

# Comments



from

Indigenous Peoples, Smallholders and NGOs

on the consultation draft

‘The World Bank Group’s Framework for  
Engagement in the Palm Oil Sector’



Forest  
Peoples  
Programme

Jakarta, August 2010



SAWIT WATCH

**Comments from Indigenous Peoples, Smallholders and NGOs on the consultation draft, 'World Bank Group's Framework for Engagement in the Palm Oil Sector', Jakarta, August 2010.**

This statement may be reproduced, provided that acknowledgement is made to Forest Peoples Programme and Sawit Watch.



1c Fosseway Business Centre, Stratford Road,  
Moreton-in-Marsh GL56 9NQ, UK  
Tel: +44 (0)1608 652893 Fax: +44 (0)1608 652878  
[info@forestpeoples.org](mailto:info@forestpeoples.org) [www.forestpeoples.org](http://www.forestpeoples.org)

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It is also registered as a non-profit Stichting in the Netherlands.



Jl. Sempur Kaler No.28  
Bogor 16129  
Indonesia  
Tel: + 62 251-352171

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Cover photograph: CAO investigating the concerns of palm oil-affected communities in Sambas district, West Kalimantan, in response to a formal complaint, March 2008.

Back cover photo: Villagers holding placards rejecting palm oil in meeting with IFC's CAO.

Photographer: Marcus Colchester

## Introduction

It is some measure of the progress achieved so far by this review process about the World Bank's engagement in the palm oil sector that the draft Framework document currently states that:

The World Bank Group is aware of the sector's negative environmental and social impacts, including deforestation, biodiversity loss, greenhouse gas emissions, land use conflicts and questions over land tenure and human rights.<sup>1</sup>

We note however that this awareness was not apparent when we began making complaints to the World Bank Group (WBG) about its involvement in the sector in the early 2000s, when despite our expressions of concern WBG persisted in providing financial support to companies acting contrary to both national laws and the IFC's standards. Nor was it apparent when, even after our complaints had been taken up by the IFC's own Compliance Advisory Ombudsman (CAO), the Executive Directors of the IFC continued to approve further such investments to the same companies also in violation of IFC procedures and Performance Standards. Indeed so absent was this awareness that the CAO concluded in 2009 that IFC's engagement in the palm oil sector was being carried out in a way;

inconsistent with IFC's asserted role, mandate in reducing poverty and improving lives, and a commitment to sustainable development.<sup>2</sup>

Real awareness within the WBG of the problems with the sector only became apparent in August 2009, when, in response to the CAO's highly critical audit and further appeals by NGOs, World Bank President Robert Zoellick wrote to us agreeing to freeze WBG funding to the palm oil sector pending 'development of a comprehensive strategy to guide its involvement in the sector.' He noted:

it is clear that we must have higher levels of due diligence and clearer guidance to staff. That is why the action plan includes steps to ensure that similar projects are handled differently in the future.

So, the main question that now needs to be answered is: given this late surge of awareness in WBG of the problematic nature of the palm oil sector and the admission of the need for a new approach, **does the draft Framework provide adequate guidance to WBG staff to address these serious problems diligently?**

We appreciate that this second round of public consultations on the development of a World Bank's policy toward oil palm is a response to our request for a more iterative engagement in the process.<sup>3</sup> In revising its review process, the WBG has: extended the time line for consultations; agreed to share its draft 'Framework' and receive comments on it via an email consultation process; has planned a further two-day consultation on the draft to be held in Frankfurt on 31<sup>st</sup> August to 1<sup>st</sup> September and;

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<sup>1</sup> Draft framework page 3.

<sup>2</sup> CAO 2010:2.

<sup>3</sup> Joint Statement.

[http://www.forestpeoples.org/documents/ifi\\_igo/ifc\\_wbg\\_ngo\\_palm\\_oil\\_may2010\\_eng.pdf](http://www.forestpeoples.org/documents/ifi_igo/ifc_wbg_ngo_palm_oil_may2010_eng.pdf)

has set up both an External Advisory Group and a Discussants Panel to ensure diverse views are heard in the consultation process.<sup>4</sup>

We also note that although the email consultation is being held in English and the final meeting is being held in Frankfurt, rather than in a palm oil producing country, at least the draft Framework document has been translated into Bahasa Indonesia.

We also note that in response to our expressed concern, the draft framework does now seek to embrace the full World Bank Group (or at least the IDA/IBRD and the IFC).

The fact that the WBG has proven responsive to some of our concerns encourages us to make this further submission.

However it is our view that the current document as it stands fails to address substantively the issues that have been raised by us as complainants and concerned NGOs. Likewise it fails to address the concerns raised in the CAO audit which was carried out in response to our complaint. Finally, it fails to address the issues raised by us in the first round of consultations in our detailed Joint Statement which was supported by over 160 other organisations worldwide.

**It is our view that the weaknesses and omissions of the current draft are so great that it must be substantially revised to address these matters in detail and to develop a comprehensive strategy to guide WBG involvement in the palm oil sector. There will then need to be further consultations to ascertain if the revised draft is adequate. In the meantime, the moratorium on WBG funding of the sector should be retained.**

We substantiate these points below.<sup>5</sup>

### **General concerns:**

#### *Process:*

Although the revised process has taken some steps to be more inclusive and iterative, the consultation process has nevertheless been very one-sided and hasty. It compares poorly with other World Bank Group policy review processes such as the Forest Policy Implementation Review and Strategy, the World Commission on Dams or the Extractive Industries Review.

In summarising the outcome of the first round of consultations the draft framework claims there were 'strong calls from stakeholders, urging the World Bank Group to re-engage and tackle some of the challenges facing the sector'. This may be true of some stakeholders, but a more balanced summary would also note that many other stakeholders, including ourselves, **explicitly cautioned the Bank not to re-engage in**

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<sup>4</sup> We note that we still harbour uncertainties about how the EAG and Discussant groups were selected by the WBG. We are also very unclear why the final consultation is being held in Europe meaning there will be limited participation by palm oil affected parties from Malaysia and Indonesia.

<sup>5</sup> These comments were developed by pooling our concerns through an email consultation and then at one day meeting, held in Bogor on 12<sup>th</sup> August 2010, of many of the lead signatories of the original complaint.

**financing the sector without strong measures to ensure compliance with safeguards and before first working with governments, stakeholders and rights holders to reform the inappropriate national legal, institutional and policy frameworks, which are causing all these problems.**

*A new strategy?*

Although the document does note some of the key problems in the palm oil sector and reaffirms the Bank's overall commitments regarding poverty alleviation, good governance and respect for the environment, the proposed 'framework' does little more than restate the WBG's existing policies and structure. It affirms the WBG's current Agriculture Action Plan, restates the WBG's normal procedures for developing national development strategies (CAS) and asserts that safeguards will be adhered to. None of this is more than business as usual.

Indeed, the 'framework' as presented is not a 'Strategy' in the sense that the World Bank normally uses this term, which is what World Bank President Zoellick promised and indeed is what IFC staff promised Executive Directors that they would develop back in 2001.<sup>6</sup>

*Involving the whole World Bank Group*

Likewise, while accepting that the 'framework' does apply to the whole World Bank Group and summarising the potential complementarity between IDA/IBRD and IFC, the framework provides no clarity about how the two arms of the Bank will coordinate in practice.

With respect to the IFC, the draft only restates that the Performance Standards will apply and that certification will be required (and see more below). However the document does not address how financial assistance to entities further down the supply chain will ensure that the palm oil being traded or used comes from acceptable or certified sources, given the challenges with reliably tracing the source of internationally traded palm oil.<sup>7</sup>

It is left completely unclear what criteria the World Bank will use to develop Country Assistance Strategies (CAS), the main tool offered to address problems such as weak governance, corruption and inappropriate land tenure systems. In addition there is no clarification given about how the Operational Policies of the IDA/IBRD will be applied or assessed.<sup>8</sup> It is also unclear how framework reforms will be achieved if countries choose not to ask for CAS or choose not to follow through on the recommendations made in the CAS.

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<sup>6</sup> CAO audit report: pages 24 and 27.

<sup>7</sup> Page 14 of the draft Framework notes the problem of traceability but the framework offers no solution nor does it suggest any criteria which staff should use to avoid investing in risky supply chains except that they must satisfy themselves that the client is knowledgeable of the risks and seeking to secure palm oil from certified sources (page 17).

<sup>8</sup> The document only says 'For the World Bank, the final selection of indicators will follow as activities are selected (page 18), which we take to mean that World Bank staff have not yet given time to thinking through seriously how they are going to address the problems confronting the sector.'

## Specific concerns

### *Developing national approaches*

Currently some 85% of globally traded palm oil comes from just two countries – Malaysia and Indonesia (and the main country where oil palm is expanding most rapidly is Indonesia) - yet the draft Framework provides no real guidance on how the WBG will address the serious legal, governance and human rights problems related to the palm oil sector in both these countries. The Framework barely mentions the problems in Malaysia nor does it clarify how the WBG will deal with the systemic issues in Indonesia identified by the submissions of the complainants and substantiated by CAO. Yet the World Bank President in his letter of August 2009 promised us that:

Development of the strategy will also provide an opportunity to analyze the broader issues you mention regarding the sector in Indonesia.

There is no evidence that WBG has carried out any such analysis, much less is there any guidance in this document for WBG staff on what steps they should undertake to address such matters. Instead the draft Framework just says that:

In major oil palm producing countries, the World Bank will, if requested by governments, engage in policy dialogue relevant to the palm oil sector as part of the design of the Country Assistance Strategy.

The development of CAS is a routine part of WBG investment strategy. Yet clearly, to date, this has not prevented the WBG supporting the wrong kinds of investments. The document does not make clear how CAS processes will be different in the future nor does it provide clear guidance for WBG staff on the criteria that must be addressed in CAS for effective development of the sector.

### *IFC may go it alone*

Indeed far from offering assurances that the WBG will pursue a phased approach – as we have suggested - to ensure that frameworks are reformed before new investments are made the draft document states that:

IFC may invest in oil palm plantation operations and other palm oil sector companies *even if the public sector legal/regulatory enabling environment is less than ideal*, if IFC is convinced that the project will have strong and measurable development impacts and that any risks can be mitigated through other governmental or non-governmental programs, including other World Bank Group operations, if present (emphasis added).

This is a formula for a repeat of the errors of the past.

### *Restitution for past damages*

The audit by the CAO noted the long record of failure of the WBG's involvement in the palm oil sector, especially in Indonesia. Since 1965, according to the draft document (page 30) the WBG has invested over US\$2 billion in the oil palm sector, half of which was in Indonesia and Malaysia the two countries where there are still

the biggest problems with oil palm development notably in terms of dispossessed indigenous peoples and land conflicts.

However, instead of focusing on addressing these problems, as we have recommended, the draft document instead proposes means for expanding areas under oil palm. However indigenous peoples and smallholders insist that the WBG should be addressing their existing problems caused by oil palm rather than creating further problems.

### *Categorisation*

In his letter to NGOs on 28 August 2009, World Bank President Robert Zoellick noted:

I share your views about the needs to revise categorization procedures... In recognition of the shortcomings of the previous [categorization] system, we are making this change, effective as of August 14,2009, to provide more precise guidance to staff. It is likely to result in categorizing these projects as an "A" or "B," depending on identified risks.

This was a point we also emphasised in our own submission to the first round of consultations, recommending that as a matter of course investments related to palm oil should be categorised as 'A' so that due care is taken to ensure that the WBG safeguards (Operational Policies and Performance Standards) are adhered to scrupulously.

The main part of the document however fails to address the issue of categorization while in the Annexes on page 44, the draft only notes that:

All World Bank projects are categorized on the basis of the environmental and social risks associated with the project. Depending on the assessment of environmental and social impacts and risks, projects may require Environmental Assessments and/or Environmental Management Plans to be prepared and implemented.

Again, this is just business as usual and it seems WBG staff drafting the document have overlooked the guarantees given by the World Bank President assuring us of a new approach, at least with regards to palm oil.

### *Triggering of safeguards*

In our own submission to the first round of consultations we recommended that the draft strategy should provide clear guidance on how safeguards should be 'triggered' to ensure due diligence and development effectiveness. Specifically we recommended that:

Any palm oil investment should thus trigger all or most of the IFC Performance Standards and World Bank Operational Policies.... In particular in accordance with the IFC PS/ IBRD OPs requirements, clients must:

- comply with applicable national laws, including host country obligations under international law;
- carry out and implement comprehensive social and environmental impact assessments;
- avoid any forced resettlement;

- acquire land through due process and through negotiated agreements;
- avoid land conflicts and resolve outstanding ones;
- respect indigenous peoples' rights;
- foster good faith negotiations with them and ensure free, prior and informed consultations; and develop an indigenous peoples' development plan;
- pay special attention to threatened habitats, species and ecosystems and avoid conversion of critical habitats.

However, beyond restating existing WBG policies, these issues are not addressed substantively in the draft 'framework' document.

*Accountability of staff for non-compliance*

The CAO's audit had shown that staff had allowed financial considerations to override social and environmental concerns, implying that staff feel they are under greater pressure to move money than carry out due diligence. Accordingly in our own submission we recommended that the new strategy should provide means by which WBG staff are:

held accountable for any failures to adhere to the IFC's Performance Standards and World Bank Operational Policies or relevant national laws and regulations

The draft Framework makes no proposals about how staff incentives will be changed to ensure greater diligence in following WBG procedures.

*Uphold RSPO standard*

We appreciate that the draft Framework includes commitments to upholding the standard of the Roundtable on Sustainable Palm Oil.

However, in our own submission to the first round of consultations, we had noted that the IFC Performance Standards and WB Operational Policies differ from the RSPO's Principles and Criteria in a number of respects, most notably with respect to recognition of customary rights and recognition of the right to Free, Prior and Informed Consent. We recommended the setting up of a multi-stakeholder Working Group to assess the compatibility between IFC PS and WB OP on the one hand and RSPO P&C on the other. The framework document fails to address this issue

We note that the document does assert that IFC will only make direct investment in oil palm plantations if:

The client's operations are certified for sustainable palm oil production according to an internationally-recognized certification scheme, or have a time bound action plan to achieve such certification.<sup>9</sup>

However, (unlike the WBG strategy and policies on forests which also relies on certification to assure sound timber production), this draft framework on palm oil does not then go on to spell out what criteria staff should use to decide if a certification scheme is acceptable or not. We are also very concerned that the weak requirement for having a 'time-bound action plan' is wide open to abuse and / or mis-interpretation by both staff and clients.

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<sup>9</sup> Draft document page 17.

### *Making Free, Prior and Informed Consent mandatory*

In our earlier submissions we recommended that, pending a revision of WBG policies in line with international laws, at least with respect to the palm oil sector and consistent with standard of the RSPO, the strategy should require that no lands are used for oil palm plantations without communities' Free, Prior and Informed Consent.

The draft framework, however, avoids addressing this issue even though in the summary of the consultations (Annexes page 23) the document does note that

Full adherence to the concept of Free Prior Informed Consent by investors in the palm oil sector was seen as essential by many of the stakeholders.

### *Absent standards*

There are a series of further serious omissions in the document, all of which were raised by the complaint, the audit and/ or in the first round of consultations.

Critical issues which were raised in the consultations but on which the draft document fails to give useful guidance to WBG staff include:

- The need to involve local people in land use planning (**not addressed**)
- No forced resettlement to make way for palm oil (**not addressed**)
- In line with the recommendations on the UN Committee on the Elimination of Racial Discrimination, not invest where lands are taken by invoking the State's power of eminent domain (**not addressed**)
- Ensure special measures to secure the rights of indigenous peoples (**not addressed**)
- Resolve existing land use conflicts (**not addressed**)
- Provide measures to protect the rights of women, bonded labour and stateless children (**not addressed**).

### *Protecting the interests of smallholders*

It is indeed the case that small scale palm oil development can **under the right circumstances** provide incomes to smallholders and thus help lift people out of poverty. On the other hand there is extensive documentation that shows that **under the wrong circumstances** communities can be seriously affected by oil palm development, for example by losing their lands and alternative livelihoods, and by being encumbered with debts, thereby becoming immiserated. As we have noted, serious human rights violations result and land conflicts are widespread: some of these problems are noted on page 9 of the document.

The draft framework does emphasise the importance of improved benefit sharing and smallholder development as a goal of future WBG engagement in the sector (page 13) and it summarises some of the issues that could be addressed to attain better outcomes (page 15), such as provision of advisory services and improved project design (page 17).

However it is our view that this approach is inadequate to address the existing problems of smallholders many of whom currently face very difficult situations which need to be addressed by changing national laws and policies and resolving conflicts

over land. These issues need to be addressed first, **before** WBG considers further investment in the sector.

### *Securing High Conservation Values*

The draft framework does note that the WBG supports measures to ensure that planting will gradually shift away from forested areas with high conservation values,<sup>10</sup> and also notes that the IFC will engage ‘earlier in plantation planning ... (for) ensuring that Critical Habitat/High Conservation Value habitat is protected’.<sup>11</sup>

However, in our own submission to the first round of comments we noted that the current legal framework in Indonesia does not provide legal means to protect HCVs in areas permitted for plantations so companies seeking to follow the RSPO standard are finding that government agencies are taking these unplanted areas off them and handing them to less scrupulous companies to develop.

The draft framework does not explain how it will address such issues and offers no guidance for staff on how the concept of High Conservation Values should be addressed in applying the Operational Policies and Performance Standards (which do not use this concept but instead use the as yet undefined concept of ‘critical habitat’). This is despite the fact that in the Annexes the document does note that the ‘lack of clarity about what constitutes high-value conservation forest was raised as an important issue for resolution’ (page 22).

### *Climate responsibility*

It is a fact that forest and peatland clearance for oil palm plantations is a major cause of the extremely high green house gas emissions from SE Asia, notably Sarawak and Indonesia. In our own submission to the first round of consultations we noted that

The WBG Strategy should proscribe any expansion of oil palm in areas classed as forests and should prohibit any planting on peat. A credible and effective procedure needs to be developed to screen national land use policies, ensure carbon audits and avert ‘leakage’.

However, the draft framework, beyond acknowledging the problem of green house gas emissions from clearance (pages 3 and 9), provides no guidance whatsoever to WBG staff on how they should address this challenge.<sup>12</sup>

This seems to us to be the height of irresponsibility. At a time when the WBG is seeking to take a lead on measures to reduce emissions from deforestation and forest degradation through its Forest Carbon Partnership Facility and Forest Investment Program, it is simultaneously developing an approach to assist further land use change for palm oil without taking the climate issue into account in any meaningful way.

### *Participatory M&E*

One of the clearest conclusions that comes from reading the CAO’s audit is that for a new approach to be effective the WBG needs to make a commitment to first develop

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<sup>10</sup> Draft document Page 3.

<sup>11</sup> Repeated on page 5 and 17.

<sup>12</sup> This is especially important as the current RSPO standard does not address GHG emissions adequately and an RSPO GHG working group has so failed to agree standards.

country specific data about the sector which could provide a baseline against which development impact, and the success of the new "strategy", could be monitored and evaluated.

In our own submission to the first round of consultations we noted that:

Any WBG Strategy for re-engagement in the palm oil sector must be designed to achieve demonstrable gains for poor people and threatened environments and must ensure that investments prioritise the needs and rights of local communities. The Strategy must therefore:

- Establish these (as underlined) as clear and measurable objectives;
- Clarify standards, baselines and indicators against which achievement of these objectives can be assessed;
- Include country strategies (at least for the main palm oil producing countries) which address the specific obstacles identified in the complaint and audit and through the consultations;
- Set out a process by which progress will be monitored in an inclusive manner involving all relevant stakeholders.

In our view the draft Framework almost entirely lacks these basic requirements nor is there any mention of any plan of the WBG to follow through with a more inclusive approach. Indeed some of the indicators noted in Table 3 (page 19) seem extraordinarily superficial. The WBG would measure improvements in the regulatory and policy environment by noting "the number of stakeholder dialogues", and "the number of countries who have undertaken agreed activities such as E&S assessments".

### **Conclusion**

The draft document is indeed not a **strategy** for WBG engagement in the palm oil sector but only provides a very weak framework for such a strategy. It is clear that neither the IFC nor the World Bank have yet been able to seriously address the issues raised by the complainants, the CAO audit and the first round of consultations.

Accordingly, we request that such a strategy is indeed developed, with further engagement with stakeholders, but in the meantime the moratorium on WBG investment in the sector must be retained.

### **Signed:**

1. Forest Peoples Programme, UK
2. Sawit Watch, Indonesia
3. SETARA Jambi
4. Community Alliance for Pulp and Paper Advocacy (CAPPA), Indonesia
5. Lembaga GEMAWAN, Pontianak, Kalimantan Barat, Indonesia
6. Serikat Petani Kelapa Sawit Kalimantan Barat (SPKS Kalbar, Sanggau), Indonesia
7. Jaringan Kerja Pemetaan Partisipatif, Bogor-Indonesia
8. Down to Earth (DTE), UK
9. HuMA, Jakarta, Indonesia

10. First Peoples Human Rights Coalition, USA
11. Cultural Survival, Inc., USA
12. Center for International Environmental Law, USA
13. The Oakland Institute, California, USA
14. North East Peoples Alliance, India
15. Both ENDS, the Netherlands
16. Scale Up, Riau-Indonesia
17. Akar, Bengkulu
18. Komkot PRP Bengkulu, Indonesia
19. Lingkar untuk Pembaruan Desa dan Agraria (KARSA), Yogyakarta, Indonesia
20. Konsorsium Pembaruan Agraria, Indonesia
21. WALHI NTB, Indonesia
22. Kelompok Studi dan Pengembangan Prakarsa Masyarakat (KSPPM), Parapat Sumatera Utara, Indonesia
23. Yayasan Peduli Nanggroe Atjeh, Banda Aceh, Indonesia
24. Perkumpulan Penembangan Partisipasi untuk Rakyat (PETRA), Medan, Indonesia
25. LBBT, Pontianak, Indonesia
26. KPS, Medan, Indonesia
27. PIAR NTT, Indonesia
28. The Ecological Society of the Philippines, Philippines
29. TARA-Ping Pu, Taiwan
30. Robin Wood, Germany
31. Komunitas Hijau Proklamasi, Indonesia
32. pt. PPMA Papua, Indonesia
33. Perkumpulan MEDIKRA, Sulawesi Tenggara, Indonesia
34. Save Our Borneo, Kalimantan Tengah, Indonesia
35. Kelompok Kerja Sistem Hutan Kerakyatan [POKKER SHK], Kalimantan Tengah, Indonesia
36. Yayasan Tanah Merdeka, Indonesia
37. WALHI Aceh, Indonesia
38. Institute Menua Punjung, Sekadau, Kalbar, Indonesia
39. Perhimpunan BAKUMSU, Sumatra Utara, Indonesia
40. WALHI Riau, Indonesia
41. SPKS Riau, Indonesia
42. WALHI Sumatra Barat, Indonesia
43. WALHI Bali, Indonesia
44. Yayasan Merah Putih (YMP), Sulawesi Tengah, Indonesia
45. Institut Transformasi Lokal (Instal), Sulawesi Tengah, Indonesia
46. KSPPM, Parapat, Sumatra Utara, Indonesia
47. AMAN, Jakarta-Indonesia
48. Almaciga, Spain
49. Rainforest Action Network, California, USA
50. Eksekutif Nasional WALHI, Jakarta, Indonesia
51. The Netherlands Centre for Indigenous Peoples (NCIV), The Netherlands
52. Sarekat Hijau Indonesia, Jakarta, Indonesia
53. Andiko, Jakarta
54. Ahmad Zazali, Riau, Indonesia
55. Erwin Basrin, Bengkulu, Indonesia
56. Ronald Reagen, Bengkulu, Indonesia
57. Alma Adventa PhD, UK

58. Deddy Ratih, Jakarta, Indonesia
59. Paula Palmer, USA
60. Ram Wangkheirakpam, India
61. Anuradha Mittal, California, USA
62. Anne Perrault, USA
63. R. Yando Zakaria, praktisi antropologi, fellow KARSA, Yogyakarta, Indonesia
64. Iwan Nurdin, Jakarta Selatan, Indonesia
65. Muhammad Juaini, NTB, Indonesia
66. Dimpos Manalu, Parapat – Sumatra Utara, Indonesia
67. Jes Putra Kluet, Banda Aceh, Indonesia
68. Monang Ringo, Medan, Indonesia Indonesia
69. Tandiono Bawor Purbaya, Jakarta, Indonesia
70. Agustinus, Pontianak, Indonesia
71. Gindo Nadapdap, Medan, Indonesia
72. Lery Mboeik, NTT, Indonesia
73. Solihin, Sulawesi Tenggara, Indonesia
74. Antonio M. Claparols, the Philippines
75. Jason Pan, Taiwan
76. Peter Gerhardt, Germany
77. A. M. Jufri, Indonesia
78. Agung Wardana, Nottingham, UK
79. Lyndon B. Pangkali, Papua, Indonesia
80. Gustav George, Palu, Sulawesi Tengah, Indonesia
81. Nur Hidayati, Jakarta, Indonesia
82. Nordin, Kalimantan Tengah, Indonesia
83. Haryanto, Belitung, Indonesia
84. Wanly Thomas, Kotawaringin Timur, Kalimantan Tengah, Indonesia
85. Heny Soelistyowati, Jakarta, Indonesia
86. Andika Kuntani, Indonesia
87. Bambang A. Kusyanto, Bandung, Jawa Barat, Indonesia
88. TM Zulfikar, Aceh, Indonesia
89. Shaban stiawan, Sekadau, Kalimantan Barat, Indonesia
90. Benget Silitonga, Medan, Sumatra Utara, Indonesia
91. Hariansyah Usman, Riau, Indonesia
92. Lamhot, Riau, Indonesia
93. Khalid Saifullah, Padang, Sumatra Barat, Indonesia
94. Maryo, Bali, Indonesia
95. Nasution Camang, Sulawesi Tengah, Indonesia
96. Ibrahim Hafid, Sulawesi Tengah, Indonesia
97. Suryati Simanjuntak, Parapat, Sumatra Utara, Indonesia
98. Limantina Sihaloho, Pematang Siantar, Sumatra Utara, Indonesia
99. Taryudi Caklid, Indonesia
100. Mahir Takaka, Indonesia
101. Loreto Ferrer, Spain
102. Ashley Schaeffer, California, USA
- 103 Drs. Michael Nico Bohot, Sekadau, Kalimantan Barat, Indonesia
104. Mr. Leo van der Vlist, The Netherlands
105. Koesnadi Wirasapoetra, Jakarta, Indonesia

CC. Executive Directors of the World Bank Group.



Dayak people making their views plain about their rejection of oil palm on their customary lands in community meeting with CAO in Sambas District, March 2008.