

REPORT ON MONITORING OF APP'S FPIC IMPLEMENTATION IN PT. OKI MILL PULP AND PAPER, SOUTH SUMATRA - INDONESIA

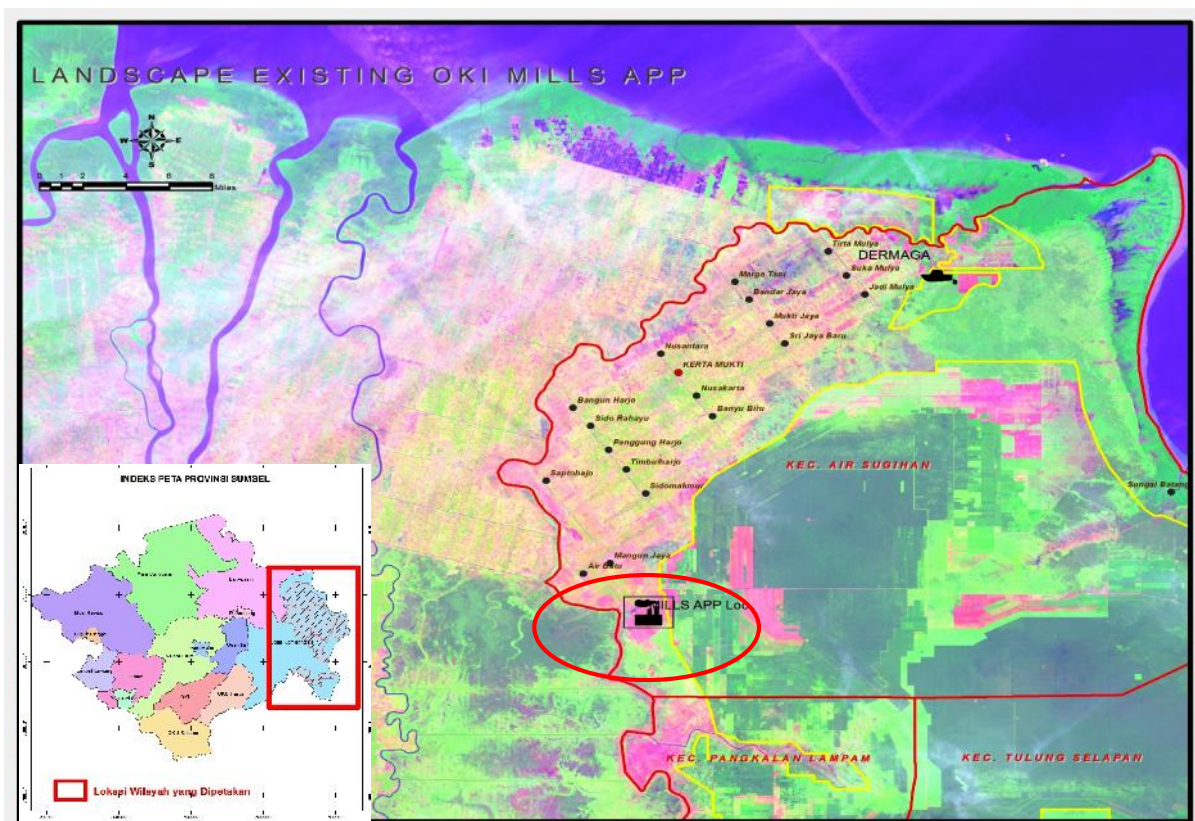
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Background

South Sumatra has 3.7 million hectares of forest areas, with about 800,000 hectares with partial forest cover. Degradation is caused by several factors, including forest conversion for Industrial Pulp Wood Plantations (HTI). According to data from the Ministry of Forestry, the total area of HTI concessions in South Sumatra is about 1.3 million hectares. These concessions are owned by 19 companies, about 57% of which are affiliated with APP.

Currently, APP is developing OKI Pulp and Paper Mill, set to be the biggest paper mill in Asia, in the Village of Bukit Batu – District of Ogan Komering Ilir, South Sumatra. The mill is projected to get fiber from seven HTI concessions affiliating with APP, with a total area of 787,995 Ha in the Districts of Musi Banyuasin, Banyuasin and Ogan Komering Ilir. Mill construction is in progress with work on the foundations and an associated port underway. However, many communities in the surrounding area still have no information about the mill and the impact it will have on their lives.



APP announced their new commitment, Forest Conservation Policy – FCP on February 5th 2013, one aspect of which is about respecting the right of local communities to give or withhold their Free, Prior and Informed Consent (FPIC) to developments that would affect them. In line with this commitment, APP developed a Standard Operating Procedure (SOP) Protocol on FPIC for new plantation developments and mills. In conjunction with the PT. OKI Mill development, as reported in the 5th report of The Forest Trust (TFT) on December 2013, APP is going to respect the right to FPIC for 11 affected villages around the planned mill.¹

Wahana Bumi Hijau (WBH) wrote a grievance letter to APP on March 2014 due to lack of transparency and stakeholder participation in the EIA process for the mill, as well as respecting the right to FPIC of mill affected communities. In our letter, we noted that many people in affected villages were unaware of or misinformed about the OKI Mill.² APP responded to the grievance letter three weeks later, and we agreed to have a meeting. From that meeting, WBH and APP made a “Gentlemen’s Agreement” that WBH will independently monitor the FPIC process and will be informed about the progress of FPIC, as well as possibly to attend to processes associated with respecting the right of communities to give or withhold their FPIC. Unfortunately, since then we have received no information from APP about its consultation or negotiation with affected communities, so we have had no opportunity to follow or contribute to the process.

Responding to this situation, WBH decided to independently carry out an assessment on APP’s efforts to respect the right of affected communities to FPIC in relation to the planned OKI Mill. In order to do this, we met with and interviewed 67 people from eight different affected villages. Additionally, we met with community members from the Hamlet of Sungai Rasau, since this village is about 4 km upstream of the river on which the Mill will operate and will possibly be affected by Mill construction and operations.

Purpose and Methodology

The aim of this research is to learn how APP implemented its FPIC protocol and how local people understand that FPIC process. In August and September 2014, WBH conducted field studies in eight affected villages surrounding the Mill and the hamlet of Sungai Rasau, interviewing 67 people from those villages, including at least 2 village government officer from each village (*Bukit Batu – 15 respondent, Rengas Abang/ Sido Rahayu– 5, Simpang Heran – 10, Jadi Mulya – 10, Kuala Sugihan/ Muara Sugihan – 5, Negeri Sakti/ Sapto Harjo – 6, Pangkalan Sakti/ Timbul Harjo – 6 dan Rantau Karya/ Panggung Harjo 5 respondent*).

¹ TFT Progress report on APP Forest Conservation Policy, 20 December 2013

² WBH Grievance Letter, http://www.wbh.or.id/index.php?option=com_content&view=article&id=198:ywbh-keberatan-atas-proses-pembangunan-app-pulp-mill-di-sumatera-selatan&catid=48:media-hijau

FIN D I N G S

Free – Consent freely given

Free means without coercion, intimidation and/or manipulation. In order to examine the extent of APP's respect for the right of affected communities to freely decide about the mill, our study examined how public decision-making processes were carried out, how communities' representatives were chosen, the representation of parties present at the meetings, and the opportunity of community members to obtain complete information. From these components, we find some important things as follow:

- 1. In the village of Bukit Batu ;** From the 15 respondents, four are part of the village government, information has been obtained that there were meetings related to FPIC in the village hall, which were then followed by a meeting in each sub-village. However three respondents who live in Sungai Baug said that they are not aware of any meeting. There is no any intimidation and/or manipulation of the village's representative; however, two respondents said that the representation is determined by the village head. Furthermore, related to the right to free access to necessary information³ or independent advise if requested⁴, all respondents said that there was no explanation from the company about it.
- 2. Rangas Abang Village ;** From five respondents, two of whom are the village government officers, four people said there were not any meetings related to FPIC and the villagers only knew the information about the OKI Mill from hearsay.
- 3. Pangkalan Sakti Village ;** Interviews were conducted with six people, including village government. Only four respondents said that the meeting was ever conducted in the village hall. In the meeting, there was no intimidation, bribery and/or communities' representative manipulation, but the company mostly told the communities about potential job opportunities associated with the mill. Furthermore, related to the right to free access to necessary information or independent advise if requested, all respondents said that there was no explanation from the company about it.
- 4. Negeri Sakti Village ;** A meeting was held at the house of the Village Secretary. There were four of the six respondents who did not know about the meeting. Two people who knew and attended the meeting were village government officers. Also it is identified that one meeting that was held at the village secretary's house was attended by **Police**, which caused inconvenience for community members. There was no intimidation, bribery or communities' representative manipulation identified in the meeting. However, like other villages, in this meeting, the company delivered more information about employment opportunities and aid from the company, such as clean water and village infrastructure. Furthermore, related to the right to free access to necessary information or

³ "necessary information" refers to: pertinent information regarding legality, ownership, project activities, location, size and potential adverse impacts and benefits, project purpose and timing, technology that will be used and associated risks, etc. (see page 5&6 below under "Informed" section for full list)

⁴ APP FPIC SOP 7.3. In the matter of community asking to get advices/ assistances from necessary groups so company has to give that opportunities with a sufficient time that is agreed by both parties.

independent advise if requested, all respondents said that there was no explanation from the company about it.

5. **Kuala Sugihan Village** ; All respondents said that there was a meeting in the mosque, in which all of them were present, and the meeting was attended by **military** personnel. There was no intimidation, bribery or communities' representative manipulation identified in the meeting. Like in other villages, in this meeting, they mostly discussed the employment opportunities and aid of the company for the village. Furthermore, related to the right to free access to necessary information or independent advise if requested, all respondents said that there was no explanation from the company about it.
6. **Simpang Heran Village** ; Six respondents knew about and attended the meeting. Four respondents were not aware of any meetings. Meetings were held more than twice in the Village Hall and the Village Head's House. Peoples can freely determine the participants who attended the meeting and there was no intimidation, bribery or manipulation of participants. However, it is identified that there was a special request from the head of the village for village government officers to attend. This meeting was also attended by a **police officer**. The company also delivered information about labor issues that will require about 60% of local workers and offer road construction work. Furthermore, related to the right to free access to necessary information or independent advise if requested, all respondents said that there was no explanation from the company about it.
7. **Rantau Karya Village**; From five respondents who were interviewed, only two people who are village government said that there were meetings and they attended the meeting at the Village Hall. 3 other respondents did not know and did not hear any activity related to the FPIC. In this meeting, the company also described labor or job opportunities, and offered bridge construction work as well. Furthermore, related to the right to free access to necessary information or independent advise if requested, all respondents said that there was no explanation from the company about it.
8. **Jadi Mulya Village** ; From ten respondents who were met, there were only three village government officials who are aware of and attended the meeting in the village hall. The meeting was also attended by **police** and **Koramil** (Sub-district Military Office). Furthermore, related to the right to free access to necessary information or independent advise if requested, all respondents said that there was no explanation from the company about it. In the meeting, the company also informed people about job opportunities.
9. **Sungai Rasau Village**, a village on a river bank, which is regularly traversed by giant barges, and is located approximately 4 km upstream from the Mill. At the time of this study, this village had not yet been visited by PT. OKI Mill.

Prior

Prior approval means that communities have the right to give or withhold their consent to propose developments before any licenses or construction have taken place. It should have been obtained within a reasonable time prior authorization or beginning of activities, and respect reasonable time for indigenous / local people to make the process of

consultation/deliberation. The focus within the Prior is related to whether the implementation of FPIC operating companies performed before or after the construction is done. It is also intended to detect whether the public is given adequate time for deliberation or not.

1. **Bukit Batu Village** ; The company held a meeting with the community in the context of socializing information about the Mill before the Mill is developed, but in subsequent meetings related to FPIC, four respondents reported that these meetings were done after construction started. Six respondents, however, informed us that meetings took place before the construction. Five other respondents informed us that they were unsure of whether the meeting was done after or before the construction.
2. **Rengas Abang Village** ; Four of five respondents said that meetings were done after construction had been started. However, community members informed us that there was also a meeting held in the sub-district office before construction started.
3. **Pangkalan Sakti Village**; Two of four respondents who participated in the meeting, who are all village government officers, said that the meeting was held prior to the activity of the company. The others said they were not really aware of it.
4. **Negeri Sakti Village**; From six respondents, there were only two respondents who said that there was a meeting held prior to the company activities. The rest said that they are not aware of any meeting.
5. **Kuala Sugihan Village** ; All five respondents said that the meetings related to FPIC were held after the company had begun the construction. Prior to that meeting, there was also a meeting to socialize information about plans for mill development in the sub-district office.
6. **Jadi Mulya Village** ; From ten respondents who were interviewed, three respondents who attended the meeting said that it was held after Mill construction started, but all respondents confirmed that there was a meeting to socialize information about plans to develop the mill before the head of district (Bupati) came to the village. The others said they were not aware of whether the meeting was after or before construction.
7. **Simpang Heran Village** ; There were a few meetings related Mill, both before and after the mill construction began. However, four respondents confirmed that the meeting where communities were asked about consent to mill's construction, which is considered an FPIC meeting, was done at the time mill construction was being started.
8. **Rantau Karya Village**; According to two village government officers who attended the meeting, it is understood that the meetings were held prior to starting the Mill construction.
9. **Sungai Rasau Village** ; There has never been a meeting, and the construction of the Mill had already started.

Informed

Informed should be mean that the information provided to communities includes (at least) the following aspects:

- a. The communities are informed that APP has a new policy and SOPs, which include a commitment to respect the right of affected communities to give or withhold their FPIC to developments that APP is proposing (in this case the OKI mill).
 - b. The nature and size of the development, and ability or not to restore the area to its original state (reversibility) and the scope of the proposed project or activity;
 - c. The reason or purpose of the project and/or activity;
 - d. Duration of projects
 - e. Locations that will be affected;
 - f. An initial study of the economic, social, cultural, and environmental effects that may arise, including potential risks and fair distribution of benefits and equal respect in the context of the precautionary principle;
 - g. People who may be involved in the implementation of the proposed project (including indigenous peoples, private sector staff, research institutions, government officials, and others); and
 - h. Procedures that may be required to the project, as stipulated by the related rules/regulations.

1. Bukit Batu Village; The tenure research activities conducted by the company were known by only two respondents who are village officials, or only 13% of the total respondents. No document of study results was given to the community. The company also did not provide written documents related to legality, ownership, proposal, duration and activities to be carried out by the company. Meeting participants were only informed verbally, for example, of the intention of the company to develop a pulp and paper mill and the period of the company operation. Furthermore, related to identifying potential impacts and corporate responsibility, the community members were told that there will be impacts on the river and noise. Related to waste, the company informed participants that the company will manage the waste well and with technology. But the company did not inform participants of the potential social and environmental impacts that may arise. If there is contamination, the company said it will provide compensation to the community. Related to APP's complaint or grievance mechanism, some people do not know of such a mechanism, and there was no explanation from the company about it. However, the company did encourage people to establish a monitoring team that could convey community concerns and also facilitate communication between the company and the community.

2. Rengas Abang Village ; All respondents did not know the relevant aspects of information⁵ needed by the community to make an informed decision. One of the respondents who attended the meetings said that there was no document given to them during the meeting. All information was available only verbally. If there are complaints from the public, one of the respondents who is the village government officer said that it can be delivered directly to the company, and the company also will establish a

⁵ see footnote 3 above

monitoring team that will serve to facilitate communication between the company and the community, including to the matters related with the complaints/grievances.

3. **Pangkalan Sakti Village** ; 100% of respondents said that they were not given any written document with necessary information that should be given to community members. Communities know about the mill based on information from person to person. Related to APP's complaint or grievance mechanism, the company did not explain the mechanism, but informed meeting participants that they will establish a monitoring team whose members come from the village, and will serve to collect and give the company any community concerns. Then, related to official minutes and any agreements from the meeting, two thirds of respondents said do not know about it. The other respondents said that there were minutes of the meeting but that they were only delivered to the village government.
4. **Negeri Sakti Village** ; Of all respondents, only one, a village government official, said that there was a document with the necessary information⁶ that was given to the him. The others said they did not receive such written information. The company did not inform the community of the potential social, cultural and environmental impacts, but the company said that if there is a negative impact emerging, the companies will be responsible. The company also stated that the company will use the most advanced technology, so there is nothing to worry about. The communities did not get a copy of any document or record of the meeting, including a summary of Minutes of Meeting. Relating to community concerns or complaints, as with other villages, the company stated that there will be a monitoring team, in which there are members from the villages.
5. **Kuala Sugihan Village** ; Of all respondents, 100 percent said no documents with necessary information (see footnote 3) were given to the community. Three respondents said verbal information related to the company's activities – the planned dredging of the river – was provided at the meeting. The company did not thoroughly explain other potential social, cultural and environmental impacts, including information about the technology to be used. Community members also did not know and were not informed of the company related complaints/grievance mechanism. Respondents reported that any records or documents of the meeting were not provided to them.
6. **Rantau Karya Village** ; 100 percent of all respondents said that there were no documents with necessary information (Look at footnote 4/5) given to them. According to village government officials they were informed about such information verbally. In addition, the company did not inform people of the potential social, cultural and environmental impacts, including information related to technology that will be used. The company only informed meeting participants that it will manage the waste to become fertilizer, and if there are negative impacts, the company will be responsible for them. The community also did not know and were not informed of the complaints/grievance mechanisms. Two village officials said that they received a copy of the minutes of the meeting.
7. **Simpang Heran Village**; From all respondents, only one person said that there was a survey related to tenure. Related necessary information (see footnote 3) was not

⁶ see footnote 3 above

provided in writing. The majority of the respondents did not feel well informed about the social and environmental impacts of the project, except for one person who said he knew about the license and the duration of company's operations. Meeting participants were informed that the company will manage the waste properly, and that if there were impacts, the company would be responsible. Respondents also did not know and were not informed about the company's complaints/grievance mechanism.

8. **Jadi Mulya Village** ; According to the Jadi Mulya's village head, the company had conducted a survey related to tenure but he did not get a copy of the results of the study. He reported that he was informed and given documents related to the Mill permit, as well as activities that will be carried out by the company. One other respondent also said the same thing as the head of the village. However, the other respondent say that they were never given documents with the necessary information (see footnote 3 above). According to the head of the village, he was shown a copy of the Mill Project EIA (Environmental Impact Assessment) document. According to people who attended the meeting, there is an official report/minutes of the meeting of which they received a copy. Finally the company did state its intention to establish a monitoring team including community members that could convey community concerns and also facilitate communication between the company and the community.
9. **Sungai Rasau Village** ; There was never a meeting, so no information was conveyed to the community. The information they have is from meeting the NGO (Non Government Organization).

Consent–The Decision to give or withhold a proposed development

The focus to be detected in this aspect is related to the process of making the decision, either an agreement or rejection, as well as documentation of the process and the decision. From the studies conducted, the following things were discovered:

1. **Bukit Batu Village**; Related to rights of the people to give or withhold their consent to the company proposal, the information we gathered was from the community members that were present in the meeting. There were four people (three of them village government officials) who said that the company informed participants about their right to give or withhold consent. Another respondent said the company only informed participants about the mill plans (socialization). Most of the people who attended the meeting said that agreement was given verbally, with only one respondent saying that the agreement was included in the signed meeting minutes (Berita Acara). However, 100 percent of respondents reported that there was no written consent agreement that was signed by a majority of community members or by group representatives potentially affected by the new mill.
2. **Rangas Abang Village** ; One village official who attended the meeting reported that there was a consent process, but he did not get a copy of any document, only the attendance list.
3. **Pangkalan Sakti Village** : Three respondents who attended the meeting reported that the company informed participants verbally about the right to reject or accept the

company. Two of the respondents reported not giving their agreement. All respondents said that they do not get any final decision document.

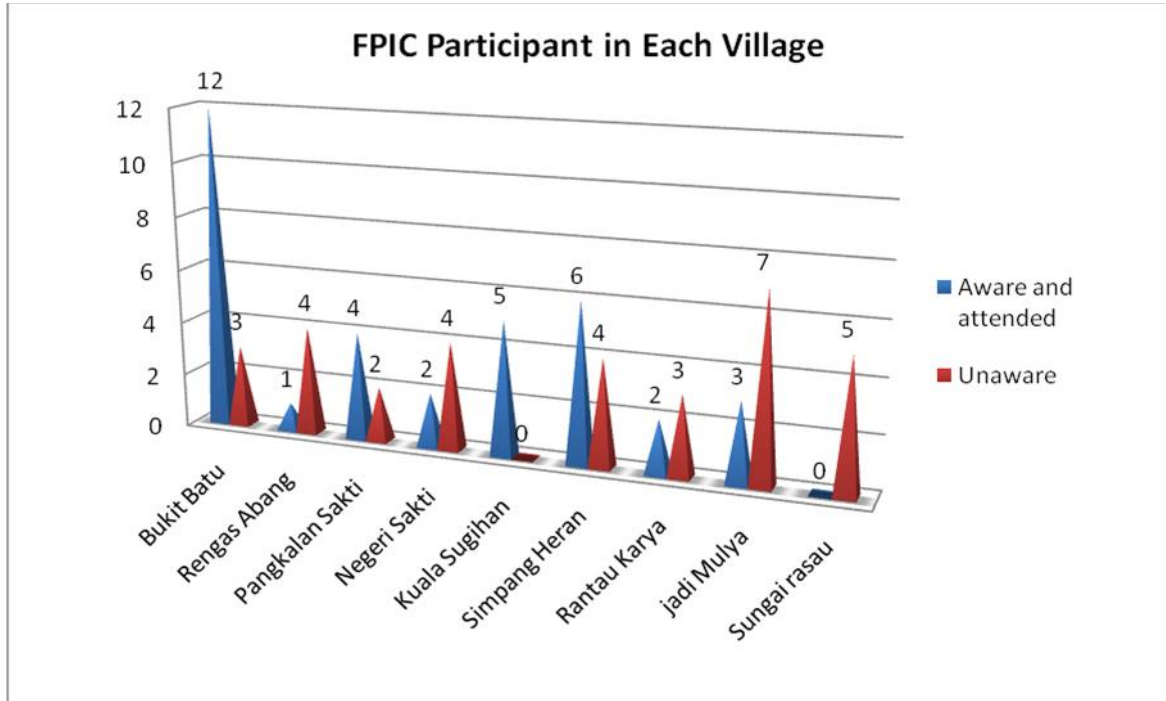
4. **Negeri Sakti Village**; Of the three respondents that attended the meeting, one said there was an explanation by the company regarding the right to accept or reject the company project, and two reported there was no such explanation. However, all of the respondents reported that no copies of any agreement or other relevant documents, including meeting minutes, were received.
5. **Kuala Sugihan Village** ; All respondents that attended the meeting said that there was an explanation from the company concerning their right to accept or reject the project. They also reported that there is are official minutes from the meeting, and that they received a copy of them.
6. **Rantau Karya Village** ; Of the two respondents who attended the meeting, both said that the company informed them about the right to reject or accept the company project. However, the respondents disagreed about whether there was a signed document agreeing to the project with one reporting that such a document existed and one reporting that it did not.
7. **Simpang Heran Village** ; A majority of the respondents reported that there was no signed or written document conveying community agreement with the project. However, respondents said that meeting minutes were recorded.
8. **Jadi Mulya Village** ; According to the information gained from respondents who were present at the meeting, most reported that the company informed participants about their right to accept or reject the project. However, all respondents reported that they had not received any written consent agreement that was signed by a majority of community members or by group representatives potentially affected by the new mill.
9. **Sungai Rasau Village**; There is no FPIC process.

CONCLUSION

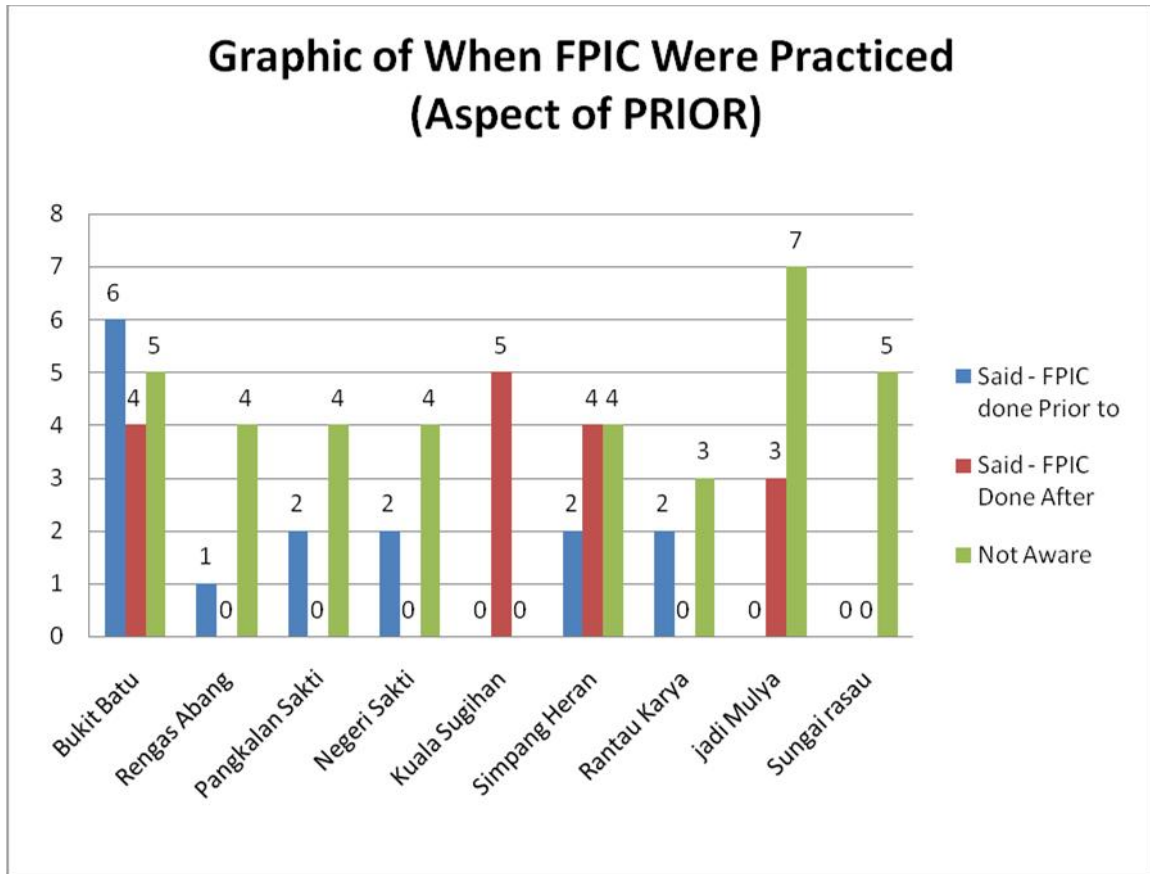
There are several types of conclusions of this report; 1) those relating to community participation and representation in FPIC process; 2) those relating to the FPIC element “PRIOR” which concerns when FPIC process is conducted; and 3) those relating to FPIC implementation process compliance with APP’s FPIC Protocol.

1. *Participation and representation of communities in FPIC process*; Of 67 respondents, we found 35 who said there was a meeting taken place in their village. 20 of these 35 were village government officers. On the other hand, 32 respondents said there was no meeting related to FPIC. As showed in graphic below, we found that in only four out of nine villages/hamlet surveyed (Bukit Batu, Simpang Heran, Pangkalan Sakti and Kuala Sugihan) did more than 50 percent of our respondents attend the meetings. Meanwhile, in the other villages, including Jadi Mulya where a main port is set to be constructed for the Mill development, participant was just 40 percent or less. Our findings suggest that in many cases the FPIC process did not include robust social and participatory mapping, and that where it was done, few if any of the rights or stakeholders were provided with the

results or support to organize representatives from key community groups. So, in several cases, critical potentially affected groups in the villages were not well-informed or well organized. Finally, invitations to meetings were rarely provided directly to targeted participants, but instead relied on village governments to invite participants and convey information.



2. Findings relating to “PRIOR” in the FPIC process; According to the definition of PRIOR in the FPIC process, consent must be given before the activities/development is started. Regretfully, we found only 15 respondents reporting that meetings, not consent, took place prior to construction of the Mill taking place. We found that 16 respondents who attended the meetings confirmed to us that the meetings were held after the development had begun, and that 36 respondents were unaware of any meetings or unsure about whether the meeting was before or after the development.



3. Comparison of FPIC process with APP's FPIC SOP;

Table of Comparison on FPIC's Protocol and Field Finding

APP - FPIC Protocol	Field Finding
<i>Preparation (SOP 7.1)</i>	
<p>Conducting initial study on secondary data to identify whether there is or no land right that is traditionally recognized, local/indigenous community who are living around the area, the use of land/forest by local/indigenous people, affected community by company's activities, and potential impacts on cultural values.</p> <p>Preparing materials for socialization. The information is at least included ; characteristic of project, scale of project, duration, area and purpose; the reason of why the project is important, potential affected area, result of initial analysis on social, cultural, economy. Potential risk</p>	<ul style="list-style-type: none"> Based on information from 4 village government officers, study on tenure has been conducted in 3 villages; Bukit Batu, Simpang Heran and Jadi Mulya. In contrary. That information was received from 4 village government officers (Bukit Batu 2 respondents, and Jadi Mulya and Simpang Heran one respondent each). Conclusion; study were only involved the village government officers, and the study result is not shared and consulted with communities. In regard to the study result, all respondents but one confirmed that they had not received adequate necessary information (see footnote 3 above) in

and benefit; employee and SOP.

writing to make informed decisions. Specifically, the SOP suggests that materials for socialization of the project are supposed to be given to communities in writing. Unfortunately, this study found that in most cases this did not occur. Only one village government officer in Jadi Mulya said that he received such documentation in written form. And, regarding information about potential risks and impacts, no written documentation was shared. When issues of waste and noise linked to the Mill development were raised, the company verbally informed the community that the best technology would be used and that the company would address any problems that emerged.

Interaction with government official and village community (SOP FPIC 7.2)

FPIC team holds meetings with necessary groups in the villages such as village government, informal group and social/cultural groups for ;

- Verifying and validating the result of initial study that has been done.
- Explaining company's work plan and negative/positive impacts that possibly occurred due to mill/ HTI development.
- Asking and giving opportunities to all groups to decide and select their representative for the next meeting(s).

- FPIC team explained positive aspects, for instance about CSR – clean water - for communities and about job opportunities relating such as with road construction. Issues related to waste and noise that came up in meetings were addressed by the company saying that community members should not worry because the company will use the most modern technology.
- We found no respondent that said that the company/FPIC Team encouraged community groups to select and establish their representative for next meeting(s).
- Although there is no intimidation and/or manipulation found in the process of FPIC, in 4 villages – Negeri Sakti, Simpang Heran, Kuala Sugihan and Jadi Mulya, Police and/or military personnel attended the meetings.

Decision making process (SOP FPIC 7.3)

FPIC team meets and discusses with affected representative of communities or groups from villages to ;

- ✓ Identifying and defining on how community/ group rights that had been validated and identified is respected.
- ✓ Formulating how HTI/ Mill should be developed so potential negative impacts can be deducted or even eliminated, and positive impacts can be

- Respondents from village governments in Bukit Batu, Simpang Heran and Jadi Mulya reported that there were tenure studies, but no information was obtained that suggests that the tenure study results had been officially shared in writing with the communities.
- FPIC team identified concern/ fears from communities in particular about potential waste and noise impacts of Mill. The

increased.

- ✓ Formulating the best approach to ensure that options are available and developed so that both the community's rights are respected and the HTI/Mill/ regional development can continue.

FPIC Team gives an opportunities and sufficient time to representative of communities to think and communicate amongst themselves before making final decision, which will be negotiated company.

In the matter of community asking to get advices/ assistances from necessary groups so company has to give that opportunities with a sufficient time that is agreed by both parties.

In reaching the agreement, it is important to make official report/ news note – *Berita Acara* that is signed by all parties such as government, village government, community representatives and other relevant parties.

Along with community representative, FPIC team designs work plan to carry out the signed agreement, and develop monitoring mechanism that will be performed.

company responded by saying that company will use the most modern technology. In one case it was reported that the company stated that they will treat the waste to become fertilizer. In case there are accident and negative impacts, the company assured community members that it will be totally responsible. However, the details of such harm remediation are unclear. In addition, company encouraged communities to establish – what they called - Joint Monitoring Teams. These teams would convey concerns or grievances from the community, as well as function as communication forums between the community and the company. However, no respondents could explain how these Teams relate to the FCP grievance protocol.

- We found no evidence of the company/ FPIC team explaining or setting out processes for their right to select representatives and communicate and discuss amongst themselves (with sufficient time) before making decision. Moreover, we found no evidence of the company explaining the community's right to get independent information and advices/assistance from third parties/ NGOs as needed.
- Respondents from all the villages except Sungai Rasau confirmed that there was an explanation from company (FPIC Team) concerning their right not only to accept, but also to withhold their consent for the company development/activities. However, from all villages, it is only the village of Kuala Sugihan that confirmed that they received a written document news note/ official report (*Berita Acara*) of meeting result.
- **Conclusions;** *FPIC Team failed to fully implement APP's FPIC SOP. Participation in the FPIC process was limited. Information provided was often inadequate and not given in writing. Written consent from a majority of community members or groups potentially affected by the project was not obtained. Permits for the Mill and construction of the Mill commenced before consent was given by at least*

some of the potentially affected communities with a clear right to FPIC (e.g. Sungai Rasau and Bukit Batu)



Recommendation

1. APP should make amendment its own FPIC protocol, at least included ;
 - It must be stated clearly in written on protocol that FPIC will be done before any construction is started.
 - There should be a process to improve FPIC knowledge/ understanding of community who will become object of FPIC. This can be done by APP or civil society.
 - Before practicing FPIC, APP shall make a public announcement and inform key related NGOs about process of FPIC, so NGOs or other interest group can offer their expertise and information about FPIC to communities who will become an object of FPIC.
 - There must have an official written consent agreement between potentially affected community members and groups and the company stating their agreement, whether it is an agreement to accept or to withhold the proposed development. Moreover, this agreement must be different from official report/ signed minute meeting (BeritaAcara).

2. APP should revisit and address shortcomings in the OKI Mill FPIC process. The process should be done by working together with the communities to develop a mutually agreed FPIC process, and involve an independent observer.
The process, at least must include:

- Provide information about the project; e.g. area and size, timing and duration, the results of the social and environmental impacts assessments and HCV or other studies; wood supply requirements and sourcing, costs and financial projections, environmental and toxics risks - including impacts on the river, fishing and water supplies, etc.
 - Explain and support the communities to have independent legal, financial, environmental and other expert advice.
 - Ensure that the participation of the meeting is not less than 60% of groups or stakeholders in the community potentially affected by the development and whose rights and claims have been mapped in advance.
3. APP should re-do the process of INFORMED CONSENT with the entire villages that have become objects of the FPIC process because, in the initial FPIC process, APP – with exception to village of Kuala Sugihan - has failed to secure the consent of potentially affected community members and groups in writing. APP can begin this activity with the villages of Bukit Batu and Jadi Mulya and must adopt and implement best practices – including the improvements suggested in 1 & 2 above – for a robust and comprehensive FPIC process in Sungai Rasau. During this process, construction of the mill and other mill associated activities shall be suspended.