



**An Independent Evaluation of Progress to Meet
Commitments made by Asia Pulp and Paper (APP) in its
Forest Conservation Policy (05 February 2013)**

EVALUATION PLAN

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Version Approved by APP and the Rainforest Alliance

Foreword

Asia Pulp & Paper (APP) has engaged the Rainforest Alliance to independently evaluate progress against the commitments in its forest conservation policy (FCP) and other public commitments related to the FCP. The evaluation covers both APP's Indonesian operations as well as its operations in China. However, considering the scale of work, the evaluation has been split into two phases with Indonesia being the first phase for evaluation in 2014. The decision to start an evaluation in China will be made later this year. This document sets out the evaluation process for APP's Indonesian operations.

Throughout the Rainforest Alliance's evaluation documentation there will be references to Sinar Mas Forestry (SMF). SMF represents APP's forest concessions.

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SECTION 1 OVERVIEW

1.1 Scope of the Rainforest Alliance Independent Evaluation

The APP Forest Conservation Policy (FCP, 05 February, 2013) consists of four (4) Key Policy Commitments and a set of subsidiary commitments related to:

- High conservation value forests and high carbon stock forests;
- Peatland management;
- Social and community engagement; and,
- Third party suppliers.

In addition, the FCP includes a statement that ‘Recent independent assessments of the growth and yield of APP suppliers’ plantation areas confirm that the company has sufficient plantation resources to meet the long-term forecast demand for its pulp mills’.

This independent evaluation conducted by the Rainforest Alliance will involve an evaluation of:

1. APP’s progress to meet the four Key Policy Commitments made in the FCP including any additional public commitments made by APP since February 2013 that are directly related to the FCP, and any additional commitments agreed between APP and other parties in Indonesia. This evaluation will include document and map reviews, interviews, and direct field observations on a sample of concessions.
2. APP’s assertion that it has sufficient plantation resources to meet the long-term forecast demand for its pulp mills in Indonesia. This evaluation will address the quality and reliability of APP reports, models and analyses related to growth and yield projections of the plantation resource and will include field evaluation of the health, extent and quality of the plantation resource in order to evaluate the reasonableness and reliability of the reports, models and analyses.

The geographical scope of the evaluation of the progress to meet the four Key Policy Commitments in the FCP (see section 1.1) and any related or additional commitments made by APP includes:

- All Indonesian forest concessions that supply pulp wood to APP mills in Indonesia; and,
- All future expansion or acquisition of plantation estates and/or mills in Indonesia.

Therefore, the scope of the evaluation of the four Key Policy Commitments in the FCP includes:

- 38 forest concessions in five provinces in Indonesia – Riau, Jambi, South Sumatra, East Kalimantan and West Kalimantan – a total area of approximately 2.6 million ha.;
- Two existing and one planned pulp mill in Indonesia; and,
- APP’s global supply chain supplying raw materials to mills in Indonesia.

The geographical scope of the evaluation of the sufficiency of the plantation resources to meet the long-term forecast demand of the pulp mills in Indonesia will be confined to the plantation resource in Indonesia.

This Evaluation Plan provides detailed information about two discrete parts of the evaluation in Indonesia. These two parts are:

- Part 1 - An evaluation of the progress to meet the Key Policy Commitments and related commitments in Indonesia; and,
- Part 2 - An evaluation of the sufficiency of the APP and supplier plantation resources to meet long-term forecast demand for the APP pulp mills in Indonesia.

Planning and preparation for the evaluation is described in Section 2 of this Plan. Each part is addressed in detail in Sections 3 and 4 of this Plan. This work in Indonesia will be carried out and completed in 2014.

1.2 Rainforest Alliance Staff and Consultants

Richard Donovan: Rainforest Alliance Executive Management Rep

Senior Vice-President, Vice-President of Forestry, Rainforest Alliance. Richard is responsible for assuring that the evaluation is consistent with the Rainforest Alliance values and meets the expectations of the Executive Management Committee and the Board of Directors.

Walter Smith: Agreement Manager for the Rainforest Alliance

Senior Manager/Regional Manager, Asia Pacific, Certification Division, Rainforest Alliance. Walter is responsible for all matters related to agreements between the Rainforest Alliance and APP and any other parties.

Lita Natasastra: Project Manager for the Rainforest Alliance

Associate Manager, Southeast Asia, Certification Division, Rainforest Alliance. Lita is responsible for all matters related to budgets and evaluation costs, the evaluation team make-up, interactions with APP management and other interested parties, engaging consultants and supervision of all parts the project.

Keith Moore: Evaluation Team Leader for the Rainforest Alliance

Moore Resource Management, Consultant on retainer to the Rainforest Alliance. Keith is responsible for all matters related to planning and logistics and completion of the work described in this Evaluation Plan including development of the evaluation plan; interactions with APP and Sinar Mas Forestry (SMF) in regard to the evaluation plan; development of performance indicators and performance measures; contact and consultation with external stakeholders; the receipt of all documents and evidence related to the evaluation; the selection of concessions for field work; all evaluation procedures; supervision of team members; completion of all parts of the evaluations; and preparation of draft and final reports.

Anita Neville: Communications Manager for the Rainforest Alliance

Australia and Oceania, Regional Management and Communications, Certification Division, Rainforest Alliance. Anita is responsible for all releases of information or communication materials related to the evaluations, including regular progress updates.

1.3 APP Counterparts for the Rainforest Alliance Staff and Consultants

Rainforest Alliance	Counterpart in APP	Roles
Walter Smith	Aida Greenbury	Agreement Managers
Lita Natasastra Keith Moore	Rolf McRae-Jensen	Project Managers Team Leader
Anita Neville	Darragh Ooi	Communication Managers

1.4 Communications Protocol

Any public communications about this evaluation are governed by a Communications Protocol. All public communication will be coordinated by Anita Neville for the Rainforest Alliance and Darragh Ooi for APP.

The Communications Protocol addresses a defined set of specific circumstances and public communications. Communications with a wide range of stakeholders and others will also be undertaken by the Rainforest Alliance staff and consultants as a normal part of conducting the evaluation. That stakeholder communication will be treated as confidential communication between the evaluation team and the stakeholder and will not require the co-ordination with APP or the approvals described in the Communications Protocol for public communication.

1.5 Reports

Drafts of final reports will be provided to APP for review and comment. Following revisions to address APP comments, drafts of the final reports will be made available for peer review. The peer reviews will follow the standard process established by Rainforest Alliance. The final reports will be prepared following receipt and consideration of peer review comments. Consistent with the Rainforest Alliance normal procedures, peer reviewers can remain anonymous if they choose. Peer review comments are not normally included in the final public report.

Two final reports are anticipated – one for each part of the evaluation in Indonesia. Final reports will include an executive summary and full report and will be made publicly available. Specific items considered confidential to APP, stakeholders or any other organisation will be removed from public versions of the final reports.

SECTION 2 PLANNING AND PREPARATION FOR THE EVALUATION

2.1 Completion of an Evaluation Plan

The Evaluation Plan describes how the work in each of the two parts of the project (Section 1.1) covered in the agreement between APP and the Rainforest Alliance will be conducted. Drafts of the Evaluation Plan were reviewed by APP.

A final version of the Evaluation Plan has been approved by the Rainforest Alliance and APP and will be made publicly available.

2.2 Development of Performance Indicators

An important part of this evaluation involves the development of Performance Indicators and Performance Measures. These are necessary to allow the Evaluation Team to consistently and methodically evaluate the progress to meet the four (4) Key Policy Commitments in the FCP and any additional public commitments and the assertion about the sufficiency of the plantation resources to meet the forecast long-term demand of the pulp mills.

The evaluation of the progress to meet the four (4) Key Policy Commitments and related commitments will be conducted using a set of Performance Indicators developed by the Rainforest Alliance.

The Performance Indicators will address each of the Policy Commitments and all associated subsidiary commitments outlined in the FCP as well as any related public commitments. Performance Indicators will also address the health, extent and quality of the plantation resource. Development of Performance Indicators will be completed prior to initiation of any fieldwork.

The development of Performance Indicators will be guided by the SMART framework for constructing indicators¹ in which SMART means:

- Specific: Each indicator should refer to a single aspect of performance to be evaluated. An indicator which includes more than one aspect to be evaluated shall list these aspects separately as subdivisions of the indicator.
- Measurable: Indicators shall specify outcomes or levels (i.e. thresholds) of performance that are measurable during an evaluation at reasonable cost. The level of performance required to comply with the indicators should be clear to the reader.
- Achievable: Indicators should not be defined in terms of design or descriptive characteristics and shall not favour a particular technology or patented item.
- Relevant: Indicators shall only include elements that contribute to the achievement of the objective of the applicable Criterion
- Tangible: Indicators shall be written using a clear and consistent vocabulary, free from subjective elements. The use of such phrases as ‘ordinarily’, ‘substantial’, ‘proactive’, ‘appropriate

¹ From [FSC-STD-60-002](#) Structure and Content of National Forest Stewardship Standards Version 1 approved October 2009.

to', 'minimise', 'wherever possible', 'thorough', or 'best available' should be avoided.

In developing Performance Indicators for the evaluation of progress to meet the FCP, the Rainforest Alliance will pay close attention to the Performance Milestones² established in September 2013 by a group of NGO's under the leadership of the Environmental Paper Network and the European Environmental Paper Network.

The Performance Indicators will be structured so that they can be re-evaluated in 2015 and at any later date in subsequent years. During the development of the Performance Indicators, the Rainforest Alliance will consult extensively with APP and with other organisations, including but not limited to interested social and environmental NGOs, buyers and buyers groups, government experts, and academics. The Rainforest Alliance will provide drafts of the Performance Indicators to these interested parties for detailed review and comment during the development of the Performance Indicators.

The Rainforest Alliance will consider input and suggestions from all parties and will document responses before finalising the Performance Indicators. During the development process, the Rainforest Alliance will invite interested parties, including the above, to participate in workshops to review and discuss a draft of the Performance Indicators.

The Rainforest Alliance will be responsible for the final content and structure of the Performance Indicators. APP will be requested to approve these Performance Indicators before any field evaluation proceeds in Indonesia.

Rainforest Alliance reserves the right to consider making changes to the Performance Indicators if the use of the Indicators in the first concessions visited in Indonesia as part of the evaluation identifies significant problems. Any changes made to address problems will be available for review by APP and other interested parties. APP will be requested to approve the changes.

When completed, the final version of the Performance Indicators for Indonesia will be made publicly available and posted on the Rainforest Alliance and APP websites. The Indicators will be translated into the Indonesian language for use in Indonesia.

2.3 Development of Performance Measures

Performance Measures are required to evaluate and report the extent to which the Performance Indicators are met or not met at the time of the evaluation. These Performance Measures will be developed in association with the development of the Indicators. The Rainforest Alliance will consult with APP and interested groups, including professional auditors and auditing authorities, academics and others, and will establish Performance Measures³ against which to evaluate the Performance Indicators, prior to starting any field evaluations.

² Environmental Paper Network and the European Environmental Paper Network, 2013. The First Test –Performance Milestones for customers and other stakeholders to assess the implementation of commitments made under Asia Pulp and Paper's Sustainability [Roadmap-Vision 2020](#) and Forest Conservation Policy, September 2013.

³ For example, consideration will be given to different sets of performance measures. These could include measures such as 'met', 'partially met', 'not met'; or, alternatively, 'fully complete', 'significant progress to complete', 'initiated, some progress', and 'not yet initiated'. Various measures used by international auditors and auditing bodies will be reviewed.

To the extent possible, the Performance Measures developed will be consistent with international auditing standards and with measures in current use in Performance Audits⁴. APP will be requested to approve the selected Performance Measures.

2.4 Engagement of Consultants

Rainforest Alliance will be solely responsible for all aspects of recruiting and retaining consultants to work on the evaluation teams. Consultants will be required to have demonstrated technical knowledge and extensive experience in fields related to the evaluation, and to be free of bias and conflicts of interest. Efforts will be made to recruit Indonesian nationals and consultants with fluency in the Indonesian language for work in Indonesia.

2.5 Conflict of Interest, Bias and Confidentiality

All the Rainforest Alliance staff and consultants involved in the evaluation will be required to sign a declaration that they have no conflict of interest or bias, and a confidentiality agreement.

All matters related to ensuring that there is no bias and that confidentiality is maintained by Evaluation Team members are the responsibility of the Rainforest Alliance and will be monitored by the Rainforest Alliance throughout the project. APP is requested to bring specific concerns in regard to bias or breaches of confidentiality by the Evaluation Team to the attention of Lita Natasastra, Project Manager, at the earliest possible opportunity.

2.6 Opening Meetings

The Rainforest Alliance will participate in opening meetings for APP and staff of Sinar Mas Forestry, supplier companies and consultants at the initiation of planning and for each part of the evaluation.

⁴ In professional auditing bodies, 'performance audits are also known as 'value-for-money' audits.

SECTION 3 EVALUATION OF PROGRESS TO MEET THE KEY POLICY COMMITMENTS IN INDONESIA (PART 1)

The evaluation of progress to meet the four Key Policy Commitments in the FCP and related public commitments will commence early in 2014 and will involve evaluation of forest concessions and mills in Indonesia. It will be completed by the last quarter of 2014.

3.1 Geographical Scope of Evaluation of Progress to Meet the Key Policy Commitments in Indonesia

The geographical scope of the evaluation of the progress to meet the four Key Policy Commitments in the FCP (see section 1.1) and any related or additional commitments made by APP will include:

- 38 forest concessions in five provinces in Indonesia – Riau, Jambi, South Sumatra, East Kalimantan and West Kalimantan – an area approximately 2.6 million hectares;
- Two existing pulp mills and one planned pulp mill in Indonesia; and,
- APP's global supply chain supplying raw materials to mills in Indonesia.

3.2 Field Evaluation in Indonesia

A sample of 20 concessions will be selected for evaluation from the 38 concessions in five provinces of Indonesia and from any other concessions identified as sources of pulpwood used in APP mills. The two existing APP pulp mills in Indonesia will be visited and APP activities in concessions that will supply pulpwood to the planned pulp mill will be evaluated.

The sample will be representative of the diversity of operations and will include evaluation of progress in:

- More than half of the 38 concessions in Indonesia;
- Concessions in all five provinces where concessions supplying mills are found; and,
- Any specific sites or issues identified by NGOs.

The make-up of the 20 sample concessions is expected to include:

- Eight (8) concessions in Riau;
- Two (2) concessions in Jambi;
- Five (5) concessions in South Sumatra;
- Three (3) concessions in West Kalimantan; and,
- Two (2) concessions in East Kalimantan.

A list of the 20 concessions selected will be provided to APP in advance of field work. Concessions will be evaluated province by province in a sequence that will be determined by the Rainforest Alliance. Starting dates for each province will be provided to APP well in advance as planning proceeds and will be publicly available.

If the Rainforest Alliance determines that evaluation of additional concessions is important for the credibility of the audit, or to address any specific matters that

arise, additional concessions may be added to the sample of 20. APP will be notified well in advance if any additional concessions are added.

3.3 Dates for the Evaluation of Progress in Indonesia

The evaluation will be based on the observed progress to address the FCP commitments. Thus, the progress to meet commitments will be based on information received at the time of the field evaluation in a concession and on all progress and activities that can be observed and reported up to the date that the evaluation team leaves a selected concession.

Information related to progress made after the time the evaluation team leaves the concession, but prior to the completion of the final report, may be provided by APP to the Evaluation Team, and will be reviewed by the team. Depending on the nature of the information, and whether it can be verified, it may or may not be included in the evaluation reported in the final report.

3.4 Evaluation Teams for Indonesia

The Rainforest Alliance will establish two separate teams of four (4) persons (8 persons in total). Each team will consist of social specialists and team members with backgrounds in HCV and HCS assessments, forest management and plantations. The teams will assess both forest concessions and mills.

The two evaluation teams will be coordinated and supervised by a single evaluation team leader. The evaluation team leader will lead one of the teams. An assistant team leader will lead the second team.

3.5 Provision of Evidence and Information by APP and others

APP will be requested to provide evidence that demonstrates the progress to meet the Key Policy Commitments at a corporate and/or concession-by-concession basis, as appropriate. The Evaluation Team will request that this specific evidence related to progress to meet each of the FCP commitments and the related Performance Indicators for the specific concessions to be visited in the field will be presented in an organized fashion. This required evidence is expected to be provided in a timely way, with delivery at least two (2) weeks in advance of the projected start date of fieldwork in each concession.

The Rainforest Alliance may also request any additional information from APP that they feel is necessary to evaluate progress to meet the commitments. This may include for example, digital imagery or shape files of the concessions. The Evaluation Team may also request information or documents while in the field doing fieldwork and will expect this to be delivered as quickly as possible.

The evaluation will be conducted on the basis that it is the responsibility of APP to demonstrate progress to meet the Key Policy Commitments, and that the evaluation team will expect APP to provide that evidence in a complete, comprehensive, organized and timely fashion.

Rainforest Alliance will also seek information from other parties who will be invited to provide any information or evidence that they feel is relevant to the evaluation. This information may be provided in the form of written submissions, documents or verbally in direct meetings with the Rainforest Alliance. Public meetings will not be undertaken. The Rainforest Alliance will

request that information is provided by outside parties in advance of the evaluation so that it can be considered by the Evaluation Team in the field work.

3.6 Opening and Closing Meetings

The Rainforest Alliance will conduct opening meetings in Jakarta for key staff in APP and SMF at the start of the initiation of the project, and immediately prior to commencement of the fieldwork part of the project. Opening meetings will be held on-site in the concessions with staff in each of the concessions where fieldwork will be conducted.

The evaluation team will also conduct closing meetings immediately upon completion of the fieldwork in each selected concession. These meetings will provide a summary of the observations and findings in that concession.

In addition, the Rainforest Alliance will conduct closing meetings in Jakarta to provide summaries of the findings following completion of work in provinces. One meeting will occur following completion of fieldwork in Riau, and a later closing meeting will be held when all field work is completed in the other four provinces.

3.7 Draft and Final Report

Following completion of field work, the evaluation team will provide APP with the results of the evaluation in a closing meeting. APP will be asked to review and comment on the results to the Evaluation Team leader.

Upon completion of the evaluation, the findings of the evaluation will be reported in a single final report, authored by the Evaluation Team leader. There will not be separate formal evaluation reports for each province. The final report will provide a detailed narrative providing a full explanation of the findings and observations that have led to the ‘scoring’ of the Performance Measures. Specific examples of progress, or lack of progress, may be provided as supporting information for the overall findings and the report may include reference to individual concessions or provinces. It will provide an evaluation of each Performance Indicator (supported by explanation of findings) and a summary evaluation of the progress to meet each of the Key Policy commitments and other related commitments in Indonesia. The final report will be a summary of all work in all provinces of Indonesia.

A draft of the final report will be provided to APP for review and comment. Comments submitted by APP will be addressed by the Evaluation Team leader. A revised draft of the final report will be made available for peer review following the procedures developed by the Rainforest Alliance. The final report will be prepared following receipt and consideration of peer review comments.

The final report will include an executive summary and a full report and will be made publicly available. Specific items that are considered confidential to APP, stakeholders or any other organisation will be removed from public versions of the report.

3.8 Safe Work Procedures

The Rainforest Alliance Evaluation Teams will be required to file daily itineraries and to check in daily with the evaluation team leader and/or the

Rainforest Alliance project office. Any team member working alone will be required to check-in with the team leader on an established regular frequency. Each team leader will ensure that adequate safety equipment and personal protective clothing is available and that safe work procedures are strictly adhered to.

3.9 Observers

Observers may be allowed to participate in the field evaluations if the observers seek and receive permission in advance from both the Rainforest Alliance and APP. Observers must agree to abide by a Code of Conduct to the satisfaction of both the Rainforest Alliance and APP. Observers will only be allowed to participate in locations where stakeholder confidentiality or field logistics are not compromised by observer participation.

3.10 Updates

The Rainforest Alliance evaluation team will provide APP with regular updates on the progress of the evaluation in addition to planned closing meetings. Any items encountered during field review that are considered serious breaches of the FCP will be brought to the attention of APP as soon as possible.

3.11 Subsequent Evaluations

The performance indicators and performance measures, and the protocols and procedures developed for evaluation of progress in the field will allow for subsequent evaluations of progress to meet Key Policy Commitments in Indonesia in 2015 or at subsequent milestone dates.

SECTION 4 EVALUATION OF THE SUFFICIENCY OF PLANTATION RESOURCES IN INDONESIA TO MEET FORECAST DEMAND IN THE APP MILLS (PART 2)

4.1 Scope of the Evaluation of Plantation Resources in Indonesia

The evaluation of the sufficiency of APP suppliers' plantation resources to meet the long-term forecast demand for the pulp mills in Indonesia will involve:

- an independent assessment by a qualified consultant of the quality and reliability of models, analyses and reports related to the projected growth and yield, and annual production from the APP plantation resource, as well as an evaluation of loss factors used in the projections of the fibre supply reaching the mills from the plantations (planting, harvesting, felling, extraction and handling losses); and,
- field evaluations by the Evaluation Team of the health, extent and quality of the plantation resource in selected concessions in order to evaluate the reasonableness and reliability of the projections of plantation productivity in the reports, models and analyses.

Information collected in the field will be determined in consultation with the consultant selected for the assessment of the reports, models and analyses. This evaluation will not include:

- evaluation of conversion factors used in projecting the final product output from the mills; or
- evaluation of the APP fibre supply coming from elsewhere to mills in Indonesia.

4.2 Field Evaluation of the Plantation Resource

Plantations will be evaluated in each of the 20 concessions to be visited in Indonesia in association with the fieldwork for the evaluation of the FCP key policy commitments. Evaluation will be based on Performance Indicators to be developed and suggested by the consultant responsible for this evaluation.

4.3 Evaluation Team

The Rainforest Alliance will retain a consultant to review the models, analyses and reports supporting APP's projections of yield from plantations. The consultant will have expertise in plantation growth and yield models and with plantations of eucalyptus and acacia species in tropical forest environments. The Rainforest Alliance will seek suggestions about suitable consultants from a wide variety of sources, including APP, but the Rainforest Alliance will be solely responsible for all decisions related to the engagement of the consultant. The evaluations of plantations in the field will be undertaken by the evaluation teams conducting the work described in Section 3.4.

4.4 Provision of Evidence and Information by APP and others

APP will be requested to provide all relevant documents, reports, models, and analyses related to growth and yield and wood supply projections. The Rainforest Alliance may request any additional information that they feel is

necessary to conduct this evaluation, and may request access to APP staff or consultants who have prepared documents. All the required evidence from APP will be expected to be provided.

4.5 Opening and Closing Meetings

The consultant undertaking the evaluation will conduct an opening meeting with APP prior to initiating work. He/she will conduct a closing meeting when the document review phase is complete. Findings from the fieldwork conducted by the FCP Evaluation Team will be presented in the closing meetings associated with that evaluation.

4.6 Draft and Final Report

A preliminary report from the consultant will be submitted to APP for review upon completion of the consultants evaluation of the documents analyses and models. This report will not be public.

A draft of the final report will be prepared following completion of the fieldwork on the 20 concessions. This draft report will incorporate the findings of both the review of models, analyses and reports by the consultant and the evaluations in the field.

A draft of the final report will be provided to APP for review and comment. Comments submitted by APP will be addressed by the report author. A revised draft of the final report will be made available for peer review following the established Rainforest Alliance procedures. The final report will be prepared following receipt and consideration of peer review comments. Upon review and revision, the final report will be made public. Information deemed confidential will be removed from the final public report.