

Ineligible Grievance
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No	Group	Concession	Grievance Report	Stakeholder	Investigation Outcome
1.	Anglo Eastern Plantations	Kahayan Agro Plantation	Rapid Response Report 14 , 15 , 24 , 25	Mighty Earth	Anglo Eastern has already submitted the HCS report for peer review and land clearing identified is located outside the identified HCS area.
2.	Widya Corporation	Mulia Inti Perkasa	Rapid Response Report 15 , 25 , 29	Mighty Earth	Mulia Inti Perkasa has already conducted all the necessary assessment, including HCS and HCV in 2018. MIP has also submitted their maps for our internal monitoring. Based on our investigation, the area identified in the report is outside the HCV/HCS area.
3.	Fangiono Agro Plantation Group (FAP Agri)	Ketapang Hijau Lestari	Rapid Response Report 9	Mighty Earth	High Carbon Stock assessment at PT Ketapang Hijau Lestari was completed in 2017 by a registered organization with HCSA. Based on our monitoring, there was no land clearing at HCS area identified. FAP Agri has also published their NDPE policy in October 2019.
4.	Mulia Sawit	Persada Era Agro Kencana	Rapid Response Report 9 , 10 , 11 , 12 , 15 , 25	Mighty Earth	Not a supplier to Wilmar
5.	Incasi Raya Group	Sumatera Jaya Agro Lestari	Rapid Response Report 10	Mighty Earth	SJAL has already conducted HCS and HCV since 2017. Their land clearing is guided by the outcome of the assessments.
6.	Samling	Lana LPF 0006	Rapid Response Report 11 , 15	Mighty Earth	The land clearing is not related to oil palm development. Our last purchase was in January 2020

7.	Rimbunan Hijau Group	Jaya Tiasa Holdings Berhad	Rapid Response Report 12	Mighty Earth	The land clearing is not related to oil palm development
8.	Triputra Group	Dwiwira Lestari Jaya	Rapid Response Report 12	Mighty Earth	HCV and HCS assessment has already been conducted at PT Dwiwira Lestari Jaya in 2014 and 2016, respectively and there were no land clearing activities at the HCV/HCS area. For more details please refer to the overlap maps . As a RSPO member, Triputra has also publicly committed to support NDPE policy. Wilmar has been engaging with Triputra in the compliance to the NDPE policy since 2015, where we have conducted a field visit to one of Triputra's operation in 2015 under our ART programme . In 2016, upon the recommendation from Wilmar, Triputra's team has also attended trainings organised by the HCSA steering group where Triputra has become a Registered Practitioner Organisation and have a few registered individuals within organisation.
9.	Samling	LPF/0008 Marudi & Batu Belah	Rapid Response Report 13	Mighty Earth	The land clearing is not related to oil palm development. Our last purchase was in January 2020
10.	Borneo Pacific	Arjuna Utama Sawit	Rapid Response Report 14 , 18 , 23	Mighty Earth	Arjuna Utama Sawit is not a supplier to Wilmar Our supplier, Borneo Pacific does not have any oil palm operation in Indonesia https://www.borneopac.com/plantation.html
11.	TH Plantations Berhad	Hydroflow	Rapid Response Report 14 , 23 , 27	Mighty Earth	Land Clearing was not conducted by the company, it happened outside their concession boundary

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12.	Perkebunan Nusantara	Perkebunan Nusantara II Prafi	Rapid Response Report 15	Mighty Earth	Divested since 2014
13.	Samling	Samling Jelalong LPF 0007	Rapid Response Report 15	Mighty Earth	The land clearing is not related to oil palm development. Our last purchase was in January 2020.
14.	Ta Ann Holdings Bhd	Ladang Selezu	Rapid Response Report 15 , 16	Mighty Earth	Wilmar has initiated engagement with Ta Ann since May 2019 to seek clarifications on allegation of deforestation. Ta Ann has provided written commitment in adhering to the NDPE policy and shared their concession maps for further investigation. Moratorium has been put in place. A meeting was held on 21 June 2019 to discuss the issues and a follow up meeting took place on 12 July 2019 for further discussion. As part of the investigation, Wilmar team has conducted a field assessment from 22-27 July to verify the allegation. The field assessment has verified that the deforestation happened outside Ladang Selezu's concession boundaries.
15.	TH Plantations Berhad	Ladang Tabung Haji	Rapid Response Report 15 , 18 , 20	Mighty Earth	This concession doesn't belong to TH Plantations Berhad since 2002 after it was divested to a non-related party.
16.	Bakrie Group	Menthobi Mitra Lestari	Rapid Response Report 16	Mighty Earth	Divested since 2017
17.	Boustead Plantations	Boustead Pelita Kanowit	Rapid Response Report 17	Mighty Earth	Land clearing was not conducted by the company, it happened outside their concession boundary.

18.	Bukit Berlian Plantation Group	Ginang Fohu Plantation	Rapid Response Report 17	Mighty Earth	The 5 Ha land clearing was not conducted by Bukit Berlian Plantation Group, the land was illegally encroached and cleared by the communities. Bukit Berlian Plantation Group has already adopted NDPE policy where all their land clearing activities shall be guided by the outcome of HCS/HCV activities.
19.	CB Industrial Product Holding (CBIP)/Jhonlin Group:	Kurun Sumber Rezeki/Solar Green Sdn Bhd/Kumpulan Kris Jati Sdn Bhd	Rapid Response Report 17	Mighty Earth	Both CB Industrial Product Holding and Jhonlin Group are not supplier to Wilmar. With reference to the Earthsight report, the allegations were linked to CBIP- which is not a Wilmar supplier. The allegations attempt to link Wilmar via one of our suppliers to CBIP. Having done a legal review (based on the RSPO definition of groups) on the shareholding structure, we can confirm that our supplier, KKJ and CBIP do not share the same parent company, and are not part of the same group. Although CBIP holds 30% share in KKJ, they do not have management control over the operation of KKJ. In addition, the company group that has management control of KKJ, has no shareholdings in any of CBIP's oil palm operations under CBIP's management control. In fact, KKJ, has at company group level, been very supportive of Wilmar's No Deforestation, No Peat, No Exploitation (NDPE) policy implementation, participating actively in our supplier compliance and verification programs. Wilmar has previously conducted ground verification in two mills under the KKJ group since the launch of our NDPE policy in December 2013. Our last visit to a KKJ operation was in May 2019.
20.	Dharma Sawit Nusantara (DSN Group)	Prima Sawit Andalan	Rapid Response Report 17	Mighty Earth	The land clearing was not conducted by DSN as they have a moratorium in place since 2015. The land was illegally encroached and cleared by communities from Dusun Tembaga and Desa Sungai Buluh, for the planting of paddy field. DSN has already reported the case to the local authorities and copies of the reports had also been shared with Wilmar.

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21.	Incasi Raya	Arvenasepakat	Rapid Response Report 17	Mighty Earth	The land clearing was not conducted by Arvenasepakat, the area was illegally encroached and cleared by communities of Kelompok Sinaga. Police report has been lodged on the illegal encroachment.
22.	Kirana Megatara	Putra Katingan Pratama	Rapid Response Report 17	Mighty Earth	Our supplier, Triputra Agro Persada has confirmed that Kirana Megatara is not a supplier to them.
23.	RGE Group	Usaha Sawit Unggul	Rapid Response Report 17	Mighty Earth	Land clearing was not conducted by the company, it happened outside their concession boundary.
24.	Rimbunan Hijau Group	Poh Zhen Sdn Bhd	Rapid Response Report 17 , 29	Mighty Earth	The land clearing is not related to oil palm development. Field visit was carried out in March 2021 and it was verified that the development was indeed not related to oil palm.
25.	Samling	Syarikat Samling Timber Sdn Bhd (LPF 0014)	Rapid Response Report 17	Mighty Earth	The land clearing is not related to oil palm development. Our last purchase was in January 2020
26.	Woodman	Adong estate, part of LPF 0004	Rapid Response Report 17	Mighty Earth	The land clearing is not related to oil palm development
27.	Woodman	Liku estate, part of LPF 0004	Rapid Response Report 17	Mighty Earth	The land clearing is not related to oil palm development
28.	WTK Group	Southwind Plantation Sdn Bhd	Rapid Response Report 17	Mighty Earth	WTK was not involved in the land clearing. The clearance happened either outside their concession boundary or within " <u>Native Dispute Land</u> " inside their boundary. For illegal clearance within " <u>Native Dispute Land</u> ", police report has already been lodged.

29.	Yuwang	Empresa (M) Sdn Bhd	Rapid Response Report 17	Mighty Earth	Land clearing was not conducted by the company, it happened outside their concession boundary.
30.	GAMA	Sumatera Unggul Makmur	Rapid Response Report 18 , 28	Mighty Earth	Land clearing was not conducted by the company. This land is not owned and controlled by PT SUM due to Villages Boundary Dispute since 2011. The area in question belongs to the local community, where the land owner cleared it for lady finger and rubber planting. For more detail, please refer to their public statement .
31.	KLK Berhad	Menteng Jaya Sawit Perdana	Rapid Response Report 18	Mighty Earth	The alleged area is located within PT MJSP's permit area (Izin lokasi). It is however no longer within the management control of PT MJSP, as in Y2016 the area has been gazetted by Ministry of Environment and Forestry [Kementerian Lingkungan Hidup & Kehutanan "KLHH"] as Community Forest Plantation [Hutan Tanaman Rakyat ("HTR")] area. A copy of the Ministerial Decree letter [Surat Keputusan Menteri] from KLHH and the location map of the HTR area relative to the alleged area is attached here. It is a local government's development programme for the local community in collaboration with Gabungan Kelompok Tani Hutan ("Gapoktan"), and is monitored by the Forest Agency [Dinas Kehutanan].
32.	Pinehill Pacific	Makmur Jaya Malindo	Rapid Response Report 18	Mighty Earth	Not a supplier to Wilmar
33.	Rimbunan Hijau Group	Erajaya Synergy Sdn Bhd (Lassa division, part of LPF/0029)	Rapid Response Report 18	Mighty Earth	Land clearing was reported in several areas based on the RRR 18. While a small portion was cleared for non-palm planting related operation, most of the area was illegally cleared by local communities.

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34.	Rimbunan Hijau Group	Woodijaya Sdn Bhd (Lot 197)	Rapid Response Report 18	Mighty Earth	The area in question is an NCR land, where the 4ha clearance was done by communities for the planting of pineapple.
35.	Samling	Tunas Borneo Plantation	Rapid Response Report 18 , 27	Mighty Earth	The area in the Report is not within the supplier's concession as their location permit (Izin Lokasi) for that area had expired. Based on the information and photos evidence we received, the area is currently occupied by local communities which has conducted the land clearing. It was also noted that substantial land clearing was conducted by a mining company operating in the area. Our last purchase was in January 2020.
36.	TH Plantations Bhd	TH Pelata Meludam Sdn Bhd	Rapid Response Report 18	Mighty Earth	Land clearing was not conducted by the company, it happened outside their concession boundary.
37.	Tradewinds	Trans Kenyaland Sdn Bhd	Rapid Response Report 18	Mighty Earth	Land clearing was not conducted by the company, it happened outside their concession boundary.
38.	Woodman Group	Baram Estate	Rapid Response Report 18	Mighty Earth	The land clearing is not related to oil palm development.
39.	AlamBumi Group	AlamBumi Sdn Bhd	Rapid Response Report 19	Mighty Earth	The concession in question doesn't belong to our supplier, AlamBumi. <i>Remarks: This case has been removed from the latest version Rapid Response Report 19</i>
40.	Rimbunan Hijau Group	RH Plantation (Selangor Estate)	Rapid Response Report 19	Mighty Earth	The land clearing is not related to oil palm development.

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41.	Samuel International Group	Bina Sarana Sawit Utama	Rapid Response Report 19	Mighty Earth	The area in question is outside PT Bina Sarana Sawit Utama's concession boundary.
42.	Sime Darby	Sime Darby Plantation Sdn Bhd	Rapid Response Report 19	Mighty Earth	The area in question is outside Derawan estate's concession boundary
43.	NT Corp	Bintang Sakti Lenggana	Rapid Response Report 19	Mighty Earth	Field visit was carried out in March 2021, it appeared that there's no deforestation carried out in the area identified in the report. The land clearing was conducted in area consisted of mixed agriculture land, mostly consists of rubber trees.
44.	Dharma Satya Nusantara Tbk (DSN)	Putra Utama Lestari (area 1)	Rapid Response Report 20	Mighty Earth	The area in question is outside PT Putra Utama Lestari's concession boundary
45.	Dharma Satya Nusantara Tbk (DSN)	Putra Utama Lestari (area 2)	Rapid Response Report 20	Mighty Earth	The area in question is outside PT Putra Utama Lestari's concession boundary
46.	Felda Global Ventures	Citra Niaga Perkasa	Rapid Response Report 20	Mighty Earth	FGV has imposed a moratorium on land clearing since 2017, no land clearing was carried out since then. The area in question belongs to the local community, where the land owner cleared it for paddy planting

47.	GAMA	Agrinusa Persada Mulia	Rapid Response Report 20	Mighty Earth	GAMA has imposed a moratorium on land clearing July 2018, no land clearing was carried out since then. The area in question are outside PT Agrinusa Persada Mulia's HGU concession area. The land clearing was carried out by communities for farming; and by PT. BPUP (Bangun Bina Utama Papua) for road construction where a report clarifying the land clearing activities was published by GAMA: http://kpnplantation.com/assets/gama-files/pressrelease/PT_APM_-_Spatial_Ground_Check.pdf
48.	IJM Group	Prima Bahagia Permai	Rapid Response Report 20	Mighty Earth	IJM has imposed a moratorium on land clearing early 2018. No land clearing was carried out at PT Prima Bahagia Permai since then. The area in question is outside PT Prima Bahagia Permai's concession boundary.
49.	STH Group	Makmur Bersama Asia	Rapid Response Report 20	Mighty Earth	The area in question is outside PT Makmur Bersama Asia concession boundary.
50.	Surya Dumai	Kalimantan Agro Kencana	Rapid Response Report 20	Mighty Earth	Surya Dumai is not a supplier to Wilmar. Our supplier, First Resources has clarified that Surya Dumai Group is not part of First Resources. First Resources's controlling shareholder does not have any ownership or hold any management roles in SDG. You may refer this link http://www.firstresources.com/upload/file/20190917/20190917012425_32851.pdf which shows all the mills and refineries of First Resources.
51.	BBC Holdings Sdn Bhd	Almanbumi Plantations Sdn Bhd	Rapid Response Report 21 , 23	Mighty Earth	Not a supplier to Wilmar.
52.	Dhanista Surya Nusantara	Sabhantara Rawi Sentosa	Rapid Response Report 21	Mighty Earth	Land Clearing was not conducted by the company, it happened outside their concession boundary.

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53.	First Resources	Ketapang Agro Lestari	Rapid Response Report 21	Mighty Earth	HCS/HCV assessment has been duly conducted prior the land clearing. The land development was guided by the outcome of the HCV/HCS assessment. No HCV/HCS area has been cleared.
54.	Global Enterprise Sdn Bhd	Bulungan Surya Mas Pratama	Rapid Response Report 21	Mighty Earth	Land clearing was not conducted by the company, it happened outside their concession boundary.
55.	Makin Group	Cipta Karsa Kahuripan	Rapid Response Report 21	Mighty Earth	Concession in question does not belong to Makin Group, as their location permit expired for more than 10 years.
56.	Rimbunan Hijau Group	Simunjan Estate	Rapid Response Report 21	Mighty Earth	Land clearing was not done by the company, it was illegal encroachment by surrounding communities.
57.	Rimbunan Hijau Group	Timrest Sdn Bhd	Rapid Response Report 21	Mighty Earth	Land clearing was not conducted by the company, it happened outside their concession boundary.
58.	Teladan	Teladan Palma Perkasa	Rapid Response Report 21	Mighty Earth	The concession in question does not belong to Teladan Group, as their location permit expired for more than 2 years. No activities were carried by Teladan Group since 2016.
59.	TSH Resources Bhd (TSH)	Bulungan Citra Agro Persada	Rapid Response Report 21	Mighty Earth	TSH has commissioned Malaysian Environmental Consultants (MEC) to verify the allegation. Where it was concluded that the land use change was caused by fire spread into the concession from neighbouring area. As a RSPO member, TSH strictly adhered to no burn policy, and do not use fire for their land clearing activities.
60.	Agro Sarimas Group	Agro Sarimas Indonesia	Rapid Response Report 22	Mighty Earth	Land clearing was not conducted by the company, it happened outside their concession boundary.

61.	Bumitama Group	Damai Agro Sejahtera	Rapid Response Report 22, 23	Mighty Earth	<p>The area in question in PT Damai Agro Sejahtera (DAS) was not cleared by the company but impacted by forest fires that struck the landscape of Sungai Putri forest during the peak of the dry season in September 2019. While the change in vegetation colour from the satellite imagery may seem as a result of land-clearing, the ground-truthing check identified varied extent of damage, from apparently un-impacted to scorched and burned vegetation. Bumitama is conducting internal investigation to identify the causes and prevent repeated occurrences of fires in the future. for more info, please refer to a news release on this matter published on Bumitama's website:</p> <p>http://ir.bumitama-agri.com/static-files/f3999275-46d9-466b-b656-53d7dcfe985a</p>
62.	Eagle High Plantations	Arrtu Energie Resources	Rapid Response Report 22	Mighty Earth	<p>The area in question in PT Arrtu Energie Resources (AER) was caused by fire incidents triggered by extreme dry weather conditions in Indonesia. Fire outside PT AER's concession area has spread into their concession and caused the fire in PT AER during the dry period.</p>
63.	Fangiono Agro Plantation (FAP Agri)	Tirta Madu Sawit Jaya	Rapid Response Report 22, 24, 25	Mighty Earth	<p>Land clearing was not conducted by the company, it happened outside their concession boundary. FAP Agri has also published their NDPE policy in October 2019.</p>
64.	Goodhope Group	Rim Capital	Rapid Response Report 22	Mighty Earth	<p>Goodhope has no plan to carry out any new plantings at PT RIM Capital, the company has not conducted any land clearance at Rim capital since 2012. The area in question (-2.661, 112,231) is located outside of RIM Capital's concession. While another area (-2.689, 112.227) belongs to the communities, where the landowners have no intent to relinquish their land to the company.</p>

65.	Kalimantan Sawit Kusama	Fajar Saudara Lestari	Rapid Response Report 22	Mighty Earth	The area in question in Fajar Saudara Lestari (PT FSL) was caused by fire incidents triggered by extreme dry weather conditions in Indonesia. Fire outside PT FSL concession area has spread into their concession and cause the fire in PT FSL during the dry period.
66.	Sampoerna Agro	Usaha Agro Indonesia	Rapid Response Report 22	Mighty Earth	Land clearing was not conducted by the company. The area in question belongs to community, where the landowners have no intent to relinquish their land to the company.
67.	BEST Group	Menara Tunggal Perkasa	Rapid Response Report 23	Mighty Earth	Not a supplier to Wilmar. Wilmar has suspended PT BEST at group level since 2017.
68.	Bumitama Group	Andalan Sukses Makmur	Rapid Response Report 23	Mighty Earth	Our supplier has conducted ground checking and verified that this is not a result of land clearing but a fire scar from forest fires that occurred in the area in September 2019. These areas which are owned by the local community and thus enclaved from the management of the company are a part of the set-aside areas of 2,500 hectares (about 36% of PT ASMR's permit) that were excluded from the company plantation development plans and were set-aside for conservation based on the rapid HCS assessment and peat delineation study conducted in April 2014 (refer to 12 September 2014. Announcement: http://ir.bumitama-agri.com/static-files/5ce66171-9006-449f-9189-b206eca3e0c7). Upon reporting by the patrolling team, the fires were tackled by our supplier's fire-response personnel. Two teams of 24 men were dispatched to the site, equipped with pumps and water hoses to douse the flames. However, the forest terrain, lack of access roads and peat soil made it very difficult extinguish. Once put out, both incidents were recorded and reported accordingly to relevant local authorities, as well as to the RSPO under the hotspot monitoring scheme.

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69.	Incasi Raya	Makmur Agro Lestari	Rapid Response Report 23	Mighty Earth	This concession doesn't belong to Incasi Raya. MAL is located in West Kalimantan while the location of this report is located in Central Kalimantan.
70.	NPC Resources	Sumber Alam Selaras	Rapid Response Report 23 , 25	Mighty Earth	The area in question in Sumber Alam Selaras was not cleared by the company but impacted by forest fires that struck during the peak of the dry season in September 2019.
71.	Puncak Niaga Holdings Bhd	Danum Sinar Sdn Bhd	Rapid Response Report 23	Mighty Earth	Not a supplier to Wilmar. We do not source from Puncak Niaga Holdings Bhd, Danum Sinar Sdn Bhd, nor Sarawak Oil Palms.
72.	Union Sampoerna Agro Triputra Persada	Harapan Hibrida Kalbar	Rapid Response Report 23	Mighty Earth	Land clearing was not conducted by the company, it happened outside their concession boundary.
73.	Samling Group	LPF 008/Merudi & Batu Belah	Rapid Response Report 24 , 25 , 26	Mighty Earth	Not a supplier to Wilmar. Wilmar has suspended Samling at group level and our last purchase was in January 2020.
74.	CB Industrial Product Holdings	Sawit Lamandau Raya	Rapid Response Report 26	Mighty Earth	Not a supplier to Wilmar.
75.	CB Industrial Product Holdings	Jaya Jadi Utama	Rapid Response Report 26	Mighty Earth	Not a supplier to Wilmar.
76.	Teladan Prima Group	Tanjung Buyu Perkasa Plantation	Rapid Response Report 26	Mighty Earth	Land clearing was not conducted by the company. Based on the concession map we received from supplier, it was verified that the land clearing happened outside their concession boundary.

77.	Ciliandry Anky Abadi (CAA)	Agrindo Green Lestari	Rapid Response Report 27	Mighty Earth	Not a supplier to Wilmar. Wilmar has ceased sourcing from CAA at group level since March 2018.
78.	QL Resources	Pipit Mutiara Indah	Rapid Response Report 27 , 28	Mighty Earth	Land clearing was not conducted by the company, it happened outside their concession boundary.
79.	Rimbunan Hijau Group	PJP Pelita Lundu Plantation Sdn Bhd	Rapid Response Report 29	Mighty Earth	The land clearing was not conducted by the company. That particular area (LOT N17) is still owned by the local smallholders as it has not been surrendered yet. The land clearing was done by those local smallholders.
80.	Perbadanan Kemajuan Negeri Pahang (PKNP)	PKNP Tembeling	Rapid Response Report 30 , 31	Mighty Earth	PKNP is not a supplier to Wilmar Based on the RSPO's definition of group ownership (refer here and here), a review of ownership documentation and shareholdings found that PKNP is not related at group level to Wilmar supplier, LKPP Corporation Sdn Bhd.
81.	Yayasan Pelajaran Johor	YPJ Plantations Sdn Bhd (Ladang SSI Sg Ara)	Rapid Response Report 32	Mighty Earth	Total concession area of Sungai Ara is less than 90ha, where the entire concession was largely cleared prior to 2019. The remaining area of less than 5 ha which was developed in January 2019 is a combination of mixed scrub with pioneer species. There was no further land clearing post January 2019. Since the case was brought to YPJ's attention in January 2020, they have immediately developed a NDPE policy to demonstrate their commitment to adopt NDPE to guide their future development.
82.	Astra Agro Lestari	Agincourt Resources	Rapid Response Report 33 , 36	Mighty Earth	PT Agincourt Resources is a not a supplier to Wilmar. They have no activities in oil palm industry. The land clearing at PT Agincourt Resources is not related to oil palm development. PT AAL and PT Agincourt Resources are different companies and operate independently as separate legal entities. In addition, we understand that PT AAL has

					initiated direct communication with Mighty Earth and have linked Mighty Earth with PT Agincourt Resources/ PT United Tractor for further engagement.
83.	Bumi Gading Prima	Bumi Agro Prima	Rapid Response Report 33	Mighty Earth	PT Bumi Agro Prima clarified that there was no deforestation taken place as the area was planted with other crops prior converting to palm. Supporting documentation and photos had been submitted to prove their claim, where it was found that the vegetation on the ground consists of mixture of other crops, which is mostly rubber. To ensure that their activities are aligned with the NDPE requirement, the supplier has also agreed to commit to moratorium since May 2021 and engage a license assessor to conduct HCV-HCS assessment.
84.	Eagle High Plantations	Tandan Sawita Papua	Rapid Response Report 34	Mighty Earth	Prior to the publication of the Rapid Response Report 34 on 30 June 2021 on the allegation of deforestation at PT Tandan Sawita Papua (TSP), Wilmar has already initiated engagement with PT TSP when we detected the issue through our internal monitoring programme. The land clearing detected was not conducted by PT TSP. Eagle High, their parent company is a member of RSPO since 2008 and they have also published their NDPE policy since 2018. Their land development is therefore being guided by the RSPO P&C as well as NDPE policy requirement. PT TSP carried out a site visit to investigate the allegation, the report is available here . Based on the outcome of the investigation, it appeared that the land clearing was conducted by villagers in the area without PT TSP's consent. The community members claimed that they are unaware that the area belongs to PT TSP. PT TSP has therefore conducted socialisation and engagement with the local communities and managed to secure their commitment in stopping the illegal land clearance inside PT TSP. PT TSP has also engaged with local authorities, including Arso Timur District Government and Keerom Regency Government on the said issue, where the local authority has agreed to

					hold further meeting with the community leaders to provide clarity on the PT TSP boundary. In the meantime, PT TSP will put up signboard in the area to notify external party on the ownership of PT TSP in the area.
85.	Rimbunan Hijau Group	LPF 0026	Rapid Response Report 34	Mighty Earth	The land clearing is not related to oil palm development
86.	Triputra Agro Persada	Brahma Binabakti	Rapid Response Report 34	Mighty Earth	The land clearing happened outside of PT Brahma Binabakti's concession boundary. For more detail, please refer to Triputra Agro Persada's official response here .
87.	Bukit Asam	Bumi Sawindo Permai	Rapid Response Report 35	Mighty Earth	PT Bumi Sawindo Permai clarified that there was no deforestation taken place as the area was planted with other crops prior converting to palm. Supporting documentation including field verification report and photos had been submitted to prove their claim, where it was found that the vegetation on the ground consists of mixture of other crops, which is mostly rubber and coffee. To ensure that their activities are aligned with the NDPE requirement, the supplier has also agreed to commit to moratorium. Relevant assessments will have to be carried out prior resuming their land clearing to ensure their compliance to NDPE.
88.	Shin Yang	LPF 0019	Rapid Response Report 35	Mighty Earth	Not a supplier to Wilmar. Wilmar does not have direct trading relationship with Shin Yang and their associated company, Sarawak Oil Palms Bhd (SOP).
89.	Ta Ann holdings Bhd	LPF 0010	Rapid Response Report 35	Mighty Earth	The land clearing is not related to oil palm development

90.	Innoprise Plantation Berhad	Innoprise Plantation Berhad	Rapid Response 36	Mighty Earth	<p>Wilmar initiated an investigation on the Innoprise case since August 2020, and the investigation concluded that the land development was not related to their oil palm operations. Their land development activities were related to timber tree planting, mainly the timber species Laran (<i>Neolamarckia cadamba</i>). During the course of investigation, Innoprise has submitted comprehensive documents for our review, including:</p> <ul style="list-style-type: none"> • Detailed concession maps showing planting blocks, in shapefile format. • The Sabah Forestry Department (SFD) approved Annual Work Plans (this is a formal document required to be submitted to SFD annually and shows the planned work in relation to both their timber and oil palm operations) • Innoprise's field visit reports, including ground and drone photos of random selected points to show condition on the ground <p>In November 2021, when Malaysian authorities eased its Covid-19 movement control restrictions, Wilmar deployed a technical team, consisting of conservation, GIS and plantation sustainability experts to carry out field verification. Our team has visited the area to verify the condition on the ground. Drones were deployed for photo/video taking where the area is not easily accessible due to lack of roads. The outcome of our field visit is consistent with Innoprise's clarification where the area was indeed cleared for Laran tree planting.</p>
91.	Dharma Satya Nusantara Tbk (DSN)	Kencana Alam Permai	Rapid Response Report 37	Mighty Earth	<p>PT Kencana Alam Permai parent's group, Dharma Satya Nusantara Tbk (DSN) is a member of RSPO since 2008, where all their land development for palm is bound by RSPO Principles and Criteria. DSN has also made public commitment to NDPE policy where their last land clearing activities was in 2015. Specifically on the case on PT Kencana Alam</p>

					<p>Permai (KAP), we have initiated engagement with Dharma Satya Nusantara Tbk (DSN) since October 2021 to seek clarification on deforestation alert detected through our internal monitoring programme. PT KAP has carried out field investigation and confirmed that the clearance was carried out by five local communities for farming, including paddy planting. The area in question has not been surrendered to the company as the local communities are not keen to involve in oil palm development. Therefore, PT KAP does not have full control over the said area. The outcome of the investigation has also been shared with the head village and endorsed by the head village accordingly. PT KAP's official response to the case is available here.</p>
92.	Musim Mas	Multipersada Gatramegah	Rapid Response Report 37	Mighty Earth	<p>The area identified in the report is neither HCV nor HCS area. This area has been assessed and covered under the following assessment reports:</p> <p>a) HCV Report of PT Harisa Agro Lestari (PT Hariso Legra Astari, Kabupaten Barito Utara, Indonesia - HCV (hcvnetwork.org)) that has obtained satisfactory status (<i>note: the area was part of PT Harisa Agro Lestari, which PT MPG officially acquired on 1st April 2018</i>);</p> <p>b) HCS Report of PT Multipersada Gatramegah in 2018 that has covered the area in question (HCSARE1-1.pdf (highcarbonstock.org)) which has completed HCSA review process (HCSAPE1-3.pdf (highcarbonstock.org));</p> <p>c) This area has also undergone the RSPO NPP process (PT Harisa Agro Lestari RSPO - Roundtable on Sustainable Palm Oil).</p> <p>All reports are published and available on HCVRN, HCSA, and RSPO websites, respectively.</p> <p>Musim Mas has also reported the case on their grievance listing, as follow: https://www.musimmas.com/sustainability/grievances/grievance-case/</p>

93.	Jernih Kemboja	AA Sawit	Rapid Response Report 38	Mighty Earth	AA Sawit is not a supplier to Wilmar. Our supplier, Jernih Kemboja, however is associated with AA Sawit at group level due to their shareholding in AA Sawit. The outcome of our investigation is aligned with the reporting in Rapid Response Report 38 on AA Sawit's role in PTD 1815, where they were appointed to manage the development of PTD 1815. They acted as a contractor in this case and they are not a shareholder of the concession. AA Sawit has immediately ceased their operation at PTD 1815 when the case was brought to their attention a few months ago prior to the publication of the Rapid Response Report 38. Wilmar's last purchase from Jernih Kemboja was in September 2022.
94.	Sumber Tani Agung	Sawit Sukses Sejati	Rapid Response Report 39	Mighty Earth	PT Sawit Sukses Sejati (SSS) used to supply FFB to our supplier, PT Sumber Tani Agung (STA) but they are no longer a consistent supplier to PT STA after they built their own mill in 2022. There were some ad hoc FFB delivery to STA in 2022 when PT SSS's mill running into operational issues. When the allegation of deforestation on PT SSS was brought to PT STA's attention, PT STA has immediately shared the Rapid Response Report 39 with PT SSS for investigation. In the meantime, PT STA has ceased sourcing from PT SSS.
95.	Eagle High Plantations	Eagle High Plantations	Rapid Response Report 40	Mighty Earth	First Borneo Group is not a supplier to Wilmar. Our supplier, Eagle High Plantation (EHP) has clarified that PT Arjuna Utama Sawit (AUS) is not an FFB supplier to EHP. They have ceased sourcing from PT AUS since September 2018. PT AUS is still listed on PT EHP's financial statement for the last few years mainly due to the absence of a set-off agreement.
96.	Hardaya Inti Plantations	Sebuku Inti Plantation	Rapid Response Report 41	Mighty Earth	Prior to the publication of the Rapid Response Report 41 on the allegation of deforestation at PT Sebuku Inti Plantation (SIP), Wilmar has already initiated engagement with PT SIP when we detected the issue through our internal monitoring programme in end 2022. Our supplier has clarified that the land development is located within their land use permit area (Hak Guna Usaha, HGU) and guided by the outcome of land

					clearing and development plan (RKPPLP) issued by Food and Agriculture Resilience Agency. The area in question is not located within forested area as the vegetation is considered shrubs. The reported deforestation alert is located in areas previously cultivated by communities, mostly planted with rubber and durian. Supporting documents including site photos showing the vegetation condition of the area has been submitted to support their claim. PT SIP has ceased all their activities on the ground and adopted moratorium on land clearing since 2 February 2023. A timebound plan for HCV-HCS assessment has already been developed to guide their plan going forward.
97.	PIJ Plantation and Agriculture Sdn Bhd	Ladang Nilam	Rapid Response Report 43	Mighty Earth	Our supplier, Kulim (Malaysia) Berhad, does not share the same parent company as PIJ Plantation and Agriculture Sdn. Bhd (PIJP). Kulim has clarified that JCORP (Kulim's major shareholders) and PIJ Holdings have distinct management teams and operate independently. Having done a legal review based on the RSPO's definition of group ownership on the shareholding structure, we can confirm that Kulim and PIJP does not share the same parent company and are not part of the same group. For more information on RSPO definition of groups, please refer here and here .
98.	Abdi Budi Mulia	Kalimantan Hamparan Sawit	Rapid Response Report 44	Mighty Earth	Prior to the publication of the Rapid Response Report 44 on the allegation of deforestation at PT Kalimantan Hamparan Sawit (KHS), Wilmar has already initiated engagement with PT KHS when we detected the issue through our internal monitoring programme in 2023. We carried out a field investigation in July 2023 to verify the deforestation alerts and determined that the land clearing was carried out by local communities, in areas not in control of the company, for the purpose of mix agriculture farming, including paddy, corn as well as oil palm cultivation.

					<p>PT KHS carried out plasma development since January 2024 following pressure received by both local communities and the local government in the areas previously cultivated with mix agroforestry – predominantly rubber (<i>Hevea</i> sp.) interplanted with Durian (<i>Durio zibethinus</i> / <i>Durio carinatus</i>), Cempedak (<i>Arthocarpus</i> sp.), Sengon (<i>Parascrnanthes falaetaria</i>) and Angsana (<i>Pterocarpus indicus</i>). We have been provided with supporting documents, including maps, documents related to plasma development, and images of the vegetation and area prior to development.</p> <p>PT KHS has ceased all land clearing activities since May 2024 to mitigate risk of potential deforestation and has committed to conduct relevant assessments, including integrated HCV-HCSA assessment, before resuming plasma development.</p>
99.	Provident Agro	Banyan Tumbuh Lestari	Rapid Response Report 44	Mighty Earth	Neither PT Banyan Tumbuh Lestari (BTL) nor Provident Agro are suppliers to Wilmar. Additionally, Provident Agro divested from PT BTL since 2019.
100.	NSS Group	Prasetya Mitra Muda	Rapid Response Report 45	Mighty Earth	PT Nusantara Sawit Persada (NSS Group) is not a direct supplier to Wilmar. We were implicated indirectly in the past through our supplier. Our supplier has confirmed that their last purchase from PT Nusantara Sawit Persada was in December 2023. Should there be commercial interest to source from NSS Group in the future, our supplier will investigate and address the deforestation issue before resuming the purchase.
101.	Fangiono family	Inti Kabun Sawit	Rapid Response Report 45	Mighty Earth	Neither PT Inti Kabun Sawit and their parent company, PT Ciliandry Anky Abadi (CAA) are supplier to Wilmar. Wilmar has imposed a suspension on PT CAA at group level since March 2018 due to deforestation issues detected within their concession.

102.	Yayasan Sabah	Serijaya Industri Sdn Bhd	Rapid Response Report 45	Mighty Earth	Similar to the alerts raised in the Rapid Response 36 report in 2021 to which we have responded and published in our ineligible grievance listing (case no. 90), the land development reported within Serijaya Industri Sdn Bhd in this latest Rapid Response Report 45 is not related to Serijaya Industri Sdn Bhd's oil palm operations. Their land development activities were related to timber tree planting, mainly the timber species Laran (<i>Neolamarckia cadamba</i>).
103.	Double Dynasty	Mutiara Pelita Genaan Plantation	Rapid Response Report 45	Mighty Earth	<p>The land clearing was not carried out by our supplier, Double Dynasty. The land clearing occurred outside Mutiara Pelita Genaan Plantation's project area. There has been no new land development for by Mutiara Pelita Genaan since 2015.</p> <p>It is important to note that the concession is a "Pelita Project", which is a common private-government-smallholder collaboration in Sarawak, Malaysia. Pelita project involves the State government of Sarawak and it is one of the State's community development project to improve community livelihood. Pelita Project is a three-way JV collaboration, where the private sector holds 60% of the shares, 30% owned by Native Customary Rights (NCR) landowners taking part in the project through the capitalisation of their land. The remaining 10% shares are owned by government agency, Sarawak's Land Custody and Development Authority (LCDA). Generally, the procurement of the NCR lands will be undertaken by Pelita Holdings, a wholly owned subsidiary of LCDA, a statutory body under the Ministry of Rural and Land Development, Sarawak. Majority of the NCR/native lands consist of mix of shifting agricultural land, fruit trees, regenerating forest or secondary forest, subject to the land use history of the native lands. In cases where the NCR landowners refused to take part in the Pelita Project, the company will not conduct any land development on the plot of land as the NCR owners remained as the legal owner of the area. The detected</p>

					<p>deforestation in the report happened in such area where there was no participation in the Mutiara Pelita Genaan Plantation project by these NCR owners.</p> <p>Specifically for the case of Mutiara Pelita Genaan Plantation, the approved perimeter for this project is 13,000 ha, but less than 6000ha was surrendered by NCR landowners for development following the principle of FPIC. The remaining 55% of the land was not developed by Mutiara Pelita Genaan Plantation as the land was not surrendered to them.</p>
104.	Wong Kei Nai family	Medan Mestika Sdn Bhd	Rapid Response Report 45	Mighty Earth	<p>First of all, it is important to highlight that Medan Mestika does not share the same parent company as WTK. Having done a legal review (based on the RSPO definition of group ownership, refer here and here) on the shareholding structure, we have concluded that WTK and Medan Mestika do not share the same parent company, and are not part of the same group.</p> <p>Specifically on the deforestation alerts raised in Rapid Response Report 45, Medan Mestika has clarified that the land clearing was not carried out by Medan Mestika. The land clearing was carried out by local community, and that NO new land clearing has been undertaken by the Medan Mestika since 2011.</p> <p>Prior to the publication of the Rapid Response Report 45, Wilmar has initiated engagement and investigation with Medan Mestika when deforestation alerts were detected through our Supplier Group Compliance Monitoring Programme in 2023. During the course of the investigation, Medan Mestika has submitted documents for our review, including detailed concession maps showing planting blocks. Wilmar's field team also carried out a field verification in June 2023. Drones were deployed for photo/video taking where the area is not easily accessible.</p>

					The outcome of our field visit is consistent with Medan Mestika's clarification; whereby the land development is carried out by local community.
105.	Rimbunan Hijau	Palmraya Pelita Spapa Oya Plantation Sdn Bhd	Rapid Response Report 46	Mighty Earth	<p>The land clearing was not conducted by Pelita Spapa Oya Plantation Sdn Bhd and it occurred outside the Pelita project area. All the clearances reported in Rapid Response Report 46 are located outside this project area.</p> <p>It is important to note that the concession is a "Pelita Project", which is a common private-government-smallholder collaboration in Sarawak, Malaysia. Pelita project involves the State government of Sarawak and it is one of the State's community development project to improve community livelihood. Pelita Project is a three-way JV collaboration, where the private sector holds 60% of the shares, 30% owned by Native Customary Rights (NCR) landowners taking part in the project through the capitalisation of their land. The remaining 10% shares are owned by government agency, Sarawak's Land Custody and Development Authority (LCDA). Generally, the procurement of the NCR lands will be undertaken by Pelita Holdings, a wholly owned subsidiary of LCDA, a statutory body under the Ministry of Rural and Land Development, Sarawak. Majority of the NCR/native lands consist of mix of shifting agricultural land, fruit trees, regenerating forest or secondary forest, subject to the land use history of the native lands. In cases where the NCR landowners refused to take part in the Pelita Project, the company will not conduct any land development on the plot of land as the NCR owners remained as the legal owner of the area. The detected deforestation in this report happened in such area where there was no participation in the Pelita Spapa Oya Plantation project by these NCR owners.</p>

Ineligible Grievance
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106.	Tetangga Akrab (suspected)	Palm Green Development Sdn Bhd	Rapid Response Report 46	Mighty Earth	Pure Green is not a supplier to Wilmar. Having done a legal review based on the RSPO's definition of group ownership on the shareholding structure (refer here and here), we confirm that that Pure Green and our supplier, Tetangga Akrab, do not share the same parent company and are not part of the same group.
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