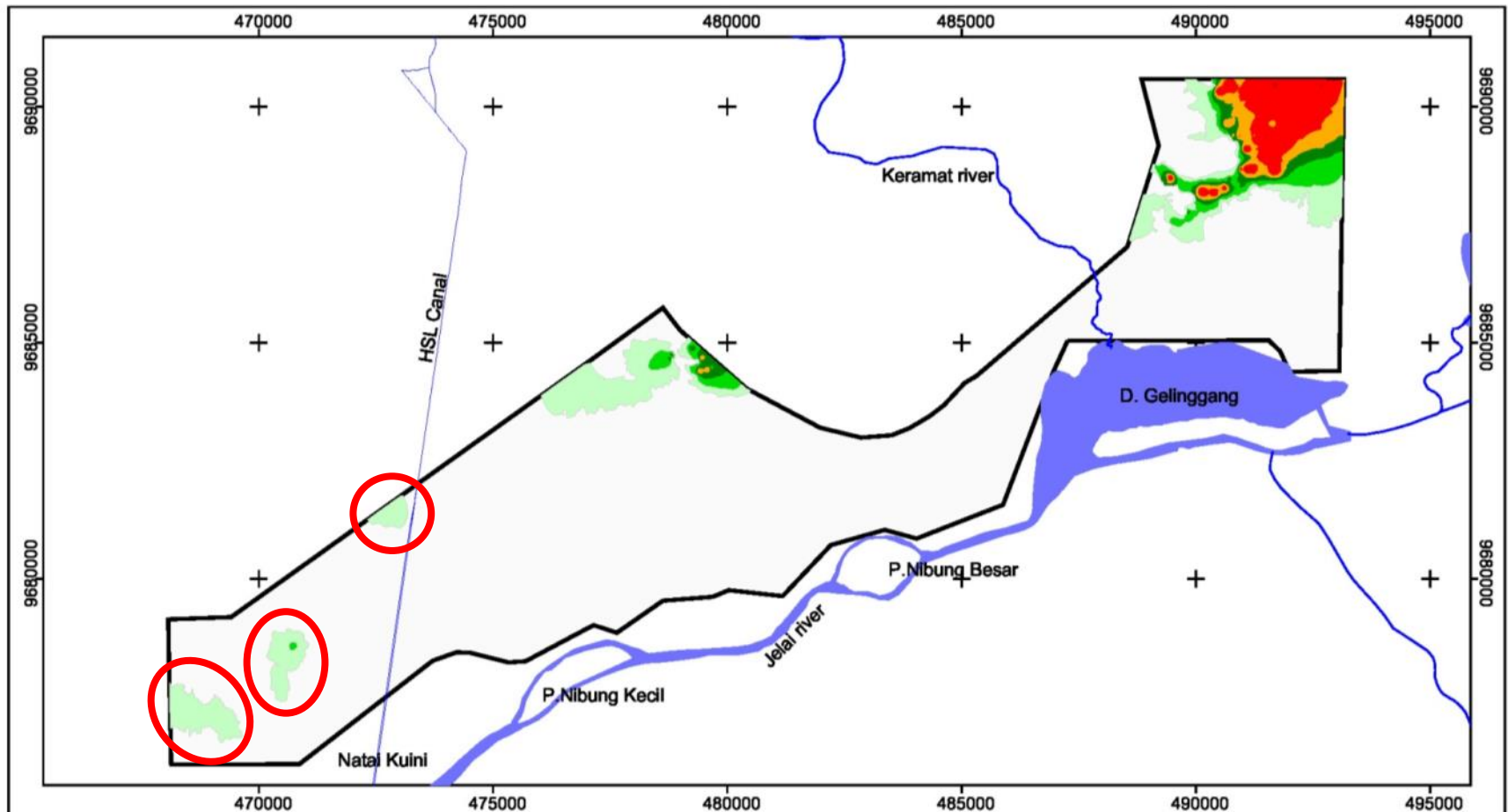
Source: Landsat 8 Satellite Imagery, December 4, 2014

The stacking progress map of PT. BSS 2013-2015



Source:
1. Stacking progress map of PT. BSS 2013-2015
2. Landsat 8 Satellite Imagery, May 13, 2015

Peat land map of PT. BSS



The Peat Thickness Map
 PT Bumi Sawit Sejahtera
 Ketapang - Kalimantan Barat
 2014

Total Peat Area : 1437.22 Ha

50-100 cm	(706.63 ha)
100-200 cm	(191.86 ha)
200-300 cm	(112.43 ha)
300-400 cm	(145.74 ha)
400-500 cm	(279.68 ha)
>500 cm	(1.89 ha)
Water body	(13.60 ha)

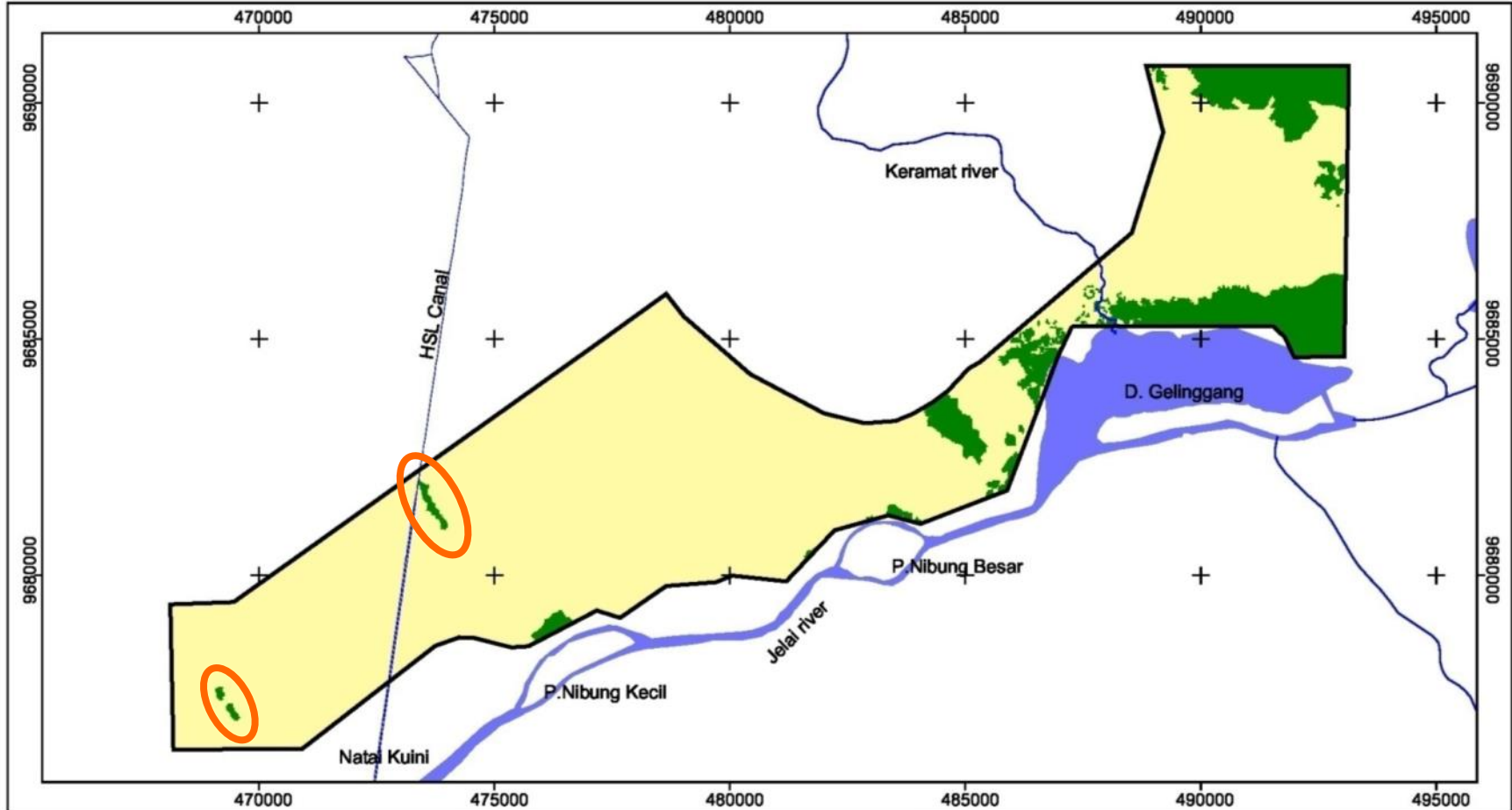
2000 0 2000 Meters

(Projection : WGS 84 - SUTM 49)

Source:

1. Map location of PT BSS
2. Landsat 8 satellite image path/row 120/62 (date : June 17, 2014)
3. Peat Mapping Survey survey by Aksenta Team, June 2014
4. Test soil result by Seameo-Biotrop Service s Laboratory, June-August 2014

Carbon stock distribution map of PT. BSS



Map of Above Ground Carbon Living Biomass - DBH > 5 cm
 (Proposed to be managed as HCS area)
 PT Bumi Sawit Sejahtera
 Ketapang - Kalimantan Barat
 2014

Carbon Stock :

- < 40 ton C/Ha (9029.49 Ha)
- > 40 ton C/Ha (1024.12 Ha)
- Water body (13.60 Ha - only in PT BSS)



2000 0 2000 Meters

(Projection : WGS 84 - SUTM 49)

Source:

1. Map location of PT BSS
2. Landsat 8 satellite image path/row 120/62 (date : June 17, 2014)
3. Ground thruting survey by Aksenta Team, June 2014
4. Carbon stock inventory survey by Aksenta team, June 2014

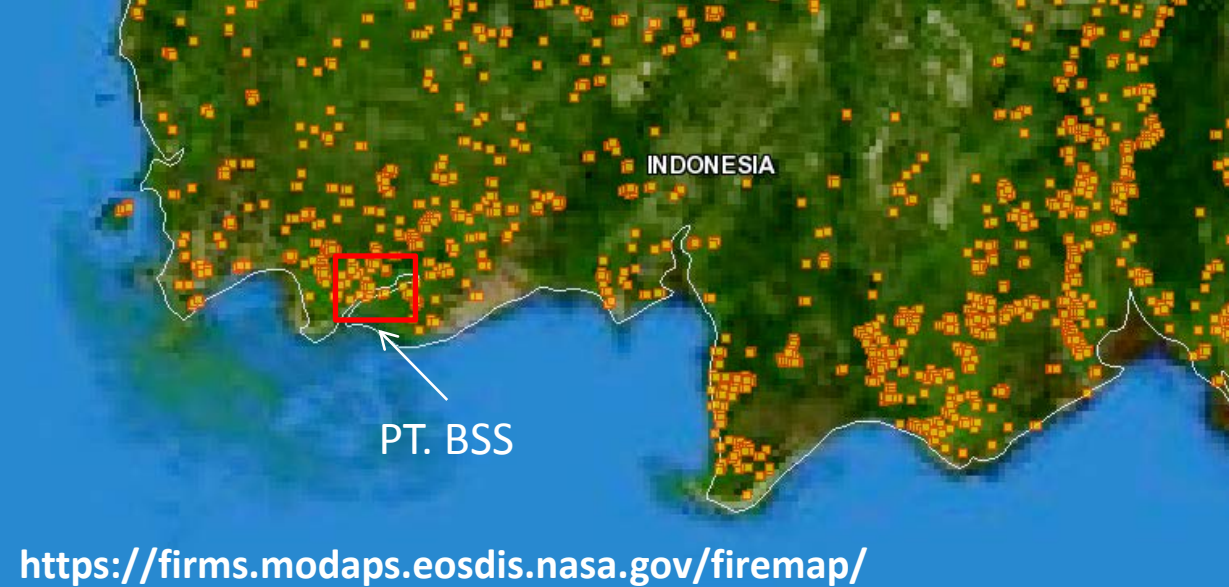
Allegation # 2

A whole HCV site was lost in PT. BSS in 2014:

- ◆ *After already having constructed a canal through HCV Site #2 early 2014, practically all forest in HCV Sites #2 disappeared between November 2014 and February 2015.*
- ◆ *Although no estate blocking is visible within the site, the clearing sharply follows boundaries.*

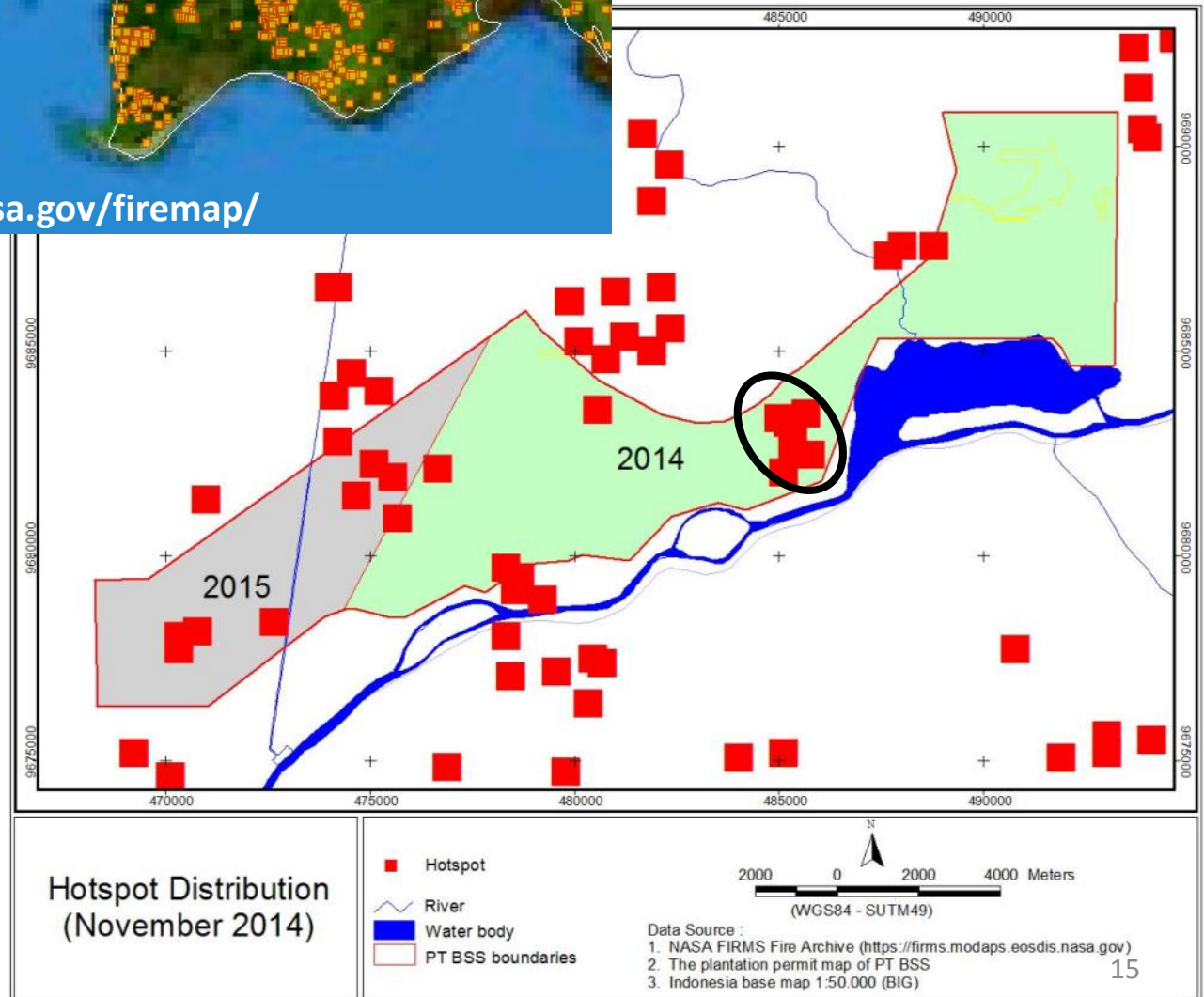
Findings #2

- ◆ The development of the canal had resulted in the clearance of an area of about 0.9 ha or 1.0% of the total area at the tip of HCV area #2 of about 87 ha. According to IOI's operational management, the 4 meter wide canal was constructed to alleviate the flooding which has occurred at the upper end non-HCV area.
- ◆ The bare land on this area, depicted as brown color on the satellite imagery of February 2015 as presented in the Aidenvironment document, was not caused by any clearance activities of the management unit, instead was caused by the severe effect of the land fires in November 2014. Nearly all of the HCV area was burned (see maps on pages 15-17 and pictures on page 18).
- ◆ The management unit is committed to the 'zero-burn' policy in land development. The fire origin either natural or man-made remained uncertain.



Hotspots Distribution in PT. BSS Permit Area and surrounding areas in November 2014

<https://firms.modaps.eosdis.nasa.gov/firemap/>



The impact of land fires of August-November 2014 to the HCV area #2

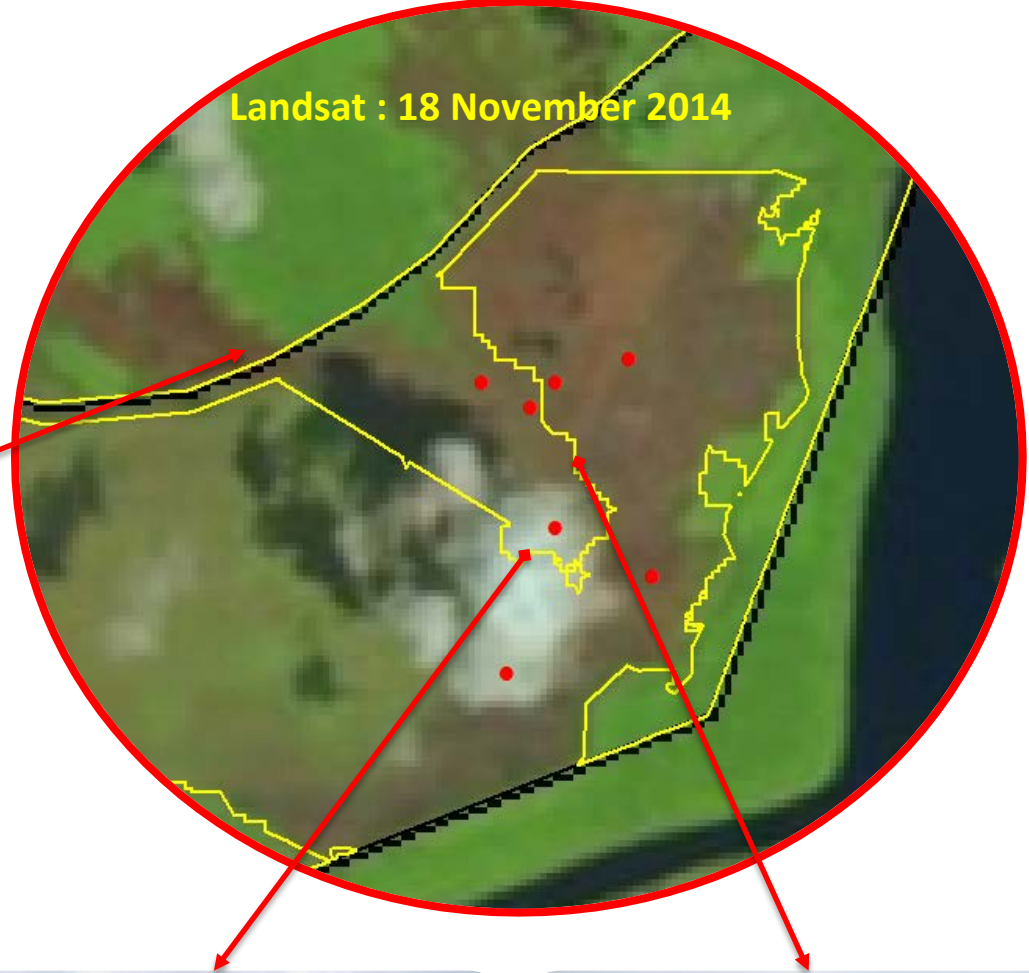


Source: Landsat 8 Satellite Imagery, December 4, 2014

The impact of land fires of August-November 2014 to the HCV area #2



Source: Landsat 8 Satellite Imagery,
November 18, 2014



▲
Paddy field and other agricultural plants cultivated by local community on the burned areas outside permit area.

The land fires in November 2014 destroyed all forest cover of HCV area #2 ▶

Pictures taken on April 25, 2015



Allegation # 3

After IOI signed up to the peat restoration project in writing, PT. BSS still cleared all peat forest in the restoration project area.

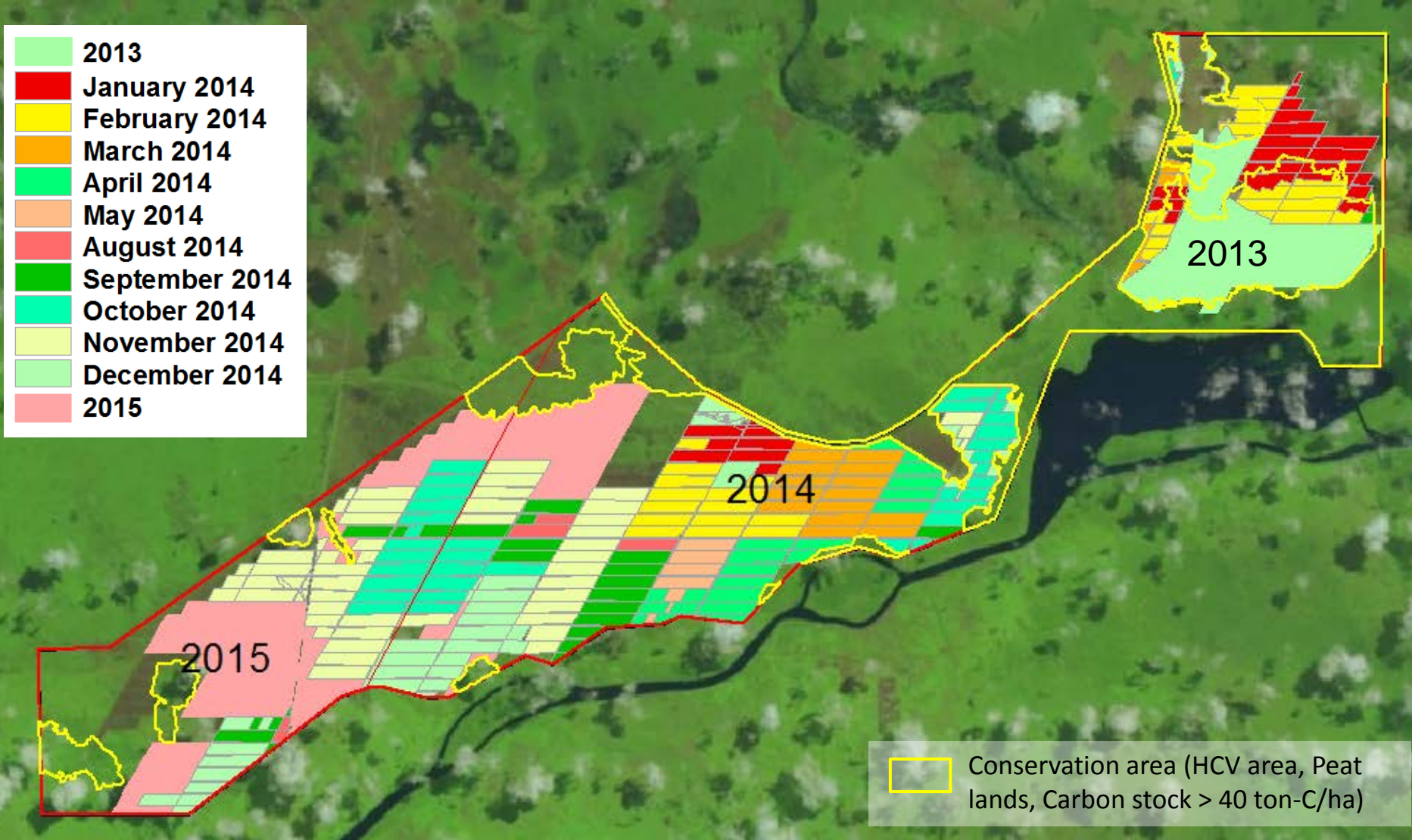
Findings #3

- ◆ According to the land clearance progress report and stacking map provided by the management unit, the management unit conducted its land clearance on the deep peat area in the northern part of the Permit Area, in the period January-February 2014 (see map on page 22).
- ◆ The management unit recognized and respected the occurrence of the HCV areas identified and mapped in April 2010, by excluding them from the land clearance plan. However, they misconceived that all deep peat areas had all been covered under the HCV areas and all other land outside the HCV areas were considered shallow. Therefore, they conducted the land clearance on all land outside the HCV areas, including on the areas which were later identified as deep peat lands.
- ◆ In fact, the HCV assessor considered that only peat lands which were still forested (peat swamp forest), regardless of depth, were still having high conservation value, therefore were considered as HCV areas. While open, degraded peat lands (the forest cover has been lost), despite they were classified as deep peats (more than 3 meter in depth), were not considered as HCV areas, taking into consideration the severe degradation has decreased their conservation value significantly.

Findings #3

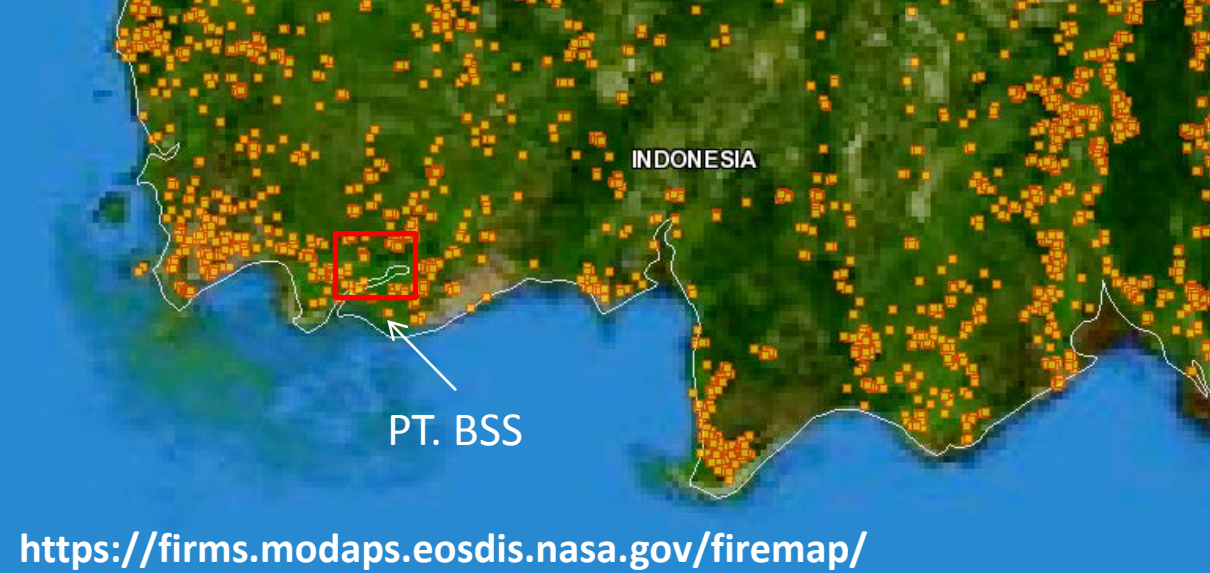
- ◆ The misinterpretation by the management unit has led to the clearance of the open, degraded deep peat lands outside the HCV areas. This land clearance activity was stopped immediately on 14th February after the management unit received an advice from the SAI Global auditor team who conducted the NPP verification, to stop the land clearance on the areas with deep peat.
- ◆ The management unit then developed its restoration program for the deep peat areas which had been cleared, covering a total area of about 141 ha, as its response of rectification to the feedback given by the SAI Global auditor team on 14th February 2014, based on the findings they collected during their field visit on 6th February 2014.
- ◆ The 141 ha restoration area however was burned subsequently by the forest and land fires in October-November 2014. This forest and land fire also destroyed the management unit's infrastructures of employee housings, machinery spare-parts storage, chemical storage and field office (see map on pages 23,24 and pictures on page 25).

The stacking progress map of PT. BSS 2013-2015

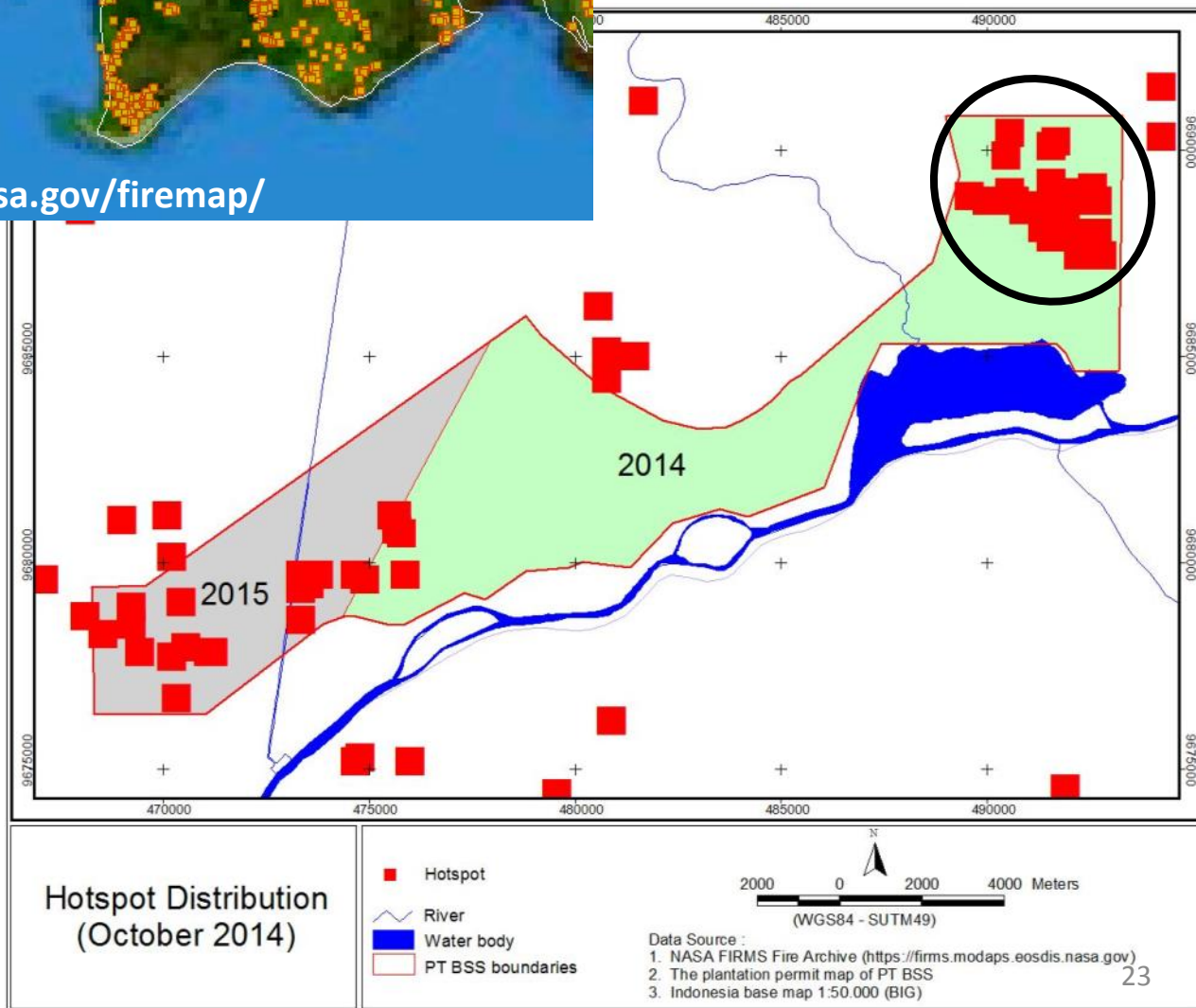


Source:

1. Stacking progress map of PT. BSS 2013-2015
2. Landsat 8 Satellite Imagery, May 13, 2015



Hotspots Distribution in PT. BSS Permit Area and surrounding areas in October 2014



The impact of land fires of October 2014 to the restoration area

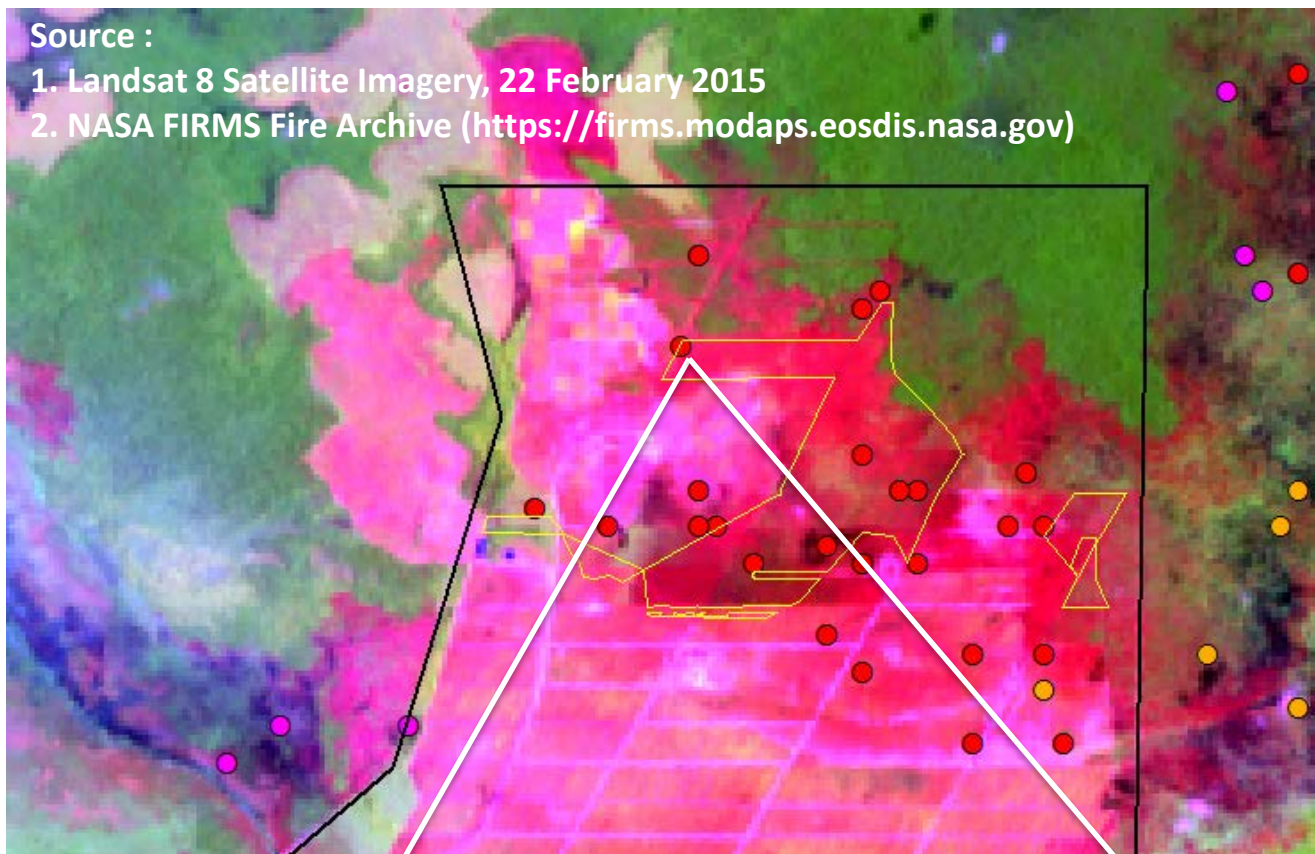


Source: Landsat 8 Satellite Imagery, October 17, 2014

Source :

1. Landsat 8 Satellite Imagery, 22 February 2015
2. NASA FIRMS Fire Archive (<https://firms.modaps.eosdis.nasa.gov>)

The impact of land fires of October 2014 to the restoration area



Hotspot (2014)

- July
- August
- September
- October
- November
- December

Hotspot resolution 1 sq.km.



Pictures taken on April 25, 2015 25

Allegation # 4

In spite of public policy commitments, IOI continued to deforest in PT. BSS throughout 2014;

- ◆ *Northern section of PT. BSS, east of nursery.*
- ◆ *The clearance of 113 ha of forest was confirmed on the ground in February 2015.*

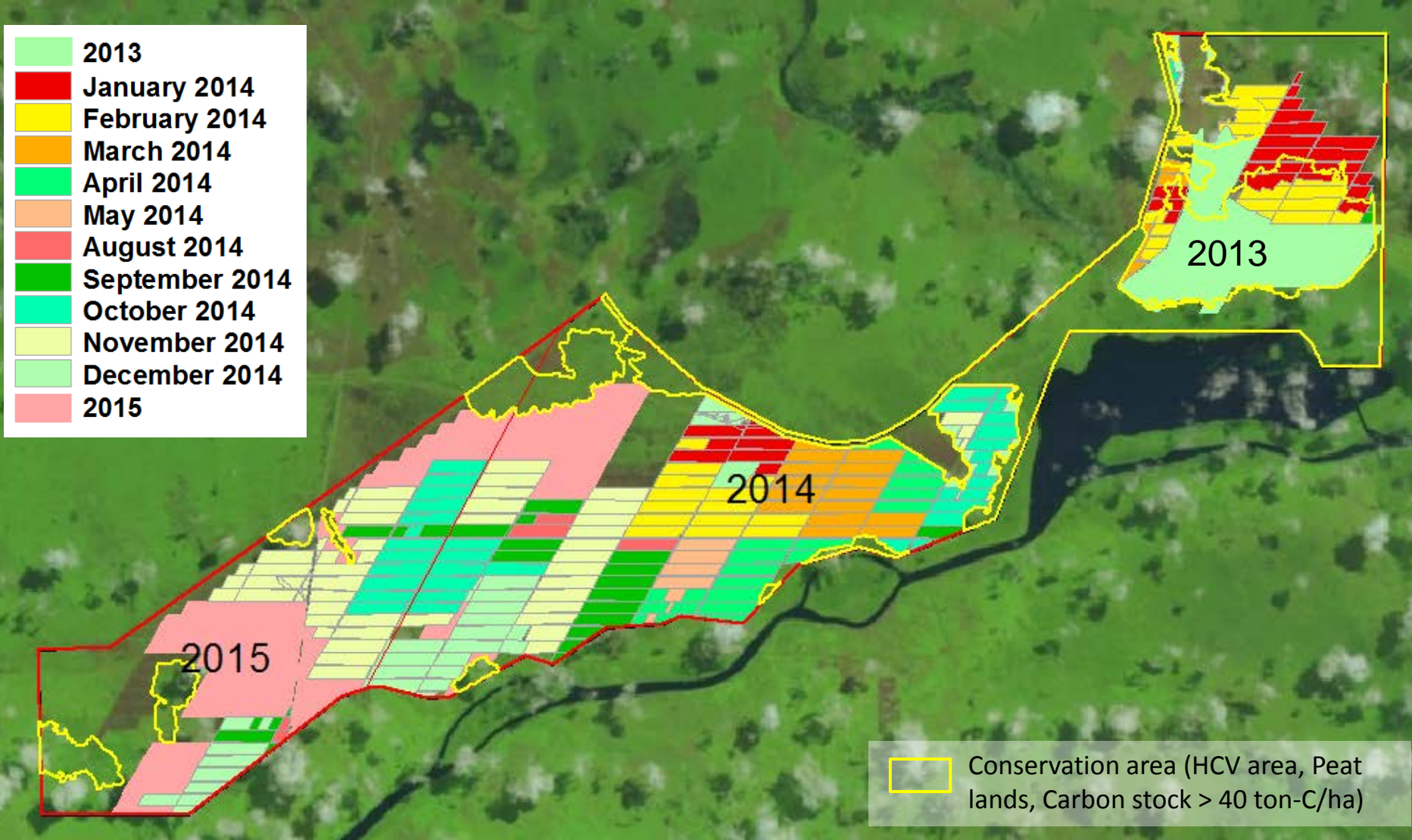
Findings #4

- ◆ The management unit conducted the land clearance on the east-northern part of its Permit Area (to the east of the nursery) in the period January-February 2014. Meanwhile in the west-southern part was conducted in December 2014 (see map on page 29;30).
- ◆ The cleared land depicted on the satellite imagery of January 2014 as presented in the Aidenvironment document, was cleared by the management unit before the signing of the Sustainable Palm Oil Manifesto(SPOM) on 6th January 2014. The activity continued until February 2014 and stopped only after SPOM details communicated to the management unit.
- ◆ the management assigned the local assessor to conduct carbon stock and peat assessments and mappings in June 2014. The reports and maps of both studies were finalized in August 2014. In the period June-July 2014, while waiting for the result of the assessments and mappings, the management unit suspended all clearance activities.
- ◆ The management unit began to use the maps developed for peat lands and carbon stock distribution as its guidance for the land clearance activities in August 2014 onwards as soon as the reports and maps were available. This was to avoid clearing of the mapped peat lands irrespective of depth and areas with carbon stock >40 ton-C/ha.

Findings #4

- ◆ The bare land on this area, depicted as brown color on the satellite imagery of August 2014 in the Aidenvironment document, was not caused by the clearance activities of the management unit. The bare land-look area on the imagery was actually areas that have been previously cleared in January 2014 and sandy soil of ex-nursery which was dried during the dry season of July-August 2014(see pages 29,30,34).
- ◆ In October 2014 all area in the north-eastern part of the Permit Area, a part of the deep peat area which were still forested to the northern tip of the area, was severely burned by the forests and land fires (see maps on pages 23-25).
- ◆ The area in the south-western part of the Permit Area which was defined as forest by Aidenvironment has been confirmed as not a forest area, instead shrubs-dominated land with carbon stock below 40 ton-C/ha (see map on pages 32;33).

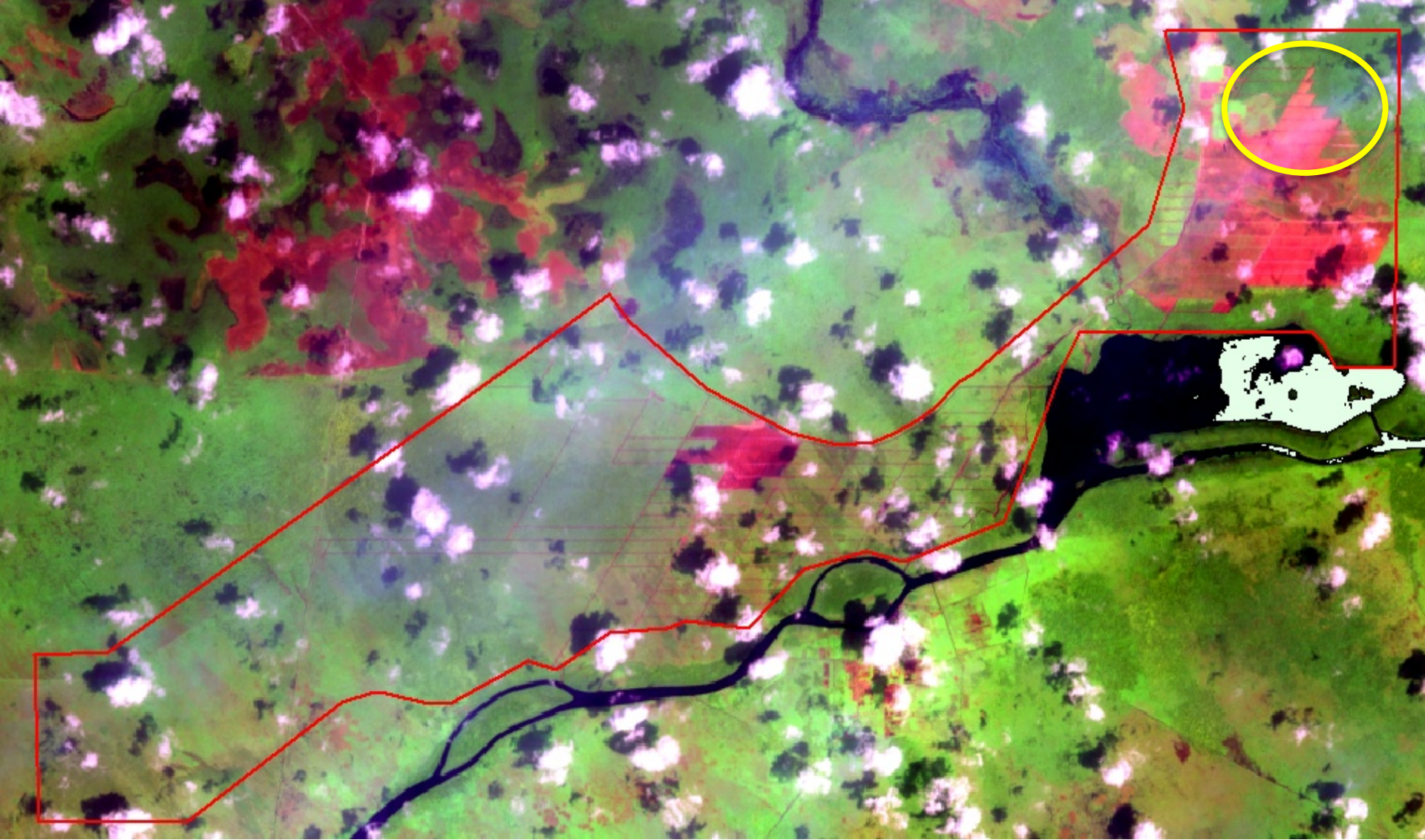
The stacking progress map of PT. BSS 2013-2015



Source:

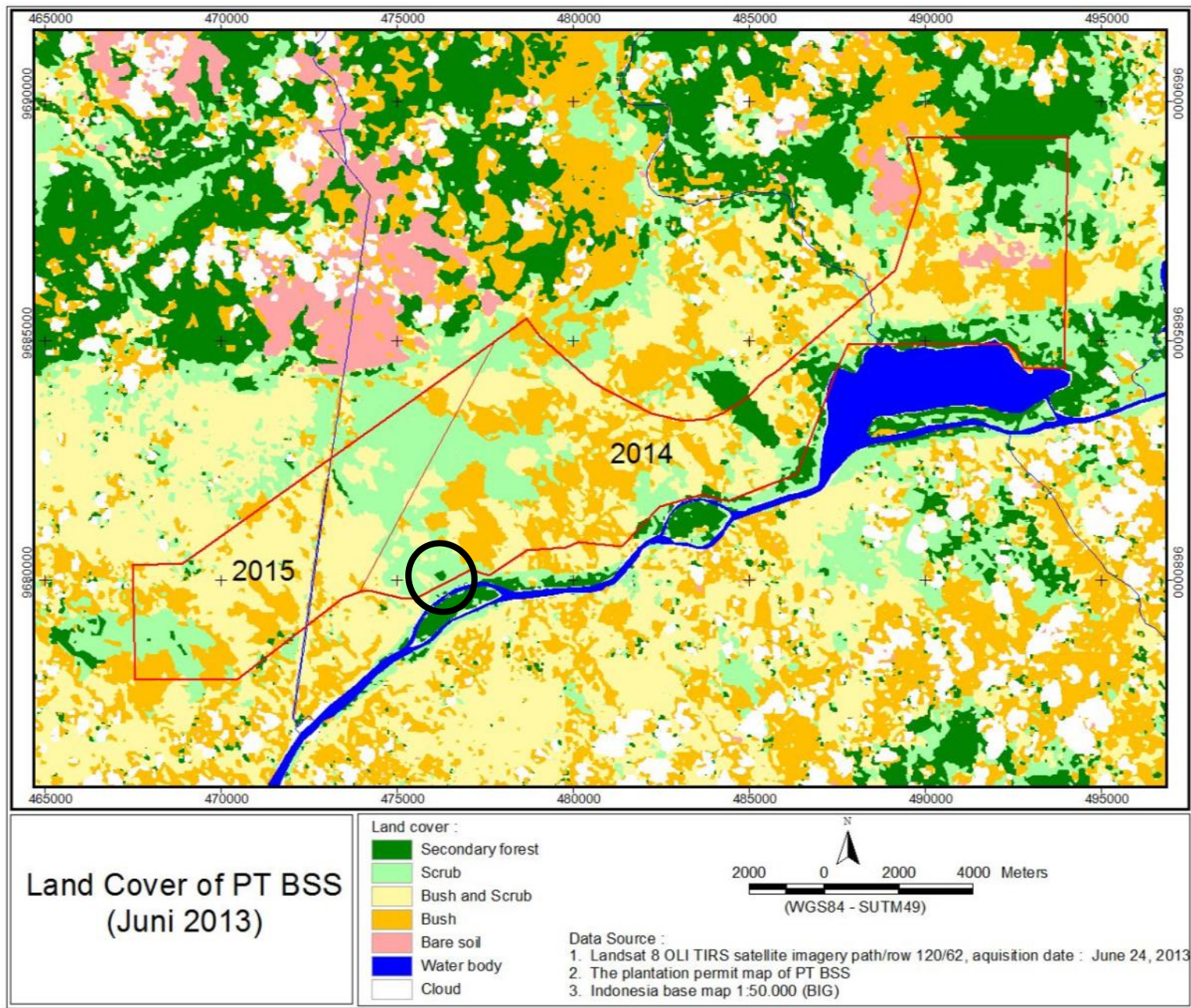
1. Stacking progress map of PT. BSS 2013-2015
2. Landsat 8 Satellite Imagery, May 13, 2015

The satellite imagery from January 2014 showing that the north-eastern part of PT. BSS Permit Area (to the east of the nursery) has been cleared before January 2014

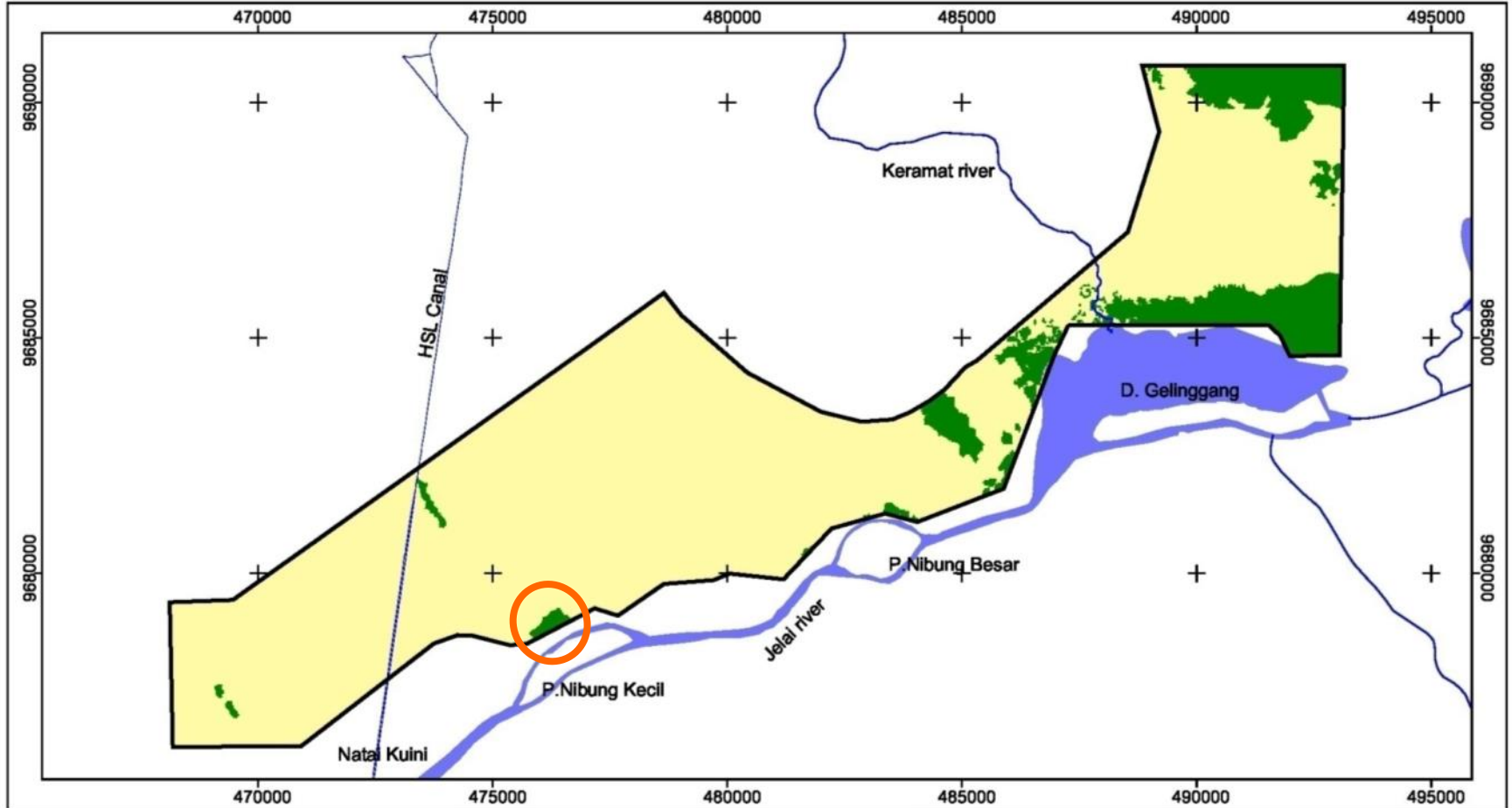


Source: Landsat 8 Satellite Imagery, January 18, 2014

Land Cover Map of PT. BSS Permit Area, June 2013



Carbon stock distribution map of PT. BSS



Map of Above Ground Carbon Living Biomass - DBH > 5 cm
(Proposed to be managed as HCS area)
PT Bumi Sawit Sejahtera
Ketapang - Kalimantan Barat
2014

Carbon Stock :

- < 40 ton C/Ha (9029.49 Ha)
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- Water body (13.60 Ha - only in PT BSS)



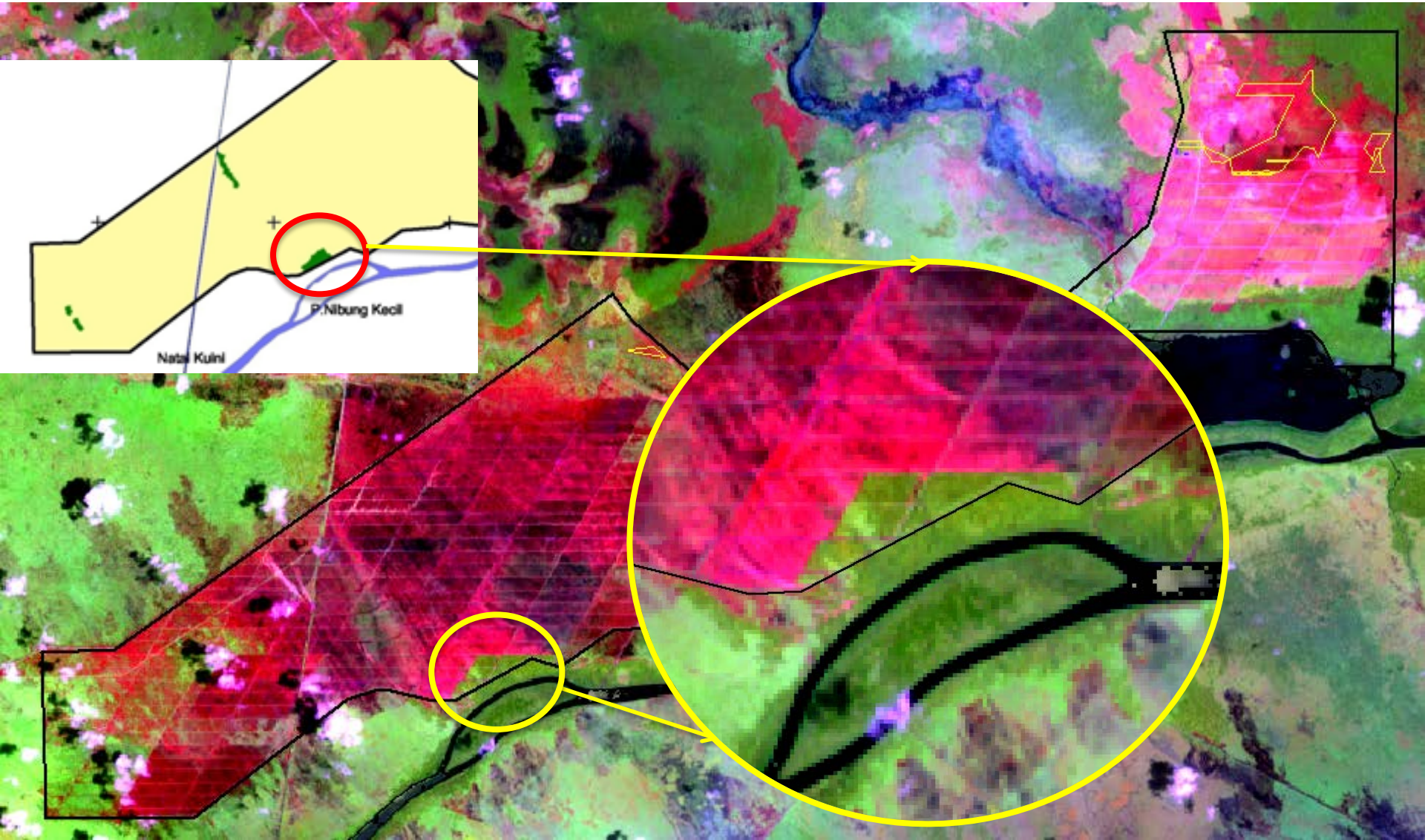
2000 0 2000 Meters

(Projection : WGS 84 - SUTM 49)

Source:

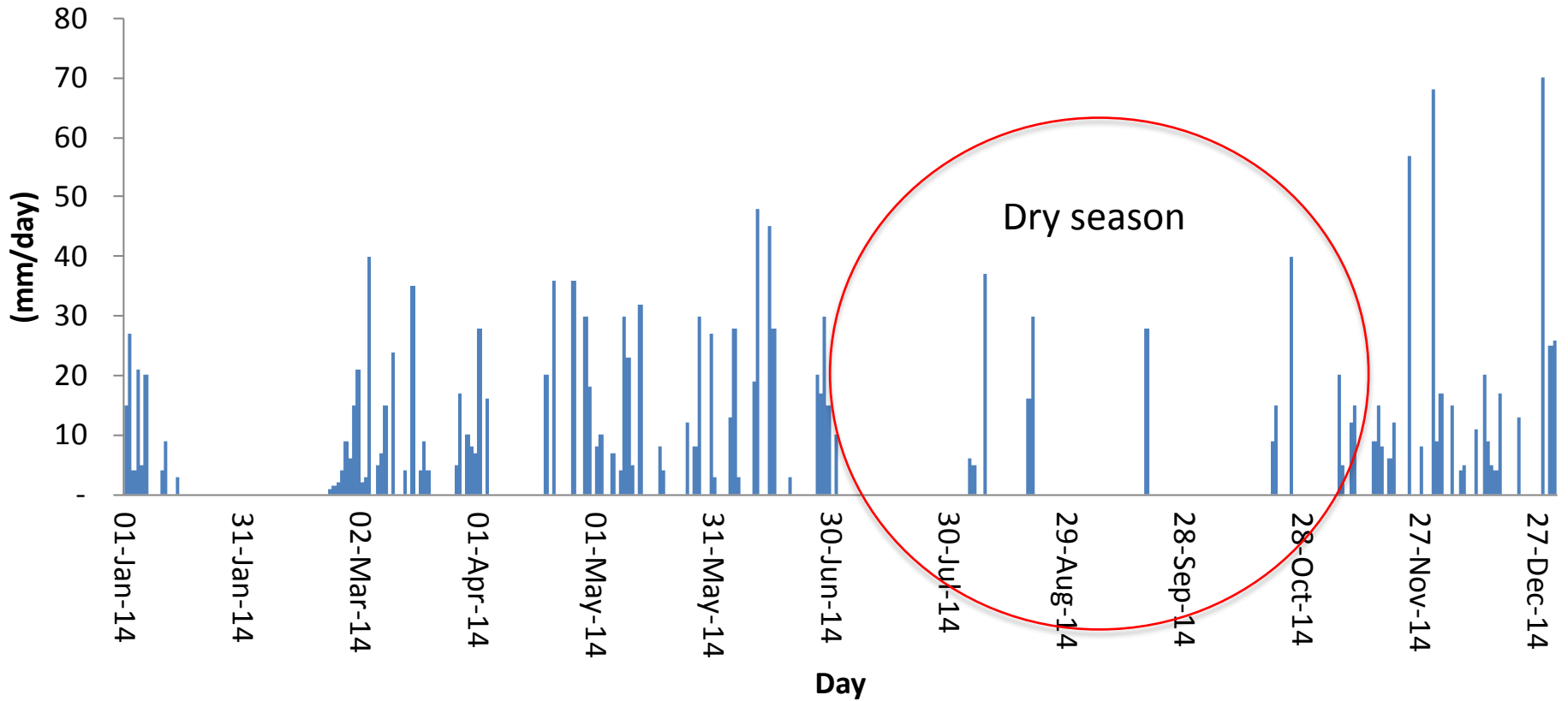
1. Map location of PT BSS
2. Landsat 8 satellite image path/row 120/62 (date : June 17, 2014)
3. Ground thruting survey by Aksenta Team, June 2014
4. Carbon stock inventory survey by Aksenta team, June 2014

Land Cover Map of PT. BSS Permit Area, February 2015, showing that the land clearance did not destroy area with carbon stock >40 ton-C/ha



Source: Landsat 8 Satellite Imagery, February 22, 2014

Daily Rainfall (mm/day) of PT BSS area



Dry season occurred in PT. BSS Permit Area in the period July-October 2014

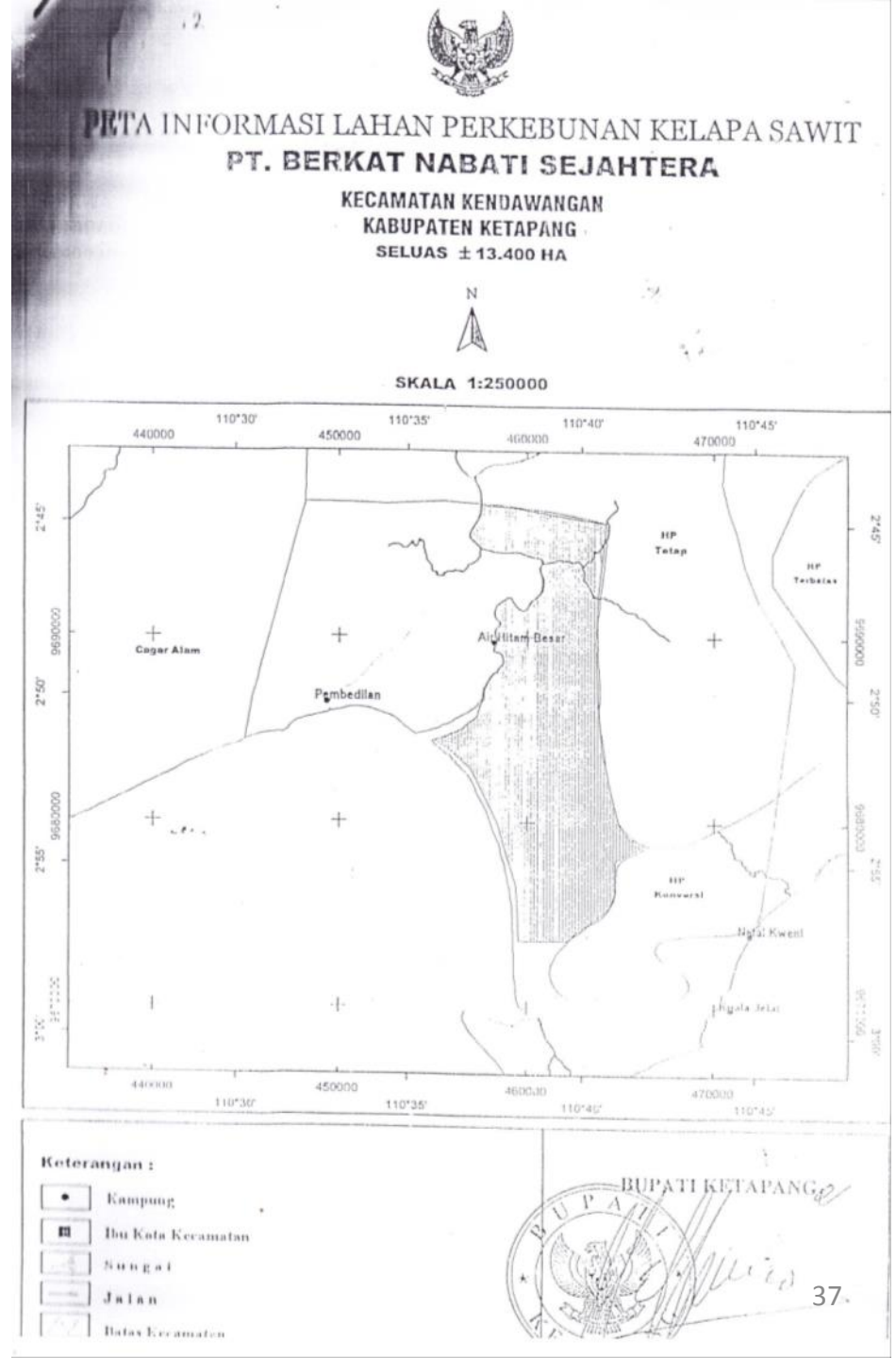
Allegation #5

PT. BNS: Illegal forestland occupation

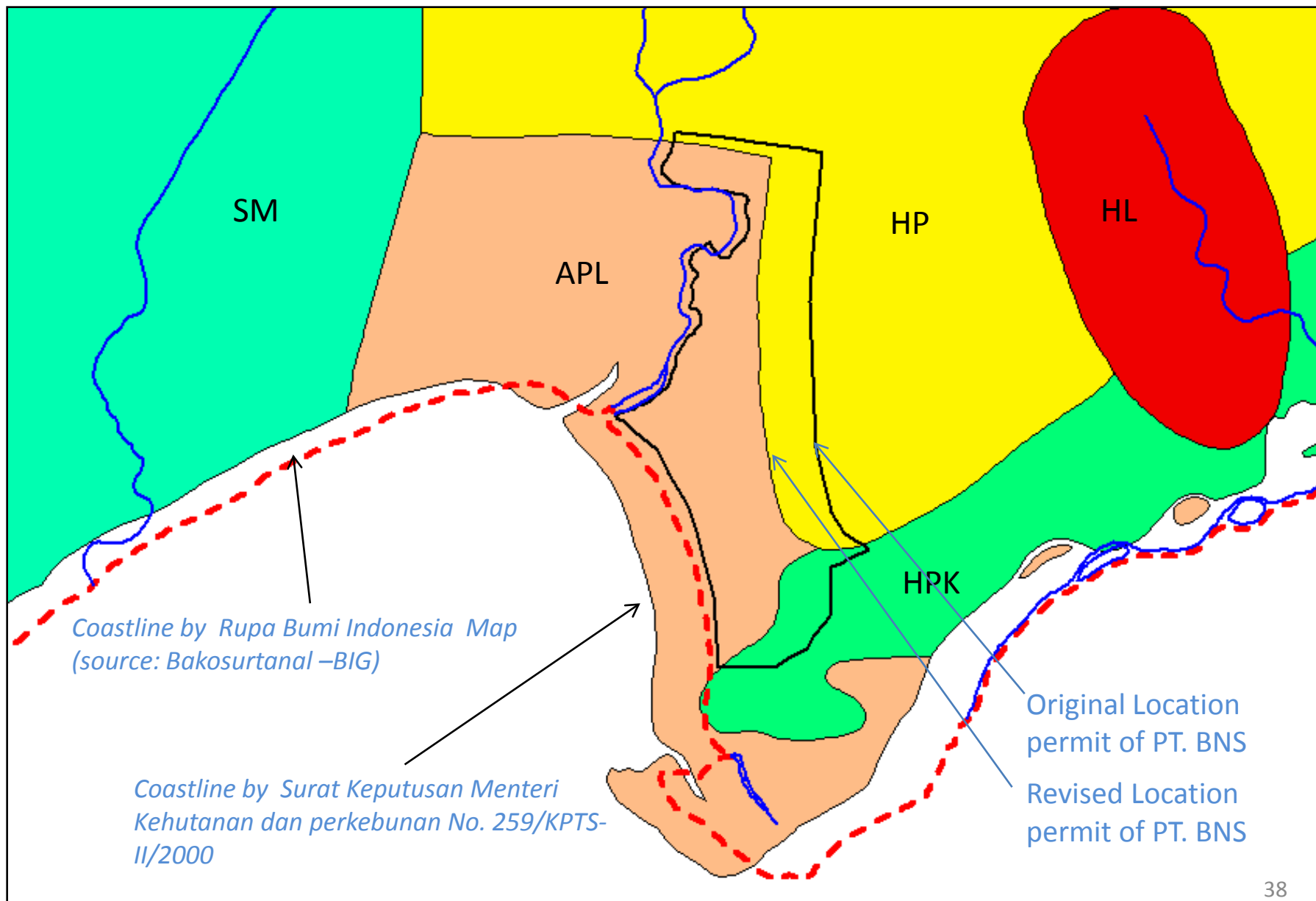
Findings #5

- Ketapang District Regent decree No 525/0975/Bappeda-D on September 14, 2007 regarding Land Information of PT. BNS declared several things, one of them is: *“Based upon the decree of Ministry of Forestry and Plantation No. 259/KPTS-II/2000 on Map of Forest and Water bodies Area of Ketapang District and Revised Regional Spatial Planning (RTRW) of Ketapang District and West Kalimantan, the requested land (\pm 13.400 ha in size) is located on area for other land uses or non-forest area (APL-Area Penggunaan Lain)”* (see page 37).
- Referring to that letter, therefore the district government issued Location Permit for \pm 13.400 ha in 2008.
- Overlaid map between forestland map (SK No. 259/KPTS-II/2000 on Map of Forest and Water bodies Area of Ketapang District) and Indonesia Base Map (RBI) of Indonesia (Bakosurtanal/BIG, at the present, resulting in the mismatch of boundary and map projection. Consequently, location permit of PT. BNS is located overlapped with Area for other land uses (APL), westward; Production Forest area (HP), Eastward; and Convertible Production Forest area (HPK) at South direction (see map page 38).

Appendix of Ketapang District
Regent No 525/0975/Bappeda-D
on September 14, 2007 on Map of
Location Permit Of PT. BNS (\pm 13.400
ha)



Overlay between basemap (Bakosurtanal) and forestland area (Kepmen No. 259/KPTS-II/2000)



Findings #5

- Original map projection mismatch causing some part of PT. BNS area being located on Production Forest despite the Regent District decree No 525/0975/Bappeda-D on September 14, 2007 clearly stated that all PT. BNS area was area for other uses (APL)
- Without knowing that their area was overlapped with Production Forest, PT. BNS then performed land clearance for oil palm plantation on later identified as Production Forest area until November 2009.
- Discrepancy in location permit and forestland maps had been subsequently verified through Field Inspection and Ground Checking.
- Field Inspection & Ground checking on the PT. BNS Plantation Business License verification was officially conducted by State Plantation Agency of Ketapang District, National Land Agency of Ketapang Region, Spatial Planning Agency-Public Work Agency of Ketapang District and Kendawangan Sub-District, based on Letter of Assignment of Plantation Agency No. 090/1192.A/Disbun-A, on November 20, 2009.

Findings #5

- Results of Field Inspection & Ground Checking were:
 - 1) There were 93 boundary coordinates, 32 points of them were then marked using boundary marker stick(see maps on pages 46-48).
 - 2) License area size reduction, i.e.: (i) 300-500 meter from Air Hitam river edge reserved for local community farmland; (ii) 200-700 meter width reserved for buffer area around Nipah (Nypa palm) vegetation site; (iii) \pm 1000 meter width for coast buffer due to the occurrence of local community's fishpond and cultivation; and (iv) \pm 200-250 meter width for buffer area of Production Forest from plantation.
 - 3) There were land clearance and oil palm plantation (aged 4-5 month) planted by PT. BNS on \pm 437 ha land of Production Forest area which was later abandoned.
 - 4) Size of Plantation Business License (IUP) for PT. BNS based on field inspection were reduced to 8.900 ha from 13.500 ha of Location Permit.

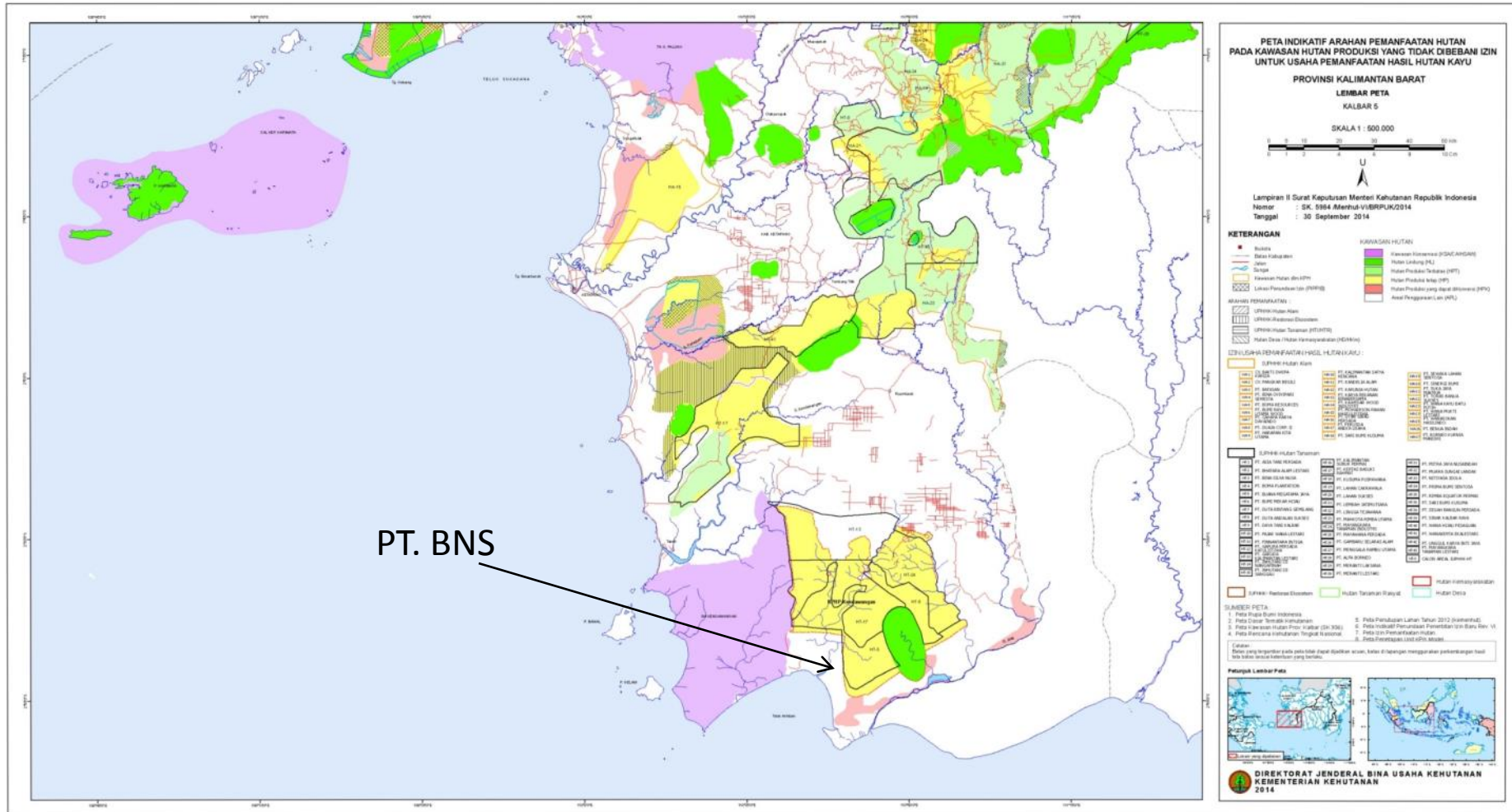
Findings #5

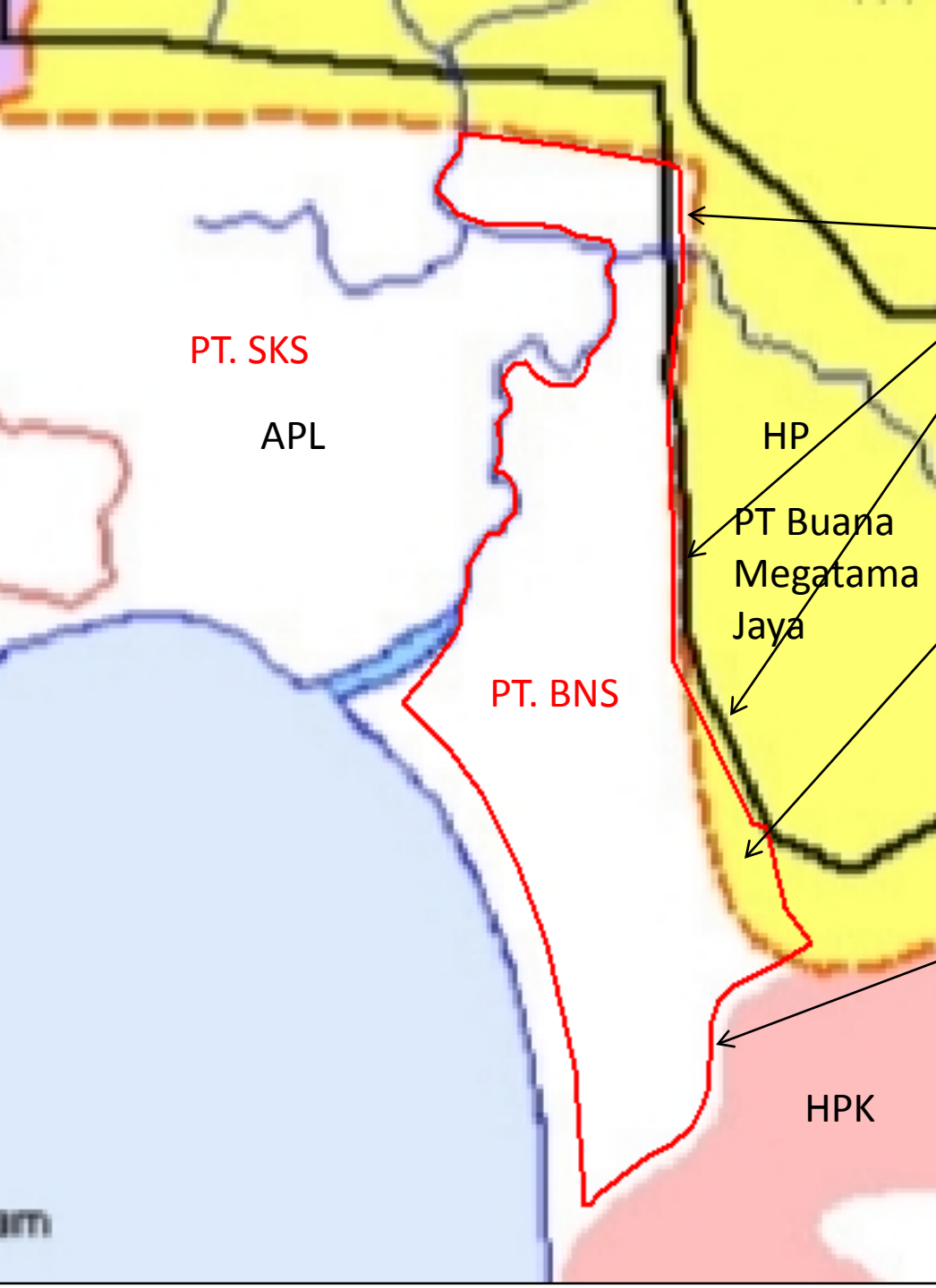
- PT. BNS Plantation Business License (8.830 Ha) was re-issued on December 4, 2009 based on Field Inspection and Ground Checking by Government Team (Assignment Letter of Head of Plantation Agency Ketapang District as Head of TP3K No. 090/1192.A/Disbun-A, on November 20, 2009)
- Aksenta Verification Team found (on April 28, 2015) that those oil palm planted earlier on Production Forest has now been occupied by local community.
- Community controlled and utilized some part of Production Forest adjacent to PT. BNS license area for cultivation(see picture on pages 47).
- Buffer zone, 200-250 m width, has been established to protect Production Forest. This buffer zone used to be part of area for other uses (APL) taken out of earlier PT. BNS area(see maps on pages 43,44).

Findings #5

- Overlaid map between IUP map and Indicative map of guidance on forest utilization at production forest without forest timber utilization permit (Appendix II SK.5984/Menhut-VI/BRPUK/2014) showed that there were overlapped area between production forest area and PT. BNS estimated to be ±536 ha size. This overlapped area happened due to the difference in the maps used by State Plantation Agency and Ministry of Forestry(see map on pages 43,44).
- There are no oil palm planted by PT. BNS at the area marked red on picture . Today, this area is occupied by community as cultivation land(see map on page 45).

Indicative Map on guidance of forest utilization on production forest without forest timber utilization permit/IUPHHK (Appendix II SK.5984/Menhut-VI/BRPUK/2014)





200-250 meter of buffer area between production forest (HP) and PT. BNS

Overlap area between land forest and IUP of PT. BNS

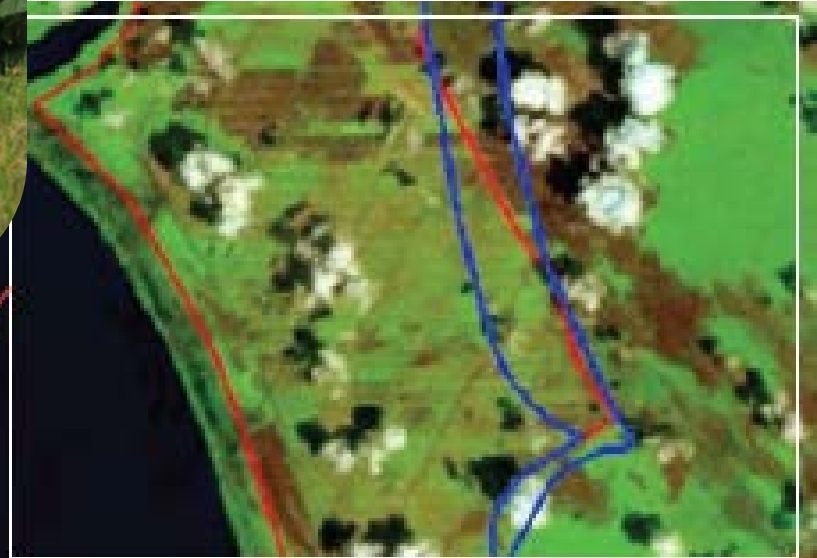
200-250 meter of buffer area between Convertible Production Forest (HPK) and PT. BNS

Source : Indicative Map on Guidance of forest utilization on production forest without forest timber utilization permit (Appendix II SK.5984/Menhut-VI/BRPUK/2014)



(Picture taken on February 28, 2015)

There are no oil palm planted at the red colored area



Source : Aidenvironment



Abandoned area
(Picture taken on February 28, 2015)



abandoned area that occupied by local people
(Picture taken on February 28, 2015)



Source : Landsat 8, May 29, 2015



Local people occupation

(Picture taken on February 28, 2015)



Cultivation activity by local people

(Picture taken on February 28, 2015)



Source : Landsat 8, May 29, 2015



(Picture taken on February 28, 2015)



Boundary markers

(Picture taken on February 28, 2015)

-END-