

Evaluation of the published policies and Standard Operating Procedures (SOPs) of the Salim Group and/or its affiliated subsidiaries or companies related to the fulfilment of the rights of Free, Prior and Informed Consent (FPIC), as set out in the High Carbon Stock Approach (HCSA)

High level summary of findings

An evaluation has been conducted of the published policies and Standard Operating Procedures (SOPs) on the fulfilment of the rights of communities to give or withhold their Free, Prior and Informed Consent (FPIC) to any development on their lands by the Salim Group, based on a comparison of the policies and SOPs of each Corporate Group on the fulfilment of FPIC rights that were available on the date of August 12th 2020, with the High Carbon Stock Approach (HCSA) Social Requirements (SRs) and Implementation Guidance (IG).¹

A key finding is of the evaluation is that the Salim Group does not have published policies and SOPs that apply to the entire Corporate Group and that set out in detail the requirements for the fulfilment of Free, Prior and Informed Consent (FPIC) in accordance with the High Carbon Stock Approach (HCSA) Social Requirements (SRs) and Implementation Guidance (IG). Salim Group's affiliated subsidiary Indofood Agri Resources, or IndoAgri, does have a published sustainability policy that contains clear commitments both to respecting human rights broadly in its operations, and specifically to respecting and fulfilling the FPIC rights of those affected by them. These commitments are set out in its Sustainable Agriculture Policy (IA-SAP), which contains explicit commitments to human rights and to FPIC, with a paragraph on FPIC in the Sustainable Communities section. Indofood Agri Resources or Indofood does not have published SOPs setting out detailed instructions on how its commitments to fulfilment of FPIC will be operationalized, and the FPIC rights of affected communities fulfilled in practice. As highlighted in Matrix 2, the brief references and paragraph of detail contain little additional information about what is required for the implementation of the FPIC process and the effective fulfilment of FPIC rights. The policy does refer to "*High Carbon Areas*" and states that, "*Prior to any new planting we use the HCS Approach Toolkit which allows estates to quantify carbon stocks of assets and **gauge FPIC in the community.***" Its reference to "*and gauge FPIC*" is clearly not an explicit commitment to ensuring the fulfilment of FPIC rights. In its response to the letter sent to notify the Salim Group of this assessment, Indofood Agri Resources reiterated its use of the "*HCS evaluation methodology using the HCS toolkit approach,*" and that its policy is "*underpinned by a set of core commitments including 'free, prior and informed consent'.*" It also claimed to have a FPIC SOP that is not

¹ High Carbon Stock Approach Social Requirements <http://highcarbonstock.org/wp-content/uploads/2020/08/HCSA-Social-Requirements-Apr-2020.pdf>
High Carbon Stock Approach Implementation Guidance <http://highcarbonstock.org/wp-content/uploads/2020/08/HCSA-Implementation-Guide-Apr-2020.pdf>

published. Other affiliated companies of the Salim Group, such as IndoGunta, do not have published policies related to the fulfilment of FPIC. This is despite this company having substantial proposed new developments, including in West Papua and Papua. Salim Group does not publicly disclose a full list of affiliates and joint ventures so it has not been possible to conduct a complete evaluation across all companies affiliated with the Corporate Group.

In order to prove Free, Prior and Informed Consent (FPIC) processes are in place for all areas under the management and control of the Salim Group, and begin demonstrating that the rights of affected Indigenous Peoples and local communities are being respected, especially their right to FPIC to proposed and existing developments that affect them, the Salim Group must develop and publish detailed SOPs on the implementation of the FPIC process. These must cover the four tenets, the other aspects required as part of an effective and rights-fulfilling FPIC process, as set out in Matrix 2, and all the actions that must be taken for its implementation, as set out in Matrix 3. These strengthened policies and SOP must then be applied in full across all landbanks and development areas of the Corporate Group and independent verification must be taken to prove the fulfilment of FPIC rights in accordance with the HCSA Social Requirements and Implementation Guidance.

These findings in no way represent an evaluation of the extent to which the Salim Group or its affiliated companies, are or are not, in compliance with these requirements for the fulfilment of Free, Prior and Consent (FPIC) rights, whether in their own operations or in their supply chains. Detailed evaluations of the fulfilment of the rights to FPIC by Salim Group remain of paramount importance. These FPIC assessments and independent verification exercises should be undertaken in the field by qualified social experts, with meaningful participation of affected communities. They should use full compliance with the High Carbon Stock Approach Social Requirements and Implementation Guidance as their benchmark for assessing the fulfilment of FPIC rights. Additional investigations must also be undertaken by the major brands that are sourcing forest-risk commodities from the Salim Group, and by the banks and financial institutions providing financial services to the company, to verify the evidence that has been presented by affected communities and civil society organizations to the media, via grievance mechanisms, and/or to certification systems, of ongoing violations of Indigenous Peoples' rights in its operations, including IndoGunta in Papua and West Papua,² as well as by third party suppliers.

² <https://awasmifee.potager.org/?p=1611>

Matrix 1 Published policies and SOPs of Salim Group related to the fulfilment of FPIC rights

The first matrix sets out the published policies and policy statements and Standard Operation Procedures (SOPs) of the Salim Group or its affiliated subsidiaries or companies (referred to collectively as “**Corporate Group**”³), where it has been necessary to look at that level, that are related to the fulfilment of FPIC rights. As no published policies are publicly available for the Salim Group, relevant references to the fulfilment of FPIC rights that are made in sustainability policies of the Corporate Group’s affiliated subsidiaries have been considered in this evaluation.⁴

Published policies and SOPs related to the fulfilment of FPIC rights	Yes	No	Description of policies or SOPs
An explicit Corporate Group sustainability policy with specific commitments on the fulfilment of FPIC rights and respect for human rights ⁵		*	Salim Group has no published sustainability policy.
Any sustainability policy of the Corporate Group’s affiliated subsidiaries or companies which includes references to the fulfilment of FPIC rights.	*		Indofood Agri Resources Ltd. is an affiliated subsidiary of the Salim Group. The Sustainable Agriculture Policy of IndoFood Agri Resources Ltd., or ‘IndoAgri’ (IA-SAP) ⁶ sets out commitments including: ‘ Respect for ... Human Rights... ’, and, ‘ Free Prior and Informed Consent ’ (p.1). Under ‘ <i>Community Sustainability</i> ’, (p.6) the following is stated:

³ [Corporate Group is as defined by the Accountability Framework Initiative](https://accountability-framework.org/definitions/?definition_category=41) including those subsidiaries or companies where there is formal ownership, investments, and/or an ownership or management relationship, as well as those where there is family control, financial control, beneficial ownership and/or shared resources, https://accountability-framework.org/definitions/?definition_category=41

⁴ As the evaluation is concerned with the role in the production, processing and trade of forest risk communities by the ten Corporate Groups, only affiliated subsidiaries and companies involved in these activities have been included in it. Due to the complex nature of many Corporate Group structures and the varying levels of disclosure, some relevant companies may have been missed out.

⁵ See Appendix on FPIC rights and international human rights instruments in the Methodology of the evaluation, found at www.ran.org/FPICEvaluation

⁶ http://www.indofoodagri.com/misc/sustainable_agriculture_policy.pdf This policy is also referred to as ‘Indoagri Sustainable Palm Oil Policy’ http://www.indofoodagri.com/misc/Sustainable_Palm_Oil_Policy.pdf

			<p>'Engaging transparently to ensure Free, Prior, and Informed Consent (FPIC) of local communities and stakeholders</p> <p>The FPIC principle refers to the right of a community to give or withhold its consent to proposed projects that may affect the lands it customarily owns, occupies or uses. We commit to uphold, and to deliver it in practice, particularly with respect to land acquisition involving local villages. This Policy commits us to engage with local communities and governments to establish land tenure and rights, likely impacts on communities, open negotiation processes, inclusive methods of decision-making and documented agreements. Before a new development takes place, a Social Impact Assessment is carried out to understand the baseline conditions and likely social impacts of development.'</p> <p>Other affiliated companies of the Salim Group, such as IndoGunta Group, do not have published policies.</p>
SOPs on the operationalisation of these policy commitments on the fulfilment of FPIC rights		*	Salim Group has no published FPIC SOPs, and neither does its subsidiary, Indofood Agri.
Any explicit commitment by the Corporate Group, and/or its affiliated subsidiaries/companies, to ensure the fulfilment of FPIC rights by any affiliated subsidiaries/companies	*		<p>Salim Group has no explicit sustainability policy that applies to all affiliated subsidiaries and companies.</p> <p>The only explicit commitments are from the subsidiary Indofood Agri. Under 'Scope of Policy' in the IA-SAP (p.2), is stated:</p> <p>'This Policy is applicable to all our operations, including our plasma smallholders and third party suppliers from whom we purchase for our factories and refineries.'</p>
Any explicit commitment by the Corporate Group and/or its affiliated subsidiaries/companies (as defined) to ensure the fulfilment of FPIC rights by all third party suppliers	*		<p>Salim Group has no explicit sustainability policy that applies to all third party suppliers.</p> <p>The only explicit commitments apply to the third party suppliers of subsidiary Indofood Agri. As above, the IA-SAP (p.2) states:</p> <p>'This Policy is applicable to all our operations, including our plasma smallholders and third party suppliers from whom we purchase for our factories and refineries.'</p>

Any explicit Corporate Group stand-alone policy on human rights including FPIC rights		*	Salim Group has no stand-alone policy on human rights or FPIC rights.
Membership of HCSA, entailing commitments to the fulfilment of FPIC rights in all developments, by all affiliated subsidiaries/companies, and by third party suppliers		*	<p>Salim Group is not a member of the HCSA.</p> <p>The IA-SAP does contain a commitment to using the HCS Approach Toolkit before any new development (p.3),⁷ but refers to High Carbon Stock areas, not forests.</p> <p>The IA-SP does not make any reference to the HCS Approach or Toolkit. There is another reference to it on the IndoAgri sustainability homepage,⁸ under ‘<i>Making a positive impact at work, Deforestation</i>’, as follows: <i>‘Prior to any new planting we use the HCS Approach Toolkit which allows estates to quantify carbon stocks of assets and gauge FPIC in the community.’</i>⁹</p> <p>Indofood Agri has not registered any assessments with the HCSA. Indogunta Group has not registered any assessments with the HCSA.</p>
A commitment to the fulfilment of FPIC rights via membership of any other voluntary certification schemes with a certification standard that requires the fulfilment of FPIC rights.		*	<p>Salim Group is not a member of any other voluntary certification schemes.</p> <p>Indofood Agri was a member of the Roundtable on Palm Oil (RSPO) but cancelled its membership following receipt of a final decision letter from the RSPO Complaints Panel, sent on 28th February 2019, detailing decisions on a complaint raised against the company for non-compliance with the principles and criteria on labor rights in the RSPO standard.¹⁰</p>

⁷ The HCSA Toolkit includes considerable detail on FPIC rights and their fulfilment, as set out in Toolkit 2, Module 2

<http://highcarbonstock.org/the-hcs-approach-toolkit/>

⁸ www.indofoodagri.com/sustainabilityhome/html

⁹ The reference to HCS areas, not HCS forests, and to using the HCS Approach Toolkit ‘*which allows estates to quantify carbon stocks of assets*’ indicates a lack of knowledge of the HCSA toolkit, which is a methodology to identify viable forests that need to be set aside from conversion, not a methodology to assess carbon stocks.

¹⁰ Roundtable on Sustainable Palm Oil. Status of Complaints on PT. Salim Ivomas Pramata Tbk/PT. London Sumatra Indonesia Tbk.

<https://askrspo.force.com/Complaint/s/case/50090000028ErzBAAS/>

Any other public statements by the Corporate Group and/or its affiliated subsidiaries/companies containing commitments to respect human rights including FPIC rights, such as commodity-specific or sector-wide policies with commitments to the fulfilment of FPIC rights, or No Deforestation, No development on Peat, and No Exploitation (NDPE) statements		*	
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Matrix 2 High-level summary evaluation of the published FPIC SOPs or policies of Salim Group against the key tenets of FPIC and the HCSA Social Requirements

The second matrix gives a high-level summary evaluation of the published Free, Prior and Informed Consent (FPIC) Standard Operating Procedures (SOPs), where these exist, of the Salim Corporate Group, against the four core tenets of the fulfilment of the rights to FPIC, and the High Carbon Stock Approach (HCSA) Social Requirements (SRs).¹¹ As no FPIC SOPs are publicly available for the Salim Group, relevant references to the fulfilment of FPIC rights that are made in sustainability policies of the Corporate Group’s affiliated subsidiaries have been considered in this evaluation.

Important note to consider when reviewing Matrix 3: No SOP = No published Standard Operating Procedure

Evaluation criteria for FPIC SOPs	Corporate Group FPIC SOPs coverage of this Aspect	Strengths and weaknesses
Are the four tenets of FPIC set out sufficiently clearly? In keeping with SR 7	No SOPs In the IA-SAP under Community Sustainability (p.5), is stated: <i>‘Engaging transparently to ensure Free, Prior, and Informed Consent (FPIC) of local communities and stakeholders</i>	No FPIC SOPs, which is where dedicated and detailed FPIC procedures, and an explanation of each of the four tenets of FPIC should be outlined. Two of the four tenets are mentioned – <i>‘the right to give or withhold consent’</i> , and a reference to ‘prior’, in relation to the

¹¹ High Carbon Stock Approach Social Requirements. <http://highcarbonstock.org/wp-content/uploads/2020/08/HCSA-Social-Requirements-Apr-2020.pdf>

	<p><i>The FPIC principle refers to the right of a community to give or withhold its consent to proposed projects that may affect the lands it customarily owns, occupies or uses. We commit to uphold, and to deliver it in practice, particularly with respect to land acquisition involving local villages. This Policy commits us to engage with local communities and governments to establish land tenure and rights, likely impacts on communities, open negotiation processes, inclusive methods of decision-making and documented agreements. Before a new development takes place, a Social Impact Assessment is carried out to understand the baseline conditions and likely social impacts of development.</i></p> <p>There is a reference to the ‘prior’ tenet, and to the HCS Approach to FPIC, on the IndoAgri sustainability home page, as above:</p> <p><i>‘Prior to any new planting we use the HCS Approach Toolkit which allows estates to quantify carbon stocks of assets and gauge FPIC in the community.’</i></p>	<p>HCS Approach and ‘gauging FPIC’. But there is no mention of the requirement for the process to be free of coercion, and based on sufficient information.</p> <p>Commitment is made to uphold and deliver FPIC in practice, with explicit reference to land rights, and to social impact assessment.</p> <p>But the four fundamental tenets are not adequately covered at all here or in the other brief references to FPIC in existing policy.</p>
<p>What provisions exist in relation to the requirement that all sections of affected communities are represented fairly and without discrimination?</p> <p>In keeping with SRs 2 and 12</p>	<p>No SOPs</p> <p>As above, there is a brief reference to:</p> <p><i>‘This Policy commits us to engage with local communities... open negotiation processes, inclusive methods of decision-making...’</i></p>	<p>No FPIC SOPs where such details would be set out.</p> <p>No specific details on how affected communities are represented fairly and without discrimination.</p> <p>Only this single reference to inclusive methods of decision-making.</p>
<p>What provisions exist in relation to the requirement that the process is genuinely participatory, with meaningful engagement and negotiation conducted fairly and in good faith?</p> <p>In keeping with the principle of self-determination, and with SRs 1 and 7, the information tenet</p>	<p>No SOPs and only the brief reference as above to: <i>‘...open negotiation processes, inclusive methods of decision-making.’</i></p>	<p>No FPIC SOPs where such details would be set out.</p> <p>No specific details on the participatory and collaborative nature of the FPIC process.</p> <p>The references made to social impact assessment processes include nothing on the requirement that they must be genuinely participatory.</p>

<p>What provisions exist in relation to the requirement that the FPIC process be fully transparent at all stages as part of fully informing rights holders?</p> <p>In keeping with the information tenet of FPIC in SR 7</p>	<p>No SOPs</p> <p>Reference is made to transparency under 'Public Disclosure' in the IA-SAP (p.2): <i>We recognize that policy commitment alone is no substitute for robust transparency and action, so we commit to publicly disclose progress towards achieving our commitments using standardized disclosure framework(s).</i></p>	<p>No FPIC SOPs where such details would be set out.</p> <p>No specific details on how the FPIC process is fully transparent at all stages and actions taken to fully inform rights holders.</p> <p>Only this brief reference in another context, with nothing on the transparent sharing of information as part of the FPIC process.</p>
<p>What provisions exist in relation to the quality assurance aspects of the process including independent verification?¹²</p> <p>Necessary for the effective fulfillment of all rights including FPIC rights</p>	<p>No SOPs and no relevant references.</p>	<p>No FPIC SOPs where such details would be set out.</p> <p>No specific details on quality assurance including independent verification of the fulfilment of the FPIC rights of affected communities.</p>
<p>What provisions are made for addressing any grievances that arise during the process?</p> <p>In keeping with SRs 7 and 10, and fundamental to the fulfillment of all rights including FPIC rights</p>	<p>No SOPs</p> <p>Brief and limited section on grievance mechanisms with no reference to grievance mechanisms in relation to FPIC.</p>	<p>No FPIC SOPs where such details would be set out.</p> <p>No specific details of how grievances that arise during the FPIC process are resolved.</p> <p>Only this brief reference to the establishment of grievance mechanisms more broadly.</p>
<p>What provisions exist in relation to the fulfillment of FPIC rights in existing operations?</p> <p>In keeping with SRs 10 and 13</p>	<p>No SOPs and no relevant references.</p>	<p>No FPIC SOPs where such details would be set out.</p> <p>No specific details on the fulfilment of FPIC rights in existing operations.</p>
<p>Any other relevant or noteworthy aspects related to the fulfillment of FPIC rights?</p>	<p>Some references made to the conduct of Social Impact Assessments, including on the sustainability homepage under 'Reducing Social Conflict': '<i>Community needs of all sites based on Social Impact Assessment</i>', and in the AI-SAP section that refers to FPIC (as above):</p>	<p>No FPIC SOPs where such details would be set out.</p> <p>Only this commitment to conduct social impact assessment, which is part of the information tenet of FPIC, but no reference to the contribution of social impact assessment to the</p>

¹² This should include provisions for ongoing monitoring, with adaptive management and continuous improvement

In keeping with SRs 2 and 7, the core FPIC rights, as well as any other relevant SRs	<i>'Before a new development takes place, a Social Impact Assessment is carried out to understand the baseline conditions and likely social impacts of development'</i>	information tenet, or to the participatory approach that is required.
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Matrix 3 – Comparison of the published FPIC SOPs of Salim Group to the specific actions required for the fulfilment of FPIC rights under the HCSA Social Requirements and Implementation Guidance

The third matrix presents key findings from a comparison of the FPIC SOPs to the specific actions that are required for the fulfilment of FPIC rights under the HCSA Social Requirements, including the Social Requirements (SRs) themselves and the detail on their operationalization provided in the Implementation Guide (IG).

Important note to consider when reviewing Matrix 3: No SOP = No published Standard Operating Procedure

Actions required for the fulfilment of FPIC rights under the HCSA SRs and IG	Documentation requirements	If and how the action is covered in SOPs	Necessary additions to SOPs to align with HCSA SR and IGs
1. Identify all potentially affected communities (ACs) in the Area of Interest (AOI) ¹³ SR 2 IG Step 1.3a	List of all ACs located in AOI, with indication of extent/ways in which likely to be affected	No SOPs	No SOPs

¹³ Affected communities (ACs) are defined by the HCSA to include indigenous people and local communities, as set out in the introductions of the SRs and IG.
High Carbon Stock Approach Social Requirements <http://highcarbonstock.org/wp-content/uploads/2020/08/HCSA-Social-Requirements-Apr-2020.pdf>
High Carbon Stock Approach Implementation Guidance <http://highcarbonstock.org/wp-content/uploads/2020/08/HCSA-Implementation-Guide-Apr-2020.pdf>

<p>2. Visit each AC and inform them¹⁴ of:</p> <p>a. The proposed development plans and their potential positive and negative impacts; details on compensation and other benefits; and possible alternative means of meeting local development needs¹⁵</p> <p>b. Their right to say no to the proposed development</p> <p>c. Their rights to : determine their own representatives; appoint advisors to support them throughout the process; set the terms for engagement, in line with customary rules, protocols and structures for decision-making; and agree the timing of the process; and the associated requirement that these processes are fair and non-discriminatory. (In line with SRs 2, 12)</p> <p>d. The company's obligations with regard to FPIC (under national law, and according to international norms, including as set out by the HCSA SRs and other sustainability mechanisms)</p> <p>e. That these obligations include the establishment of a grievance mechanism, if ACs do give their consent, in order to mediate any issues arising during the process of engagement, assessment and negotiation¹⁶</p>	<p>Full records of engagement with each AC, including lists of attendees, detailed agendas, and minutes and/or recordings of the content of all meetings and other interactions¹⁷</p> <p>Compilation of relevant information on a-f</p> <p>These records and all the relevant information are made accessible to ACs and other stakeholders, in appropriate format/language, according to arrangements that have been mutually agreed¹⁸</p>	<p>No SOPs</p>	<p>No SOPs</p>
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¹⁴ All information must be shared transparently with ACs, in a format and language accessible to all sections of communities

¹⁷ These records should reflect (and so help to ensure) fair representation, full information disclosure, and the genuinely participatory/meaningful/good faith/fair nature of the process throughout the engagement, assessment and negotiation processes

¹⁵ The corporate ownership of the proposed project; the scale of the development; the length of the permit and nature/stage of the permitting process; and any other associated planned infrastructure such as roads, ports, warehouses, processing facilities etc., must also be disclosed fully to the ACs that may be affected by it

¹⁶ According to mutually agreed arrangements and in line with international human rights norms on grievance mechanisms

¹⁸ SR 1 mandates the establishment of a 'social knowledge dossier' in which all relevant documentation related to the proposed development can be stored and made available as appropriate to rights holders and other stakeholders, with rights holders involved in setting the terms of access.

<p>f. What is involved in the assessment and land-use planning processes (land tenure and usage study (LTUS), HCV-HCS assessment, and Social and Environmental Impact Assessment (SEIA)), and in the engagement and negotiation processes</p> <p>SRs 7,2, 10</p>			
<p>3. Ensure that each AC has an opportunity during this preparatory stage to either consent to continued participation in the processes of engagement and assessment, or to withdraw from them, with sufficient time for consulting with advisors if they so choose</p> <p>FPIC GATE 1</p> <p>SRs 7, ,2, 1 IG Step 1.3c</p>	<p>A formal record of the decision of each AC, and of how it was reached, showing that the process has been free of coercion, representative and non-discriminatory¹⁹</p> <p>Also made accessible to each AC</p>	<p>No SOPs</p>	<p>No SOPs</p>
<p>4. Establish the actual mechanisms for ensuring genuinely participatory assessment and land-use planning processes, and for ensuring meaningful engagement and negotiation processes conducted fairly and in good faith including:</p> <p>a. Who will be involved in which aspects, including which members of each AC and independent and/or technical advisors on each side</p>	<p>Full records kept of engagement process, including attendees and minutes/ recordings of all meetings</p> <p>Documented details of the agreed arrangements in relation to all aspects (a-d)</p> <p>Made accessible to ACs in appropriate format/language</p>	<p>No SOPs</p>	<p>No SOPs</p>

¹⁹ Independently verified quality assurance is necessary at this point, during the process (*ongoing monitoring*) to ensure that this is the case, by checking that the written and video records show: (i) meetings attended by good proportion and representative cross-section of ACs; (ii) that meetings have covered fully/sufficiently all the necessary points in 2 from a to f; (iii) the FPIC gate has been formally documented, and the process only continued with those ACs that have given consent; (iv.) this only occurs following the independent verification of this first stage (preparation stage 1 in the SRs' Implementation Guide)

<p>b. The forum, format and frequency of interactions for engagement and negotiation, ensuring sufficient time for full consideration by the AC at each stage</p> <p>c. Procedures for recording and communicating information, including records and outputs of engagement processes, of assessments, and of the negotiations. These must all be made accessible to ACs in an appropriate format and language</p> <p>d. Procedures for reporting and addressing any grievances that arise during the assessment and engagement processes (and possibly beyond)</p> <p>SRs 2,7,12,10 Step 1.3d/2.1</p>			
<p>5. Conduct participatory assessments in conjunction with each AC as follows:</p> <p>a) Land Tenure and Usage Study (LT&US)²⁰</p> <p>b) Social and Environmental Impact Assessment (SEIA) (done by assessors)</p> <p>c) HCV-HCS assessments (done by assessors)</p> <p>Full discussion of findings with each AC, and their endorsement of the recommended land-use allocations based on it (done by assessors)</p> <p>SRs 1,7 Steps 1.4 and 2.3b/c</p>	<p>Outputs from the LT&US and two major assessments, the HCV-HCSA Assessment Report and the SEIA Report, which demonstrate the genuinely participatory nature of the process (QA done by HCVRN-ALS)</p> <p>Made accessible to ACs in appropriate format/language according to agreed arrangements</p>	No SOPs	No SOPs
<p>6. Provide each AC with two more opportunities during the assessment stage to either consent to continued participation in the process, or to withdraw from it.</p>	<p>Record of decision of each AC, and of how reached, showing that process has been representative and non-discriminatory</p>	No SOPs	No SOPs

²⁰ Involving preliminary participatory mapping and the collection of other information on tenure and usage patterns,

<p>FPIC GATE 2 follows the scoping phase of the HCV-HCS assessment, when assessors visit ACs (or a sample of them) before the main assessment takes place, to conduct due diligence on the process thus far.²¹</p> <p>FPIC GATE 3 follows the full discussion of the findings of the participatory assessments with each AC, when each has another chance to withdraw from the process.</p> <p>SR 7 Step 2.3a and 2.3d</p>	<p>Made available to each AC</p>		
<p>7. Co-develop with ACs the proposed Integrated Conservation Land Use Plan (ICLUP) and associated management and monitoring plans (MMP), and the accompanying ‘package’ of other measures (related to benefits, conservation, employment, ‘CSR’ grievance mechanisms etc.)</p> <p>SR 7 Step 3.1</p>	<p>Full records kept of engagement process including attendees of meetings and minutes/recordings.</p> <p>The output of the process, i.e. the proposed ICLUP, MMP and ‘package’</p> <p>Made available to ACs</p>	<p>No SOPs</p>	<p>No SOPs</p>
<p>8. Conduct negotiations in good faith with each AC on the proposed ICLUP, MMP and package, with sufficient time allowed for full consideration, and independent advice available, in accordance with agreed arrangements</p>	<p>Record of engagement and negotiation process</p> <p>Legally-binding record of the agreement itself, if consent is given</p>	<p>No SOPs</p>	<p>No SOPs</p>

²¹ The due diligence conducted by the HCV-HCSA assessors includes (or should include) ensuring that full information has been provided to ACs, and that their initial consent to the process was granted at FPIC GATE 1 without coercion, and with all sections of ACs fairly represented. This due diligence can be conducted with a sample of ACs to show the general pattern of the engagement process and whether it meets the requisite standards.

<p>This leads to the FINAL FPIC GATE, as each AC either gives their binding consent to what becomes the final ICLUP, or rejects it, and either withdraws from the process, or may enter further negotiations.</p> <p>SR 7 IG Step 3.2</p>	<p>The final agreed ICLUP, MMP and package</p> <p>All made fully available to ACs in accessible format</p>		
<p>9. Ensure this consent or rejection has met all the requirements of FPIC as set out above, before development proceeds, through independent verification of the documentation of all the FPIC procedures set out (including all 4 FPIC gates), thereby confirming the consent or rejection of proposed and final ICLUP by each AC.</p> <p>SRs 2, 7, 12 IG Step 3.3</p>	<p>Evidence that QA standards have been met, and IV conducted of the procedures required for the fulfillment of FPIC rights as set out in this matrix, including desk-checks of all the documentary records and field-checks with a sample of ACs</p>	<p>No SOPs</p>	<p>No SOPs</p>
<p>10. Ensure effective operation of grievance mechanisms as arranged, during the engagement, assessment and negotiation processes, and subsequently for the duration of the ICLUP.</p> <p>SRs 7, 10 Step 1.3d, 2.1, 4.3</p>	<p>Evidence that a grievance mechanism exists and is functioning effectively, with periodic QA and IV to ensure this is the case</p>	<p>No SOPs</p>	<p>No SOPs</p>