

DRAFT FOR DISCUSSION ONLY

Country Safeguards Review: Indonesia Draft Final Report March, 2017

Appendix 9: Acceptability Assessment for Environmental by Sector

This assessment is a work in progress, the purpose of which is to encourage an iterative process of feedback and update. When finalized, the Borrower will verify the assessment. The materials are prepared by consultants; hence, ADB does not guarantee the accuracy, reliability, or timeliness of these materials and therefore will not be liable in any capacity for any damages or losses that may result from the use of these materials. ADB, likewise, shall not be responsible for any errors, inadvertent omissions, or unauthorized alterations that may occur in the disclosure of content on this website.

Asian Development Bank

TABLE OF CONTENTS

Ι.	Context		
II.	Water Resources Sector: Karian Multipurpose Dam Project	3	
	 A. Institutional Capacity B. Implementation Practice: Processes and Procedures C. Outputs D. Outcomes 	3 4 5 6	
III.	Road/Toll Road Sector: Palembang–Indralaya Toll Road	7	
	 A. Institutional Capacity B. Implementation Practice: Processes and Procedures C. Outputs D. Outcomes 	7 7 8 9	
IV.	Energy Sector: Central Java–Power Station	9	
	 A. Institutional Capacity B. Implementation Practice: Processes and Procedures C. Outputs D. Outcomes 	9 10 10 11	
V.	V. Urban Planning Sector: Normalization of Kali Pesanggrahan and Development of Rempoa Flat 11		
	 A. Institutional Capacity B. Implementation Practice: Processes and Procedures C. Outputs D. Outcomes 	11 12 12 13	

ACCEPTABILITY ASSESSMENT FOR ENVIRONMENTAL SAFEGUARDS BY SECTOR

I. Context

1. The acceptability assessment findings for environment are presented in two Appendixes: 8 & 9. This document (Appendix 9) examines issues of capacity, and practice, and performance within TA-relevant sectors. Appendix 8 examines the capacity of regulatory bodies and evaluates procedures governing environment.

No.	Sector/Project	Component	Assessment Results
1.	Water Resource Sector/ Karian Multipurpose Dam (Java)	Institutional Capacity	Moderate
		Process and Procedure	Moderate
		Output	Moderate
		Outcome	Moderate
2.	Road and Transport Sector	Institutional Capacity	Moderate
	Palembang-Indralaya Toll Road (Sumatra)	Process and Procedure	Moderate
		Output	Moderate
		Outcome	Strong
3.	Energy Sector/ Transmission Line SUTET 500 kV PLTU 2 Jawa Tengah –	Institutional Capacity	Moderate
		Process and Procedure	Strong
		Output	Strong
	GITET 500kV Kesugihan (Cilacap, Central Java)	Outcome	Strong
4.	Urban Planning Sector/	Institutional Capacity	Weak
	Normalization of Kali Pesanggrahan and Development of Rempoa Flat (Jakarta)	Process and Procedure	Moderate
		Output	Moderate
		Outcome	Moderate

Table A.9: Summary of Environmental Acceptability Assessment of Case Study Sector Projects

II. Water Resource Sector: Karian Multipurpose Dam Project

A. Institutional Capacity

2. The main duties and functions of the Directorate General for Water Resources (DGWR) and its sub-directorates are formulating policy, guidelines, and assistance through its technical implementing unit (UPT/Balai). There is no legal mandate¹ to establish a dedicated safeguard unit within the Directorate General of Water Resources (DGWR), as such, it does not exist in the newly established organizational structure. However, the Sub-Directorate of Hydrology and Water Resource Environment may contribute to some environmental safeguard functions as their duties are closely related to safeguard issues included within the scope of this assessment,

¹Especially due to shift of paradigm from sector AMDAL (before 2000) to decentralized AMDAL process. However, DGWR (in particular sub-directorate Hydrology and Waer Resource Environment support for formulating policy, guidelines and assistance related to environmental safeguard.

including hydrological management of river basins and water quality, and preparation of strategic environmental assessment of water resources.²

3. As part of DGWR, BBWS 3C has a mandate to conduct water resource management in the River Basin of Cidanau-Ciujung-Cidurian. As an extended arm of DGWR at provincial level, BBWS 3C is responsible for preparation of environmental impact assessment (AMDAL) or environmental management and monitoring measures (UKL-UPL) depending on the specific project. However, there are no special dedicated units to handle these safeguard activities on a permanent basis. By default, the Program and General Planning Division of the BBWS 3C retains the function of ensuring environmental safeguards. Concurrently, they act as a proponent for projects or activities, including preparation and implementation of AMDAL or UKL-UPL, as required. Since this creates a potential conflict of interest, in practice, the AMDAL review process in BBWS 3C is commonly outsourced to consultants or contractors. The limited budget for consultants has implications for the quality of AMDAL outputs.

4. Given its potential for significant environmental impacts, BBWS 3C has established a specialized unit to implement and monitor AMDAL and Environmental Management and Monitoring Plan (RKL-RPL) implementation for the Karian Multipurpose Dam project. Structurally, environmental management for Karian Multipurpose Dam is delegated to PPK (SNVT Pembangunan Bendungan Karian)³ which is authorized to carry out supervision on the implementation of RKL-RPL linked to the environmental impact analysis report (ANDAL) of Karian Multipurpose Dam, which was approved in February 2005 by Governor of Banten.⁴ Given this *ad hoc* arrangement, institutional capacity of BBWS 3C for environmental safeguards can be considered moderate.

B. Implementation Practices: Processes and Procedures

5. The implementation practices (processes and procedures) for the AMDAL of the Karian Multipurpose Dam have been assessed. The study was accomplished in a timely manner, but there are issues on transparency and effectiveness. In terms of transparency, the AMDAL study has not made explicit efforts to encourage participation of women and vulnerable groups. Due to poor scoping, the study did not cover all items comprehensively (partial scoping). As a consequence, a separate additional AMDAL and environmental permit are required for additional project-supported activities that were identified later (quarry and access road). The scoping also did not cover assessment of impacts for post operation of the multipurpose dam. For that reason, it is assessed as "moderate."

(a) Coherence. The desk study, field visit, interviews with key personnel of BBWS 3C, KRC (Construction Supervision Consultant) and the local environmental management agency (BLHD), found that the implementation of AMDAL study can be considered generally coherent with prevailing processes and procedures.

² Per Regulation of Minister of Public Works No. 21/PRT/M/2010 dated 31 December 2010, Balai Besar Wilayah Sungai Cidanau-Ciujung-Cidurian (BBWS C3) has the duties and function, which covers Planning, Implementation of Construction, Operation and Maintenance in terms of Water Resource Conservation, Utilization of Water Resource and Control of Water Hazardous Force in rivers, lakes, reservoir, dam and other water storage, Irrigation, Groundwater, Swamp Area, Pond, and Coast.

³ Issued under the authority of in decree No. 25/KPTS/SNVT-PBK/2015 on the Establishment of Environmental Management Unit for Construction of Karian Multipurpose Dam Project FY2015

⁴ Ref. 660/605-Bpd/II/2005

Formally the documents have been reviewed and approved by the AMDAL Review Commission (ARC/KPA) of Bapedal of Banten Province (predecessor of BLHD Banten).

- (b) Transparency. As required by regulation, the AMDAL study was carried out in a transparent manner by publishing announcements in the local newspaper Fajar Banten Daily and posting the announcements on public places including government offices. The project has been publicly announced on 19 July 2004, inviting inputs and response from local community, especially affected persons. Subsequently, face-to-face public consultations were also carried on 29 July 2004 at the Village's Office of Pajagan, Kec. Sajira, Kab. Lebak.
- (c) Consistency. The implementation of AMDAL study can be considered generally consistent with prevailing processes and procedures. The documents were reviewed by the ARC/KPA of Bapedal of Banten Province, and the approval of environmental feasibility for Karian Multipurpose Dam has been issued.⁵ Due to the lack of integration with the main AMDAL, environmental assessment for associated facilities (access road and quarry) is inconsistent with prevailing processes and procedures.
- (d) Effectiveness. In terms of effectiveness, there are some gaps or issues to be considered. Initially, all associated facilities, including the borrow area and quarry, were to be located within the same project area. However, it was subsequently decided to locate and acquire another quarry location of outside of the project area. As consequence, there was confusion as to whether a separate additional AMDAL and environmental permit⁶ would be required for each of the project-supported activities or an integrated one would be prepared by amending and/or updating the original AMDAL. It was agreed that a separate additional AMDAL and environmental permit would be subsequently be required for additional project-supported activities defined later (quarry and access road).

C. Outputs

6. The AMDAL document of Karian Multipurpose Dam can be assessed using these four criteria: (i) compliance with legal requirements (mandatory), (ii) consistency with Terms of Reference, (iii) depth of analysis, and (iv) relevance to project conditions. However, in terms of transparency, the AMDAL study has not made specific efforts to encourage participation of women and vulnerable groups. Similarly, due to the poor scoping the study, did not cover all items to be included including post-operational impacts of the dam. For that reason, it is assessed as "moderate."

- (a) **Compliance (mandatory)**. The document can be considered as meeting the mandatory requirements for AMDAL as shown by the following indicators:
 - (i) scoping process with results of significant hypothetical impacts, limit of study area, and limit of study time which are supported by methods;
 - (ii) significant impacts and prediction of magnitude and characteristics of significant impacts;
 - (iii) holistic evaluation, including determination of environmental feasibility; and

⁵ Ref. No. 660/605-Bpdl/II/2005

⁶ The AMDAL document has been reviewed and approved by BLHD Kabupaten Lebak, but an Environmental Permit for Quarry has not been issued, subject to approval of the Mining Operation Permit (IUP).

- (iv) impacts managed and monitored as well as environmental management plan and monitoring.
- (b) **Consistency**. AMDAL documents of Karian Multipurpose Dam can be considered as consistent as shown in the examination of the document, as illustrated by the following:
 - (i) the potential significant impacts to be assessed in ANDAL are consistent with the KA-ANDAL (TOR for AMDAL study);
 - (ii) the significant potential impacts (including parameters to be assessed) are consistent with KA-ANDAL criteria for the environmental baseline; predictive method for impacts and their magnitude, and the environmental management and monitoring plan; and
 - (iii) the management measures set forth in the RKL-RPL are consistent with the characteristics of the environmental impacts identified in the ANDAL.
- (c) **Depth**. The ANDAL was found to lack depth with respect to the following indicators:
 - (i) dam safety and other potential risks are neglected or inadequately assessed;
 - (ii) scoping tended to focus on generic impacts as common to all infrastructure, rather than those particular to construction and operation of multi-purpose dams; and
 - (iii) many conclusions lack adequate supporting data and proper scientific evidence (or even convincing argumentation) suggesting an over-reliance on subjective "professional judgment."
- (d) **Relevance**. Basically the document can be considered as relevant as shown by the following indicators:
 - (i) relevance between direction of environmental management measures and potentially emerging impacts;
 - (ii) relevance between direction of environmental monitoring measures and environmental management measures and potential environmental impacts;
 - (iii) relevance between form of environmental management and form of environmental monitoring with potential impacts;
 - (iv) relevance between location of environmental management and location of the potential impact; and
 - (v) relevance between period of management and the time of impact occurrence.

D. Outcomes

7. The project proponent, Balai Besar Wilayah Sungai Cidanau-Ciujung-Cidurian, is responsible for implementing the RKL-RPL for the project. Implementation of this monitoring is supervised by BLH Banten Province and BLH Kabupaten Lebak. Based on semi-annual monitoring reports submitted to BLHD, the outcomes of the Karian Multi-Purpose Dam project can be considered "moderate." The following outcomes support this rating:

- (i) A "green belt" has been designed and established around the project as a buffer and catchment area.
- (ii) Under supervision of a CSC (Construction Supervision Consultant), the project provides workers with safe and healthy working conditions and prevents accidents, injuries, and disease.

III. Road and Transport Sector: Palembang–Indralaya Toll Road

A. Institutional Capacity

8. In this assessment, PT Hutama Karya (Persero), which is responsible for the Palembang-Indralaya Toll Road⁷ was selected to represent the road sector. The Ministry of Public Works and Housing (PUPR) is responsible for the formulation and implementation of policy in the road sector. There is no legal mandate to establish a dedicated safeguard unit within PUPR,⁸ thus, such a unit does not exist in newly established organization structure of Directorate General of Highways (DGH). However, the Sub-Directorate of Environment and Road Safety and the Sub-Directorate of Construction Management are responsible for safeguard- related issues.⁹ Based on a field visit, discussions and secondary data analysis of the institutional capacity of PT Hutama Karya (in particular, the Palembang Branch, PT Hutama Karya Infrastruktur, HKI) is considered "moderate."

B. Implementation Practice: Processes and Procedures

9. The implementation practices (processes and procedures) for AMDAL Study of Palembang-Indralaya Toll Road generally meet the criteria set forth, namely coherence, transparency, consistency, and effectiveness, therefore considered moderate. However, some critical notes addressed to be considered asdiscussed below.

- (a) **Coherence**. The desk study, field visit, and interviews with key personnel of PT HKI and BLHD, found that in general, the implementation of AMDAL study can be considered consistent with prevailing processes and procedures. The documents have been reviewed by the ARC/KPA of BLHD South Sumatra and the environmental feasibility clearance (SKKL) and Environmental Permit have been issued.
- (b) Transparency. As required by regulation, the AMDAL study was carried out in a transparent manner by posting announcements in local newspapers and on public places. Key stakeholders and affected people and/or their representatives were invited and involved in several public consultations. However, more officials attended the meeting than affected people, including women and vulnerable groups.
- (c) Consistency. Based on the desk study, interview with key personnel of PT HKI and BLHD, found that the implementation of the AMDAL study can be considered consistent with prevailing processes and procedures. The documents have been reviewed and approved by the ARC/KPA of BLHD South Sumatra Province. The SKKL and Environmental Permit have also been issued.
- (d) Effectiveness. The AMDAL document for the Palembang-Indralaya Toll Road is considered effective. There is no major gap/issue in term of effectiveness. Timely delivery and relatively short period between approval of AMDAL and environment and its implementation (construction) strongly indicates its effectiveness.

⁷This refers to the handover of development and operation of Palembang-Indralaya Toll Road from Bintek – DGH Ministry of PUPR to PT Hutama Karya Persero (Ref. No. 02/BA/BT/2015).

⁸Especially due to a shift of paradigm from sector AMDAL (before 2000) to decentralized AMDAL process. However, DGWR, in particular sub-directorate Environment and Road Safety support for formulating policy, guidelines and assistance related to environmental safeguard

⁹This refers to Permen PUPR on the organizational structure of the Ministry of Public Works and Housing.

C. Outputs

10. The proponent Bintek – Directorate General of Highways (DGH) – Ministry of Public Works assigned a PT Dianzani Utama Konsultan consultant to prepare the ANDAL for the Palembang-Indralaya toll road in 2014. The consultant is registered as a certified AMDAL consultant as issued by the Ministry of Environment (Ref. 0007/LPJ/AMDAL-1/LRK/KLH). The ANDAL for the Palembang-Indralaya Toll Road was assessed in terms of compliance, consistency, depth, and relevance.

11. Based on the examination of documents, ANDAL, RKL-RPL for the Palembang-Indralaya Toll Road can be considered "moderate."

- (a) **Compliance.** The AMDAL is compliant with the regulatory requirements as shown by the following indicators:
 - (i) scoping process: identification of potential significant impacts, and parameters of the study area;
 - (ii) assessment of the magnitude and characteristics of significant impacts;
 - (iii) holistic evaluation, including determination of environmental feasibility; and
 - (iv) impacts managed and monitored through environmental management and monitoring plan.
- (b) **Consistency**. The AMDAL document for Palembang-Indralaya Toll Road is consistent with prevailing processes and procedures as shown in the examination of the documents, and as highlighted below:
 - (i) The hypothetical significant impacts assessed in ANDAL are consistent with KA-ANDAL;
 - (ii) The significant hypothetical impacts (including parameters to be assessed) are consistent with the prediction method of impacts, environmental baseline, prediction of impact magnitude, feature of significant impacts, holistic evaluation and environmental management and monitoring plan; and
 - (iii) The environmental impact (including its parameters) to be managed described in KA-ANDAL and ANDAL is consistent with those in RKL-RPL.
- (c) **Depth**. Basically the document is adequately assessed and analyzed. However, there are some gap/issues as shown by the following indicators:
 - (i) Scoping has not included associated activities of river dredging and spatial impacts of "induced development" resulting from the toll road development.
 - (ii) The document does not consider future activities linked with and affected by the toll road (including spatially triggered/induced development in the surrounding).
 - (iii) The document does not clearly describe existing activities which utilize natural resources and affect the local environment, such as other non-road projects that may cause cumulative effects to the environment.
 - (iv) Use of geo-membrane and geotextile technology and disposal of hazardous waste associated with these produces is not discussed in AMDAL.
- (d) **Relevance**. The document can be considered as relevant as shown by the following indicators:
 - (i) relevance between direction of environmental management measures and potentially emerging impacts;
 - (ii) relevance between direction of environmental monitoring measures and environmental management measures and potential environmental impacts;
 - (iii) relevance between form of environmental management and form of environmental monitoring with potential impacts;

- (iv) relevance between location of environmental management and location of the potential impacts; and
- (v) relevance between period of management and the time of impact occurrence.

D. Outcomes

12. The outcomes of the Palembang-Indralaya Toll Road project can be considered "strong" as indicated by the following findings:

- (i) No critical habitat has been affected.
- The project has minimized the use of soil from the borrowed area for compaction. Instead, the project uses sand from maintenance dredging of the Musi and Ogan Rivers combined with the application of perforated vertical drain technology.
- (iii) HKI established a special unit for environmental management and monitoring (including for occupational health and safety and CSR).
- (iv) A "green belt" has been designed and established as buffer area around the road alignment.

IV. Energy Sector: Central Java–Transmission Line

A. Institutional Capacity

13. As the implementing agency for the project is "Unit Pelaksana Konstruksi Jaringan Java-Bali 7 (UPK JJB) 7 Semarang of "Unit Induk Pembangkit VII" (UIP) VII Yogyakarta (previously under UIP VII Surabaya), the discussion on institutional capacity is focused on the UPK JJB 7 Semarang and respective UIP. Since UIP VII Yogyakarta is newly established and many of the data still refer to UIP VII Surabaya, the profile primarily refers to UIP/UPK JJB.¹⁰ Based on the following indicators, UIP/UPK – PLN has "moderate" institutional capacity.

14. Most of the environmental management of installations carried out by the National Electric Company (PLN) has been internationally certified through the ISO 14001:2004 and ISO 14001: 2005 standards. With the certified systems, PLN's environmental management can increase their effectiveness in terms of covering environmental management systems, environmental auditing, environmental performance evaluation, basic life cycle assessments, and maintaining the company's credibility in environmental management. Under PLN Pusat (Persero), there are 34 Units all over Indonesia which have been certified for their environmental management system (ISO 14001) and 12 Units have been certified for their occupational health and safety (OHSAS) management system.

15. The organizational structure at the UIP level includes a General Planning and Environment Department responsible for environmental management and related issues. However, the unit is affected by high staff turnover and frequent revisions of its organizational structure. To address this a Safety, Occupational Health, and Environment Division has been established at the corporate level in 2017 to implement environmental safeguards.

¹⁰ PT PLN (Persero). *Struktur Organisasi* (Organizational Structure). <u>http://www.pln.co.id/uipkitthermaljb/?p=44</u>

B. Implementation Practice: Processes and Procedures

16. Based on the following indicators, the processes and procedures implemented for the project can be considered "strong."

- (a) Coherence. Based on the desk study, field visits, and interviews with key personnel of UPK JJB 7 Semarang (UIP VII Yogyakarta PT PLN), and BLHD, found that generally the implementation of AMDAL study of Transmission Line SUTET 500 kV PLTU 2 Jawa Tengah GITET 500kV Cilacapcan be considered coherent with prevailing processes and procedures. Documentation has been formally reviewed by the ARC (KPA) of BLHD Cilacap, and an SKKL (environmental feasibility clearance) has been issued.
- (b) **Transparency**. As required by regulation, the AMDAL study was carried out in transparent manner through announcement in local newspapers and radio and posting in designated public places). Key stakeholders and affected people and/or their representation have been invited and involved in several public consultations.
- (c) **Consistency**. Based on the desk study, interviews with key personnel of UPK PI Kitring (UIP VII) PT PLN and BLHD, the implementation of AMDAL study can be considered consistent with prevailing processes and procedures.
- (d) Effectiveness. AMDAL Study for Transmission Line SUTET 500 kV PLTU 2 Jawa Tengah – GITET 500kV Kesugihan (Cilacap, Central Java) is considered effective. There are no major gaps/issues in terms of effectiveness. Timely delivery and relatively short period between approval of AMDAL and environment and its implementation (construction) strongly indicates its effectiveness.

C. Outputs

17. PT PLN (Persero) PIKITRING Jawa – Bali-Nusa Tenggara as proponent assigned PT Prima Layanan Nasional Enjiring (Jakarta) in cooperation with Environmental Research Center of Universitas Jenderal Soedirman (Purwokerto) as Compiler/Consultant to prepare the ANDAL in 2009. The AMDAL for the Transmission Line SUTET 500 kV PLTU 2 Jawa Tengah-GITET 500kV Kesugihan (Cilacap) was assessed on the basis of the criteria of compliance, consistency, depth, and relevance. On this basis the ANDAL may be considered "strong".

- (a) **Compliance**. The AMDAL complies with all applicable regulatory requirements, as illustrated by the following indicators:
 - (i) The scoping process identifies potential significant impacts, and parameters of the study area.
 - (ii) The impact assessment identifies significant impacts and predicts their characteristics and magnitude.
 - (iii) The evaluation is holistic, including determination of environmental feasibility.
 - (iv) Impacts are managed and monitored through an Environmental Management and Monitoring Plan.
- (b) Consistency. The AMDAL documents of Transmission Line SUTET 500 kV PLTU 2 Jawa Tengah-GITET 500kV Kesugihan (Cilacap) are consistent as indicated below.
 - (i) The potential significant impacts assessed in ANDAL are consistent with those identified in the KA-ANDAL.
 - (ii) The methodology is not consistently optimized relative to the types of impacts assessed. The baseline data is weak on social economic data. The ANDAL did not address the issue of "extra and ultra-high voltage risk" a concern

voiced by the people surrounding the project during the scoping stage

- (iii) The environmental impacts to be managed through the RKL-RPL described in KA-ANDAL is consistent with those identified in the ANDAL.
- (c) **Depth**. The document is considered adequately assessed and analyzed. No major gaps or issues were found.
- (d) **Relevance**. The document can be considered as relevant as shown by the following indicators:
 - (i) relevance between direction of environmental management measures and potentially emerging impacts;
 - (ii) relevance between direction of environmental monitoring measures and environmental management measures and potential environmental impacts;
 - (iii) relevance between form of environmental management and form of environmental monitoring with potential impacts;
 - (iv) relevance between location of environmental management and location of the potential impact; and
 - (v) relevance between period of management and the time of impact occurrence.

18. Based on the examination of documents (ANDAL, RKL-RPL), the AMDAL document of Transmission Line SUTET 500 kV PLTU 2 Jawa Tengah – GITET 500kV Kesugihan (Cilacap) is considered "strong."

D. Outcomes

19. Notwithstanding some of the weaknesses in the AMDAL document, based on the monitoring results from October 2011 to October 2012, the outcomes of the project to date appear to be relatively "strong."

- (i) In addition to the RKP-RPL the project implements an Occupational Health and Safety and Environmental Management System.
- (ii) The project meets all applicable parameters for management of air quality and noise, temperature and humidity per Decree of Central Java Governor 8 of 2001.

V. Urban Planning Sector: Normalization of Kali Pesanggrahan and Development of Rempoa Flat

A. Institutional Capacity

20. Institutionally DGHS – Ministry of Public Work and Housing (PUPR) responsible for administering formulation and implementation of policies in development of settlement areas, assistance for buildings arrangement, development of water supply system, development of wastewater system and drainage and solid waste management. As no legal mandate¹¹, there is no a dedicated structure established within DGHS responsible for environmental safeguard. For these reasons, the institutional capacity of DGHS is generally considered "weak".

21. However, DGHS play roles in formulating policy and guidance, including for environmental safeguard. For example, DGHS has issued Guidance Book on Environmental

and Social Safeguard (*Buku Panduan Safeguard Lingkungan dan Sosial*)¹². This guideline is prepared to support local government in assessing feasibility of Infrastructure Investment Plan under Human Settlement Sector, viewed from environmental and social impact as well as implementation framework of land acquisition.

22. In this case, the obligation for environmental safeguard (primarily AMDAL or UKL-UPL preparation and implementation) is attached to Local Government, BUMN/BUMD, and/or Private Sector as proponent.

B. Implementation Practice (Processes and Procedures)

23. The required procedures for the AMDAL Study of Normalization of Kali Pesanggrahan and Development of Rempoa Flat were found to be "moderate," as indicated below.

- (a) Coherence. Document examination found that the implementation of AMDAL study was considered coherent. The documents have been reviewed and approved by ARC/KPA of MOEF since this project involves inter-province boundaries and were reviewed by central level MOE, predecessor of MOEF.
- (b) **Transparency**. As required by regulations, the AMDAL study was carried out in a transparent manner by posting announcements in a local newspaper and public places including government offices. For example, Normalization of Kali Pesanggrahan was publicly announced on 6 June 2012 which included inviting inputs and responses from the local community, especially affected persons. Face-to-face public consultations were carried out on 18 July 2012 at the offices of Kecamatan Kembangan and Kecamatan Ciputat.
- (c) **Consistency**. Implementation of AMDAL study is considered generally consistent with prevailing processes and procedures. The documents were formally reviewed by the ARC/KPA, and approval of environmental feasibility for Normalization of Kali Pesanggrahan and Development of Rempoa Flat were issued timely.
- (d) Effectiveness. The AMDAL process for the Normalization of Kali Pesanggrahan Normalization and Development of Rempoat Flat project is considered effective as shown by its timely delivery and relatively short period between approval of AMDAL and its implementation (construction).

C. Outputs

24. The AMDAL document for the Normalization of Kali Pesanggrahan Normalization and Development of Rempoa Flat were assessed in terms of compliance, consistency, depth, and relevance. Based on the examination, the output of AMDAL studies is considered "moderate"

- (a) **Compliance**. The AMDAL document can be considered compliant with regulatory requirements as indicated by the following:
 - (i) scoping process with results of significant hypothetical impacts, limit of study area and limit of study time;
 - (ii) significant impacts and prediction of magnitude and characteristics of significant impacts;
 - (iii) holistic evaluation, including determination of environmental feasibility; and

¹² Ministry of Public Works and Housing committed to support policy on gender mainstreaming by establishing Working Group Team IV (Tim Pokja IV) on Gender Mainstreaming of DG Human Settlement and BPPSPAM No. 108/KPTS/DC/2015.

- (iv) impacts managed and monitored as well as environmental management plan and monitoring.
- (b) **Consistency**. Basically AMDAL for the Normalization of Kali Pesanggrahan and Development of Rempoa Flat is considered consistent with the ToR for the ANDAL as indicated below:
 - (i) The potential significant impacts to be assessed in ANDAL are consistent with KA-ANDAL (TOR for AMDAL study);
 - (ii) The significant potential impacts (including parameters to be assessed) are consistent with predictive method for impacts and their environmental baseline, prediction of impact magnitude
 - (iii) The environmental impacts and parameters to be managed and monitored in the RKL-RPL are consistent with those described in KA-ANDAL and ANDAL.
- (c) **Depth**. Basically the document is considered adequately assessed and analyzed. No major gap/issue found.

D. Outcomes

25. The outcome of AMDAL study of Normalization of Kali Pesanggrahan and Development of Rempoa Flat is considered "moderate" as indicated by the inclusion of environmental consideration in planning, design, decision making, and project implementation.