



28 March 2025

Dear Forest Peoples Programme (FPP), FSC International and FSC Board,

We appreciate the opportunity to formally provide APRIL's comments and important context regarding FPP's draft report "*Assessment of FSC RF Baseline Assessment Process*". FPP and APRIL have been engaged in a dialogue for at least three years now with a focus on the social dimension of the FSC remedy process.

As FSC, FPP and other stakeholders would be aware, APRIL and RGE are committed to the effective, robust and equitable implementation of the FSC remedy process. We remain dedicated to successfully seeing this process through as we firmly believe this is an opportunity for FSC and APRIL to deliver significant, positive environmental and social outcomes in Indonesia, particularly for the impacted rights holders and other stakeholders who deserve and welcome these benefits.

APRIL has been engaged in its FSC re-association process since 2016 and is the first company globally to advance the FSC remedy process since it was adopted in 2023. So we acknowledge and endorse the view that this is a learning process for all parties and that we must all examine ways in which the process can be improved and made more effective. It is also our position that the remedy process can only be tested through implementation and that any improvement in the process should ultimately be about enabling, not impeding, the delivery of the remedy. Remedy delayed is remedy denied.

#### **Overall Response to the FPP Report**

We have noted FPP's concerns about the remedy baseline assessment process expressed in their report and would like to provide the following responses:

- We do not agree with the findings of the report that the baseline assessment process undertaken by Remark Asia, which is ongoing, is inherently deficient. Remark Asia has, in its response to FPP, comprehensively addressed with facts and examples the concerns and criticisms raised by FPP on the effectiveness of the baseline assessment process to date.
- We strongly disagree that a suspension of the process is warranted or beneficial at this point. As could be clearly evinced from the reply of Remark Asia, a lot of good work has already been done on baseline assessment and engaging with local communities. The feedback shared by local NGOs, including FPP partners Bahtera Alam and Yayasan Masyarakat Kehutanan Lestari (YMKL), from their engagement with the local communities noted that the communities are already anticipating remedy discussions. A suspension would clearly not be in the best interest of rightsholders and stakeholders who are eager to see the remedy process move forward.
- We believe our focus should be on building the capacity of the local communities and rightsholders to discuss and develop remedy solutions, encouraging pragmatic and innovative approaches to achieving resolutions of land claims and disputes, and facilitating common grounds, not reinforcing hard positions.

### **Addressing Specific Inaccuracies in the Report**

There are a number of specific points in the report regarding the application of the baseline assessment process as it relates to APRIL and PT RAPP which warrant clarification, including:

#### ***Insufficient Information-sharing about the FSC Remedy Framework process by APRIL***

- In addition to the information sharing that FPP itself cited in the draft report and the information sharing sessions held by Remark Asia which they cited in their response, APRIL has also conducted 35 community awareness sessions, covering 328 villages across APRIL Group operations in Riau, East Kalimantan, and North Kalimantan in 2024.
- In addition, APRIL has shared various other materials via social media channels with our stakeholders. These can be found here: <https://remedy.aprilasia.com/resources/> including this video. <https://www.youtube.com/watch?v=tRXF0Mb9qfk>

#### ***Criticism from environmental and social NGOs alleging that the Remedy Framework has not so far been appropriately implemented.***

- APRIL has engaged with FPP and its local partners and other NGOs for the last three years in preparation for the FSC remedy process and has had robust discussions on the application of the process to be undertaken according to the FSC Remedy Framework.
- After receiving a complaint raised by FPP on 28<sup>th</sup> February 2025, an initial meeting to discuss the resolution of the complaint took place between APRIL, FPP and their local partners YMKL and Batehra Alam on the 19<sup>th</sup> of March 2025. The tracking of this complaint and action to be taken has been publicly disclosed here <https://remedy.aprilasia.com/grievance/>

#### **Community Experiences of the Baseline Assessment of Social Harms in PT RAPP's Concessions, PT AHL's Concessions and PT IHM.**

- The social baseline assessments for these areas remain at the desktop review phase where a wide array of data sources has been reviewed to identify any allegations of unacceptable activities and social harms. The Independent Assessors for the remaining social baseline phases for both Kalimantan and Riau impact areas, including site visits and engagement direct with community members, has yet to be contracted by FSC International. So it is premature to be making any critical observations on the conduct of engagement with the local communities in these areas.
- We are concerned that the report pre-empts the third-party verification process which is meant precisely to review and verify the work of the independent assessors and we would ask FPP to allow time for the formal checks and balances to be completed.

#### **Establishment of a dedicated mechanism for information-sharing**

- The FPP report calls for the establishment of a dedicated mechanism for information-sharing about the FSC Remedy Framework process. APRIL has already provided a microsite/webpage covering the overall phases of the remedy framework. This site is the dedicated mechanism for updates on the remedy process and is publicly accessible in Bahasa Indonesia and English. <https://remedy.aprilasia.com/id/>

#### **Calls for Public Sharing of the Baseline Assessment Methodology**

- The baseline assessment methodology was shared with FPP and WWF through a presentation on 30<sup>th</sup> April 2024.
- A high level overview of the baseline methodology was presented to interested stakeholders during a large [forum held in Bogor](#) on 21 June 2024 with the opportunity for questions and answers. More than 90 people participated.
- The baseline assessment methodology was provided to RAN at a meeting held in APRIL's office on 20<sup>th</sup> September 2024.

- A descriptive summary of the baseline assessment methodology is available on the APRIL remedy microsite, under the 'Reports' tab.
- Remark Asia, as part of the stakeholder consultation process for the baseline assessment, explained the approach and application of the baseline methodologies to local community members as part of its assessment work.

***APRIL should revise its baseline assessment methodology – and FSC should approve the same – to allow for communities, working together with technical support, to document harms themselves.***

The Remedy framework already caters for considered enhancements of processes including:

- Grievance mechanisms that ensure conflicts are reviewed to identify any harm
- Conducting of pilots resulting in updates to harm assessment methodologies including review and revision of related procedures
- Incorporation of new information based on feedback from impacted rights holders, affected stakeholders and experts
- Following review of any new information, the corporate group shall revise the Remedy Plan where necessary, to ensure its outcomes and procedures are met and then submit the revisions to the Third Party Verifier for approval

We remain open to discussing with FSC, FPP and other interested stakeholders enhancements that could be made to the remedy process with the purpose of enabling and facilitating the delivery of concrete remedy solutions.

We would be keen to build on the positive results that we are seeing from the capacity building work being undertaken in partnership with Bahtera Alam, Forum Komunikasi Kehutanan Masyarakat (FKKM) and Petala Unggul Gesang (PUG) in Riau. We intend to continue and expand the geographical scope of this important work so we can engage and enable more local communities to participate in the remedy process.

We recognize the need for resources, including funding, to be committed to the remedy process and as previously stated to FSC, FPP and other interested stakeholders, we are keen to explore this particularly for purposes of developing and implementing remedy solutions.

We appreciate FPP's and the FSC's (Secretariat and Board) consideration of these inputs, and we request FPP to include this response in full within their report. We remain committed to constructive dialogue and engagement on the effective, pragmatic and impactful implementation of the remedy process.

Sincerely



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