



Jakarta, March 25<sup>th</sup>, 2025

## **AAL 3-Year Action Plan as Follow up on Third Party Verification Report (1<sup>st</sup> Semester)**

### **Executive Summary**

Following EcoNusantara’s (ENS) verification of a grievance filed by Friends of the Earth/Walhi against three PT Astra Agro Lestari Tbk (AAL) subsidiaries—PT ANA, PT Mamuang, and PT LTT—AAL developed and launched an Action Plan on June 20, 2024, to address the recommendations outlined in the ENS report. AAL re-appointed ENS to assist the development of the action plan and to ensure that the action plan is implemented transparently with a participatory approach based on FPIC principals throughout the process. The Plan was developed transparently with inputs from key stakeholders and academic experts and its implementation adheres to AAL’s grievance management procedure, emphasizing transparency, inclusive engagement, and measurable outcomes. Central to this approach is collaboration with local communities, village officials, and leaders to ensure concerns and perspectives directly inform remediation efforts. Regular consultations, particularly with impacted groups, remain a priority at every stage of the process, ensuring that they adequately capture the community's needs and concerns.

During the first semester of the Action Plan's implementation, we conducted a joint field visit with Robertsbridge and ENS as independent consultants on 1-2 October 2024. This visit aimed to directly observe the progress and execution of the Action Plan on the ground. Facilitated by ENS, we organized meetings with key stakeholders, including academics from UNTAD (University of Tadulako), to review and provide feedback on the Action Plan, as well as local civil society organizations (CSOs) to explore opportunities for constructive collaboration in promoting sustainable palm oil and addressing field-level issues (30 September, 3-4 October 2024).

As part of our commitment to transparency, we held one-on-one meetings with key stakeholders in Bangkok from 11-13 November 2024. Additionally, a Stakeholders Workshop was convened in Singapore on 12-13 December 2024 to share progress and gather feedback. These engagements ensured that all relevant parties were informed and involved in the implementation of the Action Plan.

As we move forward to continuously implement the action plan on the ground, it is important to highlight the challenges encountered thus far. This context would be beneficial in understanding the project as a whole, and the dynamics on the ground may affect the planned activities and contribute to deviation from the targeted timeline. Like all social issues and programs involving communities of different backgrounds and trust levels to outsiders and companies, the implementation of the Action Plan would depend on relationships and the willingness of the people on the ground to actively take part in the activities. These are not only directly with communities impacted but also stakeholders who influence these communities. We caution ourselves and the stakeholders not to expect speedy results and that it is more important to get the communities’ and stakeholders’ buy-in for the project than the implementation of the project itself – to ensure the long-term sustainability of the project. We encourage all parties to refrain from pre-judgment and allow progress on the ground to take place. In addition, we believe that cooperation – and most importantly sharing of data – between CSOs who partner with communities, including campaigning NGOs is very important. In ENS-led verification report they highlighted the fact that there are discrepancies between their findings between the NGOs. Therefore,



it cannot be understated how important it is for all parties, particularly Walhi & FoE, to engage constructively on a roundtable and share more concrete evidence with AAL and ENS.

Progress has been systematically reported through two prior updates, and this third report—requested by stakeholders—further details achievements, ongoing efforts, and challenges encountered in 2024, underscoring AAL’s commitment to accountability and sustainable improvement. In general, we have identified a few challenges related to external variables such as governance issues, lack of willingness from some stakeholders to engage, unclear bases for some of the land claims, and other legacy issues. AAL has also identified the general pathway forward such as maintaining an open-door policy for stakeholders (including Walhi/FoE), engaging local CSOs, government officials and academics, and continuing to refine its community engagement and empowerment programs to take into account the lessons learnt thus far.

The following sections outline the detailed progress made in the first semester (July-December 2024), challenges, and next steps across key areas of focus:

## A. PT Lestari Tani Teladan (PT LTT)

No	Issue	Verification Results	Target	Milestone	Details on Progress of Activities	Challenges
1	PT LTT confiscated 100 ha of farmers' land in Rio Mukti Village and Towiora Village.	The accusation was not proven, the people of Towiora Village only asked for 4 ha of land for TPU (public cemetery) and 10 ha for a residential reserve area.	To enable PT LTT to facilitate the purchase of the patch of land and its subsequent handover to the communities (based on the requested provisions of the local communities).	Location and land legality verified. Handover of the patch of land to the relevant community members.	<ul style="list-style-type: none"> <li>• <b>Land Allocation Agreement:</b> A 1.2-hectare plot of land has been agreed upon with the community for the establishment of a public cemetery in Towiora Village.</li> <li>• <b>Land Purchase Process:</b> The land purchase has been completed, and the process is now awaiting legal formalities, including the issuance of a Waqf (endowment) number.</li> <li>• <b>Cemetery Infrastructure Development:</b> Construction of cemetery infrastructure, including fencing and a gate, is currently underway. Detail progress can be seen in Appendix 1</li> </ul>	<ul style="list-style-type: none"> <li>• The difficulty in finding a landowner willing to sell the land needed for the TPU area.</li> <li>• Complex administrative and legalization procedures required for the purchase and handover of the TPU area.</li> </ul>
2	PT LTT illegally claimed 1,505 hectares of community land and operated outside the 321 hectare HGU permit.	There is a discrepancy between the documents claimed by Walhi/FoE US with the PT LTT HGU permit data published by BPN.	To share the HGU documentation with Walhi and FoE US in order to cross-reference with those utilized in their previous reports	Walhi opens communication channel to PT AAL and/or independent third parties appointed by PT AAL.	<ul style="list-style-type: none"> <li>• ENS formally invited Walhi Sulteng (with copies to Walhi Nasional and FOE US) twice to present the verification results and clarify the issues raised. However, Walhi Sulteng has not yet provided their availability for a meeting.</li> <li>• AAL has consistently expressed its openness to engaging with all parties, including Walhi, and has extended invitations for dialogue on multiple occasions, whether directly or facilitated by a third party.</li> </ul>	<ul style="list-style-type: none"> <li>• The difficulty in building trust and securing concrete commitment from Walhi/FoE to discuss the resolution of the issues on a roundtable.</li> <li>• Lack of clarity on which communities that Walhi/FoE are representing.</li> <li>• Unclear evidence presented in regard to the allegations and the lack of opportunity to discuss them honestly.</li> </ul>

No	Issue	Verification Results	Target	Milestone	Details on Progress of Activities	Challenges
					<ul style="list-style-type: none"> <li>AAL reiterated this open invitation through an official statement published on December 20, 2024, reaffirming its commitment to inclusive and transparent discussions, without any pre-conditions. (<a href="https://www.astra-agro.co.id/wp-content/uploads/2025/01/AAL-repeats-its-open-door-offer-to-Friends-of-the-Earth-and-Walhi.pdf">https://www.astra-agro.co.id/wp-content/uploads/2025/01/AAL-repeats-its-open-door-offer-to-Friends-of-the-Earth-and-Walhi.pdf</a>). Detail of engagement process can be seen in Appendix 2.</li> </ul>	
3	Community demands for plasma plantations are 20% of the HGU area.	PT LTT's HGU permit was issued before the obligation to facilitate the development of plasma plantations for communities around the HGU came into effect. PT LTT only has this obligation after the HGU expires and will apply for an extension while still referring to the applicable laws and regulations when extending the HGU.	To ensure that PT LTT facilitates the development of community plantations, at the time of extending the HGU permit and referring to the laws and regulations in force at that time	The Regent is aware of the plan to facilitate the development of community plantations during the HGU extension process.	<ul style="list-style-type: none"> <li>The company has initiated an internal process to identify potential partnership activities.</li> </ul>	<ul style="list-style-type: none"> <li>The lack of understanding from stakeholders of the regulations related to plasma obligations.</li> </ul>
4	Well water pollution and sewage odor.	There are differences in the results of laboratory tests on the well water of Towiora Village residents	To ensure that complaints regarding well water	PT LTT has sufficient and qualified human resources	<ul style="list-style-type: none"> <li>Environmental monitoring has been conducted semiannually with the involvement of the community, the village Government, and the Environmental</li> </ul>	<ul style="list-style-type: none"> <li>The lack of understanding of the processes involved in the mill waste &amp; emission management.</li> </ul>

No	Issue	Verification Results	Target	Milestone	Details on Progress of Activities	Challenges
		<p>by the Environmental Service (DLH), Donggala Regency, Central Sulawesi Province No. FPP/7.8.2 dated 20 November 2020 with laboratory test results on 6 (six) samples from PT LTT monitoring wells issued by BBIHP Makassar, South Sulawesi in Semester I and II 2020</p>	<p>pollution and waste odors are addressed by PT LTT.</p>	<p>to handle grievances effectively.</p>	<p>Office (DLH). The results of the monitoring indicate that no parameters exceeded standard limits, and there are no risks to public health.</p> <ul style="list-style-type: none"> <li>• Preliminary input and an initial review have been provided by academics from Tadulako University (Untad) regarding mitigation strategies for plantation waste odor. Detailed Documentation: Further details of the environmental monitoring activities can be found in Appendix 3.</li> </ul>	<ul style="list-style-type: none"> <li>• Issues regarding unpleasant odors are inherently subjective and difficult to pin down.</li> <li>• Unclear evidence and no commitments from Walhi/FoE to sit down on a forum to find a mutual resolution.</li> </ul>

## B. PT Mamuang (PT MMG)

No.	Issue	Verification Results	Target	Milestone	Details on Progress of Activities	Challenges
1	Hemsi's Claim on Block C26, PT Mamuang	<p>1. Herman Rantetondok (Hemsi's father) and 6 (six) of his colleagues are believed to have cultivated land in the disputed object (Block C26 HGU PT Mamuang) covering an area of 14 ha with a SPORADIK land title issued by the Head of Martasari Village</p> <p>2. Since 2019, the object of the dispute, Block C26, covering an area of 45.13 Ha, has been fully controlled by Hemsi. The objects and grounds of rights put forward by Hemsi are in the form of 22 land handover documents and 9 (nine) SHM, obtained in 2017/2019, which after being traced and analyzed turned out to be outside the object of the dispute</p>	To seek a peaceful resolution of the disagreement over control of land in Block C26 between PT Mamuang and the individual concerned.	The parties are willing to discuss resolving the land conflict over Block C26.	<ul style="list-style-type: none"> <li>• Meetings were held with local stakeholders, including the Village Governments of Pancamukti and Bonemarawa, the Rio Pakava District Head, and community leaders, to address land-related issues in the two villages.</li> <li>• Initial discussions were conducted with the current and former Village Heads of Mertasari to facilitate dialogue with parties claiming rights over Block C26.</li> <li>• AAL, through ENS, formally invited Walhi Sulteng (copied to Walhi Nasional and FOE US) twice to present verification results and clarify the issues raised. However, Walhi Sulteng has not yet provided their availability for a meeting.</li> </ul> <p>Details of the engagement process can be seen in Appendix 4.</p>	<ul style="list-style-type: none"> <li>• Unclear objects of land claims by Hemsi, further compounded by problematic issuance of SKT.</li> <li>• Lack of trust and willingness to engage in an open manner.</li> </ul>

No.	Issue	Verification Results	Target	Milestone	Details on Progress of Activities	Challenges
		(Block C26 HGU PT Mamuang)				
2	Land claim on Block C22, PT Mamuang by the Sinar Rio Jaya Farmers Group (KT-SRJ)	The land claim by the Sinario Jaya Farmer Group (KT-SRJ) covering an area of 172 ha is based on (a) transmigration reserve land, (b) a copy of a letter from PT LTT (c) a Land Certificate (SKT) issued in 2004 - all of which cannot be proven.	To establish constructive support for and cooperation with the farmer group enabling empowerment and capacity building.	KT-SRJ's capacity has increased and strengthened, thus they can develop a sustainable work plan and grow.	<ul style="list-style-type: none"> <li>A dialogue was conducted with the Village Head of Rio Mukti/Lalundu, community leaders, and district representatives to discuss the historical context of land issues in Rio Pakava.</li> </ul> <p>Further details of the discussion can be found in Appendix 5.</p>	<ul style="list-style-type: none"> <li>Unclear evidence and no commitments from Walhi/FoE to sit down on a forum to find a mutual resolution.</li> </ul>
3	Land Claims by Parties on behalf of the Tado Kabuyu Indigenous Community	Complaints regarding PT Mamuang's encroachment of 2,302 ha of Tado Kabuyu Indigenous community land could not be verified by the ENS Team because there was no more detailed and accurate data. Based on the results of searching available data and interviews with sources, it is known that the Tado Kabuyu village covering an area of approximately 250 ha was never part of PT Mamuang's HGU. Currently there are around 113	PT MMG to contribute to the Tado community's livelihoods through effective empowerment and welfare programs.	Assessment of needs of the Tado indigenous community and the subsequent delivery of welfare programs.	<ul style="list-style-type: none"> <li>AAL has provided assistance for Tado community before the action plan was developed in the form of education programs for children, health services, and provision of staple food for 135 households.</li> <li>A Re-Need Assessment was conducted to identify the needs of the Tado Indigenous community, followed by the distribution of staple food supplies to 135 households within the Tado community.</li> <li>Collaborative efforts with the Village Government were made to identify and document public service needs, including KIS (Kartu Indonesia Sehat), KIP (Kartu Indonesia Pintar), and PKH (Program Keluarga Harapan).</li> </ul>	<ul style="list-style-type: none"> <li>Lack of access to official assistance and social security programs</li> <li>The communities themselves have sold their ancestral lands to immigrants, depriving them of an important source of income &amp; livelihood. Companies are being demanded to help.</li> </ul>

No.	Issue	Verification Results	Target	Milestone	Details on Progress of Activities	Challenges
		<p>families (300 people) of the Tado Indigenous Community in Kabuyu Hamlet, they still follow customary rules. They live by farming along the Pasangkayu river. From interviews and field evidence it is known that the Tado tribe has lived in this area for a long time. Currently, most of the indigenous Tado Kabuyu people no longer own land because there have been buying and selling transactions with migrant communities from Bali and Bugis.</p>			<p>For detailed information on activities with the Kaili Tado community, please refer to Appendix 6</p>	
4	<p>Allegations that PT Mamuang has repeatedly criminalized farmers in Panca Mukti Village</p>	<p>Regarding allegations of criminalization, the ENS Team noted that Hemsu had been detained 3 (three) times by the Pasangkayu and North Mamuju Police, based on reports from PT Mamuang employees. However, with limited data and authority, the ENS Team did not find any facts to support that</p>	<p>To enable PT MMG to implement the Company's overarching Human Rights Strategy (Comprehensive Human Rights Strategy throughout the Company)</p>	<p>PT MMG has sufficient and qualified human resources to implement The Company's overarching Human Rights Strategy</p>	<ul style="list-style-type: none"> <li>AAL has worked together with the Tani Center-IPB University to conduct series of trainings to enhance AAL's team in the area of community understanding and empowerment. AAL has sent its team to Tani Center for training and then it was followed with a in-house training for 13 Sustainability Assistants and Supervisors in the Sulawesi region, focusing on community empowerment and engagement. This training was intended to enhance the capacity of AAL's team to understand</li> </ul>	<ul style="list-style-type: none"> <li>Unclear evidence and no commitments from Walhi/FoE to sit down on a forum to find a mutual resolution.</li> </ul>



No.	Issue	Verification Results	Target	Milestone	Details on Progress of Activities	Challenges
		<p>there had been criminalization acts systematically carried out by PT Mamuang without any legal basis or reasons or rational reasons as a basis</p>			<p>community behavior, culture, rights, and participatory approach to effectively engage with the community.</p> <ul style="list-style-type: none"> <li>• For specific areas of human rights. The company is in the process of identifying competent stakeholders to support the enhancement of human resource capacity in the implementation of Human Rights (HAM).</li> <li>• Collaboration with CRU Indonesia: A partnership has been established with CRU Indonesia to develop systems and tools for Human Rights Due Diligence, supporting the integration of human rights principles into the company's operations.</li> </ul>	
5	<p>Intensifying programs to improve community welfare, especially in Pancamukti Village</p>	n/a	<p>To achieve PT MMG's integration of community empowerment program plans with the development plans of the Pancamukti Village government</p>	<p>Establishment of a collaborative village development planning dialogue forum</p>	<ul style="list-style-type: none"> <li>• The company has coordinated with the Village Government and community representatives to review ongoing CSR programs. Further details can be found in Appendix 7.</li> <li>• The company actively participated in collaborative village development planning (Musrembang) and integrated its CSR programs with the Village Development Plan.</li> <li>• Detailed information on this activity is available in Appendix 8.</li> </ul>	<ul style="list-style-type: none"> <li>• Comprehensive need assessment(s) are required to identify the best programs and approaches that can maximize efficiency, secure collective buy-in and inclusivity, and ensure long-term sustainability due to the presence of various community groups with different interests.</li> </ul>

## Agro Nusa Abadi (PT ANA)

No.	Issue	Verification Results	Target	Milestone	Details on Progress of Activities	Challenges
1	PT ANA operates without an HGU permit and only based on a location permit	PT ANA's HGU processing first started in 2007 and is currently still in the process of waiting for the publication of Committee B Minutes and Recommendations from the Central Sulawesi Provincial BPN Regional Office regarding the issuance of the HGU Decree. verification carried out PT ANA does not yet have an HGU. Bearing in mind that HGU can only be issued if all land disputes have been resolved. The complexity of this problem is also shown by the results of validation and verification of land objects which are different each time it is carried out as well as the lack of clarity regarding land boundaries and markers.	To ensure that PT ANA completes the HGU application process in an accurate way while resolving land conflicts in each village.	The status of the land submitted to obtain an HGU permit is clear and clean.	<ul style="list-style-type: none"> <li>The resolution of land claims is currently being led by the local government to achieve a clear and clean area, which is a prerequisite for progressing with the Rights to Cultivate (HGU) process.</li> <li>Internally, the company is in the process of completing the necessary documentation and data required for the HGU application for locations that have been declared clear and clean.</li> <li>The company is actively engaging with the Village Governments of 7 villages, the North Morowali Regency Government, and the Central Sulawesi Provincial Government to facilitate the HGU process. Documentation of this engagement process can be found in Appendix 9.</li> </ul>	<ul style="list-style-type: none"> <li>The presence of different community groups with different claims, some of which are based on SKT documents and thus not recognized as valid documents, as seen through the involvement of various Verification &amp; Validation (Verval) task forces which yielded different results each time.</li> <li>The relatively high volatility in the field, which may spark horizontal conflicts amongst different community groups. This has also indirectly resulted in the cessation of harvest and production in PT ANA.</li> <li>The need for more sustained coordination between the provincial, district, and local government officials, as land can only be granted by them.</li> </ul>
2	PT ANA has confiscated	1. There are 28 community members	PT ANA has additional options to settle the land	Establishment of a multi-stakeholder forum as a	<ul style="list-style-type: none"> <li>The company has coordinated with relevant parties, including the Village</li> </ul>	

No.	Issue	Verification Results	Target	Milestone	Details on Progress of Activities	Challenges
	farmers' land in the villages of Molino, Bungintimbe, Tompira and Bunta covering an area of approximately 5,000 hectares	<p>who claim to own land in the PT ANA oil palm plantation area with a total area of 1,695.27 Ha, spread across: - Bungintimbe Village (992.24 Ha), - Bunta Village (614.30 Ha), - Tompira Village (75.52 Ha), and - Towara Village (13.21 Ha).</p> <p>2. Identified 795.13 hectares of land from the total claim land area, which is land that still overlaps between communities (claimers)</p>	claims in plantation areas where HGU permits will be applied for.	platform to find solutions to settle land claims in the PT ANA plantation area.	<p>Governments of 7 villages, the North Morowali Regency Government, and the Central Sulawesi Provincial Government to lower the temperature and ensure that the conflicts are handled peacefully.</p> <ul style="list-style-type: none"> <li>• Several preliminary meetings have been held with local Civil Society Organizations (CSOs) to discuss issues related to the palm oil industry in Sulawesi, including grievances received by AAL.</li> </ul>	

## APPENDIX 1

### Process of Provision of Public Cemetery (TPU) for Towiora Village

- **Initial Request and Response (2022–May 2023):**
  - In 2022, PT LTT received a formal request from the Towiora Village Government regarding the need for a public burial site.
  - In response, PT LTT held a meeting with the Village Government and community leaders in May 2023.
  - This meeting aligned with an independent verification conducted by Econusantara. During the discussion, all parties agreed to collaborate on providing a burial site to address the community's needs.
- **Collaboration and Filed Survey (May–September 2023):**
  - PT LTT and the community conducted a field survey.
  - Filed finding shows that Towiora Village does not have a public cemetery, only family cemeteries that are already full.
  - The community proposed a 1.4-hectare plot of land belong to one of the community members
  - An option for community land totaling 1.4 hectares was proposed.
  - PT LTT conducted a second field visit to evaluate the location and calculate the exact area.
  - In September 2023, PT LTT, the Village Government, and community leaders agreed on a 1.2-hectare burial site based on coordinate measurements.
- **Coordination with BPN and Land Documentation (November 2023–May 2024)**
  - PT LTT coordinated with the National Land Agency (BPN) regarding the cemetery land procurement.
  - In November 2023, BPN Donggala conducted a field visit and confirmed that the proposed land does not overlap with any existing land ownership certificates (SHM). However, the land was still under a SKT holder, requiring additional documentation.
  - PT LTT and the Village Government met with the landowner, who agreed to sell the land for the burial site. They then prepared all necessary documents, including landowner identification, land recognition certificates, NJOP certificates, land control certificates (SKT), location approval statements, sporadic survey maps, boundary agreements, and copies of the landowner's ID and family card.
- **Community Socialization and Verification (May 2024–August 2024):**
  - In May 2024, PT LTT and the Village Government held a socialization event about the burial site project during a community gathering. The majority of Towiora Village residents responded positively and supported the initiative.
  - Following this, the Donggala PKKPR Office conducted a verification visit, which result in a recommendation letter for BPN Donggala.
  - PT LTT, with the help of an internal notary, began handling the legal process with BPN Donggala.

- In August 2024, PT LTT made a 50% down payment for the land purchase in the presence of the landowner, Village Government officials, and community leaders. The signing of the MoU for the down payment is expected to accelerate the construction and legalization of the burial site.
- **Land Clearing and Infrastructure Construction (September–October 2024)**
  - In September 2024, PT LTT began land clearing, including installing bridges, markers, and water drainage systems.
  - In October 2024, the laying of the first stone marked the start of the cemetery infrastructure and gate construction. This ceremony included community representatives and a joint prayer for the project's success.
  - The construction process took three months due to heavy rainfall in Rio Pakava District.
- **Completion and Handover (Post-October 2024)**
  - After completing the fence and gate construction, PT LTT finalized the land purchase payment, as the infrastructure construction and legalization process for the burial site was nearing completion.
- **Next steps**
  - The ceremonial inauguration and handover of the waqf land for the cemetery will take place once the waqf process is finalized, along with the handover of funeral bathing equipment.
  - AAL to continue to monitor the situation on the ground together with the village officials to ensure that community members receive the full benefits of the TPU.

Following is the documentation of the process of provision of TPU.

# Progress of Public Cemetery (TPU) Provision at Towiora Village (PT LTT)

## Land Profile

- Width: 1.2 hectares (purchased by PT LTT from the local community)
- Beneficiaries : 470 families of Towiora village

## TPU Provision Process (September 2023 - July 2024)



## Progress as of August – December 2024

1. Work progress on 14 Coordinate Points, Bridge Construction and Land Clearing



All technical works are outsourced to the local community.

2. Construction of fencing around the TPU.



3. Meeting with Notary to discuss the process of changes AJB to Waqf Deed (endowment of property)



4. Meeting with BPN accompanied by Notary regarding Issuance of Management Rights Decree



## APPENDIX 2

### ENGAGEMENT WITH STAKEHOLDERS

- **Appointment of Independent Third Party (March 2023)**
  - AAL appointed EcoNusantara (ENS) as an independent third party to conduct a comprehensive verification regarding the allegations towards three of AAL's subsidiaries (PT LTT, PT Mamuang, and PT ANA) in Central Sulawesi and West Sulawesi.
  - The Terms of Reference (ToR) for the verification were consulted with stakeholders, including FoE and Walhi.
- **Engagement During Verification Process**
  - Throughout the verification process, ENS and AAL continuously urged FoE and Walhi to participate.
  - Before the verification results were published, they were shared with key stakeholders, including FoE and Walhi, to gather their feedback.
- **Publication of Verification Results (November 2023):**
  - The comprehensive verification results were published to the public via AAL's website on 27 November 2023.
  - Stakeholder feedback was also published in a Q&A format on 30 November 2023.
- **Development of a 3-Year Action Plan (Early 2024):**
  - In early 2024, AAL and ENS jointly developed a 3-year action plan for the three subsidiaries.
  - The process of drafting the action plan was also consulted with stakeholders to gather input.
- **Publication of the 3-Year Action Plan (June 2024):**
  - In June 2024, the 3-Year Action Plan was published as a follow-up to the Third-Party Verification Report.
  - The publication was consulted with relevant stakeholders.
- **Outreach to Walhi Sulteng (August–September 2024):**
  - Following the publication of the 3-Year Action Plan, ENS sent a letter to Walhi Sulteng in August 2024.
  - Walhi Sulteng could not be reached at the time due to their agenda for program monitoring and evaluation in Kendari.
  - ENS extended another invitation for a face-to-face meeting with Walhi Sulteng in September 2024.
  - As of now, there has been no response from Walhi Sulteng.

- **AAL's Commitment to Open Dialogue:**

- AAL has consistently expressed its openness to meet with the relevant parties, including Walhi & FOE, without any pre-conditions.
- This statement has been published on AAL's official website: <https://www.astra-agro.co.id/wp-content/uploads/2025/01/AAL-repeats-its-open-door-offer-to-Friends-of-the-Earth-and-Walhi.pdf>.
- AAL remains open and willing to engage in unconditional discussions to find common ground and resolve issues.

- **Next steps:**

- AAL will intensify engagement with local civil society organizations (CSOs) and community representatives to jointly explore the way forward in terms of resolving the issues directly on the ground.
- AAL to explore potential outreach with Walhi mediated by independent CSOs, commercial stakeholders and competent third parties.



## APPENDIX 3

### Environmental Monitoring and Socialization of Results

#### 1. Routine Environmental Monitoring by PT LTT:

- PT LTT conducts environmental monitoring every semester.
- Monitoring includes:
  - **Water Testing:** Monitoring of well water, river water, and soil quality.
  - **Air Testing:** Ambient air testing, vehicle emissions testing, odor testing, noise testing, humidity testing, and lighting testing.
- The process involves direct participation from neighboring communities and collaboration with third-party entities for sample collection.
- Collected samples are sent to certified laboratories for further analysis.

#### 2. Semester 1, 2024 Monitoring (May 2024):

- PT LTT conducted environmental testing in May 2024.
- Local community members and village government representatives participated in the process.
- Collaborated with third-party entities:
  - **Air Monitoring:** PT Eka Akurasi Envitama.
  - **Water Monitoring:** CV. Muara Saddang and PT Karsa Buana Lestari Laboratory.
- Results showed no parameters exceeded standard limits.
- Analysis results were submitted to the Donggala Regency Environmental Office.

#### 3. Socialization of Semester 1 Results:

- PT LTT, together with the Environmental Office (DLH Donggala), organized a socialization event to share the Semester 1, 2024 monitoring results.
- Attendees included village government officials and representatives from neighboring communities.
- The community responded positively to the transparency of the monitoring results.
- Suggestions from the community:
  - Request for more knowledge about palm oil mill waste processing to better understand mitigation measures in case of hazards.

- The Environmental Office encouraged the community to protect the environment, especially by avoiding deforestation.
  - PT LTT also shared contact information with the community as a channel for the reporting of environmental complaints, pollution concerns, or land fires.
4. **Semester 2, 2024 Monitoring (November 2024):**
- PT LTT conducted a follow-up environmental testing in November 2024.
  - Similar to Semester 1, the process involved community participation and third-party collaboration:
    - **Air Monitoring:** PT Energindo Prima Laboratory.
    - **Water Monitoring:** CV. Muara Saddang and PT Karsa Buana Lestari Laboratory.
  - Samples analysis is still ongoing, and results are not yet available for socialization by the end of 2024 due to laboratory processing times.
5. **Collaboration with Local Academics:**
- PT LTT and ENS communicated and coordinated with a local academic (a lecturer from Tadulako University) regarding odor mitigation from oil palm processing waste.
  - The academic provided preliminary input and an initial review of mitigation strategies for waste odor.
6. **Next steps:**
- PT LTT to explore the potential applications of the suggestions from the academics in improving its waste management practices.
  - PT LTT to arrange periodic visits to its mill and waste management facilities by community representatives.

## Documentation of Environmental Monitoring Activities



## Documentation of Air and Water Quality Monitoring in PT LTT

- Taking of water samples for the second semester of 2024 monitoring  
Samples were taken under the Village Government's supervision

## Documentation of Air and Water Quality Monitoring in PT LTT for First Semester of 2024 (samples were taken at the end of May 2024)



Air quality monitoring



Emission monitoring



River and well water quality monitoring

## Socialization of Result of Environmental Monitoring with the Community and the Environmental Service in July 2024



Socialization of PT LTT Environmental Quality Monitoring results with the Environmental Service, Village Government, Community Leaders, and community

## APPENDIX 4

### Meeting with Local Stakeholders in Rio Pakava District

PT Mamuang conducted a series of visits and meetings with local stakeholders to address land-related issues in Rio Pakava District. These engagements included government officials at the hamlet, village, and district levels, as well as community leaders in the Panca Mukti Village area. One notable meeting took place in July 2024, when PT Mamuang accepted an invitation from the Bonemarawa Village Government and Rio Pakava District Government regarding a boundary survey of the village. PT Mamuang was invited as a gesture of goodwill, given its proximity to Rio Pakava District. The meeting was attended by the Village Heads of Panca Mukti, Bonemarawa, and Pantalobete, the Rio Pakava District Head, and community leaders from Lalundu. Discussions focused on the chronology of land issues in Rio Pakava District and potential solutions to the conflict between PT Mamuang and Mr. Hemi, involving both village and regional governments.

The meeting confirmed the facts surrounding the conflict between PT Mamuang and Mr. Hemi. Attendees, including district officials, village governments, and Kaili traditional leaders, expressed full support for providing the necessary data to resolve the conflict. PT Mamuang attempted to meet with Mr. Hemi through the Panca Mukti Village Head, but Mr. Hemi did not agree to a meeting.

PT Mamuang remains committed to resolving the issue through dialogue and collaboration with all relevant stakeholders.



In November 2024, PT Mamuang accompanied representatives from Pancamukti Village and Bonemarawa Village to verify boundary markers. The survey confirmed that there is no overlap between village land and PT Mamuang's HGU (Cultivation Rights) area. Additionally, neither village holds any land rights within PT Mamuang's HGU zone.



As of the end of 2024, no further meetings have been held to resolve the conflict or gather additional supporting data. Nevertheless, PT Mamuang remains open and committed to collaborating with all parties to achieve a resolution to the land issue.

**Next steps:** PT Mamuang to engage with Hemsí's family members to find a mutual solution.

## APPENDIX 5

### Constructive Discussions with Rio Mukti Village Community

PT Mamuang maintains ongoing communication with neighboring villages, including Rio Mukti Village, located east of its operational area. In July 2024, PT Mamuang coordinated with the Rio Mukti Village Government to address existing issues. As a result, the Village Government agreed to invite historical witnesses to a joint meeting with PT Mamuang to clarify the root of the problems.

In October 2024, PT Mamuang attended a meeting hosted by the Village Government, involving several Rio Mukti community leaders. The Village Government in this case the Village Head invited several figures from Lalundu Village as historical witnesses to attend the meeting. This is because Rio Mukti Village is a division of Lalundu Village. The majority of Rio Mukti Village is from the transmigration area.

The meeting, attended by village officials, community leaders, and farmer groups, concluded that the KT-SRJ group is not officially registered as a farmer group in Rio Mukti Village and that it is unclear to what extent KT-SRJ is speaking on behalf of the broader community or the Rio Mukti Village Government. Mr. Arman, former Secretary of Lalundu Village (2002–2012) and now a community leader, confirmed that all land conflicts involving Lalundu Village residents at the time were resolved through compensation agreements.

To enhance engagement with the farmers of Rio Mukti, PT Mamuang has taken the initiative to establish a partnership with local farmer groups. This collaboration focuses on providing support for the institutional strengthening of palm oil farmer groups and implementing pest control measures. The initiative aims to bolster the organizational capacity of Rio Mukti's farmer groups while fostering mutual communication and cooperation between PT Mamuang and the farming community. In parallel, the Village Government is currently conducting a census to register previously unregistered farmer groups.

PT Mamuang remains committed to constructive dialogue and collaborative solutions to strengthen community relations and address local concerns.

**Next steps:** PT Mamuang to continue engaging with the local officials and CSOs to explore potential pathways to address the concerns of the community in a manner that is as inclusive as possible.



## APPENDIX 6

### Community Engagement with the Kaili Tado Community

Throughout 2024, PT Mamuang has fostered a strong relationship with the Kaili Tado community through regular communication and impactful CSR programs. In September 2024, PT Mamuang conducted a Re-Need Assessment to identify the evolving needs of the Kaili Tado community. This assessment involved key stakeholders, including leaders from the three hamlets inhabited by the Kaili Tado people (Sipatuo, Wayambojaya, and Kabuyu), the Customary Chief, women leaders, Kaili Tado elders, and representatives from the Martasari Village Government.

The Re-Need Assessment highlighted several key priorities for the Kaili Tado community:

- **Basic Necessities:** Provision of staple food supplies for the Kaili Tado community.
- **MSME Development:** Support for small and medium enterprise (UMKM) training and the establishment of a sales facility located at the Wayambojaya Mosque complex.
- **Mass Circumcision Program:** Organizing a mass circumcision event for Kaili Tado children.
- **Infrastructure Renovation:** Renovation of the Kaili Tado Traditional House and the Wayambojaya Mosque.





*Re-need assessment activities*

One of PT Mamuang's flagship CSR initiatives for the Kaili Tado community is the distribution of staple food supplies (sembako), which has been carried out since September 2023, benefiting 135 households. To assess the impact of this program, PT Mamuang conducted a questionnaire-based evaluation among the beneficiaries. The findings are as follows:

#### **Evaluation Results:**

- **Awareness:** All recipients are aware that the food supplies are provided by PT Mamuang.
- **Impact:** The assistance has significantly helped alleviate daily living expenses for the community.
- **Feedback:** 10% of the beneficiaries expressed a desire for alternative income-generating support programs instead of food supplies.

#### **Recommendations:**

- From the Customary Chief (*ketua adat*):
  - Reduce the frequency of food supply distributions in 2025 to once every 2–3 months.
  - Prioritize accelerating the renovation of the traditional house (*Rumah Adat*) to support the needs of the Vunja festival.
- From the Martasari Village Head:
  - Expand the scope of the food supply program to include other underprivileged communities outside the Kaili Tado group, ensuring the assistance is not exclusive to one community.



*Food Package Distribution Activities to the Kaili Tado Community*

In addition to its food supply program, PT Mamuang is actively working to improve access to public services and social security schemes for the Kaili Tado community, particularly government programs such as PKH (Program Keluarga Harapan), KIS (Kartu Indonesia Sehat), and KIP (Kartu Indonesia Pintar). In collaboration with the Pasangkayu Regency Social Services Office, PT Mamuang conducted a door-to-door survey to identify eligible Kaili Tado community members who could benefit from these initiatives.



*Coordination Activities with Village Government and Related Agencies*

Based on recommendations from the Pasangkayu Social Services Office, there is a need for socialization sessions involving Martasari Village officials and the Kaili Tado community. These sessions aim to refresh the community's understanding of the programs and encourage them to complete the required administrative documents for registration. The door-to-door survey revealed that many Kaili Tado community members are not enrolled in these programs due to incomplete population administration documents. As of October 2024, only 49 households remain actively registered as beneficiaries of the PKH, KIP, and KIS programs.

PT Mamuang is also collaborating with the Pasangkayu Regency Tourism Office to support the annual Vunja Traditional Festival, a key initiative to strengthen the institutional framework of the Kaili Tado customary practices in Pasangkayu Regency. The festival, organized in partnership with customary leaders, PT Mamuang, and the Tourism Office, successfully attracted over 500 visitors during its three-day event. This collaboration highlights PT Mamuang's commitment to preserving and promoting the cultural heritage of the Kaili Tado community while fostering community engagement and development.

**Next steps:** AAL to integrate the abovementioned recommendations in the next phase of its community empowerment programs for the Tado Kabuyu and the local Martasari villagers.



*The Kaili Tado Community Vunja Festival*



## APPENDIX 7

### CSR Program Review for Panca Mukti Village

PT Mamuang maintains close communication with the Panca Mukti Village Government. In July 2024, PT Mamuang coordinated with the Panca Mukti Village Government to align its CSR programs with the outcomes of the Village Development Planning Meeting (Musrembang) and the Village Development Plan. The Musrembang results highlighted key priorities for Panca Mukti Village, including:

- Improvement of village road infrastructure.
- Renovation of worship facilities.
- Enhancement of *Posyandu* (integrated health service post) facilities.
- Upgrading infrastructure for kindergarten (TK) facilities.
- Capacity building for durian and palm oil farmer groups.
- Initiating plans to establish Panca Mukti as a tourism village.

The Village Government expressed hope that PT Mamuang's CSR programs would align with these Musrembang priorities. PT Mamuang remains committed to collaborating on the realization of these development goals through its CSR initiatives.



Engagement activities with the Panca Mukti village government.

So far, PT Mamuang's routine CSR contributions to Panca Mukti Village include:

- Road infrastructure improvements, such as road hardening and material provision for road embankments.
- Incentive support for honorary teachers and scholarships for high-achieving students.
- Supplementary feeding assistance for infants and toddlers through *Posyandu* program.

- Incentives for *Posyandu* cadres to support community health programs.

**Next steps:** AAL to continue supporting the development and welfare of the Panca Mukti community together with the village officials, focusing on infrastructure, healthcare, education, and livelihood programs.



*CSR activities in Panca Mukti Village include providing scholarships, plant seed assistance, road repairs, freshwater fish seed assistance, and Posyandu cadre incentives.*

## APPENDIX 8

### Training on Enhancing Capabilities as Facilitators in Community Engagement and Empowerment Program Design for AAL's Sustainability Team

The "Capacity Building Training for Facilitators in Community Engagement and Empowerment Program Design" was conducted to enhance the knowledge, attitudes, and skills of the AAL Sustainability Team. This training aimed specifically at improving their ability to engage with communities and design effective and sustainable empowerment programs and strategies. The training took place from December 2-7, 2024, involving 13 members from the sustainability team, covering CSR, Conservation, and Fire Management sectors in the Sulawesi region.

Yayasan Nastari Nusantara, acting as the strategic partner, played a crucial role in facilitating the training. The foundation guided the learning process through structured stages, sessions, and curriculum, ensuring that participants not only comprehended the theoretical aspects but also applied them in real-world contexts.

The training included comprehensive and in-depth materials:

1. **Village Development Paradigm:** Understanding sustainable village development concepts and approaches.
2. **Participation Principles:** Emphasizing active community participation at every program stage.
3. **Positive Thinking:** Building an empowerment mindset by recognizing village potentials.
4. **Facilitator Knowledge, Attitudes, and Skills:** Enhancing facilitators' abilities to lead and motivate communities.
5. **Facilitator Roles and Functions:** Understanding facilitators' responsibilities and contributions to the empowerment process.
6. **Introduction to Tools/Resource Analysis:** Learning tools such as village maps, resource overlap maps, actor analysis, asset pentagon, trends and changes, and seasonal calendars to holistically understand village potentials.
7. **Empowerment Program Design:** Practical steps in designing programs tailored to community needs and potentials.

The training adopted an adult learning (andragogy) approach, incorporating various interactive methods such as case studies, role-playing, games, brainstorming sessions, group discussions, and field practice. This approach ensured that participants not only understood the material theoretically but also could apply it in real-life situations.

Pre-test and post-test results indicated significant knowledge improvement among all participants concerning the provided materials and curriculum. Additionally, the learning process evaluation showed high participant satisfaction with the training content, facilities, and supportive learning environment. Participants actively engaged throughout the training, demonstrating high levels of participation and enthusiasm.

Following the training, the Sustainability Team was tasked with implementing social approach and mapping projects in villages around the company's operational areas in Sulawesi. This task aimed to concretely apply the acquired knowledge and skills. The team was divided into several groups to conduct field social approaches, village potential mapping, and community needs identification.

Upon project completion, the team presented their work results and received constructive feedback to enhance future community empowerment programs. Through this training, the Sustainability Team not only improved their knowledge and skills but also became more adept at conducting social mapping and identifying village potentials. This capability enables them to design more targeted, positively impactful empowerment programs aligned with the community's needs and potential.

**Next steps:** AAL will continue to improve the capacity and capabilities of the local staff to ensure they are properly equipped to engage with the surrounding communities in a respectful and inclusive manner.

Documentation of activities as follows:



*Training on social approaches and program design as well as field practice with the community in the village*



## APPENDIX 9

### Engagement Progress in PT ANA

Towara Village Discussion involving Village Government, All Community, witnessed by Regional Leadership Coordination Forum ( Forkopimda )



Rapat Koordinasi 3 Desa (Towara Pantai, Peboa, Towara)



Coordination with Molino Village Government



Coordination with Tompira Village Government



Coordination with Bungintimbe Village Government



Coordination with Bunta Village Government



Checking the coordinate points with PT Bumanik in Peboa Village



**Next steps:** AAL to continue supporting the government-led mediation process in validating the various land claims.